

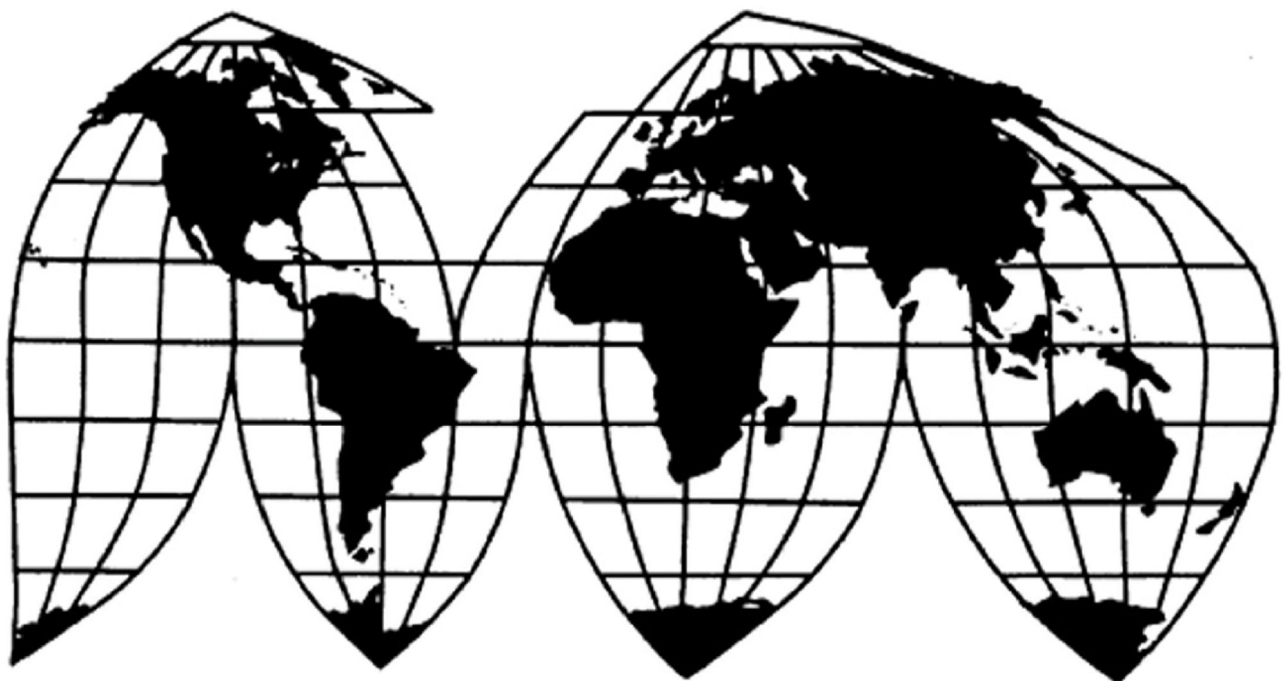
Brake Drums from China and Turkey

Investigation Nos. 701-TA-729–730 and 731-TA-1698–1699 (Final)

Publication 5651

August 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-729-730 and 731-TA-1698-1699 (Final)

Brake Drums from China and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of brake drums from China and Turkey, provided for in subheading 8708.30.50 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the governments of China and Turkey.²

BACKGROUND

The Commission instituted these investigations effective June 20, 2024, following receipt of petitions filed with the Commission and Commerce by Webb Wheel Products, Inc., Cullman, Alabama. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of brake drums from China and Turkey were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on February 7, 2025 (90 FR 9162). The Commission conducted its hearing on June 17, 2025.

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

² 90 FR 25999, 26002, 26008, and 26011 (June 18, 2025).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of brake drums from China and Turkey found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the governments of China and Turkey.

I. Background

Webb Wheel Products Inc. (“Webb Wheel” or “Petitioner”), a domestic producer of brake drums, filed the petitions in these investigations on June 20, 2024. Petitioner appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments.

Several respondent entities participated in these investigations. Consolidated Metco, Inc., Weifang ConMet Mechanical Products Co., Ltd., and ConMet Nanjing Mechanical Co., Ltd. (collectively, “ConMet”), a U.S. importer and producer/exporter of brake drums in China, appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments.¹ DuraParts LLC d.b.a. DuraBrake (“DuraBrake”), a U.S. importer of brake drums from China and Turkey, submitted a prehearing brief.

Data Coverage. U.S. industry data are based on questionnaire responses of two firms that accounted for all known U.S. production of brake drums during 2024.² U.S. imports are based on the questionnaire responses of 44 firms that accounted for more than *** of total U.S. imports from China and more than *** percent of total U.S. imports from Turkey during 2024.³ The Commission received responses to its questionnaires from seven foreign producers/resellers of subject merchandise; one producer/exporter in China, whose reported

¹ Meritor, Inc. (“Meritor”), a U.S. importer of brake drums from China, attended the hearing as a witness after its Request to File Entry of Appearance was denied.

² Confidential Staff Report (“CR”), INV-XX-086 (July 2, 2025) at 1.4; *Brake Drums from China and Turkey*, Inv. Nos. 701-TA-729-730 and 731-1698-1699 (Final), USITC Pub. 5651 (Aug. 2025) (“PR”) at 1.4.

³ CR/PR at 1.4, 4.1 n.2. U.S. import statistics for imports of brake drums from subject sources under the primary HTS statistical reporting number 8708.30.5020 are believed to be significantly overstated. Staff estimates for importer questionnaire coverage are based on a comparison of imports reported by responding importers with total U.S. imports reported under HTS statistical reporting number 8708.30.5020, as adjusted using data reported in importer questionnaire responses, staff research, and proprietary, Census-edited Customs’ import records. *Id.* n.2.

exports to the United States were equivalent to *** percent of subject imports from China in 2024, and four producers/exporters and two resellers in Turkey, accounting for approximately *** percent of production of subject merchandise in Turkey in 2024.⁴

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁵ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁶ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”⁷

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.⁸ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”⁹ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹⁰ The decision regarding the

⁴ CR/PR at 7.3, Table 7.1. The responding Chinese producer/exporter did not report its estimated share of Chinese production of subject merchandise in 2024. *Id.*

⁵ 19 U.S.C. § 1677(4)(A).

⁶ 19 U.S.C. § 1677(4)(A).

⁷ 19 U.S.C. § 1677(10).

⁸ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

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

¹⁰ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds

appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹¹ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹² The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹³

B. Product Description

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

The merchandise covered by these investigations is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹¹ See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹² See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

¹³ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. Specifically excluded is merchandise covered by the scope of the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China. *See Certain Chassis and Subassemblies Thereof from the People's Republic of China: Antidumping Duty Order*, 86 FR 36093 (July 8, 2021) and *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 FR 24844 (May 10, 2021).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight.¹⁴

The percentage limitation of the scope exclusion was modified following Commerce's preliminary countervailing duty determinations from "more than 40 percent steel by weight" to "more than 38 percent steel by weight."¹⁵

The brake drums within the scope are made of gray cast iron with a diameter of 14.75 to 16.6 inches, weighing greater than 50 pounds.¹⁶ They are cylindrical, with one end open, and the other end narrowed with a ring of bolt holes machined into them.¹⁷ Brake drums are part

¹⁴ CR/PR at 1.9; *Certain Brake Drums From the Republic of Türkiye: Final Affirmative Determination of Sales at Less Than Fair Value*, 90 Fed. Reg. 25999 (Dep't Commerce June 18, 2025); *Certain Brake Drums From the People's Republic of China: Final Affirmative Countervailing Duty Determination*, 90 Fed. Reg. 26002 (Dep't Commerce June 18, 2025); *Certain Brake Drums From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination*, 90 Fed. Reg. 26008 (Dep't Commerce June 18, 2025); *Certain Brake Drums From People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 90 Fed. Reg. 26011 (Dep't Commerce June 18, 2025).

¹⁵ *Antidumping Duty Investigations and Countervailing Duty Investigations of Certain Brake Drums from the People's Republic of China and the Republic of Türkiye: Preliminary Scope Decision Memorandum* (Dep't Commerce Jan. 23, 2025) at 9.

¹⁶ CR/PR at 1.12.

¹⁷ CR/PR at 1.12.

of a certain type of braking system for motor vehicles.¹⁸ As part of a drum-hub assembly,¹⁹ a brake drum rotates along with the wheel and axle of a vehicle, and when brakes are applied a brake shoe is forced against the brake drum, causing friction that slows the vehicle.²⁰ Larger brake drums provide more stopping power.²¹ The brake drums at issue in this proceeding are used primarily on heavy-duty trucks and trailers.²²

Manufacturing of brake drums involves a multi-step process that begins with pouring molten iron into a mold and then cooling it to form the brake drum casting.²³ Rough castings are then loaded into a de-palletizer machine that stacks them on different input lines, matching the brake drum stock keeping unit (“SKU”) number to the machine number.²⁴ Most manufacturers then guide the brake drums to an automated paint booth that paints the exterior of the drum. The painted brake drums then proceed to the machining center.²⁵

In the machining center, a computer numerical control (“CNC”) machine removes excess metal from the casting using fixturing specific to the casting’s SKU.²⁶ This process involves machining in four areas: (1) the outer diameter and overall height of the brake drum; (2) the brake surface; (3) the inside backface, pilot diameter, and outside backface; and (4) the bolt holes and wear indicator.²⁷ After machining, the CNC machines measure and verify dimensions.²⁸ The brake drums are then treated with a rust preventative coating and passed through an air dryer,²⁹ after which a certified inspector visually inspects them for material defects.³⁰ Depending on the result of the inspection, the brake drums continue to the balancer

¹⁸ CR/PR at 1.12.

¹⁹ A brake drum is fastened to a disc hub using several nuts to form a drum-hub assembly. CR/PR at 1.20.

²⁰ CR/PR at 1.12.

²¹ CR/PR at 1.12.

²² CR/PR at 1.12. They can also be used on other large vehicles like school buses, garbage trucks, and logging trailers. Conf. Tr. at 36 (Capps) and 119-120 (Hurley); Pet. Prehearing Brief, EDIS Doc. 853395 (June 10, 2025) at 11 (“Pet. Prehear. Br.”).

²³ CR/PR at 1.17. Brake drum castings may be cast by the brake drum manufacturer or purchased from a third party. *Id.*

²⁴ CR/PR at 1.18.

²⁵ CR/PR at 1.18. Unlike the other producers subject to this proceeding, ConMet employs a patented process (which it calls “TruTurn”) that requires it to paint after machining. *Id.*

²⁶ CR/PR at 1.18. Machining is a manufacturing process that creates the desired shape by removing unwanted material from a larger piece of material. *Id.*

²⁷ CR/PR at 1.19. ConMet’s TruTurn process involves also machining the exterior of the brake drum. *Id.*

²⁸ CR/PR at 1.19.

²⁹ CR/PR at 1.19.

³⁰ CR/PR at 1.20.

or are reworked or scrapped.³¹ Next, brake drums are balanced.³² Lastly, the brake drums receive a date stamp for serialization and traceability.³³

C. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that the Commission should define a single domestic like product, coextensive with the scope.³⁴ Petitioner contends that all brake drums have the same physical characteristics and end uses; share the same production processes and manufacturing facilities using the same employees; are sold through the same channels of distribution; are perceived as a single product category by producers and consumers; and that, although prices of brake drums differ between the original equipment manufacturers (“OEM”) market and aftermarket distribution channels, both OEM and aftermarket brake drums follow largely the same pricing trends.³⁵

Respondents' Arguments. Respondents make no arguments concerning the domestic like product definition.

D. Analysis

In its preliminary determinations, the Commission defined a single domestic like product consisting of brake drums, coextensive with Commerce’s scope. The Commission found that all brake drums covered by the scope shared the same basic physical characteristics and end uses, were manufactured using the same facilities, processes, and employees, and could be used interchangeably. In addition, the Commission found that all brake drums shared the same channels of distribution, being sold both in the OEM and aftermarket, and that OEM and aftermarket brake drums were perceived as essentially the same products by customers, although prices may differ due to the use of long-term contracts for OEM brake drums as compared with spot market sales for aftermarket brake drums.³⁶

The record in the final phase of these investigations does not contain any new information or argument concerning the pertinent characteristics and uses of brake drums

³¹ CR/PR at 1.20.

³² CR/PR at 1.20. ConMet reports that the TruTurn process’s exterior machining step balances the brake drums, obviating the need for a balancing step. *Id.*

³³ CR/PR at 1.20.

³⁴ Pet. Prehearing Br. at 3.

³⁵ Pet. Prehearing Br. at 4-6. OEMs purchase brake drums as production parts for installation on new trucks and trailers. CR/PR at 1.13. In the aftermarket, dealers, end users, and independent warehouse distributors purchase brake drums to replace worn brake drums. *Id.*

³⁶ *Brake Drums from China and Turkey*, Inv. Nos. 701-TA-729-730 and 731-TA-1698-1699 (Preliminary), USITC Pub. 5532 (August 2024) (“*Preliminary Determinations*”) at 10-11.

suggesting that the Commission should revisit its definition of the domestic like product from the preliminary phase determinations. Accordingly, we again define a single domestic like product consisting of brake drums, coextensive with the scope.

III. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”³⁷ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.³⁸ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.³⁹

U.S. producer *** qualifies as a related party because its parent company, ***, also owns a U.S. importer of subject merchandise, ***.⁴⁰

³⁷ 19 U.S.C. § 1677(4)(A).

³⁸ 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).

³⁹ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

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

⁴⁰ CR/PR at 3.14, Table 3.11. U.S. producer *** is also subject to possible exclusion under the related parties provision because it imported subject merchandise ***. *Id.* at 3.15, Table 3.12. Given these small ratios of subject imports to domestic production, its status as ***, no indication in the

A. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that there is no basis to exclude *** because *** and its principal interest is in domestic production.⁴¹ Petitioner states that *** was a significant domestic producer, accounting for *** percent of domestic production in 2024.⁴² Petitioner argues that ***.⁴³ As it did in the preliminary phase of the investigations, Petitioner asserts that ***.⁴⁴ Rather, it states that excluding *** during the POI.⁴⁵ Lastly, Petitioner argues that ***.⁴⁶

Respondents' Arguments. ConMet argues that appropriate circumstances exist to exclude *** from the domestic industry because *** and *** interests are primarily in the importation of brake drums rather than domestic production.⁴⁷ ConMet emphasizes that during the POI, the ratio of *** imports to *** U.S. production of brake drums was *** percent and remained substantial during the period.⁴⁸ ConMet also argues that *** subject imports consistently undersold *** U.S. shipments, further suggesting that *** primary interest is in importation rather than domestic production. Lastly, ConMet contends that inclusion of *** in the domestic industry would skew the data because its ***.⁴⁹

B. Analysis and Conclusion

*** accounted for *** percent of U.S. production in 2024, when it was the *** domestic producer of brake drums, and ***.⁵⁰ It is related to ***, a U.S. importer of subject merchandise from ***, through their common parent, ***.⁵¹ *** imported brake drums from *** during the

record that its imports of subject merchandise benefited its domestic production operations, and that no party argues for its exclusion, we find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

⁴¹ Pet. Prehear. Br. at 7; Webb Wheel's Posthearing Brief, EDIS Doc. 855071 (June 25, 2025) at 2-3 ("Pet. Posthear. Br.").

⁴² Pet. Posthear. Br. at 2.

⁴³ Pet. Prehear. Br. at 7; Pet. Posthear. Br. at 2.

⁴⁴ Pet. Prehear. Br. at 7.

⁴⁵ Pet. Posthear. Br. at 2.

⁴⁶ Pet. Posthear. Br. at 3.

⁴⁷ ConMet's Prehearing Brief, EDIS Doc. 853454 (June 11, 2025) at 16-17 ("ConMet's Prehear. Br.").

⁴⁸ ConMet Prehear. Br. at 17.

⁴⁹ ConMet Prehear. Br. at 18-19. We note that ConMet claims that "whether or not *** is excluded does not alter the outcome." ConMet's Posthearing Brief, EDIS Doc. 855083 (June 25, 2025) at 9 ("ConMet's Posthear. Br.").

⁵⁰ CR/PR at Table 3.1.

⁵¹ CR/PR at 3.14.

*** period totaling ***.⁵² The ratio of *** affiliated importer's imports to its domestic production was ***.⁵³ *** explains that it imported because of ***.⁵⁴ *** operating income to net sales ratio was *** in *** and *** than the domestic industry average throughout the period.⁵⁵ ***.⁵⁶ ***.⁵⁷ ⁵⁸

*** imported no subject merchandise itself and accounted for a substantial share of domestic production throughout the POI. The record shows that *** domestically produced brake drums competed with subject imports, including ***.⁵⁹ Furthermore, there is no evidence that *** affiliation with *** acted to shield *** domestic production operations from subject import competition such that its inclusion in the domestic industry would mask injury to the domestic industry. To the contrary, *** financial performance was *** than *** throughout the POI, and *** explained that it imported in part because aftermarket customers demanded brake drums at prices below *** cost structure.⁶⁰ Moreover, to the degree that *** bankruptcy was due to subject import competition as attested by ***, exclusion of *** would mask injury to the domestic industry. Based on the foregoing, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of brake drums, namely, Webb Wheel and Gunite.⁶¹

⁵² CR/PR at Table 3.11.

⁵³ CR/PR at Table 3.11. We note that ***. CR at 3.14, n.16.

⁵⁴ CR/PR at Table 3.13.

⁵⁵ CR/PR at Table 6.3. ***. *Id.* The domestic industry's average operating margin was *** percent in 2022, *** percent in 2023, and *** percent in 2024. *Id.*

⁵⁶ CR/PR at ***.

⁵⁷ U.S. Producer Questionnaire Response of *** at III-16.

⁵⁸ As discussed further below, the two domestic producers have different manufacturing processes: Gunite has an integrated manufacturing process, including its own foundry for castings, whereas Webb Wheel purchases castings from a third party. CR/PR at 3.6.

⁵⁹ *** reported sales of domestically produced *** that competed with subject imports in every quarter for which data were reported. *Compare* U.S. Producer Questionnaire Response of *** at IV-2b (reporting pricing data for pricing product *** for sales to *** for *** and for pricing product *** for ***, and pricing data for pricing product *** for sales to *** for *** and for pricing product *** for ***) *with* CR/PR at Tables 5.4, 5.5, 5.6 and 5.7. *See also* U.S. Producer Questionnaire Response to *** at III-9e (discussing ***).

⁶⁰ CR/PR at Tables 3.13, 6.3, C.1.

⁶¹ Meritor did not produce in-scope brake drums during the POI. CR at 3.11, n.12.

IV. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, which defines “negligibility,” imports from a subject country that are less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or self-initiation, as the case may be, shall be deemed negligible.⁶²

During the 12-month period preceding the filing of the petitions (June 2023 through May 2024), imports of brake drums from China accounted for 77.5 percent of total imports and imports of brake drums from Turkey accounted for 16.2 percent of total imports.⁶³ Given that subject imports from China and Turkey exceeded the negligibility threshold, we find that imports of brake drums from China and Turkey subject to the antidumping and countervailing duty investigations are not negligible.

V. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

⁶² 19 U.S.C. § 1677(24)(A)(i). In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (“USTR”)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent. 19 U.S.C. § 1677(24)(B).

⁶³ CR/PR at Table 4.5. The volume of imports subject to the antidumping and countervailing duty investigations is the same with respect to both China and Turkey. See CR at Table 4.5.

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.

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

A. Arguments of the Parties

Petitioner’s Arguments. Petitioner argues that imports of brake drums from China and Turkey should be cumulated for purposes of assessing material injury by reason of subject imports.⁶⁴ Petitioner asserts that the record continues to demonstrate that there is a reasonable overlap in competition between and among subject imports from China and Turkey and the domestic like product because imports from China and Turkey are fungible with each other and domestically produced brake drums, they compete in the same geographic markets, they are sold in the same channels of distribution (in the OEM or the aftermarket), and they are simultaneously present in the U.S. market.⁶⁵

Respondents’ Arguments. Respondents make no arguments concerning cumulation.

B. Analysis

The statutory threshold for cumulation is satisfied in these investigations because Petitioner filed the antidumping and countervailing duty petitions with respect to both subject countries on the same day, June 20, 2024.⁶⁶ The record in the final phase of these

⁶⁴ Pet. Prehear. Br. at 8-9.

⁶⁵ Pet. Prehear. Br. at 9-11.

⁶⁶ None of the statutory exceptions to cumulation apply. We observe that these investigations involve dumping and subsidy findings regarding brake drums from China and Turkey. Consequently, any decision to cumulate imports from both subject sources in these investigations will involve “cross-cumulating” dumped imports with subsidized imports. We have previously explained why we are continuing our longstanding practice of cross-cumulating. See *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC

investigations also indicates that there is a reasonable overlap of competition between subject imports from both countries, and between subject imports from each source and the domestic like product, for the reasons discussed below.

Fungibility. The record indicates that domestically produced brake drums and subject imports from China and Turkey are generally fungible. Subject imports from both countries are made using similar processes and equipment as brake drums manufactured in the United States.⁶⁷ U.S. producers reported that ***.⁶⁸ Almost all responding importers and purchasers reported that U.S. brake drums were always or frequently interchangeable with those from China and Turkey and that brake drums from China and Turkey were always or frequently interchangeable with each other.⁶⁹

Domestically produced brake drum and subject imports from China and Turkey also overlapped in terms of weight categories, sales type (pallet or non-pallet), and attachment status (stand-alone or part of a larger assembly). U.S. producers and importers of brake drums from China and Turkey shipped brake drums in all four weight categories for which the Commission gathered information, with the middle two categories comprising the majority of shipments for domestically produced brake drums and subject imports from China and Turkey, respectively.⁷⁰ U.S. producers and importers of brake drums from China and Turkey also reported that more than 90 percent of their U.S. shipments were made as pallet or bulk sales, with the balance consisting of non-pallet sales.⁷¹ Finally, U.S. producers and importers of brake drums from China and Turkey reported that the overwhelming majority of their U.S. shipments

Pub. 4604 at 9-11 (April 2016). *Circular Welded Carbon-Quality Steel Pipe from India, Oman, the United Arab Emirates, and Vietnam*, Inv. Nos. 701-TA-482 to 484 (Final), USITC Pub. 4362 at 12 n.59 (Dec. 2012); *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Final), USITC Pub. 3509 at 29-31 (May 2009); *Bingham & Taylor v. United States*, 815 F.2d 982 (Fed. Cir. 1987).

⁶⁷ CR/PR at 1.17; Conf. Tr. at 14 (Begley), 133-134 (Marr); Petitions at I-11. We note that the record indicates ConMet has slightly different manufacturing processes in its patented “TruTurn” production process, for example, it paints its brake drums after machining, rather than before like other domestic and foreign manufacturers and machines the exterior of the brake drum unlike other producers. CR/PR at 1.18-1.19. The record does not indicate that these differences appear significant enough to conclude the products are not fungible with domestic produced and other foreign produced products, nor does any party argue as such.

⁶⁸ CR/PR at Table 2.15.

⁶⁹ CR/PR at Tables 2.16, 2.17.

⁷⁰ CR/PR at 4.10, Table 4.6. The four weight categories were: (1) greater than 50 pounds and less than 97 pounds; (2) greater than or equal to 97 pounds and less than or equal to 106 pounds; (3) greater than 106 pounds but no greater than 113 pounds; and (4) greater than 113 pounds.

⁷¹ CR/PR at 4.13, Table 4.7.

were shipped as single, or stand-alone, brake drums and not as part of larger (e.g., hub-drum) assemblies.⁷²

For these reasons, the record indicates that there is a sufficient degree of fungibility between and among subject imports from China and Turkey and the domestic like product for purposes of cumulation.

Channels of Distribution. U.S. producers sold to both the aftermarket and OEMs, but the majority of their sales were to the aftermarket in all three years of the POI.⁷³ Similarly, subject imports from China and Turkey were also sold primarily to the aftermarket, but also to OEMs.⁷⁴ U.S. shipments to OEMs accounted for *** percent of domestic producers' U.S. shipments in 2022, *** percent in 2023, *** percent in 2024, whereas U.S. shipments to the aftermarket accounted for *** percent of domestic producers' U.S. shipments in 2022, *** percent in 2023, and *** percent in 2024.⁷⁵ Importers sold *** percent of subject imports from China to OEMs in 2022, *** percent in 2023, and *** percent in 2024, while selling *** percent of subject imports from China to the aftermarket in 2022, *** percent in 2023, and *** percent in 2024.⁷⁶ Importers sold *** percent of subject imports from Turkey to OEMs in 2022, *** percent in 2023, and *** percent in 2024, while selling *** percent of subject imports from Turkey to the aftermarket in 2022, *** percent in 2023, and *** percent in 2024.⁷⁷

Geographic Overlap. U.S. producers and importers of subject merchandise from China and Turkey each reported selling brake drums to all regions of the contiguous United States, as well as to other U.S. markets, such as Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands during the POI.⁷⁸ Official import statistics indicate that subject imports from China and Turkey entered the United States through ports located in all four regions in 2024.⁷⁹

Simultaneous Presence in Market. The domestic like product was present in the U.S. market throughout the POI.⁸⁰ Imports from each of the subject sources were present in the U.S. market in all 36 months of the POI, from January 2022 to December 2024.⁸¹

Conclusion. The record in the final phase of these investigations indicates that subject imports from China and Turkey are generally fungible with the domestic like product and each

⁷² CR/PR at 4.15, Table 4.8.

⁷³ CR/PR at Table 2.2.

⁷⁴ CR/PR at Table 2.2.

⁷⁵ CR/PR at Table 2.2.

⁷⁶ CR/PR at Table 2.2.

⁷⁷ CR/PR at Table 2.2.

⁷⁸ CR/PR at 2.3, Table 2.3.

⁷⁹ CR/PR at Table 4.9.

⁸⁰ See CR/PR at Table 4.10.

⁸¹ CR/PR at Table 4.10.

other. Subject imports from each source and the domestic like product overlapped in terms of channels of distribution and geographic markets, and were simultaneously present in the U.S. market throughout the POI. Because there is a reasonable overlap of competition between and among the domestic like product and subject imports from China and Turkey, we cumulate subject imports from China and Turkey for our analysis of whether there is material injury by reason of subject imports.

VI. Material Injury by Reason of Subject Imports

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of imports of brake drums from China and Turkey that Commerce has found to be sold in the United States at LTFV and subsidized by the governments of China and Turkey.

A. Legal Standard

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁸² In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.⁸³ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁸⁴ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁸⁵ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁸⁶

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded

⁸² 19 U.S.C. §§ 1671d(b), 1673d(b).

⁸³ 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

⁸⁴ 19 U.S.C. § 1677(7)(A).

⁸⁵ 19 U.S.C. § 1677(7)(C)(iii).

⁸⁶ 19 U.S.C. § 1677(7)(C)(iii).

imports,⁸⁷ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.⁸⁸ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.⁸⁹

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.⁹⁰ In performing its examination, however, the Commission need not isolate

⁸⁷ 19 U.S.C. §§ 1671d(b), 1673d(b).

⁸⁸ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

⁸⁹ The Federal Circuit, in addressing the causation standard of the statute, observed that “[a]s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

⁹⁰ SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

the injury caused by other factors from injury caused by unfairly traded imports.⁹¹ Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.⁹² It is clear that the existence of injury caused by other factors does not compel a negative determination.⁹³

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”⁹⁴ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”⁹⁵ The Federal Circuit has examined and affirmed various

⁹¹ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), citing *Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

⁹² S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

⁹³ See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

⁹⁴ *Mittal Steel*, 542 F.3d at 876 & 78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comports with the Court’s guidance in *Mittal*.

⁹⁵ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In

Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁹⁶ The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.⁹⁷ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.⁹⁸

B. Conditions of Competition

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

1. Demand Conditions

Brake drums are typically used in the braking system of heavy-duty trucks and trailers, as well as other large vehicles like delivery trucks, school buses, garbage trucks, and logging trailers.⁹⁹ Both U.S. producers, 21 of 39 importers, and 13 of 24 responding purchasers indicated that the market was subject to business cycles.¹⁰⁰ Specifically, demand for brake drums tends to be higher in spring and summer.¹⁰¹ Firms also reported that demand was related to the overall economy and demand for trucking, which is the primary driver of demand for brake drums.¹⁰² Petitioner, ConMet, and DuraBrake agree that the COVID-19 pandemic initially increased demand for brake drums, but that demand subsequently declined.¹⁰³ Over the POI, trucking tonnage generally decreased year-over-year.¹⁰⁴ ConMet claims this “freight recession” led to a reduced demand for brake drums.¹⁰⁵

appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

⁹⁶ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

⁹⁷ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁹⁸ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

⁹⁹ CR/PR at 1.3, n.6.

¹⁰⁰ CR/PR at 2.9.

¹⁰¹ CR/PR at 2.9-2.10.

¹⁰² CR/PR at 2.9-2.10.

¹⁰³ Pet. Prehear. Br. at 11-12; ConMet Prehear. Br. at 5; DuraBrake’s Prehearing Brief, EDIS Doc. 853402 (June 10, 2025) at 2 (“DuraBrake Prehear. Br.”).

¹⁰⁴ CR/PR at 2.8, Table 2.6.

¹⁰⁵ ConMet Prehear. Br. at 6-7; ConMet Posthear. Br. at 1.

Most firms reported that overall domestic demand for brake drums had declined or not changed over the POI.¹⁰⁶ Specifically, *** U.S. producer reported that overall domestic demand for brake drums did not change while *** reported that it steadily decreased.¹⁰⁷ Three responding importers reported that overall domestic demand for brake drums steadily increased, four reported that it fluctuated up, eight reported that it did not change, seven reported that it fluctuated down, and four reported that it steadily decreased.¹⁰⁸ Four purchasers reported that overall domestic demand for brake drums steadily increased over the POI, two reported that it fluctuated up, six reported that it did not change, five reported that it fluctuated down, and three reported that it steadily decreased.¹⁰⁹ Firms reported similar trends when asked to evaluate domestic demand for brake drums within specific channels of distribution.¹¹⁰ As discussed in more detail in section VI.B.3 below, sales to OEMs and the aftermarket are the principal distribution channels in the U.S. market.

Petitioner claims that demand for brake drums is inelastic.¹¹¹ Substitutes for brake drums are limited; half of U.S. producers and most responding importers (33 of 38) and purchasers (19 of 24 responding) reported that there were no substitutes.¹¹² Some firms identified air disc brakes as a substitute, but indicated that they were more expensive than brake drums, had engineering advantages in certain applications, and were not interchangeable with brake drums in aftermarket use.¹¹³ Approximately 40 percent of new truck builds, but a smaller share of new trailers, have air disc brakes.¹¹⁴ ConMet claims that the rate of air disc brake adoption has been accelerating since 2018.¹¹⁵

Apparent U.S. consumption of brake drums decreased over the POI, with most of the decline occurring between 2022 and 2023. Apparent U.S. consumption decreased from *** units in 2022 to *** units in 2023, or by *** percent, then to *** units in 2024, a level *** percent lower than in 2022.¹¹⁶

¹⁰⁶ CR/PR at Tables 2.7, 2.8.

¹⁰⁷ CR/PR at Table 2.7.

¹⁰⁸ CR/PR at Table 2.7.

¹⁰⁹ CR/PR at Table 2.7.

¹¹⁰ CR/PR at Table 2.8.

¹¹¹ Pet. Prehear. Br. at 11.

¹¹² CR/PR at 2.12.

¹¹³ CR/PR at 2.12. Trucks and trailers can be designed to use either air disc brakes or brake drums, but one braking system cannot be swapped for the other after installation. Hearing Tr. at 13-14 (Begley).

¹¹⁴ CR/PR at 2.12. Industry representatives from ConMet and Utility Trailers also indicate that air disc brakes were favored in refrigerated trailers. *Id.*; Hearing Tr. at 111 (Marr) and (194).

¹¹⁵ ConMet Prehear. Br. at 8-9.

¹¹⁶ CR/PR at 4.22, Table 4.11.

2. Supply Conditions

The domestic industry was the largest source of brake drums in the U.S. market throughout the POI. Its share of apparent U.S. consumption decreased from *** percent in 2022 to *** percent in 2023, then increased to *** percent in 2024, which was *** percentage points lower than in 2022.¹¹⁷

Webb Wheel *** and purchased a line of pre-adjusted hub assembly products from another company.¹¹⁸ In March 2024, Accuride announced that its Gunite-branded 3922X cast iron brake drum would be produced in a new location, Accuride's Rockford, Illinois foundry.¹¹⁹ In October 2024, however, Accuride filed for Chapter 11 bankruptcy, and in November 2024, announced that it planned to close the Rockford foundry.^{120 *** .¹²¹}

U.S. producers reported increased capacity and decreased capacity utilization from 2022 to 2024.¹²² The domestic industry's practical brake drums capacity increased from *** units in 2022 to *** units in 2023 and *** units in 2024, a level *** percent higher than in 2022.¹²³ Capacity utilization decreased by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.¹²⁴

Cumulated subject imports were the second largest source of supply during the POI. Their share of apparent U.S. consumption increased from *** percent in 2022 to *** percent in 2023, then decreased to *** percent in 2024, for an overall increase of *** percentage points.¹²⁵

Imports from nonsubject countries were the smallest source of brake drums during the POI. Their market share decreased from *** percent in 2022 to *** percent in 2023, then increased to *** percent in 2024, for an overall increase of *** percentage points.¹²⁶ The largest sources of nonsubject imports during 2024 were India and Mexico.¹²⁷

¹¹⁷ CR/PR at 4.23, Table 4.11.

¹¹⁸ CR/PR at Tables 3.3, 3.4.

¹¹⁹ CR/PR at Table 3.3.

¹²⁰ CR/PR at Table 3.3.

¹²¹ CR/PR at Table 3.4.

¹²² CR/PR at Tables 3.5, 3.7. Only *** increased its capacity. *Id.* at 3.9, Table 3.7.

¹²³ CR/PR at 3.6, Table 3.5.

¹²⁴ CR/PR at Table 3.5.

¹²⁵ CR/PR at 4.23, Table 4.11.

¹²⁶ CR/PR at 4.23, Table 4.11.

¹²⁷ CR/PR at 2.6.

Both U.S. producers reported that they *** experienced supply constraints since January 1, 2022, which they broadly attributed to production bottlenecks and labor and raw material shortages.¹²⁸ Specifically, Webb reported that ***.¹²⁹ Gunite reported that ***.¹³⁰

Twenty-one of 40 importers reported that they had experienced supply constraints; 17 reported that the constraints occurred during 2022, nine reported that they occurred during 2023, four reported that they occurred in 2024 before the petitions were filed on June 20 of that year, and 11 reported that they occurred in 2024 after the petitions were filed.¹³¹ U.S. importers attributed their supply constraints to Accuride/Gunite's bankruptcy, the pendency of these investigations, high ocean freight and container costs (especially in the first quarter through the third quarter of 2022), diminished pig iron supply resulting from the war in Ukraine, shipping issues due to the Baltimore bridge collapse and the Suez Canal obstruction, and the Waupaca Foundry's refusal to supply ***, with the exception of U.S. military and Buy America orders.¹³²

Fourteen of 26 responding purchasers reported that they had experienced supply constraints, with 12 reporting supply constraints from domestic producers in 2022, seven in 2023, three in 2024 before the petitions were filed, and six in 2024 after the petitions were filed.¹³³ Purchasers indicated that, in 2022, Webb Wheel limited the availability of brake drums to the aftermarket from April through December of 2022, extended lead times to six months, allocated product, and notified purchasers that it would not be able to supply existing or new requirements on their blanket purchase orders or accept any new purchase orders.¹³⁴ Two purchasers each reported supply constraints from foreign producers or importers in 2022, 2023, and 2024 before the petitions were filed, and one reported such constraints in 2024 after the petitions were filed.¹³⁵

Petitioner asserts that the supply constraints caused by the COVID-19 pandemic in 2021 and 2022 resulted from higher-than-normal freight costs, port delays, and pent-up demand, and that the Russian invasion of Ukraine in 2022 also reduced the availability of pig iron, the

¹²⁸ CR/PR at 2.6, 3.7.

¹²⁹ CR/PR at Table 3.6; *see also* Pet. Posthear. Br. at Exh. 2 (letters to customers regarding lead times).

¹³⁰ CR/PR at Table 3.6.

¹³¹ CR/PR at 2.6.

¹³² CR/PR at 2.6. U.S. producer Webb produces brake drums from castings, which it procures from Waupaca. CR/PR at 5.1.

¹³³ CR/PR at 2.7.

¹³⁴ CR/PR at 2.7.

¹³⁵ CR/PR at 2.7.

primary raw material used to produce brake drums.¹³⁶ It acknowledges that these conditions caused a temporary shortage of gray iron castings, which Webb Wheel uses to make brake drums, but claims that ***.¹³⁷ Additionally, Petitioner asserts ***, that ensures supply continuity and increases Webb Wheel’s capacity.¹³⁸

ConMet agrees that supply was constrained by labor shortages and supply chain issues stemming in part from the COVID-19 pandemic in 2022 but contends that subject imports are still needed to meet U.S. brake drum demand because the domestic industry does not have the capacity to fully supply the U.S. market.¹³⁹ It claims that because Webb Wheel is not an integrated producer and must rely on a separate entity, Waupaca, to provide it with castings for its brake drums, the availability of such castings constrains Webb Wheel’s ability to supply the U.S. market.¹⁴⁰

3. Substitutability and Other Conditions

Based on the record in the final phase of these investigations, we find that there is a moderate to high degree of substitutability between domestically produced brake drums and subject imports. U.S. producers reported that *** and almost all importers and purchasers reported that they were always or frequently interchangeable.¹⁴¹ A majority (or plurality) of responding purchasers reported that domestically produced brake drums were comparable to brake drums imported from China and Turkey, respectively, with respect to most of the factors that were rated as “very important” purchasing factors.¹⁴² As discussed in section V.B above, domestically produced brake drum and subject imports from China and Turkey also overlapped in terms of weight categories, sales type (pallet or non-pallet), and attachment status (stand-

¹³⁶ Pet. Prehear. Br. at 13; Pet. Posthear. Br. at 4-5.

¹³⁷ Pet. Posthear. Br. at 4, Exh. 1 Response to Question 5, Exh. 2.

¹³⁸ Pet. Posthear. Br. at 5, Exh. 6.

¹³⁹ ConMet Prehear. Br. at 10-11.

¹⁴⁰ ConMet Prehear. Br. at 10.

¹⁴¹ CR/PR at 2.23, Tables 2.15, 2.16, 2.17.

¹⁴² CR/PR at 2.19-20, Table 2.14. The only exceptions with respect to purchaser comparisons of subject imports from China with domestically produced brake drums were delivery time and technical support, for which U.S.-produced brake drums were superior; price, for which U.S.-produced brake drums were inferior (higher priced); and delivery terms, for which a plurality of purchasers reported that U.S.-produced brake drums were superior or comparable to Chinese brake drums. *Id.* The only exceptions with respect to purchaser comparisons of subject imports from Turkey with the domestic like product were delivery terms, delivery time, and technical support, for which most purchasers reported that U.S.-produced brake drums were superior, and price, for which most purchasers reported U.S.-produced brake drums were inferior (higher priced). *Id.*

alone or part of a larger assembly).¹⁴³ Finally, all brake drums intended for sale to OEMs, whether domestic or imported from China or Turkey, must undergo testing to meet Federal Motor Vehicle Safety Standard (“FMVSS”) 121, which is the standard that governs stopping distance performance for heavy trucks.¹⁴⁴

We also find that price is an important purchasing factor. The most often cited top three factors that U.S. purchasers reported considering in their purchasing decisions for brake drums were price/cost/value (26 firms), quality (19 firms), and availability/supply (11 firms).¹⁴⁵ Nevertheless, the majority of purchasers (17 of 26) reported that they only sometimes purchase the lowest-priced product.¹⁴⁶ Both U.S. producers reported that differences other than price were sometimes significant in sales of domestically produced brake drums and subject imports from China and Turkey.¹⁴⁷ Similar numbers of responding importers and purchasers reported that such differences were always or frequently significant (17 importers and 13 purchasers) or sometimes or never significant (20 importers and 9 purchasers) as between domestically produced brake drums and subject imports from China.¹⁴⁸ Likewise, comparing domestically produced brake drums and subject imports from Turkey, similar numbers of responding importers and purchasers reported that such differences were always or frequently significant (11 importers and 10 purchasers) or sometimes or never significant (14 importers and 9 purchasers).¹⁴⁹ Additionally, as noted above, most purchasers reported that domestically produced brake drums were comparable or superior to subject imports from China and Turkey with respect to availability and reliability of supply.¹⁵⁰

Brake drums are primarily sold from inventory.¹⁵¹ U.S. producers reported that *** percent of their commercial U.S. shipments were from U.S. inventories, with lead times averaging *** days.¹⁵² The remaining *** percent of their commercial U.S. shipments were

¹⁴³ CR/PR at 4.10, 4.13, 4.15, Tables 4.6, 4.7, 4.8. The four weight categories were: (1) greater than 50 pounds and less than 97 pounds; (2) greater than or equal to 97 pounds and less than or equal to 106 pounds; (3) greater than 106 pounds but no greater than 113 pounds; and (4) greater than 113 pounds.

¹⁴⁴ CR/PR at 1.15. There is no such testing requirement for brake drums sold in the aftermarket. *Id.*

¹⁴⁵ CR/PR at 2.15., Table 2.10.

¹⁴⁶ CR/PR at 2.15.

¹⁴⁷ CR/PR at 2.24, Table 2.18.

¹⁴⁸ CR/PR at 2.24, Tables 2.19, 2.20.

¹⁴⁹ CR/PR at 2.24, Tables 2.19, 2.20.

¹⁵⁰ CR/PR at Table 2.14.

¹⁵¹ CR/PR at 2.16.

¹⁵² CR/PR at 2.16.

produced to order, with lead times averaging *** days.¹⁵³ U.S. importers reported that *** percent of their commercial U.S. shipments were from U.S. inventories, with lead times averaging *** days.¹⁵⁴ Of the remainder, *** percent of their commercial U.S. shipments were produced to order, with lead times averaging *** days, and *** percent were from foreign inventories, with lead times averaging *** days.¹⁵⁵ Petitioner argues that there was a build-up of inventories of subject imports in 2021 and 2022, leading to an inventory overhang in 2023.¹⁵⁶

The majority of purchasers (14 of 26) require their suppliers to become certified or qualified to sell brake drums to their firm.¹⁵⁷ Purchasers reported that the time to qualify a new supplier ranged from 7 to 365 days, with three purchasers reporting 180 days, one reporting 360 days, and three reporting 365 days.¹⁵⁸ One purchaser, ***, reported that Webb Wheel had failed its supplier certification, or had lost its approved status since 2022, reporting that it did not reach ISO14001 certification.¹⁵⁹ Reported certification factors included meeting relevant ISO and FMVSS requirements, product testing and validation, company policies for products and workers, customer referrals, safety records and policies, raw material supply chains, labor training, design quality, delivery reliability, material certification, metallurgical and dimensional verification, and a financial risk assessment.¹⁶⁰

Brake drums are sold on both a spot basis, particularly in the aftermarket, and on a long-term contract basis, which is more common in the OEM market.¹⁶¹ Contract prices may be indexed to raw material costs.¹⁶² U.S. producers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists, while most U.S. importers reported using transaction-by-transaction negotiations and price lists.¹⁶³ U.S. producers reported selling most of their brake drums through the spot market, while U.S. importers' sales were more evenly divided between the spot market and long-term contracts.¹⁶⁴

Pig iron is the primary raw material used to make castings for brake drums.¹⁶⁵ Prices of pig iron spiked *** percent from January 2022 to April 2022, declined to a level near that of

¹⁵³ CR/PR at 2.16.

¹⁵⁴ CR/PR at 2.16.

¹⁵⁵ CR/PR at 2.16.

¹⁵⁶ Pet. Prehear. Br. at 26.

¹⁵⁷ CR/PR at 2.17.

¹⁵⁸ CR/PR at 2.17.

¹⁵⁹ CR/PR at 2.17.

¹⁶⁰ CR/PR at 2.17.

¹⁶¹ CR/PR at 5.3.

¹⁶² CR/PR at 5.3.

¹⁶³ CR/PR at 5.3, Table 5.2.

¹⁶⁴ CR/PR at 5.3, Table 5.3.

¹⁶⁵ CR/PR at 5.1.

January 2022 by August 2022, and then declined irregularly through May 2025, when pig iron prices were *** percent lower than in January 2022.¹⁶⁶ The war in Ukraine affected pig iron supply because Russia and Ukraine together reportedly account for approximately 60 percent of the world’s merchant pig iron supply.¹⁶⁷ Raw materials as a share of the domestic industry’s total cost of goods sold (“COGS”) decreased by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.¹⁶⁸

Because Webb Wheel purchases pre-made castings while Gunitite produces its own castings, their raw material usages differ. Gunitite reported that its raw materials for brake drums were ***.¹⁶⁹ Webb Wheel’s cost for castings purchased from Waupaca was its ***.¹⁷⁰ Gunitite’s raw materials costs per unit *** over the POI while Webb Wheel’s ***.¹⁷¹

Effective September 24, 2018, brake drums produced in China and imported under Harmonized Tariff Schedule (“HTS”) subheading 8708.30.50 became subject to an additional 10 percent *ad valorem* duty under section 301 of the Trade Act of 1974.¹⁷² This duty was increased to 25 percent *ad valorem* effective May 10, 2019.¹⁷³

Effective February 4, 2025, brake drums originating in China became subject to an additional 10 percent *ad valorem* duty under the International Emergency Economic Powers Act (“IEEPA”), and this duty was increased to 20 percent *ad valorem* effective March 4, 2025.¹⁷⁴

Effective April 5, 2025, brake drums originating in China became subject to an additional 10 percent *ad valorem* “reciprocal” duty under IEEPA, which rose to 84 percent *ad valorem* effective April 9, 2025, and then to 125 percent *ad valorem* effective April 10, 2025.¹⁷⁵ This “reciprocal” duty on brake drums originating in China was reduced to 10 percent *ad valorem* effective May 14, 2025.¹⁷⁶ All told, as of publication of the staff report in these investigations on July 2, 2025, the total additional *ad valorem* duty rate on brake drums from China was 55 percent.¹⁷⁷

¹⁶⁶ CR/PR at 5.1, Table 5.1, Figure 5.1.

¹⁶⁷ CR/PR at 5.1.

¹⁶⁸ CR/PR at Table 6.1.

¹⁶⁹ CR/PR at 5.1.

¹⁷⁰ CR/PR at 5.1., 6.12.

¹⁷¹ CR/PR at Table 6.3.

¹⁷² CR/PR at 1.10.

¹⁷³ CR/PR at 1.10.

¹⁷⁴ CR/PR at 1.10.

¹⁷⁵ CR/PR at 1.10.

¹⁷⁶ CR/PR at 1.11.

¹⁷⁷ CR/PR at Table 1.7.

Effective April 5, 2025, brake drums originating in Turkey became subject to an additional 10 percent *ad valorem* reciprocal duty under IEEPA.¹⁷⁸

C. Volume of Cumulated Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁷⁹

The volume of cumulated subject imports decreased from 3.3 million units in 2022 to 2.5 million units in 2023 and 2.4 million units in 2024, a level 28.1 percent lower than in 2022.¹⁸⁰ ¹⁸¹ Cumulated subject imports as a share of apparent U.S. consumption increased from *** percent in 2022 to *** percent in 2023, then declined to *** percent in 2024, a level *** percentage points higher than in 2022.¹⁸² The ratio of cumulated subject imports to U.S. production increased from *** percent in 2022 to *** percent in 2023, before declining to *** percent in 2024, for an overall decrease of *** percentage points between 2022 and 2024.¹⁸³

On the basis of these data, we find that the volume of cumulated subject imports is significant in absolute terms and relative to apparent U.S. consumption and production.¹⁸⁴

¹⁷⁸ CR/PR at 1.10.

¹⁷⁹ 19 U.S.C. § 1677(7)(C)(i).

¹⁸⁰ CR/PR at Table 4.2. As further discussed in section VI.D below, although Petitioner and ConMet argue that KIC’s subject imports should be excluded from our analysis, we find no basis to do so, particularly as, per the discussion in section III.B above, we do not find that appropriate circumstances exist to exclude its ***, from the domestic industry. Consequently, the volume figures referenced in this section include KIC’s subject imports.

¹⁸¹ We note that while total subject imports declined by 792,069 units between 2022 and 2023, U.S. importers’ U.S. shipments of subject imports declined by only 307,514 units over that time, from 2.8 million units in 2022 to 2.5 million units in 2023. *Compare* CR/PR at Table 4.2 *with id.* at Table C.1. End-of-period inventories held by U.S. importers from subject sources fell by 141,096 units, or by 27.7 percent, between 2022 and 2023, which indicates that importers’ sell-off from inventories contributed to the market share gain by subject imports in 2023. CR/PR at Table C.1.

¹⁸² CR/PR at Table 4.11.

¹⁸³ CR/PR at 4.4.

¹⁸⁴ ConMet argues that cumulated subject import volume was not significant because cumulated subject imports declined in absolute terms and gained no market share from 2022 to 2024, and only increased in 2022 when the domestic industry’s supply constraints prevented it from satisfying increased demand stemming from the COVID-19 pandemic that year. *See* ConMet Prehear. Br. at 20-21, 24-25; ConMet Posthear. Br. at 2-3; *see also* DuraBrake Prehear. Br. at 8. Contrary to this argument, the record shows that cumulated subject imports were significant in absolute terms and relative to U.S. consumption and production throughout the POI, even after the domestic industry’s supply constraints eased and demand declined.

D. Price Effects of Cumulated Subject Imports

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

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

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁸⁵

As discussed above in section VI.B.3 above, we have found that there is a moderate-to-high degree of substitutability between the domestic like product and subject imports and that price is an important factor in purchasing decisions.

We have examined several sources of data for our underselling analysis. The Commission collected quarterly quantity and f.o.b. pricing data on sales of two products shipped to unrelated U.S. customers during the POI.¹⁸⁶ Both U.S. producers and 27 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing data for all products for all quarters.¹⁸⁷ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of brake drums, *** percent of U.S. shipments of subject imports from China, and *** percent of U.S. shipments of subject imports from Turkey.¹⁸⁸

Cumulated subject imports undersold the domestic like product in 72 of 118 quarterly comparisons, corresponding to reported subject import sales of *** units, with margins of

¹⁸⁵ 19 U.S.C. § 1677(7)(C)(ii).

¹⁸⁶ CR/PR at 5.6. The two pricing products were defined as follows: product 1 – brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good; and product 2 – brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. *Id.*

¹⁸⁷ CR/PR at 5.6. ConMet argues that we should disregard KIC's pricing data because, in its view, ***. ConMet Posthear. Br. at Exh. 1 at 10. *** subsequently *** and did, in fact, report ***. See CR/PR at Table 5.4, Note; *** Imp. Questionnaire at III-2(b). *** also confirmed that ***. Revision to Part III of *** Imp. Questionnaire.

¹⁸⁸ CR/PR at 5.6.

underselling ranging from *** percent and averaging *** percent.¹⁸⁹ Cumulated subject imports oversold the domestic like product in the remaining 46 quarterly comparisons, corresponding to reported subject import sales of *** units, with margins of overselling ranging from *** percent to *** percent and averaging *** percent.¹⁹⁰ Subject import underselling intensified over the POI, with most underselling occurring in 2023 and 2024. Subject import underselling increased from only six of 40 (or 15.0 percent of) quarterly comparisons in 2022, corresponding to reported subject import sales of *** units (6.6 percent of the total) in 2022, to 34 of 40 (or 85.0 percent of) quarterly comparisons in 2023, corresponding to reported subject import sales of *** units (78.6 percent of the total) in 2023, and 32 of 38 (or 84.2 percent of) quarterly comparisons in 2024, corresponding to reported subject import sales of *** units (99.3 percent of the total) in 2024.¹⁹¹ The margins of underselling also increased overall over the POI. In 2022, margins of underselling ranged from *** to *** percent and averaged *** percent.¹⁹² The margins of underselling subsequently increased, ranging from *** to *** percent and averaging *** percent in 2023 and ranging from *** to *** percent and averaging *** percent in 2024.¹⁹³

We have also considered information concerning lost sales. Of the 26 responding purchasers, 18 reported that, since 2022, they had purchased imported brake drums from China and 14 reported that they had purchased brake drums from Turkey instead of U.S.-produced product.¹⁹⁴ Sixteen of these purchasers reported that Chinese import prices were lower than U.S.-produced product, and 10 of these purchasers reported that price was a primary reason for the decision to purchase product imported from China rather than U.S.-produced product.¹⁹⁵ Eleven of these purchasers reported that Turkish import prices were lower than U.S.-produced product, and 8 of these purchasers reported that price was a primary reason for the decision to

¹⁸⁹ CR/PR at Tables 5.11, 5.12, 5.13. Importer *** was reported separately in price comparisons due to its ***. Consequently, the absolute number of instances of under and overselling are greater than they would have been if *** imports were not considered in the pricing comparisons or if its data could be included in the country-specific data. Because all of *** imports during the POI were from subject sources, and we have cumulated subject imports from China and Turkey for purposes of our material injury analysis, *** pricing data is probative of the prevalence of underselling and we consider it in our analysis.

¹⁹⁰ CR/PR at Tables 5.11, 5.13.

¹⁹¹ CR/PR at Tables 5.11, 5.13.

¹⁹² CR/PR at Table 5.13.

¹⁹³ CR/PR at Table 5.13.

¹⁹⁴ CR/PR at 5.25.

¹⁹⁵ CR/PR at 5.25. Additionally, the majority of responding purchasers reported that U.S.-produced brake drums were inferior in price (or higher-priced) than subject imports from China. CR/PR at Table 2.14.

purchase product imported from Turkey rather than U.S.-produced product.¹⁹⁶ Those purchases of subject imports for which the lower import price was the primary reason amounted to *** units of subject imports, equivalent to *** percent of total reported purchases of subject imports, *** percent of total subject imports, and *** percent of apparent U.S. consumption during the POI.¹⁹⁷

Based on the foregoing, including the moderate-to-high degree of substitutability between domestically produced brake drums and subject imports, the importance of price in purchasing decisions, the pricing data showing pervasive underselling in 2023 and 2024, and the lost sales information, we find that underselling by cumulated subject imports was significant. The underselling caused cumulated subject imports to gain sales and market share from the domestic industry, particularly from 2022 to 2023 when subject imports gained *** percentage points of U.S. market share while the domestic industry lost *** percentage points of market share, all to cumulated subject imports (as nonsubject imports also lost market share during that period).¹⁹⁸ As noted in section VI.C above, end-of-period inventories held by U.S. importers

¹⁹⁶ CR/PR at 5.25. Additionally, the majority of responding purchasers reported that U.S.-produced brake drums were inferior in price (or higher-priced) than subject imports from Turkey. CR/PR at Table 2.14.

¹⁹⁷ CR/PR at 5.25, Tables 4.11, 5.14, 5.15, 5.16.

¹⁹⁸ CR/PR at Table 4.11. We are unpersuaded by ConMet's argument that the domestic industry's loss of market share to cumulated subject imports from 2022 to 2023 resulted from the industry's supply constraints. ConMet's Final Comments at 3-4. As discussed in section VI.B.2 above, Webb Wheel's ***. Indeed, ConMet acknowledges that supply constraints eased in the second quarter of 2023. ConMet Posthear. Br. at 12; Hearing Tr. at 161 (Pope). Only 7 of 20 responding purchasers reported experiencing supply constraints from domestic producers in 2023, down from 12 of 24 in 2022. CR/PR at Table 2.5. With a practical capacity utilization rate of only *** percent in 2023, the domestic industry had *** units of unused capacity with which it could have increased production and shipments after the supply constraints had ended after the first quarter of that year. *Id.* at Table 3.5. Furthermore, the substantial intensification of subject import underselling from 2022 to 2023, discussed above, is inconsistent with ConMet's argument that domestic industry supply constraints pulled subject imports into the U.S. market in 2023; if this were the case, U.S. importers would be expected to command a price premium under such alleged conditions of short supply, as they did in 2022. We find that the pervasive subject import underselling in 2023 caused the domestic industry's sales to be lower than they would have been otherwise that year, given the industry's substantial unused practical capacity after its supply constraints had ended, resulting in the shift in market share from the industry to subject imports.

We decline ConMet's invitation to rely on calculations using data from the preliminary phase of the investigations that it alleges shows that the entire market share shift from the domestic industry to subject imports from 2022 to 2023 occurred in the first quarter of 2023. ConMet's arguments are based on a comparison of different data sets and unsupported assumptions regarding import distributions over a calendar year. ConMet Posthear. Br. at Exh. 3. We instead rely on the more comprehensive data collected in the final phase, which ConMet has not established are inaccurate or incomplete. Questionnaire coverage of subject imports was higher in the final phase of the investigations, with 44 responding importers accounting for more than *** of subject imports from China and more than ***

fell by 141,096 units, or by 27.7 percent, between 2022 and 2023 which indicates that importers' sell-off from inventories contributed to the market share gain by subject imports in 2023. Moreover, the sell-off from inventories is coincident with the large decline in subject imports' AUVs for all pricing products which began in the first quarter of 2023 and accelerated through the remainder of that year into 2024.¹⁹⁹

We have also considered price trends during the POI and examined whether subject imports depressed domestic brake drum prices or prevented price increases for domestically produced brake drums which otherwise would have occurred. While the domestic industry's sales prices generally increased irregularly in the early part of the POI, they then declined irregularly through the third or fourth quarters of 2024²⁰⁰. In particular, for sales to the aftermarket (which accounted for the largest volume of the domestic industry's reported sales for both pricing products), the price for product 1 fell starting in the first quarter of 2023 and remained well below its peak level (reached in the fourth quarter of 2022) throughout the end of the POI, and the price for product 2 fell beginning in the third quarter of 2023 and remained

percent of subject imports from Turkey in 2024, than in the preliminary phase of the investigations, with 36 responding importers accounting for approximately *** of subject imports from China and less than *** percent of subject imports from Turkey in 2023. CR/PR at 1.4; Confidential Staff Report, Memorandum INV-WW-090 (July 29, 2024), EDIS Doc. No. 827498 at I-4.

We also decline to rely on the adjusted data in Appendix L of the staff report to compare market shares in the first quarter of 2023 to those in the second through fourth quarters of 2023. To ensure comparability between the data collected in the preliminary and final phase of these investigations, it was necessary to exclude data for U.S. importers that only responded to either the preliminary or final phase of these investigations. This exclusion, however, results in the removal of sixteen U.S. importers accounting for approximately one-fifth of the final phase data for U.S. importers and thus Appendix L overstates the domestic industry's market share while understating subject import market share. *Compare* CR/PR at Table L.1 (showing domestic industry market share of *** percent and subject import market share of *** percent for full year 2023) *with id.* at Table 4.11 (showing domestic industry market share of *** percent and subject import market share of *** percent in 2023). Given this, the market share trends between the first quarter of 2023 and the second through fourth quarters of 2023 shown in Appendix L may not reflect the actual market share trends between those periods had the Commission been able to include U.S. shipment data from all responding importers.

¹⁹⁹ See CR/PR at Tables 5.4, 5.5, 5.6 and 5.7.

²⁰⁰ In the aftermarket, domestic producers' sales prices for pricing product 1 increased between the first quarter of 2022 and fourth quarter of 2022, then declined irregularly through the fourth quarter of 2024. CR/PR at Tables 5.8, 5.9. Domestic producers' sales prices for pricing product 2 in the aftermarket increased irregularly through the first quarter of 2023, when they peaked, before declining irregularly through the fourth quarter of 2024. *Id.* Domestic producers' sales prices for pricing product 2 to OEMs increased irregularly from the first quarter of 2022 through the third quarter of 2023, declined through the third quarter of 2024, then increased in the fourth quarter of 2024. *Id.* Domestic producers' sales prices for pricing product 1 to OEMs increased irregularly through the first quarter of 2024, declined *** in the third quarter of 2024, then increased in the fourth quarter of 2024. *Id.*

well below its early 2023 peak level (reached in the first and second quarters of 2023) throughout the end of the POI.²⁰¹ Thus, domestic producer prices generally declined toward the end of 2023 and in 2024, and as discussed above the prevalence of subject import underselling increased in those years, peaking in 2024. Subject import sales prices declined irregularly during the POI with respect to both pricing products sold to OEMs and in the aftermarket.²⁰²

As the domestic industry's prices declined from 2023 to 2024, it also experienced a cost-price squeeze with the domestic industry's net sales AUVs declining to a greater degree than its unit COGS. From 2023 to 2024, the domestic industry's net sales AUV decreased by \$***, from \$*** per unit in 2023 to \$*** per unit in 2024, a decline of *** percent.²⁰³ At the same time, the industry's per unit COGS decreased by \$***, from \$*** in 2023 to \$*** in 2024, a decline of *** percent.²⁰⁴ The decline in per unit raw material costs accounted for the entirety of the decline in the domestic industry's per unit COGS from 2023 to 2024, as per unit labor, energy and utilities, and other factory costs held steady during that period.²⁰⁵ As the net sales AUV declined by twice the absolute amount as the decline in unit COGS, the industry's total COGS to

²⁰¹ As noted, the domestic price for pricing product 1 to the aftermarket peaked in the fourth quarter of 2022 (at \$*** per unit) and steadily declined thereafter. Subject import prices for this product followed a similar pattern; however, the declines from the quarter in which subject import pricing peaked (the third quarter of 2022, at \$*** per unit) to the end of the POI were greater than that for the domestic product, indicating that subject import pricing led the overall decline in pricing for this product in sales to the aftermarket. *Compare* CR/PR at Table 5.9 *with id.* at Table 5.10. This product had the highest volume of all the pricing products for the domestic industry, and it is this product which accounted for a significant majority of underselling recorded in the pricing products as a whole (*i.e.*, *** percent of overall underselling by volume). *See id.* at Table 5.11.

²⁰² For sales to OEMs and in the aftermarket, importers' sales prices for pricing product 1 increased through the third and fourth quarters of 2022, when they respectively peaked, before declining irregularly through the fourth quarter of 2024, resulting in an overall decrease of *** percent in the OEM and *** percent for the aftermarket between the first and last quarters of the POI. CR/PR at Table 5.10. Importer sales prices for pricing product 2 to OEMs declined through the third quarter of 2023 before increasing through the fourth quarter of 2024, resulting in an overall decrease of *** percent. *Id.* Importer sales prices for pricing product 2 to the aftermarket increased through the third quarter of 2022, when they peaked, declined through the second quarter of 2024, then increased through the fourth quarter of 2024, for an overall decrease of *** percent. *Id.*

²⁰³ CR/PR at Tables 6.1, 6.2. The domestic industry's net sales AUV decreased from \$*** per unit in 2022 and 2023 to \$*** per unit in 2024. *Id.*

²⁰⁴ CR/PR at Tables 6.1, 6.2. The industry's per unit COGS increased irregularly, increasing from \$*** in 2022 to \$*** in 2023, then decreasing to \$*** in 2024, for an overall increase of \$***, or *** percent. *Id.*

²⁰⁵ CR/PR at Table 6.1. The domestic industry's per unit raw material costs declined irregularly, increasing from \$*** in 2022 to \$*** in 2023, before decreasing to \$*** in 2024, for an overall decrease of \$*** per unit, or *** percent. *Id.*

net sales ratio increased from *** percent in 2023 to *** percent in 2024, or by *** percentage points.²⁰⁶ This cost-price squeeze occurred as the domestic industry's prices declined from 2023 to 2024 and subject import underselling intensified and became near-universal in 2024.

Demand trends do not explain the domestic industry's increasing COGS to net sales ratio from 2023 to 2024. Most of the decline in apparent U.S. consumption occurred between 2022 and 2023, when the AUVs of the domestic industry's net sales held steady at \$*** per unit; whereas there was only a slight decline in apparent U.S. consumption from 2023 to 2024 (*** percent) when the domestic industry's net sales AUVs declined by \$*** to \$***.²⁰⁷

Given the foregoing, as well as the moderate to high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasing decisions, we find that cumulated subject imports depressed domestic prices to a significant degree from 2023 to 2024.

In sum, we find that cumulated subject imports significantly undersold the domestic like product, causing a market shift from 2022 to 2023, and depressing prices for the domestic like product to a significant degree from 2023 to 2024. Consequently, we find that cumulated subject imports had significant price effects.

E. Impact of the Cumulated Subject Imports

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."²⁰⁸ These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business

²⁰⁶ CR/PR at Table 6.1. The industry's total COGS to net sales ratio increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points. *Id.*

²⁰⁷ CR/PR at Tables 4.11, 6.3, C-1. Apparent U.S. consumption declined *** percent from 2022 to 2023 but only *** percent between 2023 and 2024. *Id.* at Table 4.11.

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

cycle and conditions of competition that are distinctive to the affected industry.”²⁰⁹

The domestic industry’s trade, employment, and financial indicators generally declined over the POI. Its production capacity increased by *** percent, from *** units in 2022 to *** units in 2023 and *** units in 2024.²¹⁰ However, its production decreased by *** percent overall, falling from *** units in 2022 to *** units in 2023, then increasing to *** units in 2024.²¹¹ Accordingly, the domestic industry’s capacity utilization decreased by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.²¹²

The domestic industry’s employment indicators also generally declined over the POI. The number of production and related workers (“PRWs”) increased irregularly by *** percent, decreasing from *** PRWs in 2022 to *** PRWs in 2023, then increasing to *** PRWs in 2024.²¹³ Hours worked declined irregularly by *** percent over the POI, decreasing from *** hours in 2022 to *** hours in 2023, then increasing to *** hours in 2024.²¹⁴ Wages paid decreased by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²¹⁵ Productivity decreased irregularly by *** percent over the POI, declining from *** units per hour in 2022 to *** units per hour in 2023, then increasing to *** units per hour in 2024.²¹⁶

The domestic industry’s U.S. shipments decreased irregularly by *** percent, falling from *** units in 2022 to *** units in 2023, then increasing to *** units in 2024.²¹⁷ The industry’s share of apparent U.S. consumption decreased irregularly over the POI by *** percentage points, declining from *** percent in 2022 to *** percent in 2023, then increasing to *** percent in 2024.²¹⁸

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

²¹⁰ CR/PR at Table 3.5.

²¹¹ CR/PR at Table 3.5.

²¹² CR/PR at Table 3.5. Even if the domestic industry’s capacity had remained the same throughout the POI, its capacity utilization would still have declined irregularly by *** percentage points over the POI, decreasing from *** percent in 2022 to *** percent in 2023, then increasing to *** percent in 2024. *Derived from* Tables 3.5, C.1; *see also* Pet. Prehearing Br. at 39-40.

²¹³ CR/PR at Table 3.14.

²¹⁴ CR/PR at Table 3.14.

²¹⁵ CR/PR at Table 3.14.

²¹⁶ CR/PR at Table 3.14.

²¹⁷ CR/PR at Table 3.9.

²¹⁸ CR/PR at Table 4.11. ConMet argues that underselling did not cause market share shifts during the POI because the domestic industry regained market share between 2023 and 2024 as underselling intensified. ConMet Prehear. Br. at 30-31. As discussed in section VI.D above, however, subject imports depressed prices in 2024 and the domestic industry suffered a cost-price squeeze, as it regained market share at the expense of worsening profitability.

The domestic industry's end-of-period inventories increased irregularly by *** percent over the POI, decreasing from *** units in 2022 to *** units in 2023, then increasing to *** units in 2024.²¹⁹ As a share of total shipments, the domestic industry's end-of-period inventories increased by *** percentage points, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.²²⁰

The domestic industry's financial performance generally worsened over the POI. Its net sales revenue decreased by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²²¹ The industry's gross profits declined by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²²² The industry's operating income declined by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²²³ Its net income likewise decreased by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²²⁴ As a ratio to net sales, the industry's operating income declined by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.²²⁵ Its ratio of net income to net sales decreased

Additionally, Petitioner claims that it regained market share in 2024 due to post-petition effects. Pet. Posthear. Br. at Exh. 1 at 27. Because of data differences between the preliminary and final phase of these investigations, and without interim periods in this final phase, post-petition data cannot readily be discounted. However, there is record evidence submitted by Webb Wheel which indicates that certain purchasers switched from subject imports or otherwise significantly increased purchases from Webb Wheel after it filed the petitions, recording the volume of purchases by specific customers in the first half of 2024 compared to the second half of 2024, and comparing the volume of purchases by these same customers in January-May 2024 compared to January-May 2025. *See id.* at Exh. 1 at 27-28, Figure 7.1, and Exh. 8 ("In the second half of 2024, Webb saw volume increases that it attributes to customers switching from subject imports to domestic brake drums that have continued into 2025. As an initial matter, several companies issued public statements of their intent to switch from subject imports to the domestic industry after the filing of the petition. Petitioner has provided at Exhibit 8 {to its posthearing brief} two such notices. Moreover, beyond these public statements, Webb provides below some examples of companies that increased purchases from Webb after the filing of the petition on June 27, 2024, showing substantial increases in volume between the first half of 2024 and the second half . . . These increases occurred in an environment where apparent consumption was declining indicating that these increases were unrelated to increases in demand. Absent this shift, Webb's shipments in 2024, and ultimately the domestic industry's overall market share, would have otherwise been lower in 2024.").

²¹⁹ CR/PR at 3.13, Table 3.10.

²²⁰ CR/PR at Table 3.10.

²²¹ CR/PR at Tables 6.1, 6.3.

²²² CR/PR at Tables 6.1, 6.3.

²²³ CR/PR at Tables 6.1, 6.3.

²²⁴ CR/PR at Tables 6.1, 6.3.

²²⁵ CR/PR at Tables 6.1, 6.3.

by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.²²⁶

The domestic industry's capital expenditures increased irregularly by *** percent over the POI, increasing from \$*** in 2022 to \$*** in 2023, then decreasing to \$*** in 2024.²²⁷ U.S. producers reported that capital expenditures reflected ***.²²⁸ Only one U.S. producer, ***, reported research and development expenses during the period; they decreased by *** percent, from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.²²⁹ The industry's return on assets declined by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.²³⁰ Both U.S. producers reported that they experienced negative effects on investments and negative effects on growth and development due to competition with subject imports.²³¹

As discussed above, significant volumes of cumulated subject imports undersold the domestic like product to a significant degree and took sales and market share from the domestic industry, particularly from 2022 to 2023. Consequently, the domestic industry's production, capacity utilization, employment, and U.S. shipments were all lower than they would have been otherwise during the POI. As subject import underselling intensified in 2023 and 2024, subject imports depressed domestic prices to a significant degree, forcing the industry to accept prices that were lower than they would have been otherwise and placing the domestic industry in a cost-price squeeze, even as it regained sales and market share lost from 2022 to 2023. In this way, subject import competition reduced the domestic industry's financial performance, including its net sales value, operating income, net income, and operating and net income margins. Thus, we find that cumulated subject imports had a significant adverse impact on the domestic industry.

We have considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from other factors to subject imports. We find that nonsubject imports do not explain the domestic industry's deteriorating performance. Nonsubject imports were a small source of supply to the U.S. market and their share of apparent U.S. consumption remained flat during the POI, declining from *** percent in 2022 to *** percent in 2023 before increasing to *** percent in 2024, for an overall increase of

²²⁶ CR/PR at Tables 6.1, 6.3.

²²⁷ CR/PR at Table 6.7.

²²⁸ CR/PR at Table 6.8.

²²⁹ CR/PR at Table 6.9.

²³⁰ CR/PR at Table 6.12.

²³¹ CR/PR at Table 6.15.

*** percentage points.²³² The record also indicates that the AUVs of U.S. shipments of nonsubject imports were higher than the AUVs of U.S. shipments of cumulated subject imports throughout the POI.²³³ In light of this, nonsubject imports cannot explain the injury to the domestic industry that we have attributed to subject imports.

We are unpersuaded by respondents' argument that declining demand, including due to the adoption of air disc brakes, explains the domestic industry's declining performance during the POI.²³⁴ We recognize that apparent U.S. consumption declined by *** percent from 2022 to 2024. As discussed in section VI.D above, however, almost all of the decline occurred between 2022 and 2023, as the domestic industry's prices generally increased for three of the four pricing products (*i.e.*, pricing products *** market and pricing product ***) and net sales AUVs remained steady while the industry lost *** percentage points of market share to cumulated subject imports.²³⁵ Between 2023 and 2024, as apparent U.S. consumption declined by only *** percent, the domestic industry's prices for the pricing products generally declined and its net sales AUVs declined by twice as much as the industry's unit COGS as significant volumes of cumulated subject imports pervasively undersold the domestic like product, placing the industry in a cost-price squeeze. Regarding air disc brakes specifically, the long-term trend towards their adoption does not explain declining demand for brake drums during the POI; indeed, demand for brake drums in the OEM truck segment, where the parties agree that air disc brakes are most prevalent, increased over the POI.²³⁶ Additionally, respondents acknowledge that there were supply constraints on calipers, a component of air disc brakes, which decreased demand for them relative to brake drums during the POI.²³⁷ In any event, even if the decline in apparent U.S. consumption over the POI could be attributed to a shift towards air disc brakes, the decline in demand does not explain the market share shift from domestic product to subject imports from 2022 to 2023, nor domestic producers' price declines from 2023 to 2024 or the cost-price squeeze during that time given the only slight decline in apparent U.S. consumption from 2023 to 2024.

Respondents also claim that the domestic industry lost market share due to its own supply constraints and that subject imports were drawn into the U.S. market by unmet

²³² CR/PR at Table 4.11.

²³³ CR/PR at 4.4, Table 4.2.

²³⁴ ConMet Prehear. Br. at 8, 44-45; ConMet Posthear. Br. at 10; DuraBrake Prehear. Br. at 11.

²³⁵ CR/PR at Table 4.11.

²³⁶ CR/PR at Table E.7.

²³⁷ CR/PR at 1.17; Hearing Tr. at 178 (Hurley); *see also id.* at 179 (Bennett) (stating that due to caliper supply constraints during the POI, "we had to push customers that very much wanted to move to disc brakes or already had moved to disc brakes, back to drum brakes in order to get their delivery").

demand.²³⁸ As discussed above in section VI.B.2, however, the domestic industry added capacity and resolved its supply constraints by the end of the first quarter of 2023.²³⁹ Notwithstanding the domestic industry's declining capacity utilization and increasing amounts of unused capacity in 2023, cumulated subject import volume increased relative to apparent U.S. consumption, taking market share from the domestic industry as subject import underselling intensified and became pervasive in 2023. Thus, the domestic industry's supply constraints in 2022 cannot explain lost market share and the resulting injury the industry experienced in 2023, which the record shows was due to cumulated subject imports.

ConMet contends that, because *** financial performance was much worse than *** and its financial issues were allegedly unrelated to subject imports, considering *** financial performance collectively with *** would improperly attribute its financial woes to subject imports.²⁴⁰ We have found the domestic industry to include ***, and consistent with the statute, we consider the impact of subject imports on the domestic industry as a whole. Moreover, contrary to ConMet's argument, the record indicates that subject imports did have an adverse impact on *** performance. For example, *** reported that ***.²⁴¹ Moreover, we note that *** financial performance, while better than ***, also worsened over the POI as that producer recorded a decline in its net sales AUVs that well outpaced its decline in unit COGS,

²³⁸ ConMet Prehear. Br. at 20-21; ConMet Posthear. Br. at 2, 10; DuraBrake Prehear. Br. at 10-11.

²³⁹ Petitioner signed a new long term contract ("LTA") with its casting supplier, Waupaca, on ***. Petitioner states that because of the new LTA, Waupaca committed to investing additional capital into its plants to increase output. The agreement codifies communications between Waupaca and Webb Wheel dated *** that sets out the expected volume of castings that Waupaca will sell to Webb Wheel between 2023 and 2026, noting that Waupaca committed to supply Webb Wheel with a minimum of *** castings in 2023, with an additional *** castings available if Webb Wheel's demand increased. Petitioner reports that as a result, Webb Wheel's practical capacity for brake drums increased to *** units in 2023, a *** percent increase from its practical brake drum capacity in 2022.

Petitioner states that its increased capacity allowed it to reduce lead times that had previously been extended as a result of supply constraints in 2021 and 2022. Petitioner represents and documents that at the beginning of the second quarter of 2021 when COVID-19 related supply constraints were on the rise, Webb Wheel began to increase its lead times from its standard of *** from date of order to shipment, with a peak of *** in April 2022. Petitioner further states that in December 2022, it announced to customers that it would be reducing lead times to ***, and reports that by March 2023, these lead times had returned to the standard ***. As such, by the end of the first quarter of 2023, Webb Wheel states that it had ample capacity to supply the market, and virtually all customers were receiving brake drum orders by standard, pre-supply constraint timeframes by March 2023, which Webb Wheel communicated to customers the following month. Pet. Posthear. Br. at Exh. 1 at 15-17 and Exhs. 2, 5 and 6.

²⁴⁰ ConMet Prehear. Br. at 54-57.

²⁴¹ CR/PR at Table 6.15.

leading to a decline in its gross, operating, and net income, and an increase in its COGS to net sales ratio leading to a decline in its gross, operating, and net income margins.²⁴²

VII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of brake drums from China and Turkey found by Commerce to be sold in the United States at LTFV and subsidized by the governments of China and Turkey.

²⁴² See CR/PR at Table K.1. Between 2022 and 2024, *** net sales value declined irregularly by *** percent, its gross profit declined *** percent, its operating income declined *** percent, its net income declined *** percent, its operating income margins declined from *** percent in 2022 to *** percent in 2024, and its net income margin declined from *** percent in 2022 to *** percent in 2024. *Id.* We also note that *** market share declined between 2022 and 2023, from *** to *** percent, or by *** percentage points. CR/PR at Table 4.11.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Webb Wheel Products, Inc. (“Webb”), Cullman, Alabama, on June 20, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of brake drums¹ from China and Turkey. Table 1.1 presents information relating to the background of these investigations.^{2 3}

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

| Effective date | Action |
|------------------|---|
| June 20, 2024 | Petitions filed with Commerce and the Commission; institution of the Commission's investigations (89 FR 53441, June 26, 2024) |
| July 17, 2024 | Commerce’s notice of initiation (89 FR 58106 and 58122, July 17, 2024) |
| August 5, 2024 | Commission’s preliminary determinations (89 FR 65397, August 9, 2024) |
| December 3, 2024 | Commerce’s preliminary countervailing duty (“CVD”) determinations and alignment of final CVD determinations with final antidumping duty (“AD”) determinations (89 FR 95740 (Turkey) and 95744 (China), December 3, 2024) |
| January 29, 2025 | Commerce’s preliminary AD determinations and postponement of final determinations (90 FR 8377 (Turkey) and 8383 (China), January 29, 2025); scheduling of final phase of Commission investigations (90 FR 9162, February 7, 2025) |
| June 17, 2025 | Commission’s hearing |
| June 18, 2025 | Commerce’s final determinations (90 FR 25999 (Turkey AD), 26002 (China CVD), 26008 (Turkey CVD), and 26011 (China AD), June 18, 2025) |
| July 16, 2025 | Commission’s vote |
| August 4, 2025 | Commission’s views |

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

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

³ Appendix B presents witnesses who appeared at the Commission’s hearing.

Statutory criteria

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

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

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

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

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

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

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

Organization of report

Part 1 of this report presents information on the subject merchandise, subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

In-scope brake drums are primarily, although not exclusively, used as a component of the braking system for heavy-duty trucks and trailers.⁶ The leading U.S. producers of brake drums during 2024 include Webb (petitioner) and Gunit Corporation (“Gunit”), while leading producers of brake drums outside the United States include ConMet Weifang Mechanical Co. Ltd. and Shandong ConMet Mechanical Co. Ltd. (collectively, “ConMet”) in China and EKV Fren ve Döküm San. A.Ş. (“EKU”), Büyük Eker Bijon Sanayi Ve Ticaret A.Ş. (“Eker Bijon”), Akis Asansor Makina Motor Dokum Sanayi Ve Ticaret Limited Sirketi (“Akis”), and Şafak Döküm Makina Parça Sanayi Ve Ticaret A.Ş. (“Safak Dokum”) in Turkey. The leading U.S. importers of brake drums from China include ***, while the leading importers of brake drums from Turkey include ***

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

⁶ Petitions, pp. 1.6 to 1.7; Webb’s prehearing brief, p. 4; hearing transcript, p. 13 (Begley). In-scope brake drums may also be used in the braking systems of other medium- and heavy-duty vehicles, such as delivery trucks, school buses, garbage trucks, and logging trailers. Conference transcript, pp. 36 (Capps) and 119 to 120 (Hurley); Webb’s prehearing brief, p. 11.

***. Leading importers of product from nonsubject countries include ***. U.S. purchasers of brake drums are original equipment manufacturers of heavy-duty trucks and trailers and aftermarket distributors. Leading purchasers include ***.

Apparent U.S. consumption of brake drums totaled approximately *** units (\$***) in 2024. Two firms (Webb and Gunitite) are known to have produced brake drums in the United States during 2024. U.S. producers' U.S. shipments of brake drums totaled *** units (\$***) in 2024, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled 2.4 million units (\$162.8 million) in 2024 and U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled 174,510 units (\$14.9 million) in 2024 and U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, tables C.1 and C.2. The Commission's questionnaires collected data for the years 2022 to 2024. Except as noted, U.S. industry data are based on questionnaire responses of two firms that accounted for all known U.S. production of brake drums during 2024. U.S. imports are based on questionnaire responses of 44 firms representing more than *** of total U.S. imports from China and more than *** percent of total U.S. imports from Turkey during 2024.⁷

⁷ Staff estimates for importer questionnaire coverage are based on a comparison with total U.S. imports reported under HTS statistical reporting number 8708.30.5020, as adjusted using data reported in importer and foreign producer questionnaire responses; staff research; and proprietary, Census-edited Customs' import records.

Previous and related investigations

The in-scope brake drums subject to this proceeding have not singularly been subject to previous antidumping or countervailing duty investigations, although the Commission has conducted previous import relief investigations on related merchandise (i.e., aftermarket brake drums and rotors of smaller sizes and lighter weights that are typically used in passenger automobiles), as well as on in-scope brake drums as one possible component of chassis and subassemblies. Information on the Commission’s related proceedings is presented in table 1.2.

Table 1.2 Brake drums: Related Commission proceedings and current status

| Date | Product | Number | Country | ITC original determination | Current status |
|------|--|-------------|----------|--|---|
| 1996 | Aftermarket brake drums and rotors (8 to 16 inches in diameter and 8 to 45 pounds) | 731-TA-744 | China | Affirmative (brake rotors) Negative (brake drums) | Order revoked after 2nd review, effective June 25, 2008 |
| 2003 | Aftermarket brake drums and rotors (8 to 16 inches in diameter and 8 to 45 pounds) | TA-421-3 | China | Negative | — |
| 2020 | Chassis and subassemblies | 701-TA-657 | China | Affirmative | Order in place, effective May 10, 2021 |
| 2020 | Chassis and subassemblies | 731-TA-1537 | China | Affirmative | Order in place, effective July 8, 2021 |
| 2025 | Chassis and subassemblies | 701-TA-755 | Mexico | Affirmative (preliminary) | Ongoing |
| 2025 | Chassis and subassemblies | 701-TA-756 | Thailand | Affirmative (preliminary) | Ongoing |
| 2025 | Chassis and subassemblies | 731-TA-1734 | Mexico | Affirmative (preliminary) | Ongoing |
| 2025 | Chassis and subassemblies | 731-TA-1735 | Thailand | Affirmative (preliminary) | Ongoing |
| 2025 | Chassis and subassemblies | 731-TA-1736 | Vietnam | Affirmative (preliminary) | Ongoing |

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.

Nature and extent of subsidies and sales at LTFV

Subsidies

On June 18, 2025, Commerce published notice in the Federal Register of its final determinations of countervailable subsidies for producers and exporters of brake drums from China and Turkey.⁸ Table 1.3 presents Commerce's findings of subsidization of brake drums in China and table 1.4 presents Commerce's findings of subsidization of brake drums in Turkey.

Table 1.3 Brake drums: Commerce's final subsidy determination with respect to imports from China

| Entity | Final countervailable subsidy rate (percent) |
|---|--|
| CAIEC Trailer Master Co., Ltd./Trailer Master CVS Inc. | 446.83 |
| Shandong ConMet Mechanical, Ltd./Weifang ConMet Mechanical Products Co., Ltd. | 11.94 |
| Guangzhou Joyhand Import & Export Co. | 446.83 |
| Hebei Iruijin Auto Parts Co., Ltd. | 446.83 |
| Henan Broad Top Metal Work, Llc | 446.83 |
| Henan Valiant Braking System Co. | 446.83 |
| HTS (Tianjin) Supply Chain Co., Ltd. | 446.83 |
| Panasia CVS (HK), Ltd. | 446.83 |
| Raw King Brake Parts Co., Ltd. | 446.83 |
| Tianjin Textile Group Import and Export Inc. | 446.83 |
| Xiamen Tinmy Industrial Co., Ltd. | 446.83 |
| Xingtai Xunchiyoute Auto Parts Co. | 446.83 |
| Yancheng Terbon Auto Parts Co. | 446.83 |
| Yantai Hongtian Autoparts Co., Ltd. | 446.83 |
| Zhejiang Firs Group Co., Ltd. | 446.83 |
| All others | 11.94 |

Source: 90 FR 26002, June 18, 2025.

Note: For further information on programs determined to be countervailable, see Commerce's associated Issues and Decision Memorandum.

⁸ 90 FR 26002 (China) and 26008 (Turkey), June 18, 2025.

Table 1.4 Brake drums: Commerce’s final subsidy determination with respect to imports from Turkey

| Entity | Final countervailable subsidy rate (percent) |
|------------------------------------|---|
| EKU Fren ve Dok. San. A.S. | 2.8 |
| Akkus Dokum San.Ve Tic.Ltd.Sti. | 131.60 |
| Buyuk Eker Bijon Sanayi Ve Ticaret | 131.60 |
| Genk Otomotiv San.Dis Tic.Ltd.Sti. | 131.60 |
| All others | 2.8 |

Source: 90 FR 26008, June 18, 2025.

Note: For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

Sales at LTFV

On June 18, 2025, Commerce published a notice in the Federal Register of its final determinations of sales at LTFV with respect to imports from China and Turkey.⁹ Table 1.5 presents Commerce’s dumping margins with respect to imports of brake drums from China and table 1.6 presents Commerce’s dumping margins with respect to imports of brake drums from Turkey.

⁹ 90 FR 26011 (China) and 25999 (Turkey), June 18, 2025.

Table 1.5 Brake drums: Commerce’s final weighted-average LTFV margins with respect to imports from China

| Exporter | Producer | Final dumping margin (percent) |
|--|--|--------------------------------|
| Shandong ConMet Mechanical Co., Ltd. | Shandong ConMet Mechanical Co., Ltd. | 77.14 |
| Liaoning Hechuang CV Parts MFG Co. | Liaoning Hechuang CV Parts MFG Co. | 77.14 |
| Hebei OE Auto Spare Parts Co., Ltd. | Ningbo Qingchen International Trade Co., Ltd. | 77.14 |
| Longyao County Yiheng Auto Parts Co., Ltd. | Qingdao Jasmine International Trade Co., Ltd. | 77.14 |
| Shandong Lingang Nonferrous Metals Co., Ltd. | Qingdao Tordon Brake Co., Ltd. | 77.14 |
| Qiqihar Beimo Auto Parts Manufacturing Co., Ltd. | Qiqihar Beimo Auto Parts Manufacturing Co., Ltd. | 77.14 |
| Shandong Lingang Nonferrous Metals Co., Ltd. | Shandong Haoxin Co., Ltd. | 77.14 |
| Shandong Hongma Engineering Machinery Co., Ltd. | Shandong Hongma Engineering Machinery Co., Ltd. | 77.14 |
| Longyao Gucheng Automobile Parts Factory | Shandong North Autotech Co., Ltd. | 77.14 |
| Shandong Longji Machinery Co, Ltd. | Shanghai Winsun Auto Parts Co., Ltd. | 77.14 |
| China-wide entity | | 160.79 |

Source: 90 FR 26011, June 18, 2025.

Table 1.6 Brake drums: Commerce’s final weighted-average LTFV margins with respect to imports from Turkey

| Producer/exporter | Final dumping margin (percent) |
|---------------------------------------|--------------------------------|
| EKU Fren ve Dok. San. A.S. | 15.22 |
| Akkus Dokum San. Ve Tic. Ltd. Sti. | 149.29 |
| Buyuk Eker Bijon Sanayi Ve Ticaret | 149.29 |
| Genk Otomotiv San. Dis Tic. Ltd. Sti. | 149.29 |
| All others | 15.22 |

Source: 90 FR 25999, June 18, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:¹⁰

. . . certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

*Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of this investigation if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. Specifically excluded is merchandise covered by the scope of the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China. See *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Antidumping Duty Order*, 86 FR 36093 (July 8, 2021) and *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 FR 24844 (May 10, 2021).*

The scope also excludes composite brake drums that contain more than 38 percent steel by weight.

¹⁰ 90 FR 25999 (Turkey AD), 26002 (China CVD), 26008 (Turkey CVD), and 26011 (China AD), June 18, 2025. The percentage limitation of the scope exclusion was modified following Commerce's preliminary countervailing duty determinations from "more than 40 percent steel by weight" to "more than 38 percent steel by weight." Antidumping Duty Investigations and Countervailing Duty Investigations of Certain Brake Drums from the People's Republic of China and the Republic of Türkiye: Preliminary Scope Decision Memorandum, January 23, 2025, p. 9.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are imported under statistical reporting number 8708.30.5020 in the Harmonized Tariff Schedule of the United States (“HTS”).¹¹ The 2024 general rate of duty is 2.5 percent ad valorem for HTS subheading 8708.30.50. 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, brake drums produced in China and imported under HTS subheading 8708.30.50 were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. The additional duty rate increased to 25 percent on May 10, 2019.¹²

Effective February 4, 2025, brake drums originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.¹³

Effective April 5, 2025, brake drums originating in Turkey are subject to an additional 10 percent ad valorem reciprocal duty under IEEPA.¹⁴

Effective April 5, 2025, brake drums originating in China were subject to an additional 10 percent ad valorem reciprocal duty under IEEPA. That reciprocal duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025.¹⁵

¹¹ Secondary statistical reporting numbers under which subject merchandise may be imported include 8708.30.5090 and 8716.90.5060.

¹² 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e) to 20(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5464, September 2023, pp. 99.3.26 to 99.3.51, 99.3.293. 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).

¹³ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.3 to 99.3.4, 99.3.297 to 99.3.298.

¹⁴ 90 FR 15041, April 7, 2025. See also HTS heading 9903.01.25 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.1 to 99.3.10, 99.3.278.

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

However, effective May 14, 2025, the duty rate for reciprocal tariffs on brake drums originating in China was reduced to 10 percent (see table 1.7).¹⁶

Table 1.7 Brake drums: Additional tariff treatment for China and Turkey

Tariffs in percent ad valorem; NA = Not applicable

| Additional tariff | China | Turkey |
|--|-------|--------|
| Section 301 | 25 | NA |
| IEEPA (fentanyl) – effective March 4, 2025 | 20 | NA |
| IEEPA (reciprocal) – effective April 5, 2025 for Turkey and May 14, 2025 for China | 10 | 10 |
| Total additional ad valorem rate | 55 | 10 |

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

Note: Duty rates in the table reflect the duty rates as of the writing of this report. See the text above for historical changes to the additional tariffs.

Subject brake drums originating in China and Turkey are not subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.¹⁷

¹⁶ The reciprocal duty is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.1 to 99.3.10, 99.3.278.

¹⁷ While subject brake drums are exempt from these 232 tariffs, brake drums for passenger vehicles and light trucks are not. 90 FR 14705, April 3, 2025. See also HTS headings 9903.94.05 and 9903.94.06 and U.S. note 33 to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 6, Publication 5590, February 2025, pp. 99.3.284 to 99.3.285, 99.3.348 to 99.3.349.

The product

Description and applications¹⁸

Brake drums are made of gray cast iron with a diameter of 14.75 to 16.6 inches, weighing greater than 50 pounds (figure 1.1). They are cylindrical, with one end open, and the other end narrowed with a ring of bolt holes machined into them. Brake drums are part of the braking system for motor vehicles. In-scope brake drums are used primarily on heavy-duty trucks and trailers. As part of the drum-hub assembly, a brake drum rotates along with the wheel and axle. When brakes are applied, a brake shoe is forced against the brake drum causing friction that slows the vehicle. Larger brake drums provide more stopping power.

Figure 1.1 Webb brake drum



Source: Petitions, exh. 1.2.

¹⁸ Unless otherwise noted, this information is based on Brake Drums from China and Turkey, Inv. Nos. 701-TA-729-730 and 731-TA-1698—1699 (Preliminary), USITC Publication 5532, August 2024 (“preliminary publication”), pp. 1.7 to 1.10.

Brake drums are sold directly or combined with a disc hub to form a drum-hub assembly (figure 1.2). Brake drums are purchased as production parts installed by truck and trailer original equipment manufacturers (“OEMs”) on new trucks and trailers. They are also purchased in the aftermarket by dealers, end users, and independent warehouse distributors to replace worn brake drums.

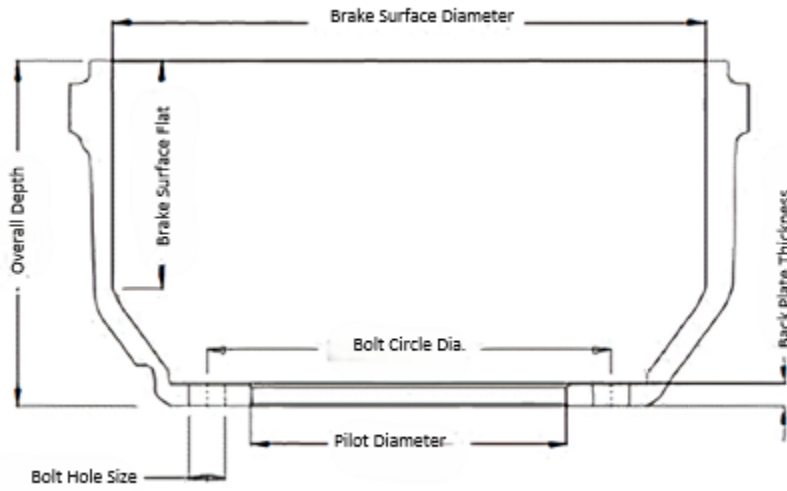
Figure 1.2 Brake drum and disc hub form a drum-hub assembly



Source: Petitions, exh. 1.3, p. 3.

The petitioner claims that OEM and aftermarket brake drums are interchangeable, and that some brake drums sold to OEMs are also sold in the aftermarket.¹⁹ Respondent ConMet reports that trailer OEMs tend to purchase drum-hub assemblies, while truck OEMs, truck aftermarket, and trailer aftermarket tend to purchase brake drums only. The petitioner states that all subject brake drums are made to the same specifications, including brake surface diameter, bolt hole size, pilot diameter, and flange thickness (figure 1.3).

Figure 1.3 Brake drum diagram



Source: Petitions, exh. 1.2, p. 1 (modified to enhance clarity of labels).

The petitioner sells brake drums in the OEM and aftermarket. The petitioner reports that it produces most of its OEM brake drums at dedicated plants because OEM brake drums make up relatively few part numbers and aftermarket brake drums have a wider range of part numbers. Thus, it is more efficient to mass produce OEM brake drums at some plants, and have other plants specialize in producing a wider range of part numbers. Respondent ConMet states that historically it has primarily sold to the truck OEM market and OEM replacement parts sold through dealerships. Respondent ConMet also sells to independent aftermarket distributors, which may sell replacement brake drums for trucks or trailers. In addition, respondent ConMet sells to the trailer OEM market; those items are nearly all drum-hub assemblies. Respondent ECU reports that it only sells brake drums to the aftermarket.

¹⁹ Petitions, p. 1.12.

Petitioner reports that all subject brake drums sold in the United States are interchangeable, conforming to the same manufacturing standards and meeting the same industry standards. To show the perceived interchangeability of brake drums in the market, the petitioner included screenshots of Chinese and Turkish producers' websites cross-referencing their brake drums with petitioner's part numbers. Respondent DuraParts LLC d.b.a. DuraBrake ("DuraBrake") states that subject brake drums have only limited interchangeability and that different brake sizes, positions, hubs, and wheels can limit interchangeability. Brake drums must pass Federal Motor Vehicle Safety Standard 121 ("FMVSS 121") in order to be sold to OEMs but not to the aftermarket. Respondent EKU argues that the OEM market is distinct from the aftermarket, with higher fixed costs, longer term contracts, and certification requirements. Respondent EKU also claims that prices in the aftermarket adjust more slowly to changes in input prices, because aftermarket prices are not indexed to pig iron prices.²⁰

As part of the engineering and design process for the brake systems of newly manufactured trucks and trailers, air disc brakes may be considered as an alternative to brake drums.²¹ Air disc brakes are part of a differently designed brake system than the brake system that uses brake drums (figure 1.4) and, once the brake system is selected for a truck or trailer, it will be the brake system for the life of the truck or trailer.²² In an air disc braking system, a caliper applies friction to a disc rotor to stop the wheel. Respondents report that this system is much safer and requires less frequent replacement of rotors compared to drums.²³ There are several U.S. suppliers of air disc brakes for heavy trucks including the petitioner.²⁴

²⁰ See Part 5 for more information on pig iron prices.

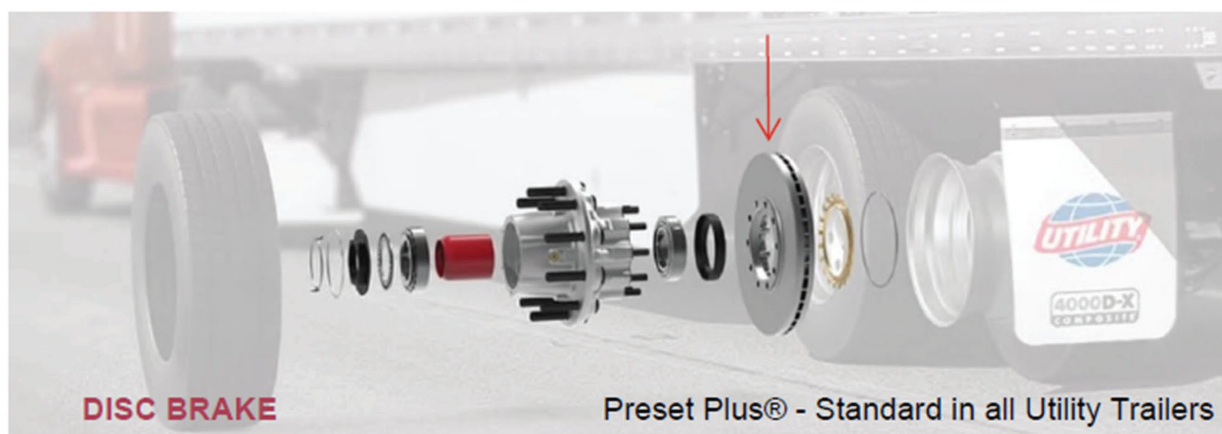
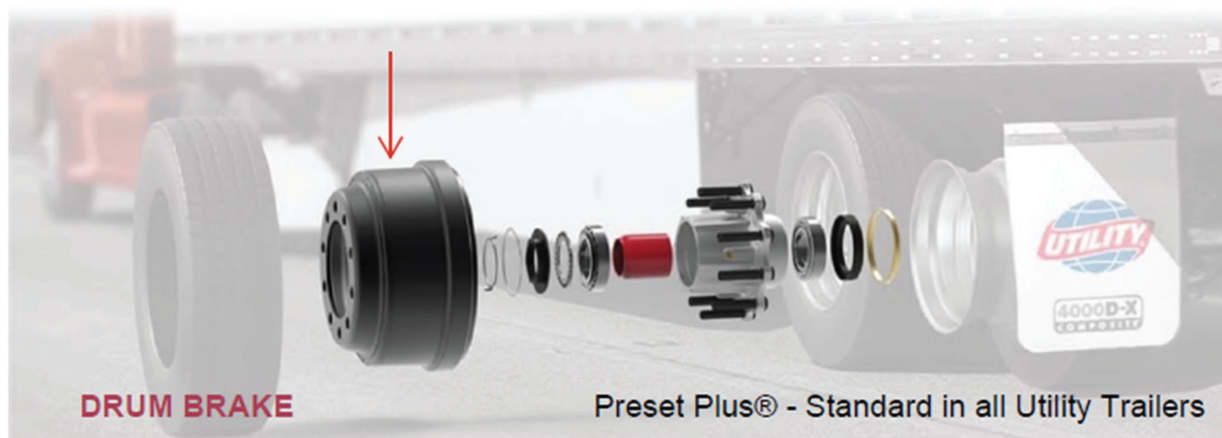
²¹ See Part 2 for more information on substitute products.

²² Hearing transcript, pp. 13 to 14, 109 to 110 (Marr). The life of a truck is typically 10 years, or about a million miles, whereas the life span of a trailer is estimated to be from 15 to 20 years. Hearing transcript, pp. 121 (Bennett), 192 (Rieger).

²³ Hearing transcript, p. 178 (Hurley). Respondents testified that for trucks and trailers, the lifespan of a brake drum ranges from 18 to 24 months and the lifespan of an air disc brake ranges from three to six years, depending on the duty cycle of the truck or trailer. Hearing transcript, p. 192 (Rieger).

²⁴ Producers of air disc brakes for heavy trucks in the United States include Bendix, Meritor, WABCO, and Webb Wheel. TPS Staff, "Bendix expanding air disc brake production capacity," March 20, 2024; Meritor, "Meritor South Carolina Facility Produces Its One Millionth Air Disc Brake," April 29, 2021; Willis, "WABCO opens new South Carolina facility," March 29, 2017; Webb Wheel, "Webb Wheel Facilities," accessed June 18, 2025.

Figure 1.4 Brake system diagrams for brake drums and air disc brakes



Source: Hearing transcript, p. 110 (Marr), slide 1.

The majority of heavy-duty trucks in the United States currently use drum brakes, but new trucks and trailers increasingly use air disc brakes.²⁵ Respondents report that air disc brakes installation in heavy trucks and trailers increased significantly when FMVSS 121, the safety standard for heavy truck braking systems, was updated in 2009 with requirements for greater stopping power.²⁶ Respondents report that meeting this standard was easier with air disc brakes. Petitioners report that 50 to 60 percent of new class 8 trucks have air disc brakes,

²⁵ Hearing transcript, pp. 13, 181 to 182 (Bennett).

²⁶ Hearing transcript, pp. 108 to 109 (Marr); 49 CFR Part 571 (July 27, 2009).

while respondents report 65 percent.²⁷ Installation rates of air disc brakes on new trailers are much lower at 10 to 20 percent.²⁸ Respondents also reported that the availability of air disc brakes was limited due to a caliper shortage.²⁹ However, once that shortage eased, one trailer manufacturer reported that air disc brake installation on new trailers increased significantly.³⁰

Manufacturing processes³¹

The brake drum manufacturing process is a multi-step process that takes cast iron and makes it into an integral part of a braking system.

Casting

First, the brake drum is cast. ***. Molten iron is poured into a mold and then cooled to form the brake drum casting. Brake drum castings may be cast by the brake drum manufacturer or purchased from a third party. During 2022 to 2024, domestic brake drum manufacturer Gunite³² and respondents ConMet and ECU produced castings at their own foundries, whereas petitioner Webb purchased castings from a third party, Waupaca Foundry, which is *** supplier of castings to the petitioner. Castings are stored on-site at the brake drum manufacturing facility (figure 1.5).

²⁷ Hearing transcript, pp. 74 (Capps), 181 to 182 (Bennett). ***. ConMet’s prehearing brief, pp. 8 to 9. Class 8 trucks have a Gross Vehicle Weight Rating (“GVWR”) of over 33,001 pounds and represented 83 percent of heavy truck sales in the United States from 2022 to 2024. Wards Intelligence, “U.S. Truck Sales by GVWR, December 2024,” January 14, 2025; Wards Intelligence, “U.S. Truck Sales by GVWR, December 2023,” January 11, 2024; Wards Intelligence, “U.S. Truck Sales by GVWR, December 2022,” January 13, 2023.

²⁸ Petitioner reports 10 to 20 percent and respondents report 15 to 20 percent. Hearing transcript, pp. 74 (Capps), 181 to 182 (Bennett). Petitioner states that air disc brakes currently account for “virtually zero” in the aftermarket for trucks and trailers. Webb’s prehearing brief, p. 46.

²⁹ Hearing transcript, pp. 178 (Hurley), 179 (Bennett).

³⁰ U.S. purchaser Utility Trailer testified that its use of air disc brakes in new trailer manufacturing increased back to 40 percent of its total trailer installations after the caliper shortage eased. Hearing transcript, p. 179 (Bennett).

³¹ Unless otherwise noted, this information is based on preliminary publication, pp. 1.10 to 1.15.

³² Gunite’s parent company, Accuride, filed for Chapter 11 bankruptcy in October 2024 and brake drum production subsequently ceased at the Gunite facility. For further information, see part 3 of this report.

Figure 1.5 Stacks of rough brake drum castings



Source: Petitions, exh. 1.3, p. 1. For clearer picture, see app. D, figure D.1.

De-palletizing

Rough castings are then loaded into a de-palletizer machine that removes the castings from their pallets and places brake drums on different input lines, matching the brake drum stock keeping unit (“SKU”) number to the machine number (figure 1.6).

Figure 1.6 De-palletizer



Source: Petitions, exh. 1.3, p. 1. For clearer picture, see app. D, figure D.2.

Painting

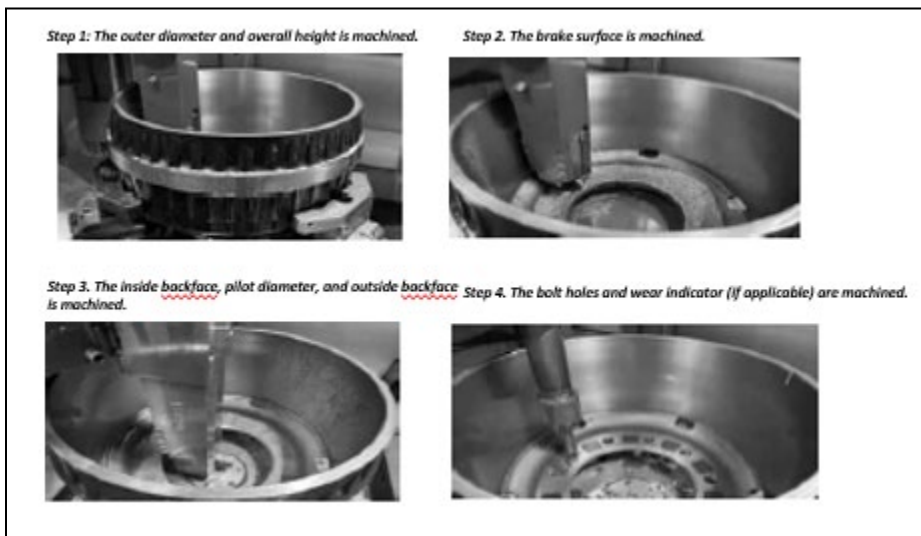
The brake drums are then guided to an automated paint booth for the painting of the exterior of the drum. Once painting is completed, the brake drums are conveyed to the machining center. Unlike other domestic and foreign manufacturers that paint the brake drum before machining, respondent ConMet (a brake drum manufacturer in China) paints its brake drums after machining because it machines the exterior of the brake drum in addition to the other areas described below.

Machining

Machining is a manufacturing process that creates the desired shape by removing unwanted material from a larger piece of material. In the machining center for brake drums, a computer numerical control (“CNC”) machine removes excess metal from the casting using fixturing specific to the casting’s SKU. CNC machines carry out pre-programmed sequences of commands from computer software, giving the machine precise measurements for production. Operators machine an initial batch and verify key control characteristics (“KCC”) for that batch before beginning full production. Once the KCCs are verified in the initial batch, the operator machines the rest of the brake drums. The brake drums are machined in four areas (each a separate stage in the machining process) (figure 1.7):

1. The outer diameter and overall height of the brake drum;
2. The brake surface;
3. The inside backface, pilot diameter, and outside backface; and
4. The bolt holes and wear indicator.

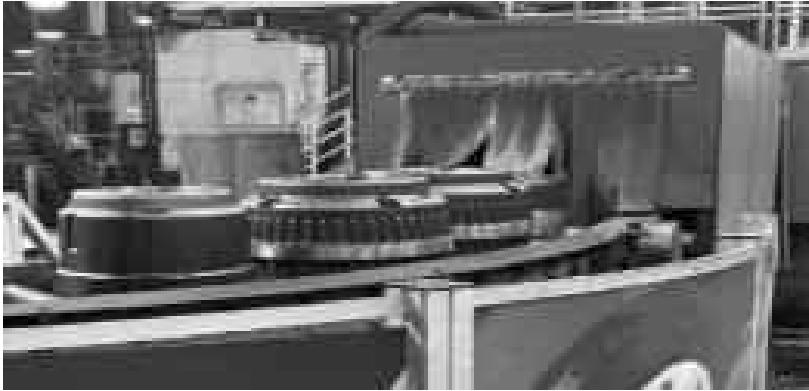
Figure 1.7 The machining process



Source: Petitions, exh. 1.3, pp. 1 to 2. For clearer picture, see app. D, figure D.3 through figure D.6.

Once all these areas have been machined, the CNC machines measure and verify KCC dimensions. Respondent ConMet machines the exterior of the brake drum as part of its patented TruTurn process in addition to the machining described above. After machining, the brake drums are treated with a rust preventative coating and passed through an air dryer (figure 1.8).

Figure 1.8 Parts dryer



Source: Petitions, exh. 1.3, p. 2. For clearer picture, see app. D, figure D.7.

Inspection

Brake drums are visually inspected by a certified inspector for material defects. Depending on the result of the inspection, the brake drum continues to the balancer, pen stamper for date stamping and labeling, rework, or scrap.

Balancing

Next is a three-step operation to ensure that brake drums are balanced according to industry specifications. Parts are fed into a weigh station that measures the imbalance of the brake drum. Then, the part is transferred to a milling station where material is removed from the outer diameter to balance the drum. Finally, the brake drum is transferred to an audit station to again measure the drum to ensure it is within industry standards. Respondent ConMet reports that because of the exterior machining with TruTurn technology, its brake drums are already balanced prior to inspection, and this balancing step is not a part of its manufacturing process.

Date stamping and labeling

Last, the brake drum receives a date stamp for serialization and traceability. The date stamp may indicate plant location, machining day and shift, machining cell location, and machining operator. The brake drum may also have a scannable barcode applied to the inner machined surface allowing producers to organize drums by specifications. It then receives the appropriate product label and is stored for sale. Separately, a brake drum may be fastened to a disc hub using several nuts to form a drum-hub assembly.

Domestic like product issues

No issues with respect to the domestic like product have been raised by parties in these investigations. The petitioner proposes that the Commission should define a single domestic like product consisting of the brake drums that are coextensive with Commerce's scope.³³ Respondents did not indicate their position with respect to the domestic like product in the preliminary or final phases of these investigations.³⁴ In its determinations in the preliminary phase of these investigations, the Commission defined a single domestic like product, coextensive with the scope.³⁵ In the final phase of these investigations, no parties requested data or other information necessary for the analysis of the domestic like product.

³³ Petitions, p. 1.10; Webb's postconference brief, pp. 2 to 11; Webb's prehearing brief, pp. 3 to 6.

³⁴ ConMet's postconference brief and prehearing brief; DuraBrake's postconference brief and prehearing brief; EKU's postconference brief.

³⁵ Preliminary publication, p. 11.

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

U.S. market characteristics

Brake drums are mainly used on heavy-duty trucks and trailers and are sold to original equipment manufacturers (“OEMs”) and aftermarket (“AFM”) parts distributors. Aftermarket suppliers purchase subject brake drums to supply replacement drums to dealers, end users, or independent warehouse distributors.¹ *** U.S. producers and 15 of 38 responding importers indicated that the brake drums market was subject to distinctive conditions of competition. U.S. producer ***. Conditions mentioned by importers include: brake drums rapidly being replaced by air disc brakes in the OEM market; competition is based on price and availability; price is sensitive to inventories; pass-through requirements; tariffs reducing foreign competition; the one U.S. foundry partnering exclusively with Webb and driving others out of business; higher demand in spring to early fall; and U.S. producers cannot supply all of U.S. brake drum needs.

Overall, apparent U.S. consumption in 2024 was *** percent lower than in 2022.

U.S. purchasers

The Commission received 26 usable questionnaire responses from firms that had purchased brake drums during January 2022 to December 2024.^{2 3 4} Fourteen responding purchasers are independent aftermarket distributors, nine are OEM aftermarket, six are truck

¹ Petitions, p. 1.7.

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

³ Of the 26 responding purchasers, 20 purchased the domestic brake drums, 20 purchased imports of the subject merchandise from China, 13 purchased imports from Turkey, 7 purchased imports of brake drums from other sources, and 5 purchased from unknown sources.

⁴ Twenty-one purchasers indicated they had marketing/pricing knowledge of domestic product, 20 of Chinese product, 15 of Turkish product, and 9 of product from nonsubject countries.

OEMs, three are trailer OEMs, and one reported that it was “other.”⁵ In general, responding U.S. purchasers were located across the contiguous United States. The responding purchasers primarily represented firms in the truck parts and repair industries. Large purchasers of brake drums include ***.

Impact of section 301 tariffs

U.S. producers, importers, and purchasers were asked whether tariffs on Chinese-origin products under section 301, or changes in those tariffs, had an impact on the brake drums market in the United States, including any effects on brake drums cost, price, supply, and/or demand, since January 1, 2022. Responses to this question are presented in table 2.1. U.S. producers reported that the section 301 tariffs ***, and most importers and purchasers (that reported having knowledge of the issue) reported that the section 301 tariffs did have an impact.

Table 2.1 Brake drums: Count of firms' responses regarding the impact of the 301 tariffs on Chinese origin products

Count in number of firms reporting

| Firm type | Yes | No | Don't know |
|----------------|-----|-----|------------|
| U.S. producers | *** | *** | *** |
| Importers | 21 | 3 | 16 |
| Purchasers | 11 | 2 | 12 |

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

Channels of distribution

U.S. producers and importers sold mainly to the aftermarket, as shown in table 2.2. The Commission’s questionnaire requested quantity and value data on U.S. producers’ and U.S. importers’ U.S. shipments during calendar years 2022 to 2024 by the following channels of distribution: (a) truck OEM, (b) trailer OEM, (c) OEM aftermarket, and (d) independent aftermarket.⁶ Detailed channels of distribution data are presented in appendix E.

⁵ Purchaser *** reported that it was consumer only, and that it was not OEM affiliated or an aftermarket supplier.

⁶ The Commission’s questionnaire defined “truck OEM” and “trailer OEM” as original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on new trucks and new trailers, respectively. It defined “OEM aftermarket” as original equipment manufacturers that purchase brake drums as replacement parts to be installed on vehicles (trucks or trailers) and it defined “independent aftermarket” as aftermarket suppliers that are unaffiliated with original equipment manufacturers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

Table 2.2 Brake drums: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

| Source | Channel | 2022 | 2023 | 2024 |
|--------------------|-------------|------|------|------|
| United States | OEM | *** | *** | *** |
| United States | Aftermarket | *** | *** | *** |
| China | OEM | *** | *** | *** |
| China | Aftermarket | *** | *** | *** |
| Turkey | OEM | *** | *** | *** |
| Turkey | Aftermarket | *** | *** | *** |
| Subject sources | OEM | *** | *** | *** |
| Subject sources | Aftermarket | *** | *** | *** |
| Nonsubject sources | OEM | *** | *** | *** |
| Nonsubject sources | Aftermarket | *** | *** | *** |
| All import sources | OEM | *** | *** | *** |
| All import sources | Aftermarket | *** | *** | *** |

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

Note: The data presented for the OEM channel are comprised of reported U.S. shipments to truck and trailer OEMs, whereas the data presented for the aftermarket channel are comprised of U.S. shipments to the OEM aftermarket and the independent aftermarket.

Geographic distribution

U.S. producers and importers reported selling brake drums to all regions of the United States (table 2.3). For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table 2.3 Brake drums: Count of U.S. producers' and U.S. importers' geographic markets

Count in number of firms reporting

| Region | U.S. producers | China | Turkey | Subject sources |
|----------------------------|----------------|-------|--------|-----------------|
| Northeast | *** | 19 | 14 | 24 |
| Midwest | *** | 23 | 15 | 29 |
| Southeast | *** | 24 | 14 | 30 |
| Central Southwest | *** | 20 | 14 | 26 |
| Mountain | *** | 17 | 9 | 20 |
| Pacific Coast | *** | 20 | 11 | 24 |
| Other | *** | 10 | 5 | 11 |
| All regions (except Other) | *** | 16 | 9 | 19 |
| Reporting firms | 2 | 30 | 19 | 37 |

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

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

Supply and demand considerations

U.S. supply

Table 2.4 provides a summary of the supply factors regarding brake drums from U.S. producers and from foreign producers in the subject countries. U.S. producers' reported production capacity was more than *** that of responding subject foreign producers' reported capacity in 2024.

Table 2.4 Brake drums: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in units; ratio and share in percent

| Factor | Measure | United States | China | Turkey | Subject suppliers |
|---|----------|---------------|-------|--------|-------------------|
| Capacity 2022 | Quantity | *** | *** | *** | 3,318,786 |
| Capacity 2024 | Quantity | *** | *** | *** | 3,077,213 |
| Capacity utilization 2022 | Ratio | *** | *** | *** | 83.1 |
| Capacity utilization 2024 | Ratio | *** | *** | *** | 81.8 |
| Inventories to total shipments 2022 | Ratio | *** | *** | *** | 4.3 |
| Inventories to total shipments 2024 | Ratio | *** | *** | *** | 3.0 |
| Home market shipments 2024 | Share | *** | *** | *** | *** |
| Non-US export market shipments 2024 | Share | *** | *** | *** | *** |
| Ability to shift production (firms reporting "yes") | Count | *** | *** | *** | *** |

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

Note: Responding U.S. producers accounted for all known U.S. production of brake drums in 2024. Responding foreign producer/exporter firms accounted for *** of U.S. imports of brake drums from China and *** of imports from Turkey during 2024. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 7.

Domestic production

Based on available information, U.S. producers of brake drums have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced brake drums to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating responsiveness of supply include limited inventories, limited ability to shift shipments from alternate markets, and limited ability to shift production to or from alternate products.

Practical capacity increased by *** percent while production decreased by *** percent, leading to a capacity utilization decrease of *** percentage points between 2022 and 2024. Major export markets include ***. Other products that producers reportedly can produce on the same equipment as brake drums are ***. Factors affecting U.S. producers' ability to shift production include *** since these are niche products that account for less than *** percent of business.

Subject imports from China

Based on available information, ConMet, the responding producer of brake drums from China, has the ability to respond to changes in demand with large changes in the quantity of shipments of brake drums to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, the ability to shift shipments from alternate markets, and ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited inventories.

ConMet's practical capacity decreased by *** percent, while production decreased by *** percent, leading to a capacity utilization decrease of *** percentage points. Other major export markets include ***. Other products that responding foreign producers reportedly can produce on the same equipment as brake drums are ***. Factors affecting the foreign producer's ability to shift production include ***.

Subject imports from Turkey

Based on available information, producers of brake drums from Turkey have the ability to respond to changes in demand with large changes in the quantity of shipments of brake drums to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, ability to shift shipments from alternate markets, and the ability to shift production to or from alternate products. A factor mitigating responsiveness of supply is limited inventories.

Practical capacity increased by *** percent and production increased by *** percent, leading to a *** percentage point increase in capacity utilization. Other major export markets include ***. Other products that responding foreign producers reportedly can produce on the same equipment as brake drums are ***. Factors affecting foreign producers' ability to shift production include the time and cost of changeovers.

Imports from nonsubject sources

Nonsubject imports accounted for 6.9 percent of total U.S. imports in 2024. The largest sources of nonsubject imports during January 2022 to December 2024 were India and Mexico. According to official statistics, these countries accounted for 84.9 percent of nonsubject imports in 2024, by value.

Supply constraints

*** U.S. producers reported that they had experienced supply constraints since January 1, 2022, while 21 of 40 importers reported that they had. Of those importers that reported they had experienced supply constraints, 17 reported the constraints occurred during 2022, 9 reported they occurred during 2023, 4 in 2024 before the petitions were filed, and 11 in 2024 after the petitions were filed (table 2.5).

U.S. producer Webb reported that ***. U.S. producer Gunite reported that ***.

U.S. importers reported supply constraints including: Accuride/Gunite's bankruptcy, these AD/CVD investigations, high ocean freight and container costs (especially in the first quarter through the third quarter of 2022), diminished pig iron supply resulting from the war in Ukraine, shipping issues due to the Baltimore bridge collapse and the Suez Canal obstruction, and the Waupaca Foundry's refusal to supply *** with the exception of U.S. military and Buy America orders. Importer *** reported having long periods without product to sell between August 2020 to December 2023.

Fourteen of 26 responding purchasers reported that they had experienced supply constraints, with 12 reporting supply constraints from domestic producers in 2022, 7 in 2023, 3 in 2024 before the petitions were filed, and 6 in 2024 after the petitions were filed. Two purchasers each reported supply constraints from foreign producers or importers in 2022, 2023, and 2024 before the petitions were filed, and one did in 2024 after the petitions were filed. Purchasers experienced the following constraints from domestic producer Webb in 2022: limited availability of service parts in April through December 2022, extending lead times to 6 months, allocated product, and serving notice in 2022 that it would not be able to supply existing or new requirements on their blanket purchase orders, nor would it accept any new purchase orders. Purchaser *** reported that Chinese suppliers have been holding production in 2023 and 2024, waiting for the results of the AD/CVD investigations. Purchasers also reported supply constraints with KIC (China) and ECU (Turkey) in 2022. One purchaser also reported that Waupaca Foundry refused to supply after March 31, 2022, with the exception of U.S. military and Buy America requirements.

Table 2.5 Brake drums: Count of firms’ responses regarding timing of supply constraints, by firm type and source

Count in number of firms reporting

| Firm type | Source | 2022 | 2023 | 2024 pre-petition | 2024 post-petition |
|----------------|----------|----------|---------|-------------------|--------------------|
| U.S. producers | Domestic | *** | *** | *** | *** |
| Importers | Imported | 17 of 36 | 9 of 28 | 4 of 23 | 11 of 30 |
| Purchasers | Domestic | 12 of 24 | 7 of 20 | 3 of 17 | 6 of 19 |
| Purchasers | Imported | 2 of 24 | 2 of 20 | 2 of 17 | 1 of 19 |

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

New suppliers

Three of 26 purchasers indicated that new suppliers entered the U.S. market since January 1, 2022. Purchasers cited Randon (Brazil), Silverback, and suppliers in India as new suppliers.

U.S. demand

Based on available information, the overall demand for brake drums is likely to experience moderate changes in response to changes in price. The main contributing factors are the inability to use substitute products in aftermarket applications (air disc brakes are not a substitute in aftermarket applications; however, air disc brakes may be installed when the

vehicle is initially designed) and the small cost share of brake drums in most of its end-use products.⁷

End uses and cost share

Overall U.S. demand for brake drums is driven by the demand for trucking in the United States. Demand for OEM brake drums is driven by heavy truck sales. As shown in table 2.6 (and figure 2.1), trucking tonnage experienced year-over-year decreases in every month except for January and February (increased between 2022 and 2023 and again between 2024 and 2025), March (increased between 2024 and 2025), and May and August (increased between 2023 and 2024). According to Respondent ConMet, while disc brakes typically have a longer useful life than drum brakes, it is not as long as the useful life of a truck or trailer and therefore replacement disc brakes are needed.⁸

Table 2.6 Brake drums: Truck tonnage index, seasonally adjusted, by month, January 2022 through March 2025

Index in percent, Jan 2022 = 100.0 percent

| Month | 2022 | 2023 | 2024 | 2025 |
|-----------|-------|-------|------|-------|
| January | 100.0 | 101.3 | 96.8 | 97.1 |
| February | 100.4 | 102.3 | 96.7 | 100.2 |
| March | 101.6 | 99.0 | 97.7 | 98.1 |
| April | 101.4 | 98.5 | 97.5 | — |
| May | 101.0 | 98.3 | 99.3 | — |
| June | 102.0 | 98.7 | 98.4 | — |
| July | 101.0 | 99.8 | 98.5 | — |
| August | 101.7 | 99.0 | 99.6 | — |
| September | 102.7 | 98.6 | 97.8 | — |
| October | 101.6 | 98.6 | 98.2 | — |
| November | 99.6 | 98.0 | 97.4 | — |
| December | 100.8 | 100.3 | 97.2 | — |

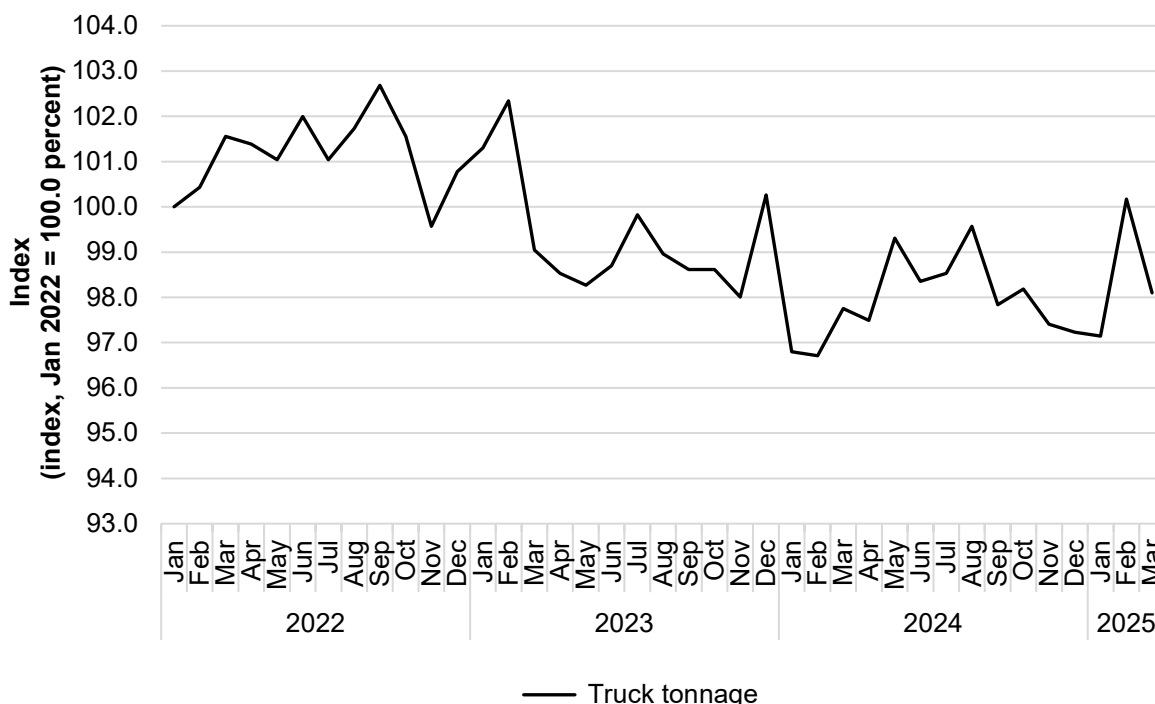
Source: <https://fred.stlouisfed.org/series/TRUCKD11>, retrieved June 20, 2025.

⁷ Hearing transcript, p. 13 (Begley).

⁸ ConMet’s posthearing brief, Answers to questions, p. 1.

Figure 2.1 Brake drums: Truck tonnage index, seasonally adjusted, by month, January 2022 through March 2025

Index in percent, Jan 2022 = 100.0 percent



Source: <https://fred.stlouisfed.org/series/TRUCKD11>, retrieved June 20, 2025.

Brake drums account for a varying share of the cost of the end-use products in which they are used. Reported cost shares for some end uses were as follows: trucks (1 percent), “fully dressed” truck axles with wheel ends (5 percent), trailer axles including hubs and drums (7 percent), brake systems with drums (15 percent), wheel end braking systems (30 percent), and OEM axles (30 percent).

Business cycles

Both U.S. producers, 21 of 39 importers, and 13 of 24 responding purchasers indicated that the market was subject to business cycles.⁹ *** reported that fluctuations in demand are linked to overall truck-related economic activity and *** reported that trailer builds initially increased after the COVID-19 pandemic but that driver shortages have led to decreased commercial fleets. It added that drum brake

⁹ Purchaser *** reported that the aftermarket was not subject to business cycles, and that the OEM vehicle commercial market is cyclical and impacts the demand for components.

replacement can be seasonal in the aftermarket, with higher sales normally occurring during springtime.

Importers cited seasonal business cycles, the broader business cycle and general economic trends, truck-related economic activity, and the number of miles associated with the trucking industry. Purchasers reported seasonal business cycles in the spring/summer and warmer weather months (with one purchaser reporting that there is a 20 to 30 percent jump in demand during warmer months), that brake drums are correlated to freight activity, that they follow the heavy duty and medium duty truck production cycles, and truck tonnage. Purchaser *** cited consumer retail demand driven by engine emissions cycles, presidential elections, and general economic impacts.

Demand trends

Most firms reported no change in U.S. demand for brake drums since January 1, 2022 (table 2.7). U.S. producer *** reported that overall domestic demand had ***, while *** reported that it *** since January 1, 2022. A plurality of responding importers (8 of 26) reported that demand had not changed, while 7 of 26 reported that it had fluctuated down. Similarly for U.S. purchasers, a plurality reported that demand had not changed (6 of 19 responding), while 5 of 19 responding purchasers reported that it fluctuated down. U.S. producer *** reported that OEM truck, aftermarket OEM, and aftermarket independent domestic demand had ***, while *** reported that they *** since January 1, 2022. *** U.S. producers reported that OEM trailer domestic demand had ***. Pluralities of importers reported that OEM truck, OEM trailer, aftermarket OEM, and aftermarket independent demand had not changed. Purchasers' responses varied, with the exception of aftermarket independent domestic demand and aftermarket OEM. For aftermarket independent domestic demand, a plurality of purchasers (6 of 17 responding) reported that it had fluctuated down, and 5 of 17 responding purchasers reported that it had not changed. For aftermarket OEM domestic demand, a plurality (5 of 14 responding) responding purchasers reported that it had not changed, while 4 of 14 responding reported that it had fluctuated down (table 2.8).

Table 2.7 Brake drums: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Count in number of firms reporting

| Market | Firm type | Steadily Increase | Fluctuate Up | No change | Fluctuate Down | Steadily Decrease |
|-----------------------------|----------------|-------------------|--------------|-----------|----------------|-------------------|
| Domestic demand | U.S. producers | *** | *** | *** | *** | *** |
| Domestic demand | Importers | 3 | 4 | 8 | 7 | 4 |
| Domestic demand | Purchasers | 4 | 2 | 6 | 5 | 3 |
| Foreign demand | U.S. producers | *** | *** | *** | *** | *** |
| Foreign demand | Importers | 1 | 0 | 10 | 3 | 1 |
| Foreign demand | Purchasers | 0 | 1 | 3 | 2 | 0 |
| Demand for end use products | Purchasers | 1 | 1 | 2 | 1 | 3 |

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

Table 2.8 Brake drums: Count of firms' responses regarding domestic and foreign demand, by channel and firm type

Count in number of firms reporting

| Market | Firm type | Steadily Increase | Fluctuate Up | No change | Fluctuate Down | Steadily Decrease |
|--|----------------|-------------------|--------------|-----------|----------------|-------------------|
| Domestic demand: OEM truck | U.S. producers | *** | *** | *** | *** | *** |
| Domestic demand: OEM truck | Importers | 2 | 0 | 7 | 3 | 4 |
| Domestic demand: OEM truck | Purchasers | 2 | 2 | 3 | 3 | 3 |
| Domestic demand: OEM trailer | U.S. producers | *** | *** | *** | *** | *** |
| Domestic demand: OEM trailer | Importers | 0 | 0 | 9 | 2 | 2 |
| Domestic demand: OEM trailer | Purchasers | 0 | 3 | 2 | 4 | 2 |
| Domestic demand: Aftermarket OEM | U.S. producers | *** | *** | *** | *** | *** |
| Domestic demand: Aftermarket OEM | Importers | 1 | 0 | 9 | 5 | 4 |
| Domestic demand: Aftermarket OEM | Purchasers | 2 | 1 | 5 | 4 | 2 |
| Domestic demand: Aftermarket independent | U.S. producers | *** | *** | *** | *** | *** |
| Domestic demand: Aftermarket independent | Importers | 2 | 5 | 9 | 7 | 3 |
| Domestic demand: Aftermarket independent | Purchasers | 3 | 2 | 5 | 6 | 1 |

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

Substitute products

Substitutes for brake drums are limited. Half of U.S. producers and most responding importers (33 of 38) and purchasers (19 of 24 responding) reported that there were no substitutes. Of firms that reported that there were substitutes, firms generally identified air disc brake systems as a substitute for brake drums, but reported that they are generally a higher cost, and have engineering advantages in certain applications. Firms also reported that air disc brakes are not interchangeable with brake drums in aftermarket use.

Air disc brakes use in new trucks and trailers is reported to have increased. Approximately 40 percent of new truck builds, but a smaller share of new trailers, have air disc brakes, and an industry representative for ConMet stated that approximately one million air disc brakes are sold per year.¹⁰ This representative also stated that there has been an increased adoption of disc brakes on trailers, especially for certain applications, particularly refrigerated trailers and tankers.¹¹ Similarly, a representative for purchaser Utility Trailers stated that Prime, the largest refrigerated carrier in the United States, and grocery retailer Kroger exclusively use disc brakes on their current fleets.¹²

Purchaser *** cited brake drums with a greater than 40 percent steel content by weight as a substitute, and reported that these brake drums produced in China are a lighter weight than in-scope cast brake drums and are significantly lower in price than all in-scope cast and composite brake drums.

¹⁰ Conference transcript, p. 73 (Begley) and hearing transcript, p. 199 (Rieger).

¹¹ Hearing transcript, p. 111 (Marr).

¹² Hearing transcript, p. 194 (Bennett).

Substitutability issues

This section assesses the degree to which U.S.-produced brake drums and imports of brake drums from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of brake drums from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate degree of substitutability between domestically produced brake drums and brake drums imported from subject sources.¹³ Factors contributing to this level of substitutability include lead times for brake drums from inventory, little preference for particular country of origin, similarities between domestically produced brake drums and brake drums imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Factors mitigating substitutability include some preferences for particular producers, several purchase factors other than price, and purchasers' perceptions of availability between domestically produced brake drums and those from subject sources.

¹³ The degree of substitution between domestic and imported brake drums depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced brake drums to the brake drums imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table 2.9, a plurality of purchasers usually make purchasing decisions based on the producer, and a plurality of purchasers sometimes make purchasing decisions based on the country of origin.¹⁴ A plurality of purchasers' customers sometimes make decisions based on the producer, while most of their customers sometimes make purchasing decisions based on the country of origin. Of the 11 purchasers that reported that they usually make decisions based on the manufacturer, purchaser *** reported that USMCA impacts are a driver, *** reported that while country of origin is a consideration, it is not the main driver and that all decisions are based on quality, price, and availability; and purchaser *** reported that it will not use suppliers from India or Mexico unless the new supplier is verified.

Table 2.9 Brake drums: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Count in number of firms reporting

| Firm making decision | Decision based on | Always | Usually | Sometimes | Never |
|----------------------|-------------------|--------|---------|-----------|-------|
| Purchaser | Producer | 5 | 11 | 6 | 5 |
| Customer | Producer | 1 | 8 | 11 | 3 |
| Purchaser | Country | 1 | 7 | 10 | 8 |
| Customer | Country | 0 | 2 | 16 | 6 |

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

Importance of purchasing domestic product

Twenty-three of 24 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Three reported that domestic product was required by law (and reported that it was for 2 percent of its purchases (***), 30 percent (***), and 60 percent (***). Nine reported it was required by their customers (for 2 to 80 percent of their purchases), and five reported other preferences for domestic product. Reasons cited for preferring domestic product included: brand preference, customer preference, and government agency bid requirements.

¹⁴ ***.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for brake drums were price/cost/value (26 firms), quality (19 firms), and availability/supply (11 firms) as shown in table 2.10. Quality was the most frequently cited first-most important factor (cited by 12 firms), followed by price/cost/value (6 firms); price/cost/value was the most frequently reported second-most important factor and third-most important factor (9 and 10 firms respectively).

Table 2.10 Brake drums: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Count in number of firms reporting

| Factor | First | Second | Third | Total |
|---------------------|-------|--------|-------|-------|
| Price/cost/value | 6 | 9 | 10 | 25 |
| Quality | 12 | 7 | 0 | 19 |
| Availability/supply | 4 | 3 | 4 | 11 |
| Contracts | 1 | 0 | 2 | 3 |
| Delivery/logistics | 0 | 3 | 2 | 5 |
| All other factors | 3 | 3 | 7 | 13 |

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

Note: Other factors include country that made the drum, parts consignment, national parts vendor, product offering/portfolio, product liability insurance, production capacity, provider to OEM partners, stock levels, and warranty coverage.

The majority of purchasers (17 of 26) reported that they only sometimes purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 22 factors in their purchasing decisions (table 2.11). The factors rated as very important by more than half of responding purchasers were availability (25 purchasers), product consistency, quality meets industry standards, and reliability of supply (24 each), delivery time (23), price (19), delivery terms (19), and technical support/service (16).

Table 2.11 Brake drums: Count of purchasers' responses regarding importance of purchase factors, by factor

Count in number of firms reporting

| Factor | Very important | Somewhat important | Not important |
|---|----------------|--------------------|---------------|
| Availability | 25 | 1 | 0 |
| Availability of balance cut(s) | 14 | 6 | 6 |
| Availability of hub-drum assembly | 7 | 6 | 13 |
| Availability of interior and exterior machining | 12 | 6 | 8 |
| Availability of pallets (16 or more brake drums) | 11 | 9 | 5 |
| Availability of smaller quantities (less than 16 brake drums) | 5 | 12 | 8 |
| Brand | 12 | 11 | 3 |
| Delivery terms | 19 | 6 | 1 |
| Delivery time | 23 | 2 | 1 |
| Discounts offered | 12 | 12 | 2 |
| Minimum quantity requirements | 10 | 10 | 6 |
| Packaging | 6 | 16 | 1 |
| Payment terms | 10 | 11 | 4 |
| Price | 19 | 7 | 0 |
| Product consistency | 24 | 2 | 0 |
| Product range | 13 | 9 | 2 |
| Quality meets industry standards | 24 | 1 | 0 |
| Quality exceeds industry standards | 15 | 7 | 3 |
| Quality of hub-drum assembly | 15 | 4 | 6 |
| Reliability of supply | 24 | 1 | 0 |
| Technical support/service | 16 | 5 | 4 |
| U.S. transportation costs | 12 | 7 | 6 |

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

Lead times

Brake drums are primarily sold from inventory. U.S. producers reported that *** percent of their commercial shipments were from U.S. inventories, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced to order, with lead times averaging *** days. U.S. importers reported that *** percent of their commercial shipments were from U.S. inventories, with lead times averaging *** days. Of the remainder, *** percent of their commercial shipments were produced to order, with lead times averaging *** days, and *** percent were from foreign inventories, with lead times averaging *** days.

Supplier certification

The majority of purchasers (14 of 26) require their suppliers to become certified or qualified to sell brake drums to their firm. Purchasers reported that the time to qualify a new supplier ranged from 7 to 365 days, with three purchasers reporting 180 days, one reporting 360, and three reporting 365 days. One purchaser, ***, reported that Webb had failed in its attempt to qualify brake drums, or had lost its approved status since 2022, reporting that it did not reach ISO14001 certification.¹⁵ Two purchasers cited ISO9001/IATF 16949¹⁶ or ISO14001, and two cited FMVSS regulations.¹⁷ Other certification factors included product testing and validation, company policies for products and workers, customer referrals, safety records and policies, raw material supply chains, labor training, design quality, delivery reliability, material certification, metallurgical and dimensional verification, and a financial risk assessment.

Minimum quality specifications

As can be seen from table 2.12, 18 responding purchasers reported that domestically produced product always met minimum quality specifications, while 3 reported that they did not know. Thirteen responding purchasers reported that the brake drums imported from China always met minimum quality specifications, while 8 reported that they always did for brake drums from Turkey. Six purchasers reported that they did not know about Chinese suppliers' ability to meet minimum quality specifications, and 11 reported that they did not know about Turkish suppliers' ability to meet these specifications.

¹⁵ ISO 14001 is the internationally recognized standard for environmental management systems ("EMS"). It provides a framework for organizations to design and implement an EMS, and continually improve their environmental performance. ISO.org, <https://www.iso.org/standard/60857.html>, accessed June 2, 2025.

¹⁶ ISO 9001 is a globally recognized standard for quality management. It helps organizations of all sizes and sectors to improve their performance, meet customer expectations and demonstrate their commitment to quality. ISO.org, <https://www.iso.org/standard/62085.html>, accessed June 2, 2025.

¹⁷ FMVSS 121 has several requirements relating to the reservoirs and air compressor systems on trucks, buses, and trailers. 73 FR 12354, March 7, 2008.

Table 2.12 Brake drums: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Count in number of firms reporting

| Source of purchases | Always | Usually | Sometimes | Rarely or never | Don't Know |
|---------------------|--------|---------|-----------|-----------------|------------|
| United States | 18 | 4 | 0 | 0 | 3 |
| China | 13 | 5 | 1 | 0 | 6 |
| Turkey | 8 | 3 | 2 | 0 | 11 |
| Nonsubject sources | 3 | 2 | 1 | 0 | 11 |

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

Note: Purchasers were asked how often domestically produced or imported brake drums meet minimum quality specifications for their own or their customers' uses.

Purchasers' responses on factors that determine quality varied, but included appearance, balance, coating, consistency, design, durability, edges, finish, hardness, heat dispersion, longevity, packaging, performance, precision machining, reliability, validation testing, virgin content, weight, and welding. Purchasers cited PPAP Level 3 or 4 requirements¹⁸ and FMVSS 121 test results, and the diameters of the brake surface, pilot, bolt circle, and the number of bolt holes.

Changes in purchasing patterns

Eleven of 26 purchasers reported that they had changed suppliers since January 1, 2022, while 16 reported that they had not.¹⁹

Specifically, firms dropped or reduced purchases from Gunitite because of its bankruptcy, and EKV because of availability. Purchaser *** reported that it dropped Panasia due to AD/CVD. *** reported that it dropped all Chinese suppliers.

Purchaser *** added ConMet, citing ***. Purchaser *** added Walther EMC due to its customer's specification and the fact that its machine drums are made from domestically procured castings.

¹⁸ The Production Part Approval Process ("PPAP") ensures that suppliers can consistently produce parts meeting customer specifications. Six Sigma, <https://sixsigmadsi.com/what-are-the-ppap-submission-levels/>, accessed June 2, 2025.

¹⁹ Purchaser *** reported both yes and no, and reported that it had ***.

Purchaser *** reported that Meritor and Walther ceased production because they could no longer get castings from the foundry, and that Walther could no longer get castings from Waupaca because it would only sell to Webb.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2022 (table 2.13). One purchaser reported increased purchases of domestic product in 2022 because of a backlog of domestically produced brake drums from Webb, and another (***) reported that its sales increased (even though prices of U.S.-produced brake drums “increased by 45 percent”). Purchaser *** reported that the industry is moving towards disc brakes so a steady decrease is expected and will continue decreasing over the next few years. Purchaser *** reported that it largely halted purchases of brake drums from Chinese and Turkish manufacturers when the AD/CVD investigation was initiated.

Table 2.13 Brake drums: Count of purchasers’ responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

| Source of purchases | Steadily Increase | Fluctuate Up | No change | Fluctuate Down | Steadily Decrease | Did not purchase |
|---------------------|-------------------|--------------|-----------|----------------|-------------------|------------------|
| United States | 4 | 2 | 2 | 8 | 4 | 2 |
| China | 2 | 5 | 3 | 5 | 5 | 2 |
| Turkey | 2 | 3 | 2 | 2 | 4 | 10 |
| Nonsubject sources | 3 | 0 | 1 | 0 | 3 | 11 |
| Sources unknown | 0 | 1 | 3 | 2 | 0 | 12 |

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

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

Purchasers were asked a number of questions comparing brake drums produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 22 factors (table 2.14) for which they were asked to rate the importance. A majority (or plurality) of responding purchasers reported that U.S.-produced brake drums and brake drums imported from China were comparable for most of the factors that were rated as “very important” purchase factors, with the exception of delivery time and technical support, for which U.S.-produced brake drums were superior; price, for which U.S.-produced brake drums were inferior (higher priced); and delivery terms, for which a plurality of purchasers reported that U.S.-produced brake drums were superior or comparable to Chinese brake drums.

Similarly, a majority of responding purchasers reported that U.S.-produced brake drums were comparable to brake drums imported from Turkey for most of the important purchase factors, with the exception of delivery terms, delivery time, and technical support, for which most purchasers reported that U.S.-produced brake drums were superior, and price, for which most purchasers reported U.S.-produced brake drums were inferior (higher priced).

Table 2.14 Brake drums: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---------------|----------|------------|----------|
| Availability | U.S. vs China | 5 | 10 | 7 |
| Availability of balance cuts | U.S. vs China | 2 | 15 | 1 |
| Availability of hub-drum assembly | U.S. vs China | 3 | 6 | 4 |
| Availability of interior and exterior machining | U.S. vs China | 4 | 13] | 1 |
| Availability of pallets | U.S. vs China | 2 | 1 | 2 |
| Availability of smaller quantities | U.S. vs China | 9 | 7 | 3 |
| Brand | U.S. vs China | 7 | 8 | 2 |
| Delivery terms | U.S. vs China | 9 | 9 | 1 |
| Delivery time | U.S. vs China | 13 | 4 | 3 |
| Discounts offered | U.S. vs China | 2 | 10 | 3 |
| Minimum quantity requirements | U.S. vs China | 8 | 9 | 1 |
| Packaging | U.S. vs China | 5 | 14 | 0 |
| Payment terms | U.S. vs China | 1 | 17 | 1 |
| Price | U.S. vs China | 0 | 9 | 11 |
| Product consistency | U.S. vs China | 4 | 16 | 0 |
| Product range | U.S. vs China | 8 | 11 | 0 |
| Quality meets industry standards | U.S. vs China | 3 | 15 | 1 |
| Quality exceeds industry standards | U.S. vs China | 5 | 10 | 1 |
| Quality of hub assembly | U.S. vs China | 4 | 7 | 2 |
| Reliability of supply | U.S. vs China | 8 | 10 | 2 |
| Technical support/service | U.S. vs China | 11 | 6 | 1 |
| U.S. transportation costs | U.S. vs China | 7 | 9 | 0 |

Table continued.

Table 2.14 Continued Brake drums: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---------------------|-----------------|-------------------|-----------------|
| Availability | U.S. vs Turkey | 3 | 9 | 3 |
| Availability of balance cuts | U.S. vs Turkey | 2 | 12 | 0 |
| Availability of hub-drum assembly | U.S. vs Turkey | 2 | 8 | 0 |
| Availability of interior and exterior machining | U.S. vs Turkey | 2 | 10 | 0 |
| Availability of pallets | U.S. vs Turkey | 2 | 13 | 0 |
| Availability of smaller quantities | U.S. vs Turkey | 6 | 8 | 1 |
| Brand | U.S. vs Turkey | 5 | 7 | 1 |
| Delivery terms | U.S. vs Turkey | 7 | 6 | 2 |
| Delivery time | U.S. vs Turkey | 10 | 4 | 2 |
| Discounts offered | U.S. vs Turkey | 4 | 5 | 2 |
| Minimum quantity requirements | U.S. vs Turkey | 7 | 7 | 0 |
| Packaging | U.S. vs Turkey | 1 | 14 | 0 |
| Payment terms | U.S. vs Turkey | 1 | 13 | 1 |
| Price | U.S. vs Turkey | 1 | 5 | 10 |
| Product consistency | U.S. vs Turkey | 2 | 14 | 0 |
| Product range | U.S. vs Turkey | 3 | 12 | 0 |
| Quality meets industry standards | U.S. vs Turkey | 3 | 12 | 0 |
| Quality exceeds industry standards | U.S. vs Turkey | 5 | 7 | 0 |
| Quality of hub assembly | U.S. vs Turkey | 3 | 6 | 0 |
| Reliability of supply | U.S. vs Turkey | 7 | 9 | 0 |
| Technical support/service | U.S. vs Turkey | 8 | 6 | 0 |
| U.S. transportation costs | U.S. vs Turkey | 4 | 8 | 0 |

Table continued.

Table 2.14 Continued Brake drums: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|----------------------------|----------|------------|----------|
| Availability | U.S. vs Nonsubject sources | 2 | 1 | 1 |
| Availability of balance cuts | U.S. vs Nonsubject sources | 0 | 3 | 0 |
| Availability of hub-drum assembly | U.S. vs Nonsubject sources | 1 | 1 | 0 |
| Availability of interior and exterior machining | U.S. vs Nonsubject sources | 1 | 2 | 0 |
| Availability of pallets | U.S. vs Nonsubject sources | 0 | 3 | 0 |
| Availability of smaller quantities | U.S. vs Nonsubject sources | 2 | 0 | 1 |
| Brand | U.S. vs Nonsubject sources | 1 | 2 | 0 |
| Delivery terms | U.S. vs Nonsubject sources | 2 | 1 | 0 |
| Delivery time | U.S. vs Nonsubject sources | 3 | 0 | 0 |
| Discounts offered | U.S. vs Nonsubject sources | 0 | | 0 |
| Minimum quantity requirements | U.S. vs Nonsubject sources | 1 | 1 | 1 |
| Packaging | U.S. vs Nonsubject sources | 1 | 2 | 0 |
| Payment terms | U.S. vs Nonsubject sources | 1 | 2 | 0 |
| Price | U.S. vs Nonsubject sources | 0 | 2 | 1 |
| Product consistency | U.S. vs Nonsubject sources | 0 | 3 | 0 |
| Product range | U.S. vs Nonsubject sources | 2 | 1 | 0 |
| Quality meets industry standards | U.S. vs Nonsubject sources | 0 | 3 | 0 |
| Quality exceeds industry standards | U.S. vs Nonsubject sources | 1 | 2 | 0 |
| Quality of hub assembly | U.S. vs Nonsubject sources | 1 | 1 | 0 |
| Reliability of supply | U.S. vs Nonsubject sources | 3 | 0 | 0 |
| Technical support/service | U.S. vs Nonsubject sources | 3 | 0 | 0 |
| U.S. transportation costs | U.S. vs Nonsubject sources | 0 | 3 | 0 |

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

Note: With respect to cost/price factors, a rating of superior means that the cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported brake drums

In order to determine whether U.S.-produced brake drums can generally be used in the same applications as imports from China and Turkey, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.15 to 2.17, both U.S. producers reported that they were *** interchangeable. Almost all importers and purchasers reported that they always or frequently were interchangeable. U.S. importer *** reported that certain brake drums are not interchangeable with domestically produced drums because they are short turn, out of production, or for unique wheel designs that are not interchangeable with standard brake drums products. U.S. importer/foreign producer *** reported that there is little substitutability between market segments because of certifications and customer requirements.

Table 2.15 Brake drums: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | *** | *** | *** | *** |
| U.S. vs. Turkey | *** | *** | *** | *** |
| U.S. vs. other | *** | *** | *** | *** |
| China vs. Turkey | *** | *** | *** | *** |
| China vs. Other | *** | *** | *** | *** |
| Turkey vs. Other | *** | *** | *** | *** |

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

Table 2.16 Brake drums: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | 24 | 11 | 2 | 0 |
| U.S. vs. Turkey | 14 | 9 | 2 | 0 |
| U.S. vs. other | 8 | 8 | 2 | 0 |
| China vs. Turkey | 12 | 7 | 1 | 0 |
| China vs. Other | 8 | 7 | 1 | 0 |
| Turkey vs. Other | 7 | 7 | 1 | 0 |

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

Table 2.17 Brake drums: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | 14 | 6 | 0 | 0 |
| U.S. vs. Turkey | 12 | 4 | 1 | 0 |
| U.S. vs. other | 4 | 6 | 0 | 0 |
| China vs. Turkey | 9 | 4 | 1 | 0 |
| China vs. Other | 4 | 3 | 0 | 0 |
| Turkey vs. Other | 4 | 3 | 0 | 0 |

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of brake drums from the United States, subject, or nonsubject countries. As seen in tables 2.18 to 2.20, both U.S. producers reported that *** between the United States and subject countries and one U.S. producer reported that *** between subject countries. Pluralities of responding importers reported that they sometimes were between the United States and China (13 importers) and the United States and Turkey (8 importers). Nine purchasers each reported that they always or sometimes were between the United States and China and between the United States and Turkey. *** reported that brake drums for consumption in the United States are interchangeable based on size, regardless of country of origin. Importer *** cited brand equity as a factor other than price between U.S. produced brake drums and those produced in China and importer/foreign producer *** reported that quality and product liability insurance as factors other than price between brake drums produced in the United States and Turkey. Three purchasers cited availability as a significant factor other than price, while others cited high quality, supplier product know-how, delivery reliability, and transportation networks.

Table 2.18 Brake drums: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | *** | *** | *** | *** |
| U.S. vs. Turkey | *** | *** | *** | *** |
| U.S. vs. other | *** | *** | *** | *** |
| China vs. Turkey | *** | *** | *** | *** |
| China vs. Other | *** | *** | *** | *** |
| Turkey vs. Other | *** | *** | *** | *** |

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

Table 2.19 Brake drums: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | 10 | 7 | 13 | 7 |
| U.S. vs. Turkey | 6 | 5 | 8 | 6 |
| U.S. vs. other | 5 | 3 | 5 | 4 |
| China vs. Turkey | 5 | 2 | 7 | 3 |
| China vs. Other | 4 | 2 | 4 | 4 |
| Turkey vs. Other | 4 | 2 | 4 | 3 |

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

Table 2.20 Brake drums: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|------------------|--------|------------|-----------|-------|
| U.S. vs. China | 9 | 4 | 9 | 0 |
| U.S. vs. Turkey | 9 | 1 | 9 | 0 |
| U.S. vs. Other | 3 | 2 | 4 | 1 |
| China vs. Turkey | 1 | 3 | 8 | 0 |
| China vs. Other | 3 | 0 | 4 | 1 |
| Turkey vs. Other | 3 | 0 | 4 | 1 |

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

Elasticity estimates

This section discusses elasticity estimates; parties' comments on elasticity estimates are discussed below.

U.S. supply elasticity

The domestic supply elasticity for brake drums measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of brake drums. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced brake drums. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 10 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for brake drums measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of brake drums. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the brake drums in the production of any downstream products. An economic consultant for Webb stated that the demand for brake drums is highly inelastic with respect to price, and that offering lower prices will not cause demand to grow.²⁰ However, an economic consultant for ConMet maintained that the demand for air disc brakes affects the elasticity of demand for brake drums by making it more elastic.²¹ Based on the available information, the aggregate demand for brake drums is likely to be moderately inelastic; a range of -0.25 to -0.5 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²² Product differentiation, in turn, depends upon

²⁰ Hearing transcript, pp. 28 to 29 (Dougan).

²¹ Hearing transcript, pp. 183 to 184 (Pope).

²² The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced brake drums and imported brake drums is likely to be in the range of 2.5 to 4. Factors contributing to this level of substitutability include lead times for brake drums from inventory, little preference for particular country of origin, similarities between domestically produced brake drums and brake drums imported from subject countries across multiple purchase factors, interchangeability between domestic and subject sources. Factors mitigating substitutability include some preferences for particular producers, several purchase factors other than price, and purchasers' perceptions of availability between domestically produced brake drums and those from subject sources.

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

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins is presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of two firms that accounted for all known U.S. production of brake drums during 2024.

U.S. producers

The Commission issued a U.S. producer questionnaire to two firms based on information contained in the petitions. Both firms provided usable data on their operations. Table 3.1 lists the two U.S. producers of brake drums, their production locations, positions on the petitions, and shares of total 2024 domestic production.

Petitioner Webb, which accounted for *** percent of U.S. brake drum production in 2024, describes itself as “the largest manufacturer of heavy-duty pneumatic brake drums in the United States.”¹ The company began production of brake drums in 1946 and currently manufactures brake drums from purchased castings at four locations in Alabama, Arkansas, and Indiana.²

¹ Hearing transcript, p. 13 (Begley).

² Preliminary publication, p. 3.4; hearing transcript, p. 13 (Begley) and pp. 49 to 50 (Capps).

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

Shares in percent

| Firm | Position on petitions | Production location(s) | Share of production |
|-----------|-----------------------|--|---------------------|
| Gunite | *** | Rockford, IL | *** |
| | | Cullman, AL Siloam Springs, AR Tell City, IN | |
| Webb | Petitioner | Ferdinand, IN | *** |
| All firms | Various | Various | 100.0 |

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

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

The *** of the two U.S. producers, Gunite, which accounted for *** percent of U.S. brake drum production in 2024, was founded in 1854 and has operated from its current location in Rockford, Illinois since 1905. The Rockford facility, which is vertically integrated to also include the foundry’s manufacture of castings, underwent a significant investment project with a decision to invest more than \$70 million to restore its production capabilities, earning the facility awards for manufacturing excellence in 2015 and 2017.³ Since that time, capital investment modernization projects ***. In particular, ***. However, ***, following the October 2024 Chapter 11 bankruptcy filing of its parent company (Accuride), Gunite, whose brake drums accounted for approximately *** percent of Accuride’s overall sales, ceased U.S. production of brake drums.⁴ Gunite reported that it ***

³ “AME names Accuride plants as 2015 AME Excellence Award recipients,” The Fabricator, October 7, 2015, <https://www.thefabricator.com/thefabricator/news/shopmanagement/ame-names-accuride-plants-as-2015-ame-excellence-award-recipients>, retrieved June 24, 2025; “2017 IW Best Plants Winner: Accuride Reinvents Its Wheel End Plant by Going All In on Lean,” Industry Week, March 16, 2018, <https://www.industryweek.com/operations/article/22025325/2017-iw-best-plants-winner-accuride-reinvents-its-wheel-end-plant-by-going-all-in-on-lean>, retrieved June 24, 2025.

⁴ In re: Accuride Corporation, et al, Debtors, Chapter 11, Case No. 24-12289, U.S. Bankruptcy Court for the District of Delaware, October 10, 2024, https://casedocs.omniagentsolutions.com/cmsvol2/pub_47527/be50ed68-e3e2-4988-8c04-64d7df94fa05_964.pdf, retrieved May 15, 2024; “Accuride’s Bankruptcy Effect on the Brake Drum and Wheel-end Industry,” DuraBrake website, <https://www.durabrake.com/accurides-bankruptcy-effect-on-the-brake-drum-and-wheel-end-industry/>, retrieved, May 15, 2025, “Gunite to begin layoffs Friday as Rockford’s oldest manufacturer goes out of business,” January 17, 2025, <https://www.mystateline.com/news/local-news/gunite-to-begin-layoffs-friday-as-rockfords-oldest-manufacturer-goes-out-of-business/>, retrieved May 15, 2025.

***. ***.⁵

Table 3.2 presents information on U.S. producers' ownership and related and/or affiliated firms. Neither U.S. producer indicated that it is owned by or related to a foreign producer of the subject merchandise. However, U.S. producer *** reported that it is related to ***, a U.S. importer of the subject merchandise from ***. In addition, as discussed in greater detail later in this part of the report, *** has directly imported the subject merchandise from ***. Neither U.S. producer purchases the subject merchandise from U.S. importers.

Table 3.2 Brake drums: U.S. producers' ownership, related and/or affiliated firms

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

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

Note: As part of the bankruptcy reorganization plan of Gunite's parent company (Accuride), ***.

⁵ At the time of the writing of this report, ***.

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

Table 3.3 Brake drums: Important industry events since 2022

| Item | Firm | Event |
|-------------------------|-----------------|--|
| Acquisition | Webb | In January 2024, petitioner Webb purchased Trifecta line of pre-adjusted hub assembly products from Stemco. |
| New production location | Gunite | In March 2024, Gunite's parent company, Accuride, announced that its Gunite-branded 3922X cast iron brake drum would be produced in the Gunite Rockford, Illinois foundry. |
| Acquisition | Waupaca Foundry | In March 2024, Monomoy Capital Partners completed its acquisition of Waupaca Foundry (a major supplier of cast iron brake drum castings). |
| Bankruptcy | Gunite | In October 2024, Gunite's parent company, Accuride, filed for Chapter 11 bankruptcy. |
| Plant closing | Gunite | In November 2024, Accuride informed union employees at the Gunite Rockford, Illinois plant that they were planning to wind down operations and close the facility. |

Source: Linger, "Accuride Brings Back USA-made Gunite 3922X Brake Drum," March 8, 2024, <https://www.fleetequipmentmag.com/accuride-usa-gunite-brake-drum/>; Crissey, "Webb Wheel Purchases Stemco Trifecta Pre-adjusted Hub Assembly Product Line," January 5, 2024, <https://www.fleetequipmentmag.com/webb-wheel-purchases-stemco-trifecta-pre-adjusted-hub-assembly-product-line/>; Monomoy Capital Partners, "Monomoy Capital Partners Completes Acquisition of Waupaca Foundry," March 5, 2024, <https://www.mcpfunds.com/news/monomoy-capital-partners-completes-acquisition-of-waupaca-foundry/>; In re: Accuride Corporation, et al, Debtors, Chapter 11, Case No. 24-12289, U.S. Bankruptcy Court for the District of Delaware, October 10, 2024, https://casedocs.omniagentsolutions.com/cmsvol2/pub_47527/be50ed68-e3e2-4988-8c04-64d7df94fa05_964.pdf; UAW Local 718, "Gunite Winding Down Production," November 22, 2024, <https://uaw718.org/2024/11/22/gunite-winding-down-production/>.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of brake drums since 2022. Both U.S. producers indicated such changes. Table 3.4 presents the changes identified.

Table 3.4 Brake drums: U.S. producers’ reported changes in operations, since January 1, 2022

| Item | Firm name and narrative response on changes in operations |
|---|---|
| Plant closings | *** |
| Expansions | *** |
| Weather-related or force majeure events | *** |
| Other | *** |

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

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. producers’ installed and practical capacity and production on the same equipment.⁶

⁶ “Installed overall capacity” is the level of production that firms’ establishments could have attained, assuming an optimal product mix, and based solely on existing capital investments. This capacity measure does not take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. “Practical overall capacity” is the level of production that firms’ establishments could reasonably have expected to attain, taking into account the actual product mix over the period. This capacity measure is based on not only existing capital investments but also non-capital investment constraints, such as (1) normal operating conditions; (2) existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited firms’ ability to produce the reported products. See U.S. Producers’ Questionnaire.

Table 3.5 Brake drums: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as in-scope production, by period

Capacity and production in units; utilization in percent

| Item | Measure | 2022 | 2023 | 2024 |
|-----------------------|-------------|------|------|------|
| Installed overall | Capacity | *** | *** | *** |
| Installed overall | Production | *** | *** | *** |
| Installed overall | Utilization | *** | *** | *** |
| Practical overall | Capacity | *** | *** | *** |
| Practical overall | Production | *** | *** | *** |
| Practical overall | Utilization | *** | *** | *** |
| Practical brake drums | Capacity | *** | *** | *** |
| Practical brake drums | Production | *** | *** | *** |
| Practical brake drums | Utilization | *** | *** | *** |

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

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

Installed overall capacity increased by *** percent from 2022 to 2024, whereas practical overall capacity and practical capacity for brake drums increased by *** percent and *** percent, respectively, over the same period. Increases in capacity from 2022 to 2024 were reported by ***, which accounted for *** percent of total practical brake drum capacity in 2024, while ***, which accounted for *** percent of total practical brake drum capacity in 2024, reported *** fluctuations in its capacity data from 2022 to 2024.⁷

As previously noted, Webb's production operations begin with a purchased casting from Waupaca, whereas Gunite's production operations are vertically integrated to also include the manufacture of the casting.⁸ Gunite reported that its practical overall capacity is based on operating *** hours per week, *** weeks per year; whereas Webb reported that its practical overall capacity is based on operating *** hours per week, *** weeks per year.

⁷ As previously noted, Gunite's brake drum production operations *** following its Chapter 11 bankruptcy filing in October 2024. The company indicated ***.

⁸ Preliminary publication, p. 3.4; hearing transcript, pp. 49 to 50 (Capps) and 130 to 131 (Pope), and 173 (Nicely).

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints. Both domestic producers cited "production bottlenecks" as a capacity constraint, whereas one firm each additionally cited "existing labor force" and "supply of material inputs" as capacity constraints. Webb explained that its casting supply constraints experienced during 2022, which were rooted in COVID-19 pandemic-related issues (i.e., pent up demand, higher-than-normal freight costs, port delays) and the Russian-Ukraine conflict, have since eased as its domestic castings supplier, Waupaca, has made significant investments to increase its castings production capacity. Webb indicated that it "responded to the tightness in the market by strengthening its production capabilities and increasing capacity" and that by March 2023 the supply constraints were absent from the U.S. market.⁹

⁹ Conference transcript, pp. 76 to 77 (Capps and Begley); Webb's prehearing brief, p. 1; hearing transcript, pp. 7 and 54 to 55 (Mintzer) and 16 to 17 (Begley). Webb signed a long-term agreement ("LTA") with Waupaca on ***, part of which included the agreement that Waupaca would have a "significant expansion" of its castings capacity available for Webb. Since that LTA was executed, Webb argues that there have been no constraints on domestic brake drum supply. Hearing transcript, pp. 66 to 67 (Begley); Webb's posthearing brief, pp. 4 to 5 and exh. 1, p. 16.

Table 3.6 Brake drums: U.S. producers' reported constraints to practical overall capacity since January 1, 2022

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

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

Table 3.7 and figure 3.1 present U.S. producers’ production, capacity, and capacity utilization. U.S. producers’ aggregate practical capacity to produce brake drums increased by *** percent from *** units in 2022 to *** units in 2024. Increases in capacity were reported by ***, while ***.¹⁰ Production, on the other hand, decreased overall by *** percent from 2022 to 2024. The increase in capacity and the overall decrease in production resulted in a capacity utilization decrease of *** percentage points from *** percent in 2022 to *** percent in 2024.¹¹

Table 3.7 Brake drums: U.S. producers’ output, by firm and period
Practical capacity

Capacity in units

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

Table 3.7 (Continued) Brake drums: U.S. producers’ output, by firm and period
Production

Production in units

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

¹⁰ Webb reported that the tight supply of brake drums in 2022 and in the beginning of 2023 led the domestic industry to expand capacity. Hearing transcript, p. 31 (Dougan). It reported that it ***.

¹¹ Webb argues that the decline in U.S. capacity utilization from 2022 to 2024 was not solely attributable to overall capacity increases and that even if capacity had remained at 2022 levels, capacity utilization would still have fallen from 2022 to 2024. Webb’s prehearing brief, pp. 39 to 40.

Table 3.7 (Continued) Brake drums: U.S. producers' output, by firm and period
Capacity utilization

Capacity utilization in percent

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

Table continued.

Table 3.7 (Continued) Brake drums: U.S. producers' output, by firm and period
Share of production

Share in percent

| Firm | 2022 | 2023 | 2024 |
|-----------|-------|-------|-------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | 100.0 | 100.0 | 100.0 |

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

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

Figure 3.1 Brake drums: U.S. producers' capacity, production, and capacity utilization, by period

* * * * *

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

Alternative products

As shown in table 3.8, *** percent of overall production during 2024 by U.S. producers was of in-scope brake drums. While *** reported the production of *** other products on the same equipment and machinery used to produce in-scope brake drums, *** reported *** production, including the production of ***. Neither Webb nor Gunitite reported production of composite or steel brake drums on the same equipment and machinery used to produce in-scope brake drums.¹²

Table 3.8 Brake drums: U.S. producers’ overall production on the same equipment as in-scope production, by product type and period

Quantity in units; share in percent

| Product type | Measure | 2022 | 2023 | 2024 |
|-------------------------------|----------|-------|-------|-------|
| Brake drums | Quantity | *** | *** | *** |
| Composite / steel brake drums | Quantity | *** | *** | *** |
| Other products | Quantity | *** | *** | *** |
| All out-of-scope products | Quantity | *** | *** | *** |
| All products | Quantity | *** | *** | *** |
| Brake drums | Share | *** | *** | *** |
| Composite / steel brake drums | Share | *** | *** | *** |
| Other products | Share | *** | *** | *** |
| All out-of-scope products | Share | *** | *** | *** |
| All products | Share | 100.0 | 100.0 | 100.0 |

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

Note: 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 “—”.

¹² Meritor, Inc. (“Meritor”), a subsidiary of Cummins Inc., responded to the Commission’s producer questionnaire and indicated ***.

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

Table 3.9 presents U.S. producers' U.S. shipments, export shipments, and total shipments.¹³ U.S. shipments, which were mostly commercial U.S. shipments (i.e., greater than *** percent in each of the annual periods from 2022 to 2024), decreased by *** percent from 2022 to 2024. The average unit values of U.S. shipments also declined by *** percent from 2022 to 2024. Export shipments, which never comprised more than *** percent of total shipments in any annual period, decreased by *** percent from 2022 to 2024. The average unit values of export shipments increased by *** percent from 2022 to 2023 before declining in 2024 to a level that was *** percent higher than that in 2022. Both U.S. producers reported export shipments principally to ***, while *** also reported export shipments to ***.

Table 3.9 Brake drums: U.S. producers' shipments, by destination and period

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

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

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

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 "—".

¹³ U.S. producers' shipment data excluding related party *** are presented in app. H.

U.S. producers' inventories

Table 3.10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments.¹⁴ ***¹⁵ U.S. producers' end-of-period inventories decreased *** percent from 2022 to 2023, but increased in 2024 to a level that was *** percent higher than in 2022. The ending inventory ratios to U.S. production, U.S. shipments, and total shipments were *** percent or less during 2022 and 2023, but were higher in 2024. As a ratio to total shipments, inventories increased by *** percentage points from 2022 to 2024.

Table 3.10 Brake drums: U.S. producers' inventories and their ratio to select items, by period

Quantity in units; ratio in percent

| Item | 2022 | 2023 | 2024 |
|------------------------------------|------|------|------|
| End-of-period inventory quantity | *** | *** | *** |
| Inventory ratio to U.S. production | *** | *** | *** |
| Inventory ratio to U.S. shipments | *** | *** | *** |
| Inventory ratio to total shipments | *** | *** | *** |

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

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 "—".

¹⁴ U.S. producers' inventory data excluding related party *** are presented in app. H.

¹⁵ Gunitite reported that after it ceased U.S. production of brake drums ***.

U.S. producers' imports from subject sources

Imports of subject brake drums by U.S. producer *** are presented in table 3.11. U.S. producer ***, which accounted for *** percent of U.S. production of brake drums in 2024, is related to U.S. importer ***, an importer of brake drums from ***.¹⁶ *** U.S. imports from *** declined by *** percent from 2022 to 2024.¹⁷ In 2024, *** accounted for *** percent of total reported subject imports from *** and *** percent of total reported subject imports from ***. Its total subject imports were equivalent to *** percent of the quantity of *** U.S. production of brake drums in ***.

Table 3.11 Brake drums: *'s U.S. production, U.S. imports from subject sources ***, and ratio of subject imports to production, by source and period**

Quantity in units; ratio in percent

| Item | Measure | 2022 | 2023 | 2024 |
|-------------------------------------|----------|------|------|------|
| U.S. production | Quantity | *** | *** | *** |
| Imports from *** | Quantity | *** | *** | *** |
| Imports from *** | Quantity | *** | *** | *** |
| Imports from *** | Quantity | *** | *** | *** |
| Imports from *** to U.S. production | Ratio | *** | *** | *** |
| Imports from *** to U.S. production | Ratio | *** | *** | *** |
| Imports from *** to U.S. production | Ratio | *** | *** | *** |

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

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

¹⁶ ***.

¹⁷ Petitioner Webb argues that the import volumes by ***. Webb's postconference brief, pp. 20 to 21; Webb's prehearing brief, pp. 20 to 21; Webb's posthearing brief, exh. 1, p. 30.

U.S. producer *** imports of brake drums are presented in table 3.12. U.S. producer ***, which accounted for *** percent of U.S. production of brake drums in 2024, directly imported brake drums from ***, accounting for less than *** percent of total reported subject imports from ***. Its U.S. imports from ***, which were equivalent to *** percent of the quantity of its U.S. production of brake drums during ***, increased by *** percent from 2022 to 2023, but declined to *** in 2024.

Table 3.12 Brake drums: *'s U.S. production, U.S. imports from subject sources, and ratio of subject imports to production, by source and period**

Quantity in units; ratio in percent

| Item | Measure | 2022 | 2023 | 2024 |
|-------------------------------------|----------|------|------|------|
| U.S. production | Quantity | *** | *** | *** |
| Imports from *** | Quantity | *** | *** | *** |
| Imports from *** to U.S. production | Ratio | *** | *** | *** |

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

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

The firms' reasons for importing brake drums are presented in table 3.13.

Table 3.13 Brake drums: U.S. producers' reasons for importing, by firm

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

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

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

Neither responding U.S. producer reported purchases of brake drums produced in the United States or in other countries since January 1, 2022.

U.S. employment, wages, and productivity

Table 3.14 shows U.S. producers' employment-related data.¹⁸ The number of brake drum production and related workers decreased by *** percent from 2022 to 2023, before increasing in 2024 to a level that was *** percent higher than in 2022. Likewise, hourly wages and unit labor costs increased overall from 2022 to 2024, although overall declines from 2022 to 2024 were reported in total hours worked, hours worked per PRW, wages paid, and productivity.

Table 3.14 Brake drums: U.S. producers' employment related information, by period

| Item | 2022 | 2023 | 2024 |
|--|------|------|------|
| Production and related workers (PRWs) (number) | *** | *** | *** |
| Total hours worked (1,000 hours) | *** | *** | *** |
| Hours worked per PRW (hours) | *** | *** | *** |
| Wages paid (\$1,000) | *** | *** | *** |
| Hourly wages (dollars per hour) | *** | *** | *** |
| Productivity (units per hour) | *** | *** | *** |
| Unit labor costs (dollars per unit) | *** | *** | *** |

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

¹⁸ U.S. producers' employment data excluding related party *** are presented in app. H.

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

U.S. importers

The Commission issued importer questionnaires to approximately 250 firms believed to be importers of subject brake drums, as well as to all U.S. producers of brake drums.¹ Usable questionnaire responses were received from 44 companies, representing more than *** of total U.S. imports from China and more than *** percent of total U.S. imports from Turkey during 2024.² Table 4.1 lists all responding U.S. importers of brake drums from China, Turkey, and other sources, their locations, and their shares of U.S. imports, in 2024.

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

² U.S. import statistics for imports of in-scope brake drums from subject sources under the primary HTS statistical reporting number 8708.30.5020 are believed to be significantly overstated. Conference transcript, pp. 29 to 30 (Dougan). Staff estimates presented for importer questionnaire coverage are based on a comparison with total U.S. imports reported under HTS statistical reporting number 8708.30.5020, as adjusted using data reported in importer questionnaire responses, as well as a comparison with export data reported by foreign producers responding to the Commission's questionnaire in this proceeding. Staff is unable to estimate with certainty the importer questionnaire coverage for in-scope imports from nonsubject countries, as U.S. import statistics for in-scope brake drums from nonsubject sources are believed to be "wildly overstated." Conference transcript, p. 30 (Dougan). Based on a comparison with adjusted import statistics, reported imports of brake drums from nonsubject sources accounted for approximately *** percent of total imports from nonsubject sources. In addition to the "primary" HTS statistical reporting number mentioned above, responding firms reported importing in-scope brake drums under HTS statistical reporting numbers 8708.30.1090 and 8708.99.8180, and subheading 8716.90. However, greater than 90.0 percent of reported imports of in-scope brake drums entered the United States under primary HTS statistical reporting number 8708.30.5020.

Table 4.1 Brake drums: U.S. importers, their headquarters, and share of imports within a given source, 2024

Share in percent

| Firm | Headquarters | China | Turkey | Subject sources | Non-subject sources | All import sources |
|-----------------------------|----------------------------|--------------|---------------|------------------------|----------------------------|---------------------------|
| Advanced Wheel Sales | Worthington, OH | *** | *** | *** | *** | *** |
| Artur Express | Hazelwood, MO | *** | *** | *** | *** | *** |
| Aurora Parts | Lebanon, IN | *** | *** | *** | *** | *** |
| Automann | Monroe Township, NJ | *** | *** | *** | *** | *** |
| AXN Heavy Duty | Louisville, KY | *** | *** | *** | *** | *** |
| Cargo Heavy Duty | Kalamazoo, MI | *** | *** | *** | *** | *** |
| Carolina | Lake City, SC | *** | *** | *** | *** | *** |
| Con Met | Vancouver, WA | *** | *** | *** | *** | *** |
| D&W Clutch | Baltimore, MD | *** | *** | *** | *** | *** |
| Dayton Parts | Shiremanstown, PA | *** | *** | *** | *** | *** |
| Discount Diesel Truck Parts | Medley, FL | *** | *** | *** | *** | *** |
| DS Parts | Bluefield, VA | *** | *** | *** | *** | *** |
| DuraBrake | Santa Clara, CA | *** | *** | *** | *** | *** |
| EKU | Çayırova - Kocaeli, Turkey | *** | *** | *** | *** | *** |
| Fleet Pride | Irving, TX | *** | *** | *** | *** | *** |
| Genuine Parts | Atlanta, GA | *** | *** | *** | *** | *** |
| Global Parts Network | Hoffman Estates, IL | *** | *** | *** | *** | *** |
| Henry's Truck Parts | Elgin, IL | *** | *** | *** | *** | *** |
| Hyundai Translead | San Diego, CA | *** | *** | *** | *** | *** |
| Inselusa | Houston, TX | *** | *** | *** | *** | *** |
| International Motors | Lisle, IL | *** | *** | *** | *** | *** |
| Isuzu | Anaheim, CA | *** | *** | *** | *** | *** |
| Johnson's Surplus | White Pigeon, MI | *** | *** | *** | *** | *** |
| Keene Export | Chicago, IL | *** | *** | *** | *** | *** |

Table continued.

Table 4.1 (Continued) Brake drums: U.S. importers, their headquarters, and share of imports within a given source, 2024

Share in percent

| Firm | Headquarters | China | Turkey | Subject sources | Non-subject sources | All import sources |
|---------------------------|-------------------|-------|--------|-----------------|---------------------|--------------------|
| KIC | Livonia, MI | *** | *** | *** | *** | *** |
| Love's Truck Solutions | Oklahoma City, OK | *** | *** | *** | *** | *** |
| Martec International | Byron Center, MI | *** | *** | *** | *** | *** |
| Meritor | Troy, MI | *** | *** | *** | *** | *** |
| Newtek | Kansas City, MO | *** | *** | *** | *** | *** |
| NFI Parts | Delaware, OH | *** | *** | *** | *** | *** |
| NYC of America | Miami, FL | *** | *** | *** | *** | *** |
| OTP USA | Odessa, TX | *** | *** | *** | *** | *** |
| PACCAR | Renton, WA | *** | *** | *** | *** | *** |
| Panasia CVS USA | Rye, NY | *** | *** | *** | *** | *** |
| Pioneer Parts | Linden, NJ | *** | *** | *** | *** | *** |
| Punita Group | Sterling, VA | *** | *** | *** | *** | *** |
| SAP | Miami, FL | *** | *** | *** | *** | *** |
| SilverbackHD | Kennesaw, GA | *** | *** | *** | *** | *** |
| Truck Spring | Saginaw, MI | *** | *** | *** | *** | *** |
| TruckPro | Cordova, TN | *** | *** | *** | *** | *** |
| Vanguard National Trailer | Monon, IN | *** | *** | *** | *** | *** |
| Volvo/Mack Trucks | Greensboro, NC | *** | *** | *** | *** | *** |
| Webb | Cullman, AL | *** | *** | *** | *** | *** |
| Wheeler Fleet | Somerset, PA | *** | *** | *** | *** | *** |
| All firms | Various | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

U.S. imports

Tables 4.2 and 4.3 and figures 4.1 and 4.2 present data for U.S. imports of brake drums from China, Turkey, and all other sources. In terms of quantity, total reported U.S. imports of brake drums from all sources combined decreased by 26.9 percent from 2022 to 2024. The average unit value of such imports followed a similar trend, declining by 31.1 percent from 2022 to 2024. The largest U.S. import source was China, accounting for 74.5 percent of total U.S. imports in 2024, followed by Turkey, accounting for 18.6 percent, and nonsubject countries combined, accounting for 6.9 percent. The leading nonsubject U.S. import sources reported by responding importers include ***. Other nonsubject sources reported by responding importers include ***.

Subject imports accounted for the vast majority of total reported U.S. imports in each annual period from 2022 to 2024. As a share of the quantity of total reported imports, U.S. imports from combined subject sources increased from 94.7 percent in 2022 to 94.8 percent in 2023, before declining to 93.1 percent in 2024. Driven by the relatively larger volume of imports from China, total U.S. imports of in-scope brake drums from the subject sources combined declined by 28.1 percent from 2022 to 2024. The average unit value of combined subject imports declined by 31.6 percent from \$101 per unit in 2022 to \$69 per unit in 2024.

During 2022, the average unit value of imports from Turkey was lower (at \$85 per unit) than the average unit value of imports from China (at \$103 per unit). As the quantity of U.S. imports from Turkey declined by 6.8 percent from 2022 to 2023, the average unit value of imports from Turkey was higher (at \$80 per unit) in 2023 relative to the average unit value of imports from China, which had declined to \$76 per unit in 2023. The quantity of U.S. imports from Turkey then increased in 2024 to a level that was 16.8 percent higher than in 2022, as the average unit value of imports from Turkey was lower (at \$59 per unit) in 2024 relative to the average unit value of imports from China (at \$71 per unit).

U.S. imports from nonsubject sources increased overall as a share of the quantity of total reported imports from 5.3 percent in 2022 to 6.9 percent in 2024. The quantity of reported imports from nonsubject sources decreased by 26.0 percent from 2022 to 2023, but increased in 2024 to a level that was 6.0 percent lower than in 2022. The average unit values of nonsubject imports, which were consistently higher than the average unit values of subject imports, decreased from \$119 per unit in 2022 to \$86 per unit in 2024.

The ratio of subject imports to U.S. production increased from *** percent in 2022 to *** percent in 2023 before declining to *** percent in 2024.

Table 4.2 Brake drums: U.S. imports by source and period

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

| Source | Measure | 2022 | 2023 | 2024 |
|--------------------|------------|-----------|-----------|-----------|
| China | Quantity | 2,885,384 | 2,120,876 | 1,893,649 |
| Turkey | Quantity | 404,501 | 376,940 | 472,407 |
| Subject sources | Quantity | 3,289,885 | 2,497,816 | 2,366,056 |
| Nonsubject sources | Quantity | 185,729 | 137,416 | 174,510 |
| All import sources | Quantity | 3,475,614 | 2,635,232 | 2,540,566 |
| China | Value | 296,396 | 161,496 | 134,808 |
| Turkey | Value | 34,545 | 30,121 | 28,003 |
| Subject sources | Value | 330,941 | 191,617 | 162,811 |
| Nonsubject sources | Value | 22,080 | 13,610 | 14,940 |
| All import sources | Value | 353,021 | 205,227 | 177,751 |
| China | Unit value | 103 | 76 | 71 |
| Turkey | Unit value | 85 | 80 | 59 |
| Subject sources | Unit value | 101 | 77 | 69 |
| Nonsubject sources | Unit value | 119 | 99 | 86 |
| All import sources | Unit value | 102 | 78 | 70 |

Table continued.

Table 4.2 (Continued) Brake drums: U.S. imports by source and period

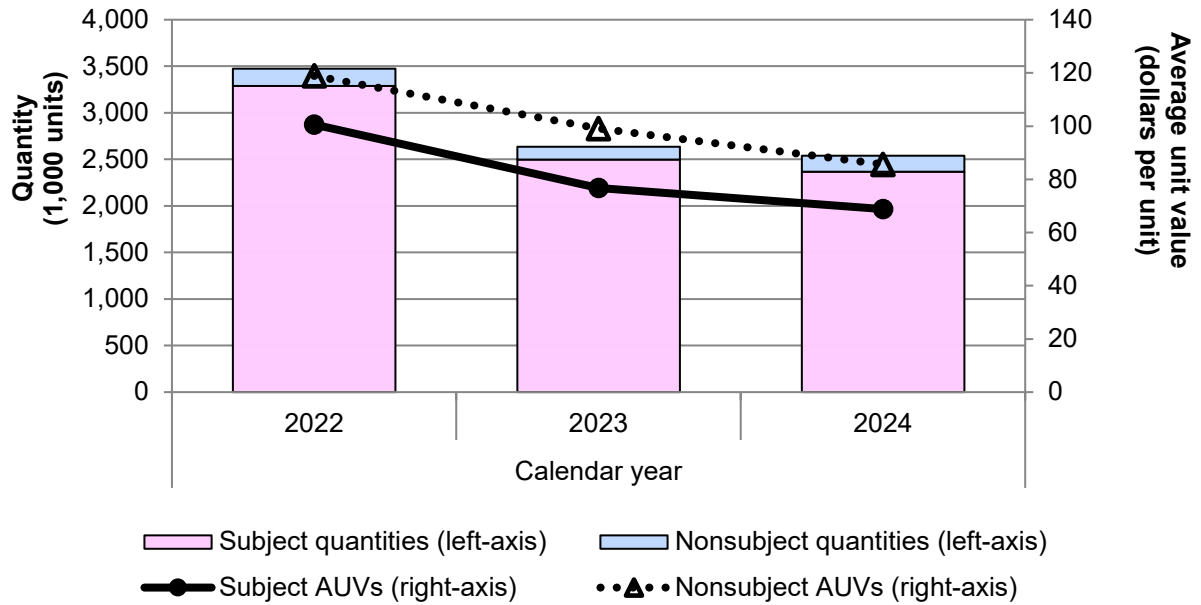
Share and ratio in percent; ratio represents the ratio to U.S. production

| Source | Measure | 2022 | 2023 | 2024 |
|--------------------|-------------------|-------|-------|-------|
| China | Share of quantity | 83.0 | 80.5 | 74.5 |
| Turkey | Share of quantity | 11.6 | 14.3 | 18.6 |
| Subject sources | Share of quantity | 94.7 | 94.8 | 93.1 |
| Nonsubject sources | Share of quantity | 5.3 | 5.2 | 6.9 |
| All import sources | Share of quantity | 100.0 | 100.0 | 100.0 |
| China | Share of value | 84.0 | 78.7 | 75.8 |
| Turkey | Share of value | 9.8 | 14.7 | 15.8 |
| Subject sources | Share of value | 93.7 | 93.4 | 91.6 |
| Nonsubject sources | Share of value | 6.3 | 6.6 | 8.4 |
| All import sources | Share of value | 100.0 | 100.0 | 100.0 |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |

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

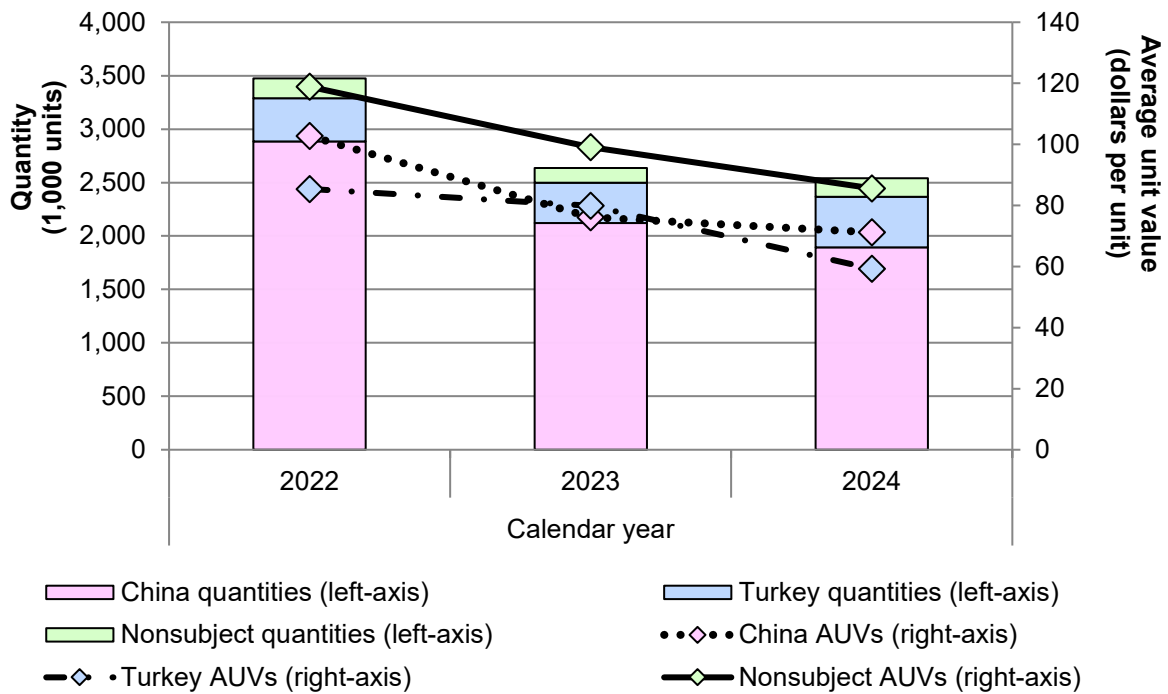
Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio is U.S. imports to production. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.1 Brake drums: U.S. import quantities and average unit values, by source and period



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

Figure 4.2 Brake drums: U.S. import quantities and average unit values, by source and period



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

Table 4.3 Brake drums: Changes in U.S. imports between comparison periods

Change (Δ) in percent (%)

| Source | Measure | 2022 to 2024 | 2022 to 2023 | 2023 to 2024 |
|--------------------|-----------------------|--------------|--------------|--------------|
| China | % Δ Quantity | ▼(34.4) | ▼(26.5) | ▼(10.7) |
| Turkey | % Δ Quantity | ▲16.8 | ▼(6.8) | ▲25.3 |
| Subject sources | % Δ Quantity | ▼(28.1) | ▼(24.1) | ▼(5.3) |
| Nonsubject sources | % Δ Quantity | ▼(6.0) | ▼(26.0) | ▲27.0 |
| All import sources | % Δ Quantity | ▼(26.9) | ▼(24.2) | ▼(3.6) |
| China | % Δ Value | ▼(54.5) | ▼(45.5) | ▼(16.5) |
| Turkey | % Δ Value | ▼(18.9) | ▼(12.8) | ▼(7.0) |
| Subject sources | % Δ Value | ▼(50.8) | ▼(42.1) | ▼(15.0) |
| Nonsubject sources | % Δ Value | ▼(32.3) | ▼(38.4) | ▲9.8 |
| All import sources | % Δ Value | ▼(49.6) | ▼(41.9) | ▼(13.4) |
| China | % Δ Unit value | ▼(30.7) | ▼(25.9) | ▼(6.5) |
| Turkey | % Δ Unit value | ▼(30.6) | ▼(6.4) | ▼(25.8) |
| Subject sources | % Δ Unit value | ▼(31.6) | ▼(23.7) | ▼(10.3) |
| Nonsubject sources | % Δ Unit value | ▼(28.0) | ▼(16.7) | ▼(13.6) |
| All import sources | % Δ Unit value | ▼(31.1) | ▼(23.3) | ▼(10.2) |

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

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

U.S. producers' and/or their affiliates' U.S. imports

As indicated in part 3 of this report, U.S. producer *** reported that it is related to ***, a U.S. importer of the subject merchandise from *** and *** has directly imported the subject merchandise from ***. Table 4.4 presents aggregate data for U.S. producers' and/or their affiliates' U.S. imports, by source.³ U.S. producers and/or their affiliates accounted for a declining share of U.S. imports from subject sources from *** percent in 2022, to *** percent in 2023, and further to *** percent in 2024.

Table 4.4 Brake drums: U.S. producers' and/or their affiliates' U.S. imports, by source and period

Quantity in units; share in percent

| Source | Measure | 2022 | 2023 | 2024 |
|--------------------|----------|------|------|------|
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |

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

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The shares represent the quantities controlled by U.S. producers and/or their affiliates as a percentage of imports of that source.

³ Detailed import data by firm are presented in part 3.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁴ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁵ From June 2023 to May 2024, the quantity of U.S. imports of brake drums from China accounted for 77.5 percent of total U.S. imports and the quantity of U.S. imports of brake drums from Turkey accounted for 16.2 percent of total U.S. imports (table 4.5).

Table 4.5 Brake drums: U.S. imports in the twelve-month period preceding the filing of the petitions, June 2023 through May 2024

Quantity in units; share of quantity in percent

| Source of imports | Quantity | Share of quantity |
|--------------------|-----------|-------------------|
| China | 1,965,747 | 77.5 |
| Turkey | 410,586 | 16.2 |
| All other sources | 160,960 | 6.3 |
| All import sources | 2,537,293 | 100.0 |

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

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

⁴ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

⁵ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Cumulation considerations

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

Fungibility

U.S. shipments, by weight category

Table 4.6 and figure 4.3 present information on U.S. producers' and U.S. importers' U.S. shipments by the following brake drum weight categories: (a) greater than 50 pounds and less than 97 pounds, (b) greater than or equal to 97 pounds and less than or equal to 106 pounds, (c) greater than 106 pounds but not greater than 113 pounds, and (d) greater than 113 pounds.⁶

U.S. producers shipped brake drums in all four weight categories, with the two middle weight categories together comprising the large majority (***) percent) of U.S. producers' U.S. shipments in 2024. U.S. importers from subject sources also shipped brake drums in all four weight categories, with the two middle weight categories accounting for the largest shares of U.S. shipments of imports from China (together comprising (***) percent in 2024)) and Turkey (together comprising (***) percent in 2024)). Imports from nonsubject sources were similarly shipped in all four weight categories, with the heaviest weight category accounting for the largest share of U.S. shipments (***) percent) in 2024 and the lightest middle weight category (i.e., greater than or equal to 97 pounds and less than or equal to 106 pounds) accounting for the second largest share (***) percent). Brake drums that are greater than or equal to 97 pounds and less than or equal to 106 pounds⁷ represented the largest share of all

⁶ The two middle weight categories align with the weight specifications for which price data were requested in these investigations (i.e., greater than or equal to 97 pounds and less than or equal to 106 pounds (pricing product 1) and greater than 106 pounds but not greater than 113 pounds (pricing product 2)). See Part 5 for a detailed description of the pricing products for which data were collected.

⁷ See pricing product 1 in Part 5.

weight categories for U.S. shipments made by U.S. producers and U.S. importers from China and Turkey.

U.S. producers accounted for the majority of all U.S. shipments of the three heaviest weight categories in 2024, whereas U.S. importers from China accounted for the majority of all U.S. shipments of the lightest weight category.

Table 4.6 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and weight, 2024

Quantity in units

| Source | >50 and <97 lbs | ≥97 and ≤106 lbs | >106 and ≤113 lbs | >113 lbs | All weight categories |
|--------------------|-----------------|------------------|-------------------|----------|-----------------------|
| U.S. producers | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** | *** |

Table continued.

Table 4.6 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and weight, 2024

Share across in percent

| Source | >50 and <97 lbs | ≥97 and ≤106 lbs | >106 and ≤113 lbs | >113 lbs | All weight categories |
|--------------------|-----------------|------------------|-------------------|----------|-----------------------|
| U.S. producers | *** | *** | *** | *** | 100.0 |
| China | *** | *** | *** | *** | 100.0 |
| Turkey | *** | *** | *** | *** | 100.0 |
| Subject sources | *** | *** | *** | *** | 100.0 |
| Nonsubject sources | *** | *** | *** | *** | 100.0 |
| All import sources | *** | *** | *** | *** | 100.0 |
| All sources | *** | *** | *** | *** | 100.0 |

Table continued.

Table 4.6 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and weight, 2024

Share down in percent

| Source | >50 and <97 lbs | ≥97 and ≤106 lbs | >106 and ≤113 lbs | >113 lbs | All weight categories |
|--------------------|-----------------|------------------|-------------------|----------|-----------------------|
| U.S. producers | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** |
| All sources | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

Figure 4.3 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and weight, 2024

* * * * *

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

U.S. shipments, by pallet/non-pallet sales

Table 4.7 and figure 4.4 present information on the quantity of U.S. producers' and U.S. importers' U.S. shipments in 2024, by pallet and non-pallet sales.⁸ U.S. producers and importers responding to the Commission's questionnaires in these investigations reported that more than 90 percent of brake drums shipped in the United States were shipped as pallet or bulk sales. U.S. producers accounted for the majority of all U.S. shipments of pallet sales, whereas U.S. importers from China accounted for the majority of all U.S. shipments of non-pallet sales.

Table 4.7 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and sales type, 2024

Quantity in units

| Source | Pallet sales | Non-pallet sales | All sales type |
|--------------------|--------------|------------------|----------------|
| U.S. producers | *** | *** | *** |
| China | *** | *** | *** |
| Turkey | *** | *** | *** |
| Subject sources | *** | *** | *** |
| Nonsubject sources | *** | *** | *** |
| All import sources | *** | *** | *** |
| All sources | *** | *** | *** |

Table continued.

Table 4.7 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and sales type, 2024

Share across in percent

| Source | Pallet sales | Non-pallet sales | All sales type |
|--------------------|--------------|------------------|----------------|
| U.S. producers | *** | *** | 100.0 |
| China | *** | *** | 100.0 |
| Turkey | *** | *** | 100.0 |
| Subject sources | *** | *** | 100.0 |
| Nonsubject sources | *** | *** | 100.0 |
| All import sources | *** | *** | 100.0 |
| All sources | *** | *** | 100.0 |

Table continued.

⁸ The Commission's questionnaires defined "pallet sales" (or "bulk sales") as sales made pursuant to higher volumes of 16 or more brake drums. "Non-pallet sales" are defined as sales made pursuant to lower volumes of less than 16 brake drums. Appendix F presents detailed quantity and value data for pallet and non-pallet sales of U.S. producers and U.S. importers from 2022 to 2024.

Table 4.7 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and sales type, 2024

Share down in percent

| Source | Pallet sales | Non-pallet sales | All sales type |
|--------------------|--------------|------------------|----------------|
| U.S. producers | *** | *** | *** |
| China | *** | *** | *** |
| Turkey | *** | *** | *** |
| Subject sources | *** | *** | *** |
| Nonsubject sources | *** | *** | *** |
| All import sources | *** | *** | *** |
| All sources | 100.0 | 100.0 | 100.0 |

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

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

Figure 4.4 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and sales type, 2024

* * * * *

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

U.S. shipments of assemblies containing brake drums

Table 4.8 and figure 4.5 present the quantity of U.S. producers' and U.S. importers' U.S. shipments during 2024 of brake drums shipped as (1) part of larger (e.g., hub-drum) assemblies and (2) stand-alone brake drums.⁹ U.S. producers and importers reported that the overwhelming majority of brake drums shipped in the United States were shipped as single, or stand-alone, brake drums and not part of larger (e.g., hub-drum) assemblies. U.S. producers and U.S. importers from China reported that *** percent and *** percent, respectively, of their U.S. shipments were stand-alone brake drums. U.S. importers from Turkey and nonsubject sources reported that *** percent of their U.S. shipments were stand-alone brake drums. U.S. producers accounted for the majority of U.S. shipments of brake drums, regardless of the attachment status.

Table 4.8 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and attachment status, 2024

Quantity in units

| Source | Attached to other merchandise | Not attached to other merchandise | All attachment statuses |
|--------------------|-------------------------------|-----------------------------------|-------------------------|
| U.S. producers | *** | *** | *** |
| China | *** | *** | *** |
| Turkey | *** | *** | *** |
| Subject sources | *** | *** | *** |
| Nonsubject sources | *** | *** | *** |
| All import sources | *** | *** | *** |
| All sources | *** | *** | *** |

Table continued.

Table 4.8 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and attachment status, 2024

Share across in percent

| Source | Attached to other merchandise | Not attached to other merchandise | All attachment statuses |
|--------------------|-------------------------------|-----------------------------------|-------------------------|
| U.S. producers | *** | *** | 100.0 |
| China | *** | *** | 100.0 |
| Turkey | *** | *** | 100.0 |
| Subject sources | *** | *** | 100.0 |
| Nonsubject sources | *** | *** | 100.0 |
| All import sources | *** | *** | 100.0 |
| All sources | *** | *** | 100.0 |

Table continued.

⁹ The Commission's questionnaire instructed firms to report only the quantity and value relating to the brake drum itself. For assemblies, firms were instructed to exclude the quantity and value of the out-of-scope components to which the brake drums were attached. Appendix G presents 2024 U.S. shipment quantity and value data of U.S. producers and U.S. importers, by attachment status.

Table 4.8 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and attachment status, 2024

Share down in percent

| Source | Attached to other merchandise | Not attached to other merchandise | All attachment statuses |
|--------------------|-------------------------------|-----------------------------------|-------------------------|
| U.S. producers | *** | *** | *** |
| China | *** | *** | *** |
| Turkey | *** | *** | *** |
| Subject sources | *** | *** | *** |
| Nonsubject sources | *** | *** | *** |
| All import sources | *** | *** | *** |
| All sources | 100.0 | 100.0 | 100.0 |

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

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

Figure 4.5 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and attachment status, 2024

* * * * *

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

Geographical markets

As previously indicated in part 2 of this report, U.S. producers and importers reported selling brake drums to all regions of the United States. Table 4.9 presents data on U.S. imports by source and border of entry in 2024 as compiled from official U.S. import statistics using statistical reporting number 8708.30.5020, as adjusted with proprietary, Census-edited Customs import records to remove data for firms that have not imported brake drums since January 1, 2022.¹⁰ These data show that U.S. imports from all sources entered through all four U.S. borders of entry (i.e., East, North, South, and West) in 2024. China was the largest source of imports through all four U.S. entry borders.

Table 4.9 Brake drums: U.S. imports, by source and by border of entry, 2024

Quantity in units

| Source | East | North | South | West | All borders |
|--------------------|------|-------|-------|------|-------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** |

Table continued.

Table 4.9 (Continued) Brake drums: U.S. imports, by source and by border of entry, 2024

Share across in percent

| Source | East | North | South | West | All borders |
|--------------------|------|-------|-------|------|-------------|
| China | *** | *** | *** | *** | 100.0 |
| Turkey | *** | *** | *** | *** | 100.0 |
| Subject sources | *** | *** | *** | *** | 100.0 |
| Nonsubject sources | *** | *** | *** | *** | 100.0 |
| All import sources | *** | *** | *** | *** | 100.0 |

Table continued.

¹⁰ Despite the adjustments made to the U.S. import statistics to more closely reflect the in-scope merchandise, the data presented are nevertheless imprecise, as the U.S. import statistics for the primary HTS statistical reporting number not only overstate in-scope brake drum imports but may also understate the in-scope imports by virtue of items that enter under other HTS statistical reporting numbers, particularly with respect to U.S. imports from China. Conference transcript, pp. 29 to 30 (Dougan); Importer questionnaire responses, 2.5a.

Table 4.9 (Continued) Brake drums: U.S. imports, by source and by border of entry, 2024

Share down in percent

| Source | East | North | South | West | All borders |
|--------------------|-------|-------|-------|-------|-------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 8708.30.5020, accessed March 12, 2025, as adjusted using proprietary, Census-edited Customs import records to remove data for firms that have not imported brake drums since January 1, 2022. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The primary HTS statistical reporting number includes both in-scope brake drums and out-of-scope brake drums (e.g., excluded composite or steel brake drums that otherwise meet the weight and size requirements of in-scope brake drums, cast iron brake drums that are lighter or smaller than the weight and size requirements of in-scope brake drums (such as used in passenger cars), etc.).

Presence in the market

Table 4.10 and figures 4.6 and 4.7 present data on U.S. imports by source and month from January 2022 to December 2024. Imports from China, Turkey, and aggregated nonsubject sources were each present in every month during calendar years 2022, 2023, and 2024.

Table 4.10 Brake drums: U.S. imports, by month and source, January 2022 through December 2024

Quantity in units

| Year | Month | China | Turkey | Subject sources | Nonsubject sources | All import sources |
|------|-----------|-------|--------|-----------------|--------------------|--------------------|
| 2022 | January | *** | *** | *** | *** | *** |
| 2022 | February | *** | *** | *** | *** | *** |
| 2022 | March | *** | *** | *** | *** | *** |
| 2022 | April | *** | *** | *** | *** | *** |
| 2022 | May | *** | *** | *** | *** | *** |
| 2022 | June | *** | *** | *** | *** | *** |
| 2022 | July | *** | *** | *** | *** | *** |
| 2022 | August | *** | *** | *** | *** | *** |
| 2022 | September | *** | *** | *** | *** | *** |
| 2022 | October | *** | *** | *** | *** | *** |
| 2022 | November | *** | *** | *** | *** | *** |
| 2022 | December | *** | *** | *** | *** | *** |
| 2023 | January | *** | *** | *** | *** | *** |
| 2023 | February | *** | *** | *** | *** | *** |
| 2023 | March | *** | *** | *** | *** | *** |
| 2023 | April | *** | *** | *** | *** | *** |
| 2023 | May | *** | *** | *** | *** | *** |
| 2023 | June | *** | *** | *** | *** | *** |
| 2023 | July | *** | *** | *** | *** | *** |
| 2023 | August | *** | *** | *** | *** | *** |
| 2023 | September | *** | *** | *** | *** | *** |
| 2023 | October | *** | *** | *** | *** | *** |
| 2023 | November | *** | *** | *** | *** | *** |
| 2023 | December | *** | *** | *** | *** | *** |
| 2024 | January | *** | *** | *** | *** | *** |
| 2024 | February | *** | *** | *** | *** | *** |
| 2024 | March | *** | *** | *** | *** | *** |
| 2024 | April | *** | *** | *** | *** | *** |
| 2024 | May | *** | *** | *** | *** | *** |
| 2024 | June | *** | *** | *** | *** | *** |
| 2024 | July | *** | *** | *** | *** | *** |
| 2024 | August | *** | *** | *** | *** | *** |
| 2024 | September | *** | *** | *** | *** | *** |
| 2024 | October | *** | *** | *** | *** | *** |
| 2024 | November | *** | *** | *** | *** | *** |
| 2024 | December | *** | *** | *** | *** | *** |

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 8708.30.5020, accessed March 12, 2025, as adjusted using proprietary, Census-edited Customs import records to remove data for firms that have not imported brake drums since January 1, 2022. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The primary HTS statistical reporting number includes both in-scope brake drums and out-of-scope brake drums (e.g., excluded composite or steel brake drums that otherwise meet the weight and size requirements of in-scope brake drums, cast iron brake drums that are lighter or smaller than the weight and size requirements of in-scope brake drums (such as used in passenger cars), etc.).

Figure 4.6 Brake drums: U.S. imports from individual subject sources, by source and by month, January 2022 through December 2024

* * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 8708.30.5020, accessed March 12, 2025, as adjusted using proprietary, Census-edited Customs import records to remove data for firms that have not imported brake drums since January 1, 2022. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The primary HTS statistical reporting number includes both in-scope brake drums and out-of-scope brake drums (e.g., excluded composite or steel brake drums that otherwise meet the weight and size requirements of in-scope brake drums, cast iron brake drums that are lighter or smaller than the weight and size requirements of in-scope brake drums (such as used in passenger cars), etc.).

Figure 4.7 Brake drums: U.S. imports from aggregated subject and nonsubject sources, by month, January 2022 through December 2024

* * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 8708.30.5020, accessed March 12, 2025, as adjusted using proprietary, Census-edited Customs import records to remove data for firms that have not imported brake drums since January 1, 2022. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The primary HTS statistical reporting number includes both in-scope brake drums and out-of-scope brake drums (e.g., excluded composite or steel brake drums that otherwise meet the weight and size requirements of in-scope brake drums, cast iron brake drums that are lighter or smaller than the weight and size requirements of in-scope brake drums (such as used in passenger cars), etc.).

Apparent U.S. consumption and market shares

Quantity

As indicated in Part 2 of this report, overall demand for brake drums is driven by the demand for trucking in the United States.¹¹ Table 4.11 and figure 4.8 present data on apparent U.S. consumption of brake drums and U.S. market shares based on quantity data for calendar years 2022, 2023, and 2024.¹² Apparent U.S. consumption by quantity decreased by *** percent from 2022 to 2023, and decreased further in 2024 to a level that was *** percent below that in 2022.¹³

¹¹ Parties describe a market transition from drum brakes to air disc brakes in the U.S. trucking industry, though the rate of that transition is described somewhat differently by petitioner and respondents. Conference transcript, pp. 13 and 73 (Begley), 115 (Cullerton), and 137 to 138 (Marr); ConMet’s postconference brief, p. 4; DuraBrake’s prehearing brief, p. 2; Webb’s prehearing brief, p. 46. Parties also describe a seasonality in the brake drum market that is a function of temperature variations. That is, brake drum replacements generally increase as temperatures moderate during spring and summer. Conference transcript, pp. 51 (Capps, Begley) and 140 (Hurley, Shroff); DuraBrake’s postconference brief, p. 4.

¹² Additional U.S. producers’ and U.S. importers’ U.S. shipment data for first quarter 2023, last three quarters of 2023, first quarter 2024, and last three quarters of 2024 are presented in appendix L. The dataset shown in appendix L, which were constructed from preliminary and final phase questionnaires, required the removal of a number of importer questionnaire responses from the dataset and, therefore, should not be directly compared with the full year data presented throughout this report.

¹³ The primary demand driver for the OEM segment is new builds for commercial trucks and trailers and the primary demand driver for the aftermarket segment is shipping volumes. ConMet’s postconference brief, app. A, p. 3; Webb’s prehearing brief, p. 11; hearing transcript, p. 15 (Begley). Respondent ConMet indicates that the decline in apparent U.S. consumption is a result of a “freight recession” from 2022 to 2024 when demand for commercial trucks and trucking services was weak. It adds that demand for brake drums also declined because of a shift away from brake drums to air disc brakes. ConMet’s prehearing brief, pp. 6 to 8. Webb argues that the adoption of air disc brakes “could only have had a relatively small impact” during 2022 to 2024. Webb’s prehearing brief, p. 47.

Table 4.11 Brake drums: Apparent U.S. consumption and market shares based on quantity data, by source and period

Quantity in units; share in percent

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-----------|-----------|-----------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | 2,403,687 | 2,075,669 | 1,706,584 |
| Turkey | Quantity | 359,131 | 379,635 | 504,327 |
| Subject sources | Quantity | 2,762,818 | 2,455,304 | 2,210,911 |
| Nonsubject sources | Quantity | 185,486 | 138,052 | 150,322 |
| All import sources | Quantity | 2,948,304 | 2,593,356 | 2,361,233 |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |

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

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

Figure 4.8 Brake drums: Apparent U.S. consumption based on quantity data, by source and period

* * * * *

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

The downward trend in subject imports is somewhat similar to that of overall apparent U.S. consumption, although the trend in subject imports was a more consistent decline over the annual periods than the decline in overall apparent U.S. consumption, which experienced a larger decline from 2022 to 2023 than from 2023 to 2024.¹⁴ The U.S. producers' component of apparent U.S. consumption shows a decline of *** percent in terms of absolute quantity from 2022 to 2023, but an increase from 2023 to 2024 to a level that was *** percent below that in 2022.

The share of the quantity of apparent U.S. consumption held by U.S. producers declined from *** percent in 2022 to *** percent in 2023, but increased back to *** percent in 2024, a level that was *** percentage points lower than in 2022. Conversely, the share of the quantity of apparent U.S. consumption held by aggregate subject imports increased from *** percent in 2021 to *** percent in 2023, but declined back to *** percent in 2024, a level that was *** percentage points higher than in 2022. Brake drums from nonsubject sources ranged from *** to *** percent of apparent U.S. consumption from 2022 to 2024.

Value

Table 4.12 and figure 4.9 present data on apparent U.S. consumption and U.S. market shares by value for brake drums. Apparent U.S. consumption by value decreased by *** percent from 2022 to 2023 and decreased further in 2024 to a level that was *** percent below that in 2022. The share of the value of apparent U.S. consumption held by U.S. producers decreased from *** percent in 2022 to *** percent in 2023, but increased to *** percent in 2024, a level that was *** percentage points higher than in 2022. The share of the value of apparent U.S. consumption held by aggregate subject imports increased from *** percent in 2021 to *** percent in 2023, but declined to *** percent in 2024, a level that was *** percentage points lower than in 2022. The share of the value of brake drums from nonsubject sources declined from *** percent of apparent U.S. consumption in 2022 to *** percent in 2023 before increasing back to *** percent of apparent U.S. consumption in 2024.

¹⁴ The petitioner argues that, as demand and cost conditions normalized in 2023, subject imports “overshot the market” and gained U.S. market share. The petitioner alleges that the 2023 decline in consumption was further exaggerated by the inventory overhang of subject imports (both by importers and potentially their U.S. customers) that resulted in an oversupply of brake drums in the United States that was being worked down in 2023. Conference transcript, pp. 7 (Mintzer), 53 (Dougan); Webb’s postconference brief, pp. 1, 25 to 26; Webb’s prehearing brief, p. 1. Respondent DuraBrake argues that “{a}lthough the quantity of subject imports may have increased temporarily to fulfill the unmet demand, in 2023 both demand and supply chains began to stabilize and the volume of subject imports began to normalize.” DuraBrake’s postconference brief, p. 1. Respondent EKU’s description of consumption and the trend in imports is similar to that argued by DuraBrake. EKU’s postconference brief, p. 10.

Table 4.12 Brake drums: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars; share in percent

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|---------|---------|---------|---------|
| U.S. producers: Gunite | Value | *** | *** | *** |
| U.S. producers: Webb | Value | *** | *** | *** |
| U.S. producers: All U.S. producers | Value | *** | *** | *** |
| China | Value | 278,180 | 207,110 | 154,253 |
| Turkey | Value | 36,825 | 35,095 | 38,169 |
| Subject sources | Value | 315,005 | 242,205 | 192,422 |
| Nonsubject sources | Value | 26,839 | 18,123 | 18,037 |
| All import sources | Value | 341,844 | 260,328 | 210,459 |
| All sources | Value | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |

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

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

Figure 4.9 Brake drums: Apparent U.S. consumption based on value data, by source and period

* * * * *

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

OEM brake drums

Table 4.13 presents data on U.S. OEM shipments of brake drums based on quantity.¹⁵ Total OEM shipments (i.e., truck OEMs and trailer OEMs) in the United States from all sources accounted for *** percent of the total U.S. brake drum market in 2022, *** percent in 2023, and *** percent in 2024.¹⁶ The total quantity of U.S. OEM shipments (i.e., both truck and trailer OEMs) from all sources combined decreased by *** percent from *** units in 2022 to *** units in 2023, and declined further by *** percent to *** units in 2024, a level that was *** percent below that in 2022. Truck OEM shipments from all sources combined increased by *** percent from 2022 to 2023, but declined in 2024 to a level that was *** percent higher than that in 2022; whereas trailer OEM shipments from all sources combined decreased by *** percent from 2022 to 2023, and declined further in 2024 to a level that was *** percent below that in 2022.

The share of the quantity of the total OEM market held by U.S. producers decreased from *** percent in 2022 to *** percent in 2023, but increased to *** percent in 2024, a level that was *** percentage points higher than in 2022. The share of the quantity of the OEM market held by aggregate subject imports increased from *** percent in 2022 to *** percent in 2023, but declined to *** percent in 2024, a level that was *** percentage points lower than in 2022. The share of the total OEM brake drum market held by nonsubject sources declined from *** percent in 2022 to *** percent in 2024. Most of the share lost by not only U.S. producers, but also imports from Turkey and nonsubject sources from 2022 to 2023 was captured by imports from China, whereas the U.S. regained market share in the total OEM market from 2023 to 2024 as the shares held by imports from China, Turkey, and nonsubject sources declined.

The share of the quantity of the truck OEM market held by U.S. producers increased from *** percent in 2022 to *** percent in 2023, but declined to *** percent in 2024. Most of the share gained by U.S. producers from 2022 to 2023 came at the expense of mostly nonsubject imports, whose share declined from *** percent in 2022 to *** percent in 2023. From 2023 to 2024, as U.S. producers and importers from Turkey and nonsubject sources lost

¹⁵ As previously indicated in Part 2 of this report, the Commission's questionnaire collected quantity and value data on U.S. producers' and U.S. importers' U.S. shipments during calendar years 2022 to 2024 by the following channels of distribution: (a) truck OEMs, (b) trailer OEMs, (c) OEM aftermarket, and (d) independent aftermarket. Detailed channels of distribution quantity and value data for these four categories are presented in appendix E.

¹⁶ Truck OEMs accounted for *** percent of the U.S. brake drum market in 2022, *** percent in 2023, and *** percent in 2024; whereas trailer OEMs accounted for *** percent in 2022, *** percent in 2023, and *** percent in 2024. See appendix E.

market share, the shares held by imports from China increased from *** percent to *** percent.

The share of the quantity of the trailer OEM market held by U.S. producers decreased from *** percent in 2022 to *** percent in 2023, but increased to *** percent in 2024, a level that was *** percentage points higher than in 2022. Most of the share lost by U.S. producers from 2022 to 2023 was captured by imports from China, whose share increased from *** percent in 2022 to *** percent in 2023. From 2023 to 2024, as U.S. producers increased trailer OEM market share, the shares of the trailer OEM market held by imports from China declined from *** percent to *** percent.

Table 4.13 Brake drums: U.S. producers' and U.S. importers' U.S. shipments to OEMs, by source and period

Truck OEMs

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

Table continued.

Table 4.13 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments to OEMs, by source and period

Trailer OEMs

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

Table continued.

Table 4.13 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments to OEMs, by source and period

Total OEMs

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

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

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

Aftermarket brake drums

Table 4.14 presents data on U.S. aftermarket shipments of brake drums based on quantity. Total aftermarket shipments (i.e., OEM aftermarket and independent aftermarket) in the United States from all sources accounted for *** percent of the total U.S. brake drum market in 2022, *** percent in 2023, and *** percent in 2024.¹⁷ The total quantity of U.S. aftermarket brake drum shipments (i.e., both OEM aftermarket and independent aftermarket) declined by *** percent from 2022 to 2023, but increased in 2024 to a level that was *** percent below that in 2022. OEM aftermarket shipments from all sources combined decreased by *** percent from 2022 to 2023, but increased by *** percent from 2023 to 2024, a level that was *** percent lower than that in 2022; whereas independent aftermarket shipments from all sources combined decreased by *** percent from 2022 to 2023, and declined further by *** percent from 2023 to 2024, a level that was *** percent below that in 2022.

The share of the quantity of the total brake drum aftermarket held by U.S. producers decreased from *** percent in 2022 to *** percent in 2023, but increased to *** percent in 2024, a level that was *** percentage point lower than in 2022. The share of the quantity of the aftermarket held by aggregate subject imports increased from *** percent in 2022 to *** percent in 2023, but declined to *** percent in 2024, a level that was *** percentage points higher than in 2022. The share of the brake drum aftermarket held by nonsubject sources increased from *** percent in 2022 to *** percent in 2024. Most of the share lost by U.S. producers from 2022 to 2023 was captured by imports from Turkey, while imports from China and nonsubject sources gained a smaller share. While imports from Turkey and nonsubject sources continued to gain share of the brake drum aftermarket in 2024, the U.S. producers also regained some of the lost aftermarket share, as the share of the aftermarket held by imports from China declined from *** percent 2023 to *** percent in 2024.

The share of the quantity of the OEM aftermarket held by U.S. producers increased from *** percent in 2022 to *** percent in 2023, and to *** percent in 2024. The share gained by U.S. producers from 2022 to 2024 came at the expense of imports from China, whose share declined from *** percent in 2022 to *** percent in 2023 and to *** percent in 2024. The share of the OEM aftermarket held by imports from Turkey increased from *** percent in 2022 to *** percent in 2024.

¹⁷ The OEM aftermarket accounted for *** percent of the U.S. brake drum market in 2022, *** percent in 2023, and *** percent in 2024; whereas the independent aftermarket accounted for *** percent in 2022, *** percent in 2023, and *** percent in 2024. See appendix E.

The share of the quantity of the independent aftermarket held by U.S. producers decreased from *** percent in 2022 to *** percent in 2023, and to *** percent in 2024, a level that was *** percentage points lower than in 2022. Most of the share lost by U.S. producers from 2022 to 2023 was captured by imports from China, whose share increased from *** percent in 2022 to *** percent in 2023. From 2023 to 2024, as U.S. producers continued to lose share of the independent aftermarket, the shares held by imports from Turkey increased from *** percent to *** percent and the shares held by imports from China decreased from *** percent to *** percent.

Table 4.14 Brake drums: U.S. producers' and U.S. importers' U.S. shipments to the aftermarket, by source and period

OEM aftermarket

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

Table continued.

Table 4.14 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments to the aftermarket, by source and period

Independent aftermarket

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

Table continued.

Table 4.14 (Continued) Brake drums: U.S. producers' and U.S. importers' U.S. shipments to the aftermarket, by source and period

Total aftermarket

Quantity in units; share and ratio in percent; ratios represent the ratio to overall apparent consumption

| Source | Measure | 2022 | 2023 | 2024 |
|------------------------------------|----------|-------|-------|-------|
| U.S. producers: Gunite | Quantity | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| All sources | Quantity | *** | *** | *** |
| U.S. producers: Gunite | Share | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** |
| China | Share | *** | *** | *** |
| Turkey | Share | *** | *** | *** |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 |
| U.S. producers: Gunite | Ratio | *** | *** | *** |
| U.S. producers: Webb | Ratio | *** | *** | *** |
| U.S. producers: All U.S. producers | Ratio | *** | *** | *** |
| China | Ratio | *** | *** | *** |
| Turkey | Ratio | *** | *** | *** |
| Subject sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | *** | *** | *** |
| All sources | Ratio | *** | *** | *** |

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

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

Part 5: Pricing data

Factors affecting prices

Raw material costs

U.S. producer Webb produces brake drums from castings, which it procures from Waupaca. The raw material used to make castings is pig iron. U.S. producer Gunitite produces its own castings and reported that its raw materials for brake drums are ***.

Prices of pig iron fluctuated, with a large spike in the first half of 2022, but were lower in Q1 2025 than they were in Q1 2022 (table 5.1 and figure 5.1). Pig iron prices were impacted by the war in Ukraine because of shortages of imports from Russia and Ukraine, which account for 60 percent of the world’s merchant pig iron supply.¹ ***.²

Raw materials, as a share of U.S. producers’ cost of goods sold (“COGS”), decreased slightly from *** percent in 2022 to *** percent in 2024.

Figure 5.1 Raw materials: Price index of pig iron, January 2022 to May 2025

* * * * *

¹ Webb’s postconference brief, Exh. QA, pp. 28 to 29.

² Webb’s postconference brief, Exh. QA, p. 29.

Source: ***, retrieved June 20, 2025.

Note: ***.

Table 5.1 Raw materials: Price index of pig iron, January 2022 to May 2025

Indexed prices in percent, January 2022 = 100.0 percent

| Month | 2022 | 2023 | 2024 | 2025 |
|-----------|-------|------|------|------|
| January | 100.0 | *** | *** | *** |
| February | *** | *** | *** | *** |
| March | *** | *** | *** | *** |
| April | *** | *** | *** | *** |
| May | *** | *** | *** | *** |
| June | *** | *** | *** | — |
| July | *** | *** | *** | — |
| August | *** | *** | *** | — |
| September | *** | *** | *** | — |
| October | *** | *** | *** | — |
| November | *** | *** | *** | — |
| December | *** | *** | *** | — |

Source: ***, retrieved June 20, 2025.

Note: ***.

Transportation costs to the U.S. market

Transportation costs for brake drums shipped from subject countries to the United States averaged 11.9 percent for China and 14.6 percent for Turkey during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.³ The Shanghai Containerized Freight Index declined by 48.4 percent between January 2025 and its trough in March, and although it increased by 66 percent between March and June 2025, it has recently begun to decline again.⁴

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting number 8708.30.5020. The primary HTS statistical reporting number includes both in-scope brake drums and out-of-scope brake drums (e.g., excluded composite or steel brake drums that otherwise meet the weight and size requirements of in-scope brake drums, cast iron brake drums that are lighter or smaller than the weight and size requirements of in-scope brake drums (such as used in passenger cars), etc.).

⁴ Shanghai Containerized Freight Index, Shanghai Shipping Exchange via Factset. [Tariff Worries Aside, Importers Get Some Good News](#), retrieved on June 22, 2025.

U.S. inland transportation costs

*** of responding U.S. producers and the majority of importers (24 of 44) reported that they typically arrange transportation to their customers. U.S. producer *** reported that its U.S. inland transportation costs were *** percent while U.S producer *** reported that its inland transportation costs were *** percent. U.S. importers reported costs of 0.4 to 35.0 percent, with 6 importers reporting that their U.S. inland transportation costs averaged 10.0 percent, and 4 importers reporting 5.0 percent.

Pricing practices

Pricing methods

Brake drums are sold on both a spot basis, particularly in the aftermarket, and on a long-term contract basis, which is more common in the OEM market.⁵ Contract prices may be indexed to raw material costs.

U.S. producers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists, while most U.S. importers reported using transaction-by-transaction negotiations and set price lists (table 5.2).

Table 5.2 Brake drums: Count of U.S. producers' and importers' reported price setting methods

Count in number of firms reporting

| Method | U.S. producers | Importers |
|----------------------------|----------------|-----------|
| Transaction-by-transaction | *** | 24 |
| Contract | *** | 9 |
| Set price list | *** | 27 |
| Other | *** | 7 |
| Responding firms | 2 | 41 |

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

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

U.S. producers and importers reported selling most of their brake drums in the spot market, while U.S. importers reported selling most of their brake drums through spot sales and long-term contracts (table 5.3).

⁵ Webb's postconference brief, Exh. QA, p. 28; conference transcript, p. 69 (Begley).

Table 5.3 Brake drums: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

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

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

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

*** U.S. producers reported renegotiating price, indexing to raw materials, and *** reported fixing price for long-term contracts. Most U.S. importers reported that typical contract provisions did not apply. Of those reporting contract provisions, two each reported renegotiating price, two reported fixing to both price and quantity for short-term and long-term contracts, two reported indexing to raw materials for short term contracts, while three reported indexing to raw materials for long term contracts.

Two purchasers reported that they purchase product daily, 12 purchase weekly, 6 purchase monthly, 4 purchase quarterly, and one reported another purchasing frequency. Twenty-two of 25 responding purchasers reported that their purchasing frequency had not changed since 2022. Most purchasers contact 1 to 4 suppliers before making a purchase.

Sales terms and discounts

U.S. producer *** reported that it quotes prices on an f.o.b. basis, while *** reported that it quotes prices on a delivered basis. U.S. producers reported offering transaction by transaction negotiations, contracts, and set price lists, while most responding importers (27 of 40) typically quote prices on a delivered basis. *** U.S. producers reported offering quantity and total volume discounts. Most U.S. importers reported offering set price lists and transaction by transaction discounts.

Price leadership

Eleven purchasers reported that Webb was a price leader, three each reported that ConMet, and three reported that Accuride/Gunite was a price leader.⁶ Purchaser *** reported that there were no clear price leaders. Purchasers indicating the presence of price leaders indicated that these price leaders led by being an industry leader for drums, having the majority of the market, pricing to the market and not direct inputs, having a large production capacity, providing monthly updates based on steel indices, and setting the prices for the market.

⁶ Two reported that the parent company Accuride was, while three reported that Gunite was.

Price data

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

Product 1.-- Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good.

Product 2.-- Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good.

Both U.S. producers and 27 of 44 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁷ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of brake drums, *** percent of U.S. shipments of subject imports from China, and *** percent of U.S. shipments of subject imports from Turkey.⁸ Price data for products 1 and 2 for sales to OEM are in tables 5.4 and 5.5 and figures 5.2 and 5.3, while price data for products 1 and 2 for sales to AFM are presented in tables 5.6 and 5.7 and figures 5.4 and 5.5.

⁷ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

⁸ Pricing coverage is based on U.S. shipments reported in questionnaires.

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

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

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

Table continued.

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

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by U.S. importer KIC ***. No pricing product data were reported for Product 1 OEM from Turkey.

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

Price of product 1 OEM

* * * * *

Volume of product 1 OEM

* * * * *

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

Note: Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by U.S. importer KIC ***. No pricing product data were reported for Product 1 OEM from Turkey.

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

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

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

Table continued.

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

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by U.S. importer KIC ***. No pricing product data were reported for Product 2 OEM from Turkey.

Figure 5.3 Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 OEM, by source and quarter

Price of product 2 OEM

* * * * *

Volume of product 2 OEM

* * * * *

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

Note: Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

***. No pricing product data were reported for Product 2 OEM from Turkey.

Table 5.6 Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 AFM and margins of underselling/(overselling), by source and quarter

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

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

Table continued.

Table 5.6 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 AFM and margins of underselling/(overselling), by source and quarter

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by U.S. importer KIC ***.

Figure 5.4 Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 AFM, by source and quarter

Price of product 1 AFM

* * * * *

Volume of product 1 AFM

* * * * *

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

Note: Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

Table 5.7 Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 AFM and margins of underselling/(overselling), by source and quarter

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

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

Table continued.

Table 5.7 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 AFM and margins of underselling/(overselling), by source and quarter

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by U.S. importer KIC ***.

Figure 5.5 Brake drums: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 AFM, by source and quarter

Price of product 2 AFM

* * * * *

Volume of product 2 AFM

* * * * *

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

Note: Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

Price trends

In general, domestic prices increased during January 2022 to December 2024, while subject import prices decreased. Table 5.8 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent during January 2022 to December 2024 while import price decreases ranged from *** percent.

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

Quantity in units, price in dollars per unit

| Product | Source | Number of quarters | Quantity of shipments | Low price | High price | First quarter price | Last quarter price | Percent change in price over period |
|-----------------------|---------------|--------------------|-----------------------|-----------|------------|---------------------|--------------------|-------------------------------------|
| Product 1 OEM | United States | 11 | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | Turkey | — | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | Turkey | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | Turkey | — | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | Turkey | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | KIC | 12 | *** | *** | *** | *** | *** | *** |

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2024. KIC represents pricing data reported by US importer KIC ***.

Table 5.9 Brake drums: Indexed U.S. producer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

| Period | Product 1 OEM | Product 1 aftermarket | Product 2 OEM | Product 2 aftermarket |
|---------|---------------|-----------------------|---------------|-----------------------|
| 2022 Q1 | 100.0 | 100.0 | 100.0 | 100.0 |
| 2022 Q2 | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** |

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

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

Figure 5.6 Brake drums: Indexed U.S. producer prices, by quarter

* * * * *

Table 5.10 Brake drums: Indexed U.S. importer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

| Period | Product 1 OEM | Product 1 aftermarket | Product 2 OEM | Product 2 aftermarket |
|---------|---------------|-----------------------|---------------|-----------------------|
| 2022 Q1 | 100.0 | 100.0 | 100.0 | 100.0 |
| 2022 Q2 | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** |

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

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

Figure 5.7 Brake drums: Indexed U.S. importer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

* * * * *

Price comparisons

The subject quantity undersold was *** units; margins of underselling ranged from *** percent. The subject quantity oversold was *** units; margins of overselling ranged from *** percent to *** percent.

Table 5.11 shows comparisons by product and channel, table 5.12 shows comparisons by country source, and table 5.13 shows comparisons by year. The quantity of brake drums for which product from China undersold U.S.-produced brake drums was *** units; margins of underselling ranged from *** percent. The quantity of brake drums for which prices for product from China were above prices for the domestic product was *** units; margins of overselling were between *** percent above prices for the domestic product. The quantity of brake drums for which product from Turkey undersold U.S.-produced brake drums was *** units; margins of underselling ranged from *** percent. The quantity of brake drums for which prices for product from Turkey were above prices for the domestic product was *** units; margins of overselling were between *** percent above prices for the domestic product. As shown in table 5.13, underselling became more pronounced in 2023 and 2024; in 2022, the quantity undersold was *** out of a total of ***, while in 2023, the quantity undersold was *** out of ***, and increased to *** units undersold out of *** units in 2023.

Table 5.11 Brake drums: Instances of underselling and overselling and the range and average of margins, by product

Quantity in units; margin in percent

| Product | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-----------------------|--------------|--------------------|----------|----------------|------------|------------|
| Product 1 OEM | Underselling | 16 | *** | *** | *** | *** |
| Product 2 OEM | Underselling | 16 | *** | *** | *** | *** |
| Product 1 aftermarket | Underselling | 20 | *** | *** | *** | *** |
| Product 2 aftermarket | Underselling | 20 | *** | *** | *** | *** |
| Total, all products | Underselling | 72 | *** | *** | *** | *** |
| Product 1 OEM | Overselling | 6 | *** | *** | *** | *** |
| Product 2 OEM | Overselling | 8 | *** | *** | *** | *** |
| Product 1 aftermarket | Overselling | 16 | *** | *** | *** | *** |
| Product 2 aftermarket | Overselling | 16 | *** | *** | *** | *** |
| Total, all products | Overselling | 46 | *** | *** | *** | *** |

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

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

Table 5.12 Brake drums: Instances of underselling and overselling and the range and average of margins, by source

Quantity in units; margin in percent

| Source | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|----------------------------|--------------|--------------------|----------|----------------|------------|------------|
| China | Underselling | 25 | *** | *** | *** | *** |
| Turkey | Underselling | 14 | *** | *** | *** | *** |
| KIC | Underselling | 33 | *** | *** | *** | *** |
| Total, all subject sources | Underselling | 72 | *** | *** | *** | *** |
| China | Overselling | 22 | *** | *** | *** | *** |
| Turkey | Overselling | 10 | *** | *** | *** | *** |
| KIC | Overselling | 14 | *** | *** | *** | *** |
| Total, all subject sources | Overselling | 46 | *** | *** | *** | *** |

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

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

Table 5.13 Brake drums: Instances of underselling and overselling and the range and average of margins, by year

Quantity in units; margin in percent

| Year | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-------------|--------------|--------------------|----------|----------------|------------|------------|
| 2022 | Underselling | 6 | *** | *** | *** | *** |
| 2023 | Underselling | 34 | *** | *** | *** | *** |
| 2024 | Underselling | 32 | *** | *** | *** | *** |
| All periods | Underselling | 72 | *** | *** | *** | *** |
| 2022 | Overselling | 34 | *** | *** | *** | *** |
| 2023 | Overselling | 6 | *** | *** | *** | *** |
| 2024 | Overselling | 6 | *** | *** | *** | *** |
| All periods | Overselling | 46 | *** | *** | *** | *** |

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

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

Lost sales and lost revenue

In the preliminary phase of these investigations, the Commission requested that U.S. producers of brake drums report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of brake drums from China during January 2021 to March 2024. U.S. producer Webb submitted lost sales and lost revenue allegations, identifying *** firms with which it lost sales or revenue (*** consisting of lost sales allegations and *** consisting of lost revenue allegations). All the allegations were with respect to ***. Timing of all allegations involved lost sales in ***.

In the final phase of these investigations, of the two responding U.S. producers, *** reported reducing prices, *** reported rolling back announced price increases, and *** firms reported lost sales.

Staff contacted 102 purchasers and received responses from 26 purchasers. Responding purchasers reported purchasing and importing *** units of brake drums during January 2022 to December 2024 (table 5.14).

Of the 26 responding purchasers, 18 reported that, since 2022, they had purchased imported brake drums from China and 14 reported that they had purchased brake drums from Turkey instead of U.S.-produced product. Sixteen of these purchasers reported that Chinese import prices were lower than U.S.-produced product, and 10 of these purchasers reported that price was a primary reason for the decision to purchase product imported from China rather than U.S.-produced product. Eleven of these purchasers reported that Turkish import prices were lower than U.S.-produced product, and 8 of these purchasers reported that price was a primary reason for the decision to purchase product imported from Turkey rather than U.S.-produced product.

Eleven purchasers estimated the quantity of brake drums from China and Turkey purchased instead of domestic product; quantities ranged from *** units to *** units (table 5.15). Four purchasers cited lack of availability from U.S. suppliers or domestic suppliers' refusal to supply as non-price reasons for purchasing imported rather than U.S.-produced product. Purchasers also identified availability, guaranteed supply after being placed on allocation, safety risk, customer choice/preference, and preference for proprietary design.

Of the 26 purchasers, none reported that U.S. producers had reduced prices to compete with lower-priced imports from China and Turkey; 12 reported that they did not know for China, while 15 reported that they did not know for Turkey. Purchaser ***.

| Purchaser | Purchased subject imports instead of domestic | Imports priced lower | Choice based on price | Quantity | Explanation |
|------------------|--|-----------------------------|------------------------------|-----------------|--------------------|
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| *** | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | NA |

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

Table 5.16 Brake drums: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in units

| Source | Count of purchasers reporting subject instead of domestic | Count of purchasers reported that imports were priced lower | Count of purchasers reporting that price was a primary reason for shift | Quantity |
|-----------------|--|--|--|-----------------|
| China | 18 | 16 | 10 | *** |
| Turkey | 14 | 11 | 8 | *** |
| Subject sources | 22 | 20 | 13 | *** |

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

Part 6: Financial experience of U.S. producers

Background¹

Two U.S. producers (Gunite and Webb) provided usable financial results on their brake drums operations. Both responding U.S. producers provided their financial data on a calendar year basis and on the basis of GAAP.^{2 3}

Figure 6.1 presents each responding firm's share of the total reported net sales quantity in 2024. Net sales consisted primarily of commercial sales, with *** U.S. producer (***) reporting internal consumption during the period examined.⁴ Non-commercial sales are included but not presented separately in this section of the report.

¹ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), return on assets ("ROA"), and January 1, 2022 to December 31, 2024 ("period examined" or "period for which data were collected").

² The petitioner (and the *** U.S. producer by net sales quantity and value), Webb, is wholly owned by Berkshire Hathaway Inc. (NYSE: BRK) and organized within Marmon Holdings, Inc.'s transportation group. Webb started producing brake drums in 1946 and currently produces brake drums (using castings purchased from unrelated third parties) at four manufacturing facilities in the United States. Webb's U.S. producer questionnaire, 1.2a, 1.2b, 3.9b, conference transcript, p. 11 (Witkowski) and p. 13 (Begley), hearing transcript, pp. 49 to 50 (Capps), and Marmon's webpage, <https://www.marmon.com/industry-groups/transportation-products/>, retrieved on May 16, 2025.

Staff conducted a verification of Webb's questionnaire data and incorporated revisions resulting from verification within the report. Staff verification report, Webb, June 26, 2025.

³ The only other U.S. producer, Gunite, ceased all operations in *** (its parent, Accuride, declared bankruptcy in October 2024). Brake drums accounted for *** percent of Gunite sales in 2024 (and approximately *** percent of Accuride's overall sales in 2024). Gunite was the sole integrated U.S. producer of brake drums at its facility in Rockford, Illinois ("Rockford") that included a steel making foundry to make castings as well as dedicated machining production lines. The Rockford facility was placed in ***. The foundry ceased operations *** and its machining lines stopped in ***. Brake drum inventories at Rockford and its distribution center ***. Gunite expects ***. Fleet Owner, <https://www.fleetowner.com/equipment/article/55234732/wheel-maker-accuride-files-for-bankruptcy-for-us-operations>, retrieved on May 16, 2025, Gunite's U.S. producer questionnaire, 2.2, and emails from ***, May 15, 2025 and June 23, 2025. See part 3 of this report for additional details.

⁴ From 2022 to 2024, internal consumption accounted for *** of total net sales by quantity and value, respectively.

Figure 6.1 Brake drums: U.S. producers' share of net sales quantity in 2024, by firm

* * * * *

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

Operations on brake drums

Table 6.1 presents aggregated data on U.S. producers' operations in relation to brake drums, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data.⁵

⁵ Appendix K presents the U.S. industry's financial results excluding *** for related party considerations.

Table 6.1 Brake drums: U.S. producers' results of operations, by item and period

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

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

Table continued.

Table 6.1 (Continued) Brake drums: U.S. producers' results of operations, by item and period

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

| Item | Measure | 2022 | 2023 | 2024 |
|----------------------------|------------|-------|-------|-------|
| COGS: Raw materials | Share | *** | *** | *** |
| COGS: Direct labor | Share | *** | *** | *** |
| COGS: Energy and utilities | Share | *** | *** | *** |
| COGS: Other factory | Share | *** | *** | *** |
| COGS: Total | Share | 100.0 | 100.0 | 100.0 |
| Total net sales | Unit value | *** | *** | *** |
| COGS: Raw materials | Unit value | *** | *** | *** |
| COGS: Direct labor | Unit value | *** | *** | *** |
| COGS: Energy and utilities | Unit value | *** | *** | *** |
| COGS: Other factory | Unit value | *** | *** | *** |
| COGS: Total | Unit value | *** | *** | *** |
| Gross profit or (loss) | Unit value | *** | *** | *** |
| SG&A expenses | Unit value | *** | *** | *** |
| Operating income or (loss) | Unit value | *** | *** | *** |
| Net income or (loss) | Unit value | *** | *** | *** |
| Operating losses | Count | *** | *** | *** |
| Net losses | Count | *** | *** | *** |
| Data | Count | 2 | 2 | 2 |

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

Table 6.2 Brake drums: Changes in AUVs between comparison periods

Changes in percent

| Item | 2022–24 | 2022–23 | 2023–24 |
|----------------------------|---------|---------|---------|
| Total net sales | ▼*** | ▼*** | ▼*** |
| COGS: Raw materials | ▼*** | ▲*** | ▼*** |
| COGS: Direct labor | ▲*** | ▲*** | ▲*** |
| COGS: Energy and utilities | ▲*** | ▲*** | ▲*** |
| COGS: Other factory | ▲*** | ▲*** | ▼*** |
| COGS: Total | ▲*** | ▲*** | ▼*** |

Table continued.

Table 6.2 (Continued) Brake drums: Changes in AUVs between comparison periods

Changes in dollars per unit

| Item | 2022–24 | 2022–23 | 2023–24 |
|----------------------------|---------|---------|---------|
| Total net sales | ▼*** | ▼*** | ▼*** |
| COGS: Raw materials | ▼*** | ▲*** | ▼*** |
| COGS: Direct labor | ▲*** | ▲*** | ▲*** |
| COGS: Energy and utilities | ▲*** | ▲*** | ▲*** |
| COGS: Other factory | ▲*** | ▲*** | ▼*** |
| COGS: Total | ▲*** | ▲*** | ▼*** |
| Gross profit or (loss) | ▼*** | ▼*** | ▼*** |
| SG&A expense | ▲*** | ▲*** | ▲*** |
| Operating income or (loss) | ▼*** | ▼*** | ▼*** |
| Net income or (loss) | ▼*** | ▼*** | ▼*** |

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

Note: Shares and ratios shown as "0" represent values greater than zero, but less than "0.5" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table 6.3 Brake drums: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in units

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Net sales value

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

COGS

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Gross profit or (loss)

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

SG&A expenses

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Operating income or (loss)

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Net income or (loss)

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

COGS to net sales ratio

Ratios in percent

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Gross profit or (loss) to net sales ratio

Ratios in percent

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

SG&A expenses to net sales ratio

Ratios in percent

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Operating income or (loss) to net sales ratio

Ratios in percent

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Net income or (loss) to net sales ratio

Ratios in percent

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit net sales value

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit raw material costs

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit direct labor costs

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit other factory costs

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit COGS

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit gross profit or (loss)

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit SG&A expenses

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit operating income or (loss)

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

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

Unit net income or (loss)

Unit values in dollars per unit

| Firm | 2022 | 2023 | 2024 |
|-------------|-------------|-------------|-------------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

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

Net sales

As presented in table 6.1, total net sales value and AUVs decreased consistently while net sales quantity decreased irregularly (U.S. producers sold fewer brake drums at lower prices) from 2022 to 2024. Table 6.3 shows individual U.S. producers' net sales quantity and values trends declined from 2022 to 2024 (***). Differences in net sales between U.S. producers are largely attributable to differences in level of production and product mix.⁶ Webb's net sales volume and AUVs ***.⁷ Gunite's net sales quantities and AUVs ***.⁸

⁶ U.S. producers reported selling *** types of brake drums and *** in their product mixes during the period examined. U.S. producer questionnaires, 3.4a and 3.4b.

⁷ *** U.S. producer questionnaire, 3.9e.

⁸ ***. *** U.S. producer questionnaire, 3.9e and emails from ***, July 17 to 18, 2024 and May 13 to 16, 2025.

Cost of goods sold and gross profit or loss

As presented in table 6.1, raw material costs accounted for a large majority share of total COGS, ranging from *** percent of COGS from 2022 to 2024. In absolute values, raw material costs decreased consistently from 2022 to 2024. On a per unit basis, raw material costs decreased irregularly from 2022 to 2024. As shown in table 6.3, individual U.S. producers reported differing raw material cost trends, primarily the result of using different raw materials due to different levels of integration.⁹ ¹⁰ *** from 2022 to 2024; *** reported lower per unit raw material values than *** over the period.¹¹ As a ratio to net sales, aggregated raw material costs increased each year from 2022 to 2024.¹² Table 6.4 shows that all of ***'s raw material costs were incurred during its upstream foundry castings operations while table 6.5 shows that Webb's purchased castings cost was the ***.¹³ Table 6.6 provides an alternative presentation of combined U.S. producers COGS so that the cost structure for Gunite's integrated castings production is shown on a similar basis as Webb (by adding Gunite's

⁹ Gunite and Webb did not use the same starting materials to produce brake drums. Gunite was more vertically integrated and produced all of its own castings while Webb purchased all of the castings from unrelated entities. Petition, exh. 1.3 and conference transcript, p. 11 (Witkowski) and pp. 24 to 25 (Dogan). As an integrated producer, Gunite made the castings used in brake drums at its foundry at the same location as its brake drums production, starting with scrap steel and pig iron. Respondent ConMet's postconference brief, p. 6 and exh. 4.

¹⁰ As a vertically integrated producer, Gunite's per unit raw material costs were ***. Gunite ***. Gunite's management ***. Emails from ***, May 15, 2025 and June 23, 2025.

¹¹ Webb does not operate a foundry to make castings and starts brake drums production using purchased castings from Waupaca as the only raw material used to produce brake drums. After a shortage of castings in 2022, Webb entered into a long-term supply agreement with Waupaca on ***. Hearing transcript, pp. 49 to 50 (Capps) and pp. 66 to 67 (Begley); Webb's posthearing brief, exh.1, p. 15.

¹² *** reported purchasing inputs from related firms. Webb's purchased castings from unrelated entities *** of total raw material costs from 2022 to 2024 in the aggregated financials in table 6.1.

¹³ ***. *** U.S. producer questionnaire, 3.9b.

direct labor, energy and utilities cost, and other factory costs, in its upstream foundry castings production to its brake drum machining COGS).

Table 6.4 Brake drums: Gunite's internally produced raw material costs at its foundry, by period

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

| Input type | Measure | 2022 | 2023 | 2024 |
|--------------------------------------|---------|-------|-------|-------|
| Pig iron costs | Value | *** | *** | *** |
| Other foundry inputs | Value | *** | *** | *** |
| Raw materials | Value | *** | *** | *** |
| Direct labor foundry | Value | *** | *** | *** |
| Energy and utility costs foundry | Value | *** | *** | *** |
| Other factory costs foundry | Value | *** | *** | *** |
| Cost of internally produced castings | Value | *** | *** | *** |
| Pig iron costs | Share | *** | *** | *** |
| Other foundry inputs | Share | *** | *** | *** |
| Raw materials | Share | *** | *** | *** |
| Direct labor foundry | Share | *** | *** | *** |
| Energy and utility costs foundry | Share | *** | *** | *** |
| Other factory costs foundry | Share | *** | *** | *** |
| Cost of internally produced castings | Share | 100.0 | 100.0 | 100.0 |

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

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

Table 6.5 Brake drums: Webb's purchased casting costs by period, by source and period

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

| Input type | Measure | 2022 | 2023 | 2024 |
|-----------------------------------|---------|-------|-------|-------|
| Castings from related suppliers | Value | *** | *** | *** |
| Castings from unrelated suppliers | Value | *** | *** | *** |
| Castings from related suppliers | Share | *** | *** | *** |
| Castings from unrelated suppliers | Share | 100.0 | 100.0 | 100.0 |

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

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

Table 6.6 Brake drums: Alternative U.S. producers' COGS, by source and period

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

| Item | Measure | 2022 | 2023 | 2024 |
|----------------------------|-------------|-------|-------|-------|
| COGS: Raw materials | Value | *** | *** | *** |
| COGS: Direct labor | Value | *** | *** | *** |
| COGS: Energy and utilities | Value | *** | *** | *** |
| COGS: Other factory | Value | *** | *** | *** |
| COGS: Total | Value | *** | *** | *** |
| COGS: Raw materials | Ratio to NS | *** | *** | *** |
| COGS: Direct labor | Ratio to NS | *** | *** | *** |
| COGS: Energy and utilities | Ratio to NS | *** | *** | *** |
| COGS: Other factory | Ratio to NS | *** | *** | *** |
| COGS: Total | Ratio to NS | *** | *** | *** |
| COGS: Raw materials | Share | *** | *** | *** |
| COGS: Direct labor | Share | *** | *** | *** |
| COGS: Energy and utilities | Share | *** | *** | *** |
| COGS: Other factory | Share | *** | *** | *** |
| COGS: Total | Share | 100.0 | 100.0 | 100.0 |
| COGS: Raw materials | Unit value | *** | *** | *** |
| COGS: Direct labor | Unit value | *** | *** | *** |
| COGS: Energy and utilities | Unit value | *** | *** | *** |
| COGS: Other factory | Unit value | *** | *** | *** |
| COGS: Total | Unit value | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". U.S. producer Gunite's internally produced castings COGS (reported in the raw materials line in tables 6.1, 6.2, and 6.3) have been reclassified and placed into the same categories as Webb's COGS.

In table 6.1, other factory costs accounted for the second largest share of total COGS, ranging from *** percent of COGS from 2022 to 2024. Total other factory costs decreased irregularly in absolute value, increased consistently as a ratio to net sales, and increased before remaining the same per unit from 2022 to 2024.¹⁴ Direct labor costs, which accounted for the third largest share of total COGS (ranging from *** percent),

¹⁴ Other factory costs as a share of total COGS and as ratio to net sales were lowest when sales volume was at its highest in 2022 for U.S. producers. As the ***. Webb explained that the ***. U.S. producer questionnaires, 3.9e and emails from ***, July 17, 2024 and May 13 to 16, 2025.

decreased irregularly in total value but increased consistently as a ratio to net sales while per unit direct labor stayed the same from 2022 to 2024.¹⁵ Energy and utility costs, which accounted for the smallest share of total COGS (less than one percent), increased in total value and as a ratio to net sales, but remained the same on a per unit basis from 2022 to 2024. ***.¹⁶

As presented in table 6.1, total COGS decreased each year from 2022 to 2024, while the ratio of COGS to net sales rose each year (driven mostly by lower sales volume). The AUVs of total COGS increased irregularly from 2022 to 2024, reflecting the fluctuations in per unit raw materials and other factory costs.

Based on the data in table 6.1, all presented measures of gross profit decreased consistently from *** in 2022 to *** in 2023 and to *** in 2024, reflecting net sales volume and price declines as well as increases in raw materials and other factory costs.^{17 18}

¹⁵ *** direct labor costs *** direct labor costs as a ratio to net sales and per unit from 2023 to 2024.

*** U.S. producer questionnaire, 3.9e.

*** direct labor costs ***. *** U.S. producer questionnaire, 3.9e.

¹⁶ ***. *** U.S. producer questionnaire, 3.9e.

¹⁷ *** net sales declined faster than its total COGS, resulting in *** from 2022 to 2024.

¹⁸ *** gross profit indicators *** from 2022 to 2024 but ***.

SG&A expenses and operating income or loss

As presented in table 6.1, U.S. producers' total, SG&A expense ratios (i.e., total SG&A expenses divided by net sales), and per unit SG&A expenses increased from 2022 to 2024. Gunite explained that its SG&A costs ***.¹⁹ Webb's SG&A expenses ***.²⁰

Table 6.1 shows that U.S. producers' operating income decreased each year from 2022 to 2024. The trend in the operating performance of U.S. producers is attributable to the similar reasons as those for gross profit from 2022 to 2024 (i.e., net sales AUVs declined while unit COGS and SG&A expenses increased).

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. In table 6.1, these items are aggregated and only the net amount is shown (revealing that net expenses increased irregularly) from 2022 to 2024.²¹ Net income declined consistently from 2022 to 2024.²²

¹⁹ *** U.S. producer questionnaire, 3.9e.

²⁰ *** U.S. producer questionnaire, 3.9e.

²¹ U.S. producer *** accounted for all of the other expenses/income, net below operating profits. ***. Emails from ***, July 17, 2024 and May 13 to 16, 2025.

²² A variance analysis is not shown due to the different production levels, large variety of product mixes, and different cost structures between the two reporting firms.

Capital expenditures and research and development expenses

Table 6.7 presents capital expenditures, by firm, and table 6.9 presents R&D expenses, by firm. Tables 6.8 and 6.10 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. Capital expenditures were higher in 2024 than in 2022, while R&D expenditures declined each year.

Table 6.7 Brake drums: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

Table 6.8 Brake drums: U.S. producers' narrative descriptions of their capital expenditures, by firm

| Firm | Narrative on capital expenditures |
|--------|-----------------------------------|
| Gunite | *** |
| Webb | *** |

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

Table 6.9 Brake drums: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

Table 6.10 Brake drums: U.S. producers' narrative descriptions of their R&D expenses, by firm

| Firm | Narrative on R&D expenses |
|--------|---------------------------|
| Gunite | *** |
| Webb | *** |

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

Assets and return on assets

Table 6.11 presents data on the U.S. producers' total assets while table 6.12 presents their operating ROA.²³ Table 6.13 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total net assets were lower in 2024 than in 2022, but ROA declined each year.

Table 6.11 Brake drums: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

Table 6.12 Brake drums: U.S. producers' ROA, by firm and period

Ratio in percent

| Firm | 2022 | 2023 | 2024 |
|-----------|------|------|------|
| Gunite | *** | *** | *** |
| Webb | *** | *** | *** |
| All firms | *** | *** | *** |

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

Table 6.13 Brake drums: U.S. producers' narrative descriptions of their total net assets, by firm

| Firm | Narrative on assets |
|--------|---------------------|
| Gunite | *** |
| Webb | *** |

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

²³ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Capital and investment

The Commission requested U.S. producers of brake drums to describe any actual or potential negative effects of imports of brake drums from China and/or Turkey on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.14 presents the number of firms reporting an impact in each category and table 6.15 provides the U.S. producers' narrative responses.

Table 6.14 Brake drums: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect

Number of firms reporting

| Effect | Category | Count |
|--|------------|-------|
| Cancellation, postponement, or rejection of expansion projects | Investment | *** |
| Denial or rejection of investment proposal | Investment | *** |
| Reduction in the size of capital investments | Investment | *** |
| Return on specific investments negatively impacted | Investment | *** |
| Other investment effects | Investment | *** |
| Any negative effects on investment | Investment | *** |
| Rejection of bank loans | Growth | *** |
| Lowering of credit rating | Growth | *** |
| Problem related to the issue of stocks or bonds | Growth | *** |
| Ability to service debt | Growth | *** |
| Other growth and development effects | Growth | *** |
| Any negative effects on growth and development | Growth | *** |
| Anticipated negative effects of imports | Future | *** |

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

Table 6.15 Brake drums: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

| Item | Firm name and narrative on impact of imports |
|------|--|
| *** | *** |
| *** | *** |
| *** | *** |
| *** | *** |
| *** | *** |
| *** | *** |
| *** | *** |

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

Part 7: Threat considerations and information on nonsubject countries

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

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

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

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

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

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

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

Subject countries

The Commission issued foreign producer/exporter questionnaires to approximately 80 firms for which valid contact information was obtained that are believed to produce and/or export brake drums from China and Turkey.³ Responses to the Commission’s questionnaire were received from seven firms: one producer in China (ConMet),⁴ four producers in Turkey (Akis, Eker Bijon, EKU, and Safak Dokum), and 2 resellers in Turkey (Altunyay Otomotiv Sanayi ve Ticaret Ltd.Sti. (“Altunyay”) and Ford Otomotiv Sanayi A.S. (“Ford Otomotiv”)).⁵ Table 7.1 presents the number of producers and/or exporters in each subject country that responded to the Commission’s questionnaire, their estimated share of total production of brake drums in each subject country during 2024, and their exports to the United States as a share of U.S. imports by each subject country in 2024.

Table 7.1 Brake drums: Number of responding firms, approximate shares of subject country production, and exports to the United States as a share of U.S. imports from subject country, 2024

| Country | Number of responding firms | Approximate share of production (percent) | Exports as a share of U.S. imports from subject country (percent) |
|---------|----------------------------|---|---|
| China | 1 | *** | *** |
| Turkey | 6 | *** | *** |

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

Note: “Approximate share of production” reflects the responding firms’ estimates of their production as a share of total country production of brake drums in 2024. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm’s share of the total requested. For countries in which more than one firm responded, the average denominator for reasonably reported estimates is used in the share presented.

Note: “Exports as a share of U.S. imports” reflects a comparison of export data reported by firms in response to the Commission’s foreign producer questionnaire with official Commerce import statistics using HTS statistical reporting number 8708.30.5020, as adjusted using questionnaire responses and to remove out-of-scope merchandise using proprietary, Census-edited Customs import records.

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

⁴ ConMet submitted a combined foreign producer questionnaire response for the following two establishments in China: ConMet Weifang Mechanical Co. Ltd. and China Shandong ConMet Mechanical Co. Ltd.

⁵ Six firms—***—certified in the preliminary phase of these investigations that they had not produced or exported brake drums at any time since January 1, 2021. Two additional firms—***—certified in this final phase that they had not produced or exported brake drums at any time since January 1, 2022.

Tables 7.2 and 7.3 present information on the brake drum operations of the responding producers in China and Turkey, by firm and subject foreign industry, respectively. Table 7.4 presents summary data submitted by exporters in Turkey that reported exports to the United States of brake drums that their firm did not produce, but were produced by other firms in Turkey (i.e., foreign resellers). No foreign resellers in China submitted a questionnaire response.

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

| Subject foreign industry: producer name | Production (units) | Share of reported production (percent) | Exports to the United States (units) | Share of reported exports to the United States (percent) | Total shipments (units) | Share of firm's total shipments exported to the United States (percent) |
|--|-----------------------|---|---|---|-------------------------------|--|
| China: ConMet | *** | *** | *** | *** | *** | *** |
| Turkey: Akis | *** | *** | *** | *** | *** | *** |
| Turkey: Eker Bijon | *** | *** | *** | *** | *** | *** |
| Turkey: EKU | *** | *** | *** | *** | *** | *** |
| Turkey: Safak Dokum | *** | *** | *** | *** | *** | *** |
| All reporting producers | 2,517,885 | 100.0 | *** | 100.0 | 2,512,628 | *** |

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

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

Table 7.3 Brake drums: Summary data for subject foreign producers, by subject foreign industry, 2024

| Subject foreign industry | Production (units) | Share of reported production (percent) | Exports to the United States (units) | Share of reported exports to the United States (percent) | Total shipments (units) | Share of firm's total shipments exported to the United States (percent) |
|--------------------------------|-----------------------|---|---|---|-------------------------------|--|
| China | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** |
| All subject foreign industries | 2,517,885 | 100.0 | *** | 100.0 | 2,512,628 | *** |

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

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

Table 7.4 Brake drums: Summary data for subject foreign resellers, by firm, 2024

| Subject foreign industry: Reseller name | Resales exported to the United States (units) | Share of resales exported to the United States (percent) |
|---|---|--|
| Turkey: Altunyay | *** | *** |
| Turkey: Ford Otomotiv | *** | *** |
| All individual resellers | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". *** reported resales exported to the United States in ***.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of brake drums since January 1, 2022. *** indicated in their questionnaire responses that they had experienced such changes. Table 7.5 presents the changes identified by these subject producers in their responses to the Commission's questionnaires. Producer *** reported the opening of *** in *** and a consolidation of firms in ***. Producer *** reported the acquisition of the *** brake drum manufacturing facility in ***. ConMet company representatives testified that the ConMet manufacturing operations in China are wholly-owned and are fully integrated throughout the entire production process from the foundry to the machining of brake drums, in addition to other commercial vehicle parts.⁶

Table 7.5 Brake drums: Reported changes in operations in subject foreign industries since January 1, 2022, by reported change category and firm

| Item | Subject foreign industry: firm name: narrative response |
|----------------|---|
| Plant openings | *** |
| Acquisitions | *** |
| Consolidations | *** |

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

⁶ ConMet, with headquarters in Vancouver, Washington, is a subsidiary of U.S.-based Amsted Industries. Conference transcript, pp. 105 to 106 (Marr); hearing transcript, pp. 105 to 106 (Marr).

Industry events that have occurred in Turkey since January 1, 2022, as identified from public sources, are presented in table 7.6.

Table 7.6 Brake drums: Important industry events in Turkey since 2022

| Item | Subject country: firm name | Event |
|---------------|-------------------------------|--|
| Plant opening | Turkey: Akis | Akis completed production of its foundry with an 80,000-ton casting capacity in 2022. |
| Expansion | Turkey: EKU | In the fourth quarter of 2022, EKU initiated investment in foundry and machining to increase its capacity. With completion expected in 2024, it projected a production capacity increase of 200 percent. With the new investment, EKU “aim{s} to continue growing in existing and new markets as Europe’s largest heavy commercial brake drum and brake disc manufacturer.” EKU reported that 90 percent of its production is exported to 100 countries. |

Source: Akis website, <https://www.akisasansor.com.tr/en/group-companies/akis-casting>, retrieved July 15, 2024; Akis website, <https://www.akisasansor.com.tr/en/corporate/history>, retrieved July 18, 2024; “One of Us Dr. Mehmet Dudaroğlu,” EKU website, <https://www.eku.com.tr/en/news-from-us/one-of-us-dr-mehmet-dudaroglu>, retrieved July 18, 2024.

Subject producers were asked to report anticipated changes in the character of their operations or organization relating to the production of brake drums in the future. *** indicated in their questionnaire responses that they anticipated such changes. Table 7.7 presents the anticipated changes identified by these firms.

Table 7.7 Brake drums: Reported anticipated changes in operations in subject foreign industries, by firm

| Subject country: firm name | Narrative response regarding anticipated changes in operations |
|-------------------------------|--|
| *** | *** |
| *** | *** |

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

Installed and practical overall capacity

Table 7.8 presents data on subject producers' installed capacity, practical overall capacity, and practical capacity and production of brake drums. Two subject producers (***) reported increases in installed overall capacity from 2022 to 2024 and three subject producers (***) reported increases in practical overall capacity. The other two responding producers in *** reported no change in installed and practical overall capacity. Aggregate installed overall capacity increased by 21.9 percent from 2022 to 2024 and aggregate practical overall capacity similarly increased by 23.6 percent. Installed and practical overall capacity utilization both declined from 2022 to 2024, by 8.5 and 10.8 percentage points, respectively.

Table 7.8 Brake drums: Installed and practical capacity and production on the same equipment as in-scope brake drum production for producers in subject foreign industries, by period

Capacity and production in units; utilization in percent

| Item | Measure | 2022 | 2023 | 2024 |
|-----------------------|-------------|-----------|-----------|-----------|
| Installed overall | Capacity | 7,904,714 | 8,154,714 | 9,638,009 |
| Installed overall | Production | 6,288,893 | 5,956,333 | 6,848,366 |
| Installed overall | Utilization | 79.6 | 73.0 | 71.1 |
| Practical overall | Capacity | 6,918,674 | 7,073,211 | 8,552,543 |
| Practical overall | Production | 6,288,893 | 5,956,333 | 6,848,366 |
| Practical overall | Utilization | 90.9 | 84.2 | 80.1 |
| Practical Brake drums | Capacity | 3,318,786 | 2,998,535 | 3,077,213 |
| Practical Brake drums | Production | 2,759,004 | 2,127,689 | 2,517,885 |
| Practical Brake drums | Utilization | 83.1 | 71.0 | 81.8 |

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

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

Constraints on capacity

Table 7.9 presents subject producers' reported capacity constraints since January 1, 2022. Reported capacity constraints identified by producers include production bottlenecks, existing labor force, supply of material inputs, fuel or energy, and other constraints.

Table 7.9 Brake drums: Subject producers' reported constraints to practical overall capacity, since January 1, 2022

| Type of constraint | Subject country: firm name: narrative response |
|---------------------------|--|
| Production bottlenecks | *** |
| Production bottlenecks | *** |
| Production bottlenecks | *** |
| Existing labor force | *** |
| Existing labor force | *** |
| Supply of material inputs | *** |
| Fuel or energy | *** |
| Fuel or energy | *** |
| Fuel or energy | *** |
| Other constraints | *** |

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

Operations on brake drums

Aggregate brake drum operations in the subject countries

Table 7.10 presents information on the brake drum operations of the responding producers/exporters (aggregate data for all subject foreign industries). One producer (***) reported an increase in its practical brake drum capacity, two responding producers (***) reported declines, and the remaining two responding producers (***) reported no change in capacity. Aggregate subject producers' capacity decreased by 9.6 percent from 2022 to 2023, but increased in 2024 to a level that was 7.3 percent lower than in 2022. Production followed a similar trend, decreasing by 22.9 percent from 2022 to 2023, and increasing in 2024 to a level that was 8.7 percent lower than in 2022. Relative to levels reported in 2022, 2023, and 2024, subject producers' capacity and production are projected to be higher in both calendar years 2025 and 2026. Capacity utilization decreased from 83.1 percent in 2022 to 71.0 percent in 2023, before increasing to 81.8 percent in 2024. Capacity utilization is projected to be higher in 2025 than levels reported in 2022, 2023, and 2024, but is projected to decline in 2026 to a level below that reported in 2022 and 2024, but higher than in 2023.

As a share of subject producers' total shipments, home market shipments increased overall from *** percent of total shipments in 2022 to *** percent by 2024, while the share of total shipments held by exports to the United States declined from *** percent in 2022 to *** percent in 2023 and increased to *** percent in 2024. Exports to all other markets as a share of total shipments increased from *** percent in 2022 to *** percent in 2023, and was lower in 2024 at *** percent.

Subject producers' aggregate home market shipments⁷ increased by *** percent from 2022 to 2024. The aggregate subject producers' exports to the United States decreased by *** percent from 2022 to 2023, before increasing by *** percent in 2024 to a level that was *** percent below that reported in 2022.⁸ Exports to all other markets by the subject producers declined by *** percent from 2022 to 2024. Relative to 2024 levels, home market

⁷ As a share of total home market shipments, subject producers' internal consumption accounted for ***, **, and ** percent during 2022, 2023, and 2024, respectively. Projections indicate that subject producers' internal consumption is expected to account for ** and ** percent of total home market shipments during 2025 and 2026.

⁸ Of those firms providing questionnaire responses, the leading exporters of brake drums to the United States during all periods for which data were collected in these investigations were **. Together, these two firms accounted for ** percent of total reported exports to the United States in 2024.

shipments and exports to the United States and all other markets are projected to be higher in 2025 and 2026. Projections for home market shipments and exports to the United States are also projected to be higher in 2025 and 2026 than levels reported in 2022.

Table 7.10 Brake drums: Data on subject foreign industries, by item and period

Quantity in units

| Item | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|---------------------------------------|-----------|-----------|-----------|-----------------|-----------------|
| Capacity | 3,318,786 | 2,998,535 | 3,077,213 | 3,361,513 | 3,831,433 |
| Production | 2,759,004 | 2,127,689 | 2,517,885 | 2,840,925 | 2,966,625 |
| End-of-period inventories | 119,685 | 76,690 | 75,720 | 43,708 | 60,338 |
| Internal consumption | *** | *** | *** | *** | *** |
| Commercial home market shipments | *** | *** | *** | *** | *** |
| Home market shipments | *** | *** | *** | *** | *** |
| Exports to the United States | *** | *** | *** | *** | *** |
| Exports to all other markets | *** | *** | *** | *** | *** |
| Export shipments | *** | *** | *** | *** | *** |
| Total shipments | 2,786,626 | 2,170,684 | 2,512,628 | 2,872,937 | 2,949,995 |
| Resales exported to the United States | *** | *** | *** | *** | *** |
| Total exports to the United States | *** | *** | *** | *** | *** |

Table continued.

Table 7.10 (Continued) Brake drums: Data on subject foreign industries, by item and period

Share and ratio in percent

| Item | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|---|-------|-------|-------|-----------------|-----------------|
| Capacity utilization ratio | 83.1 | 71.0 | 81.8 | 84.5 | 77.4 |
| Inventory ratio to production | 4.3 | 3.6 | 3.0 | 1.5 | 2.0 |
| Inventory ratio to total shipments | 4.3 | 3.5 | 3.0 | 1.5 | 2.0 |
| Internal consumption share | *** | *** | *** | *** | *** |
| Commercial home market shipments share | *** | *** | *** | *** | *** |
| Home market shipments share | *** | *** | *** | *** | *** |
| Exports to the United States share | *** | *** | *** | *** | *** |
| Exports to all other markets share | *** | *** | *** | *** | *** |
| Export shipments share | *** | *** | *** | *** | *** |
| Total shipments share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Share of total exports to the United States exported by producers | *** | *** | *** | *** | *** |
| Share of total exports to the United States exported by resellers | *** | *** | *** | *** | *** |
| Adjusted share of total shipments exported to the United States | *** | *** | *** | *** | *** |

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

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

Practical brake drum capacity and production by subject foreign industry

Table 7.11 presents information on subject producers' production, capacity, and capacity utilization by subject country.

The single responding brake drum producer in China reported a capacity decrease of *** percent from 2022 to 2023, but an increase in 2024 to a level that was *** percent lower than reported in 2022. Similar trends in production, though a larger downward volume shift from 2022 to 2023, resulted in a decline in capacity utilization from *** percent in 2022 to *** percent in 2023, and an increase to *** percent in 2024. The Chinese producer's capacity and production are projected to increase from 2024 to 2025 but remain at that 2025 level in 2026.

The responding producers' capacity and production in Turkey increased overall by *** percent and *** percent, respectively, from 2022 to 2024,⁹ as one producer in Turkey, Akis, reported a plant opening. Capacity utilization in Turkey declined from *** percent in 2022 to *** percent in 2023, but increased to *** percent in 2024. Capacity and production of responding producers in Turkey are projected to be higher than 2024 levels in 2025 and 2026. The largest responding producer in Turkey, ***, accounted for *** percent of reported brake drum production in Turkey during 2024.¹⁰

⁹ Aggregate reported production in Turkey decreased by *** percent from 2022 to 2023, before increasing in 2024 to a level that was *** percent higher than that reported in 2022.

¹⁰ EKU, one of the oldest foundries in Turkey, maintains both a foundry and a machining facility under the same roof. It states that "{h}aving an integrated foundry has proven to be an advantage for cost savings, as buying from a separate entity that maintains a casting and machining shop increases overhead and logistics costs." EKU's postconference brief, p. 2.

Table 7.11 Brake drums: Subject foreign industries' output: Practical capacity, by subject foreign industry and period

Practical capacity

Quantity in units

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|-----------|-----------|-----------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 3,318,786 | 2,998,535 | 3,077,213 | 3,361,513 | 3,831,433 |

Table continued.

Table 7.11 (Continued) Brake drums: Subject foreign industries' output: Production, by subject foreign industry and period

Production

Quantity in units

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|-----------|-----------|-----------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 2,759,004 | 2,127,689 | 2,517,885 | 2,840,925 | 2,966,625 |

Table continued.

Table 7.11 (Continued) Brake drums: Subject foreign industries' output: Capacity utilization ratio, by subject foreign industry and period

Capacity utilization

Ratio in percent

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|------|------|------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 83.1 | 71.0 | 81.8 | 84.5 | 77.4 |

Table continued.

Table 7.11 (Continued) Brake drums: Subject foreign industries' output: Share of production, by subject foreign industry and period

Share of production

Share in percent

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|-------|-------|-------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

Brake drum exports, by subject country

Table 7.12 presents reported export data of the responding producers/exporters. Exports to the United States by producers in China and Turkey declined from 2022 to 2023 before increasing in 2024 to a level that was *** percent lower than in 2022 for exports from China and *** percent higher than in 2022 for exports from Turkey. Projections indicate that exports to the United States from both China and Turkey are expected to be higher in calendar year 2026 compared with calendar year 2024. Similar trends are reported for total exports by producers in both China and Turkey.

Exports to the United States accounted for a majority share (*** percent) of China's total shipments in 2024 and about one-third (*** percent) of Turkey's total shipments in 2024. Total exports accounted for the following large majority shares of the individual subject countries' total shipments in 2024 by source: China (*** percent) and Turkey (*** percent).

Table 7.12 Brake drums: Subject foreign industries' exports: Exports to the United States, by subject foreign industry and period

Exports to the United States

Quantity in units

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|------|------|------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | *** | *** | *** | *** | *** |

Table continued.

Table 7.12 (Continued) Brake drums: Subject foreign industries' exports: Share of total shipments exported to the United States, by subject foreign industry and period

Share of total shipments exported to the United States

Share in percent

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|------|------|------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | *** | *** | *** | *** | *** |

Table continued.

Table 7.12 (Continued) Brake drums: Subject foreign industries' exports: Total exports, by subject foreign industry and period

Total exports

Quantity in units

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|---------------------------------|-------------|-------------|-------------|------------------------|------------------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | *** | *** | *** | *** | *** |

Table continued.

Table 7.12 (Continued) Brake drums: Subject foreign industries' exports: Share of total shipments exported, by subject foreign industry and period

Share of total shipments exported

Share in percent

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|---------------------------------|-------------|-------------|-------------|------------------------|------------------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | *** | *** | *** | *** | *** |

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

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

Brake drum inventories, by subject foreign industry

Table 7.13 presents information on ending inventory of the responding producers, by subject foreign country. Foreign producers' ending inventories declined overall by *** percent in China and *** percent in Turkey. Similar trends were reported for the subject foreign producers' ratio of inventories to total shipments. Further declines into 2025 and 2026 are expected by the responding producers in Turkey, whereas the producer in China projected higher inventory levels in 2025 and 2026.

Table 7.13 Brake drums: Subject foreign industries' ending inventories: End of period inventories, by subject foreign industry and period

Quantity in units

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|---------|--------|--------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 119,685 | 76,690 | 75,720 | 43,708 | 60,338 |

Table continued.

Table 7.13 (Continued) Brake drums: Subject foreign industries' ending inventories: Ratio of inventories to total shipments, by subject foreign industry and period

Ratio in percent

| Subject foreign industry | 2022 | 2023 | 2024 | Projection 2025 | Projection 2026 |
|--------------------------------|------|------|------|-----------------|-----------------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| All subject foreign industries | 4.3 | 3.5 | 3.0 | 1.5 | 2.0 |

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

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

Alternative products

As shown in table 7.14, responding firms in China and Turkey produced other products on the same equipment and machinery used to produce brake drums. None of the responding firms reporting production of composite or steel brake drums using the same equipment and machinery used to produce the in-scope brake drums.

Representing an overall declining share from 2022 to 2024, brake drums accounted for 36.8 percent of subject producers' overall production in 2024. All responding producers in China and Turkey reported the production of other products on the same equipment and machinery used to produce brake drums. Other products include brake discs (rotors), wheel hubs, industrial parts for special machinery, and miscellaneous structural castings.

Table 7.14 Brake drums: Overall production on the same equipment as in-scope production by producers in the subject countries, by product type and period

Quantity in units; share in percent

| Product type | Measure | 2022 | 2023 | 2024 |
|-------------------------------|----------|-----------|-----------|-----------|
| Brake drums | Quantity | 2,759,004 | 2,127,689 | 2,517,885 |
| Composite / steel brake drums | Quantity | — | — | — |
| Other products | Quantity | 3,529,889 | 3,828,644 | 4,330,481 |
| Out-of-scope products | Quantity | 3,529,889 | 3,828,644 | 4,330,481 |
| All products | Quantity | 6,288,893 | 5,956,333 | 6,848,366 |
| Brake drums | Share | 43.9 | 35.7 | 36.8 |
| Composite / steel brake drums | Share | — | — | — |
| Other products | Share | 56.1 | 64.3 | 63.2 |
| Out-of-scope products | Share | 56.1 | 64.3 | 63.2 |
| All products | Share | 100.0 | 100.0 | 100.0 |

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

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

Exports

Table 7.15 presents Global Trade Atlas (“GTA”) data for exports of “brakes and servo-brakes” from subject countries to the United States and to all destination markets.¹¹ China was, by far, the larger exporter of the two subject countries, accounting for 96.7 percent of their combined exports to the United States and 93.4 percent of their combined exports to all destination markets in 2024. During 2024, 24.6 percent of exports from China and 12.1 percent of exports from Turkey were destined for the United States. Overall, in terms of value, exports from China to the United States were lower in 2024 than in 2022, but the exports from Turkey to the United States were higher. Collectively, the export value from the combined subject countries to the United States decreased by 10.0 percent from 2022 to 2024.

¹¹ The presentation of GTA export data in this report is for “brakes and servo-brakes” reported at the 6-digit HS level, which includes not only in-scope brake drums, but also other out-of-scope brake items. Value data are presented for GTA export data, as quantity data are not uniformly available.

Table 7.15 Brakes and servo-brakes: Global exports from subject exporters: Exports to the United States, by exporter and period

Value in 1,000 dollars

| Exporter | Measure | 2022 | 2023 | 2024 |
|-------------------|---------|-----------|-----------|-----------|
| China | Value | 2,283,265 | 1,939,468 | 2,030,379 |
| Turkey | Value | 51,346 | 56,223 | 70,165 |
| Subject exporters | Value | 2,334,611 | 1,995,691 | 2,100,544 |

Table continued.

Table 7.15 (Continued) Brakes and servo-brakes: Global exports from subject exporters: Exports to all destination markets, by exporter and period

Value in 1,000 dollars

| Exporter | Measure | 2022 | 2023 | 2024 |
|-------------------|---------|-----------|-----------|-----------|
| China | Value | 7,634,586 | 7,554,275 | 8,260,471 |
| Turkey | Value | 518,930 | 558,258 | 580,859 |
| Subject exporters | Value | 8,153,516 | 8,112,533 | 8,841,330 |

Table continued.

Table 7.15 (Continued) Brakes and servo-brakes: Global exports from subject exporters: Share of exports exported to the United States, by exporter and period

Shares in percent

| Exporter | Measure | 2022 | 2023 | 2024 |
|-------------------|---------|------|------|------|
| China | Share | 29.9 | 25.7 | 24.6 |
| Turkey | Share | 9.9 | 10.1 | 12.1 |
| Subject exporters | Share | 28.6 | 24.6 | 23.8 |

Source: Official exports statistics from China and Turkey under HS subheading 8708.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed March 25, 2025.

Note: Shares represent the shares of value exported to the United States out of all destination markets. Shares shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. inventories of imported merchandise

Table 7.16 presents data on U.S. importers' reported inventories of brake drums. U.S. importers' inventories of imports from China and Turkey combined decreased overall by 25.6 percent from 2022 to 2024. U.S. importers' inventories of imports from nonsubject sources, which accounted for only 7.0 percent of ending inventories in 2024 held by importers from all sources, increased overall by 363.8 percent from 2022 to 2024. Subject U.S. importers holding the largest amounts of inventories include ***.¹²

Table 7.16 Brake drums: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in units; ratio in percent

| Measure | Source | 2022 | 2023 | 2024 |
|-------------------------------------|--------------------|---------|---------|---------|
| Inventories quantity | China | *** | *** | *** |
| Ratio to imports | China | *** | *** | *** |
| Ratio to U.S. shipments of imports | China | *** | *** | *** |
| Ratio to total shipments of imports | China | *** | *** | *** |
| Inventories quantity | Turkey | *** | *** | *** |
| Ratio to imports | Turkey | *** | *** | *** |
| Ratio to U.S. shipments of imports | Turkey | *** | *** | *** |
| Ratio to total shipments of imports | Turkey | *** | *** | *** |
| Inventories quantity | Subject sources | 509,917 | 368,821 | 379,489 |
| Ratio to imports | Subject sources | 15.5 | 14.8 | 16.0 |
| Ratio to U.S. shipments of imports | Subject sources | 18.5 | 15.0 | 17.2 |
| Ratio to total shipments of imports | Subject sources | *** | *** | *** |
| Inventories quantity | Nonsubject sources | 6,181 | 5,486 | 28,665 |
| Ratio to imports | Nonsubject sources | 3.3 | 4.0 | 16.4 |
| Ratio to U.S. shipments of imports | Nonsubject sources | 3.3 | 4.0 | 19.1 |
| Ratio to total shipments of imports | Nonsubject sources | *** | *** | *** |
| Inventories quantity | All import sources | 516,098 | 374,307 | 408,154 |
| Ratio to imports | All import sources | 14.8 | 14.2 | 16.1 |
| Ratio to U.S. shipments of imports | All import sources | 17.5 | 14.4 | 17.3 |
| Ratio to total shipments of imports | All import sources | *** | *** | *** |

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

Note: 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 "—".

¹² Webb argues that importers of brake drums from China and Turkey responded to the tight market in 2022 by importing "enormous volumes" of brake drums in 2022 and into 2023, which resulted in an oversupply of brake drums and inventory overhang of subject imports as demand began to normalize in 2023. It adds that in 2023 and 2024, importers were working down elevated inventories that had built up by late 2022. Webb's prehearing brief, pp. 1 and 26; hearing transcript, pp. 7 to 8 (Mintzer) and 89 to 90 (Dougan). ConMet testified that at the beginning of 2023 it was "holding quite a bit of inventory" and that it slowly worked down that inventory over 2023 and 2024. Hearing transcript, pp. 186 to 187.

U.S. importers’ outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of brake drums after December 31, 2024. Twenty-four of the 44 importers responding to the Commission’s questionnaire reported that they had imported or arranged such imports, 18 of which reported arranged imports from subject sources. Their reported data are presented in table 7.17. The subject sources combined accounted for *** percent of U.S. importers’ arranged imports of brake drums during calendar year 2025. Separately, China, Turkey, and nonsubject sources accounted for ***, ***, and *** percent, respectively, of U.S. importers’ arranged imports of brake drums for 2025.

Table 7.17 Brake drums: Arranged imports, by source and by period

Quantity in units

| Source | Q1 2025 | Q2 2025 | Q3 2025 | Q4 2025 | Total |
|--------------------|---------|---------|---------|---------|-------|
| China | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** |

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

Third-country trade actions

There are no known trade remedy actions on brake drums concerning either of the subject countries in third-country markets.

Information on nonsubject countries

Table 7.18 presents global export data for brake parts including in-scope brake drums, as well as out-of-scope brake drums, and other types of brakes and brake parts. The largest global exporter was China, representing 21.6 percent of global export values in 2024, with exports of more than \$8.2 billion. The next four leading exporters, which accounted for a combined 38.2 percent of global export value in 2024, were Germany, Mexico, Italy, and Poland. Exports from nonsubject countries combined (i.e., other than the United States, China, and Turkey), represented about 70.0 percent of total global exports, by value, in 2024.

Table 7.18 Brakes and servo-brakes: Global exports, by reporting country and by period

Value in 1,000 dollars; Share in percent

| Exporting country | Measure | 2022 | 2023 | 2024 |
|-------------------------|----------------|------------|------------|------------|
| United States | Value | 2,502,731 | 2,760,720 | 2,621,093 |
| China | Value | 7,634,586 | 7,554,275 | 8,260,471 |
| Turkey | Value | 518,930 | 558,258 | 580,859 |
| Subject exporters | Value | 8,153,516 | 8,112,533 | 8,841,330 |
| Germany | Value | 4,724,661 | 5,126,153 | 5,105,469 |
| Mexico | Value | 4,114,183 | 4,490,206 | 4,544,567 |
| Italy | Value | 2,196,808 | 2,482,820 | 2,490,911 |
| Poland | Value | 1,819,537 | 2,367,194 | 2,486,368 |
| Japan | Value | 1,564,729 | 1,564,110 | 1,598,570 |
| Czech Republic | Value | 1,338,445 | 1,509,956 | 1,585,290 |
| France | Value | 1,051,214 | 1,126,663 | 1,138,840 |
| Spain | Value | 1,000,233 | 1,115,457 | 1,060,015 |
| United Kingdom | Value | 756,439 | 788,184 | 764,966 |
| All other exporters | Value | 5,802,929 | 6,270,288 | 6,025,706 |
| All reporting exporters | Value | 35,025,426 | 37,714,285 | 38,263,125 |
| United States | Share of value | 7.1 | 7.3 | 6.9 |
| China | Share of value | 21.8 | 20.0 | 21.6 |
| Turkey | Share of value | 1.5 | 1.5 | 1.5 |
| Subject exporters | Share of value | 23.3 | 21.5 | 23.1 |
| Germany | Share of value | 13.5 | 13.6 | 13.3 |
| Mexico | Share of value | 11.7 | 11.9 | 11.9 |
| Italy | Share of value | 6.3 | 6.6 | 6.5 |
| Poland | Share of value | 5.2 | 6.3 | 6.5 |
| Japan | Share of value | 4.5 | 4.1 | 4.2 |
| Czech Republic | Share of value | 3.8 | 4.0 | 4.1 |
| France | Share of value | 3.0 | 3.0 | 3.0 |
| Spain | Share of value | 2.9 | 3.0 | 2.8 |
| United Kingdom | Share of value | 2.2 | 2.1 | 2.0 |
| All other exporters | Share of value | 16.6 | 16.6 | 15.7 |
| All reporting exporters | Share of value | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheading 8708.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed March 25, 2025.

Note: Shares shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2024 data.

APPENDIX A
FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

| Citation | Title | Link |
|------------------------------------|---|---|
| 89 FR 53441, June 26, 2024 | Brake Drums From China and Turkey; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations | https://www.govinfo.gov/content/pkg/FR-2024-06-26/pdf/2024-13969.pdf |
| 89 FR 58106, July 17, 2024 | Certain Brake Drums from the People's Republic of China and the Republic of Türkiye: Initiation of Countervailing Duty Investigations | https://www.govinfo.gov/content/pkg/FR-2024-07-17/pdf/2024-15713.pdf |
| 89 FR 58116, July 17, 2024 | Certain Brake Drums from the People's Republic of China and the Republic of Türkiye: Initiation of Less-Than-Fair-Value Investigations | https://www.govinfo.gov/content/pkg/FR-2024-07-17/pdf/2024-15714.pdf |
| 89 FR 65397, August 9, 2024 | Brake Drums From China and Turkey; Determinations | https://www.govinfo.gov/content/pkg/FR-2024-08-09/pdf/2024-17680.pdf |
| 89 FR 72827, September 6, 2024 | Certain Brake Drums From the People's Republic of China and the Republic of Türkiye: Postponement of Preliminary Determinations in the Countervailing Duty Investigations | https://www.govinfo.gov/content/pkg/FR-2024-09-06/pdf/2024-20070.pdf |
| 89 FR 91675, November 20, 2024 | Certain Brake Drums From the Republic of Türkiye and the People's Republic of China: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations | https://www.govinfo.gov/content/pkg/FR-2024-11-20/pdf/2024-27006.pdf |
| 89 FR 95740, December 3, 2024 | Certain Brake Drums From the Republic of Türkiye: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination | https://www.govinfo.gov/content/pkg/FR-2024-12-03/pdf/2024-28239.pdf |
| 89 FR 95744, December 3, 2024 | Certain Brake Drums From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination | https://www.govinfo.gov/content/pkg/FR-2024-12-03/pdf/2024-28238.pdf |
| 89 FR 100465, December 12, 2024 | Certain Brake Drums From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination; Correction | https://www.govinfo.gov/content/pkg/FR-2024-12-12/pdf/C1-2024-28238.pdf |

| Citation | Title | Link |
|---------------------------------|--|---|
| 90 FR 8377, January 29, 2025 | Certain Brake Drums From the Republic of Türkiye: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures | https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-01892.pdf |
| 90 FR 8383, January 29, 2025 | Certain Brake Drums 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 | https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-01891.pdf |
| 90 FR 9162, February 7, 2025 | Brake Drums From China and Turkey; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations | https://www.govinfo.gov/content/pkg/FR-2025-02-07/pdf/2025-02365.pdf |
| 90 FR 25999, June 18, 2025 | Certain Brake Drums From the Republic of Türkiye: Final Affirmative Determination of Sales at Less Than Fair Value | https://www.govinfo.gov/content/pkg/FR-2025-06-18/pdf/2025-11230.pdf |
| 90 FR 26002, June 18, 2025 | Certain Brake Drums From the People's Republic of China: Final Affirmative Countervailing Duty Determination | https://www.govinfo.gov/content/pkg/FR-2025-06-18/pdf/2025-11229.pdf |
| 90 FR 26008, June 18, 2025 | Certain Brake Drums From the Republic of Türkiye: Final Affirmative Countervailing Duty Determination | https://www.govinfo.gov/content/pkg/FR-2025-06-18/pdf/2025-11231.pdf |
| 90 FR 26011, June 18, 2025 | Certain Brake Drums From People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value | https://www.govinfo.gov/content/pkg/FR-2025-06-18/pdf/2025-11228.pdf |

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject: Brake Drums from China and Turkey
Inv. Nos.: 701-TA-729-730 and 731-TA-1698-1699 (Final)
Date and Time: June 17, 2025 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Sydney Mintzer**, Mayer Brown LLP)
In Opposition to Imposition (**Matthew R. Nicely**, Akin Gump Strauss Hauer & Feld LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Mayer Brown LLP
Washington, DC
on behalf of

Webb Wheel Products, Inc. ("Webb")
TruckPro, LLC

Johnathon Capps, Vice President, Aftermarket Business Unit,
Webb Wheel Products Inc.

Brad Begley, President, OEM Business Unit, Webb Wheel Products Inc.

Jim Dougan, Partner, ION Economics, LLC

J. Christian Riva, Economic Consultant, ION Economics, LLC

Chuck Broadus (remote), President, TruckPro, LLC

Reid Garrett (remote), Vice President, Product Management and Merchandising,
TruckPro LLC

Sydney Mintzer)
Valerie Denaburg) – OF COUNSEL
Jacob Reiskin)

**In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders:**

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

Consolidated Metco, Inc. (“ConMet”)
Meritor, Inc. (“Meritor”)

Luke Penskar, Chief Financial Officer, ConMet

Mike Hurley, Vice President, Global Business Development, ConMet

Chris Marr, Vice President, Global Manufacturing Strategy, ConMet

Brian Rieger, Vice President, Sales, ConMet

Steve Bennett, President and Chief Operating Officer, Utility Trailer
Manufacturing Company, LLC

Rachel Heemer, North America Purchasing Director, Meritor

Travis Pope, Principal, Capital Trade Inc.

Matthew R. Nicely)
Daniel M. Witkowski) – OF COUNSEL
Julia K. Eppard)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Sydney Mintzer**, Mayer Brown LLP)

In Opposition to Imposition (**Daniel M. Witkowski**, Akin Gump Strauss Hauer & Feld LLP)

APPENDIX C
SUMMARY DATA

Table C-1: Brake drums: Summary data concerning the U.S. market, by item and period..... C.3

Table C-2: Brake drums: Summary data concerning the U.S. market excluding U.S. producer
***, by item and period..... C.5

All producers

Table C.1

Brake drums: Summary data concerning the U.S. market, by item and period

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

| Item | Reported data | | | Period change comparisons | | |
|--|---------------|-----------|-----------|---------------------------|---------|---------|
| | 2022 | 2023 | 2024 | Calendar year | | |
| | | | | 2022–24 | 2022–23 | 2023–24 |
| U.S. consumption quantity: | | | | | | |
| Amount | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Producers' share (fn1) | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Importers' share (fn1): | | | | | | |
| China | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Turkey | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Subject sources | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Nonsubject sources | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| All import sources | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| U.S. consumption value: | | | | | | |
| Amount | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Producers' share (fn1) | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Importers' share (fn1): | | | | | | |
| China | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Turkey | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Subject sources | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Nonsubject sources | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| All import sources | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| U.S. importers' U.S. shipments of imports from: | | | | | | |
| China: | | | | | | |
| Quantity | 2,403,687 | 2,075,669 | 1,706,584 | ▼(29.0) | ▼(13.6) | ▼(17.8) |
| Value | 278,180 | 207,110 | 154,253 | ▼(44.5) | ▼(25.5) | ▼(25.5) |
| Unit value | \$116 | \$100 | \$90 | ▼(21.9) | ▼(13.8) | ▼(9.4) |
| Ending inventory quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Turkey: | | | | | | |
| Quantity | 359,131 | 379,635 | 504,327 | ▲40.4 | ▲5.7 | ▲32.8 |
| Value | 36,825 | 35,095 | 38,169 | ▲3.6 | ▼(4.7) | ▲8.8 |
| Unit value | \$103 | \$92 | \$76 | ▼(26.2) | ▼(9.8) | ▼(18.1) |
| Ending inventory quantity | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Subject sources: | | | | | | |
| Quantity | 2,762,818 | 2,455,304 | 2,210,911 | ▼(20.0) | ▼(11.1) | ▼(10.0) |
| Value | 315,005 | 242,205 | 192,422 | ▼(38.9) | ▼(23.1) | ▼(20.6) |
| Unit value | \$114 | \$99 | \$87 | ▼(23.7) | ▼(13.5) | ▼(11.8) |
| Ending inventory quantity | 509,917 | 368,821 | 379,489 | ▼(25.6) | ▼(27.7) | ▲2.9 |
| Nonsubject sources: | | | | | | |
| Quantity | 185,486 | 138,052 | 150,322 | ▼(19.0) | ▼(25.6) | ▲8.9 |
| Value | 26,839 | 18,123 | 18,037 | ▼(32.8) | ▼(32.5) | ▼(0.5) |
| Unit value | \$145 | \$131 | \$120 | ▼(17.1) | ▼(9.3) | ▼(8.6) |
| Ending inventory quantity | 6,181 | 5,486 | 28,665 | ▲363.8 | ▼(11.2) | ▲422.5 |
| All import sources: | | | | | | |
| Quantity | 2,948,304 | 2,593,356 | 2,361,233 | ▼(19.9) | ▼(12.0) | ▼(9.0) |
| Value | 341,844 | 260,328 | 210,459 | ▼(38.4) | ▼(23.8) | ▼(19.2) |
| Unit value | \$116 | \$100 | \$89 | ▼(23.1) | ▼(13.4) | ▼(11.2) |
| Ending inventory quantity | 516,098 | 374,307 | 408,154 | ▼(20.9) | ▼(27.5) | ▲9.0 |

Table continued.

Table C.1 Continued

Brake drums: Summary data concerning the U.S. market, by item and period

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

| Item | Reported data | | | Period change comparisons | | |
|--|---------------|------|------|---------------------------|---------|---------|
| | 2022 | 2023 | 2024 | Calendar year | | |
| | | | | 2022–24 | 2022–23 | 2023–24 |
| U.S. producers': | | | | | | |
| Practical capacity quantity | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Production quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Capacity utilization (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| U.S. shipments: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Export shipments: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Ending inventory quantity | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Inventories/total shipments (fn1) | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Production workers | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Hours worked (1,000s) | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Wages paid (\$1,000) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Hourly wages (dollars per hour) | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Productivity (units per hour) | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Unit labor costs | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Net sales: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Cost of goods sold (COGS) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Gross profit or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| SG&A expenses | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Operating income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Net income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit COGS | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Unit SG&A expenses | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Unit operating income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit net income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| COGS/sales (fn1) | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Operating income or (loss)/sales (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Net income or (loss)/sales (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Capital expenditures | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Research and development expenses | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Total assets | *** | *** | *** | ▼*** | ▼*** | ▲*** |

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Related party exclusion

Table C.2

Brake drums: Summary data concerning the U.S. market excluding U.S. producer *, by item and period**

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

| Item | Reported data | | | Period change comparisons | | |
|--|---------------|-----------|-----------|---------------------------|---------|---------|
| | 2022 | 2023 | 2024 | Calendar year | | |
| | | | | 2022–24 | 2022–23 | 2023–24 |
| U.S. consumption quantity: | | | | | | |
| Amount | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Producers' share (fn1): | | | | | | |
| Included producers | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Excluded producers | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| All U.S. producers | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Importers' share (fn1): | | | | | | |
| China | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Turkey | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Subject sources | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Nonsubject sources | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| All import sources | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| U.S. consumption value: | | | | | | |
| Amount | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Producers' share (fn1): | | | | | | |
| Included producers | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Excluded producers | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| All U.S. producers | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Importers' share (fn1): | | | | | | |
| China | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Turkey | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Subject sources | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Nonsubject sources | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| All import sources | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| U.S. importers' U.S. shipments of imports from: | | | | | | |
| China: | | | | | | |
| Quantity | 2,403,687 | 2,075,669 | 1,706,584 | ▼(29.0) | ▼(13.6) | ▼(17.8) |
| Value | 278,180 | 207,110 | 154,253 | ▼(44.5) | ▼(25.5) | ▼(25.5) |
| Unit value | \$116 | \$100 | \$90 | ▼(21.9) | ▼(13.8) | ▼(9.4) |
| Ending inventory quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Turkey: | | | | | | |
| Quantity | 359,131 | 379,635 | 504,327 | ▲40.4 | ▲5.7 | ▲32.8 |
| Value | 36,825 | 35,095 | 38,169 | ▲3.6 | ▼(4.7) | ▲8.8 |
| Unit value | \$103 | \$92 | \$76 | ▼(26.2) | ▼(9.8) | ▼(18.1) |
| Ending inventory quantity | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Subject sources: | | | | | | |
| Quantity | 2,762,818 | 2,455,304 | 2,210,911 | ▼(20.0) | ▼(11.1) | ▼(10.0) |
| Value | 315,005 | 242,205 | 192,422 | ▼(38.9) | ▼(23.1) | ▼(20.6) |
| Unit value | \$114 | \$99 | \$87 | ▼(23.7) | ▼(13.5) | ▼(11.8) |
| Ending inventory quantity | 509,917 | 368,821 | 379,489 | ▼(25.6) | ▼(27.7) | ▲2.9 |
| Nonsubject sources: | | | | | | |
| Quantity | 185,486 | 138,052 | 150,322 | ▼(19.0) | ▼(25.6) | ▲8.9 |
| Value | 26,839 | 18,123 | 18,037 | ▼(32.8) | ▼(32.5) | ▼(0.5) |
| Unit value | \$145 | \$131 | \$120 | ▼(17.1) | ▼(9.3) | ▼(8.6) |
| Ending inventory quantity | 6,181 | 5,486 | 28,665 | ▲363.8 | ▼(11.2) | ▲422.5 |

Table continued.

Table C.2 Continued

Brake drums: Summary data concerning the U.S. market excluding U.S. producer *, by item and period**

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

| Item | Reported data | | | Period change comparisons | | |
|--|---------------|-----------|-----------|---------------------------|---------|---------|
| | 2022 | 2023 | 2024 | Calendar year | | |
| | | | | 2022-24 | 2022-23 | 2023-24 |
| U.S. importers' U.S. shipments of imports from:--Continued | | | | | | |
| All import sources: | | | | | | |
| Quantity | 2,948,304 | 2,593,356 | 2,361,233 | ▼(19.9) | ▼(12.0) | ▼(9.0) |
| Value | 341,844 | 260,328 | 210,459 | ▼(38.4) | ▼(23.8) | ▼(19.2) |
| Unit value | \$116 | \$100 | \$89 | ▼(23.1) | ▼(13.4) | ▼(11.2) |
| Ending inventory quantity | 516,098 | 374,307 | 408,154 | ▼(20.9) | ▼(27.5) | ▲9.0 |
| Included U.S. producers': | | | | | | |
| Practical capacity quantity | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Production quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Capacity utilization (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| U.S. shipments: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Export shipments: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Ending inventory quantity | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Inventories/total shipments (fn1) | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Production workers | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Hours worked (1,000s) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Wages paid (\$1,000) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Hourly wages (dollars per hour) | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Productivity (units per hour) | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Unit labor costs | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Net sales: | | | | | | |
| Quantity | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Value | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit value | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Cost of goods sold (COGS) | *** | *** | *** | ▼*** | ▼*** | ▲*** |
| Gross profit or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| SG&A expenses | *** | *** | *** | ▲*** | ▼*** | ▲*** |
| Operating income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Net income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit COGS | *** | *** | *** | ▼*** | ▲*** | ▼*** |
| Unit SG&A expenses | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Unit operating income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Unit net income or (loss) (fn2) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| COGS/sales (fn1) | *** | *** | *** | ▲*** | ▲*** | ▲*** |
| Operating income or (loss)/sales (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Net income or (loss)/sales (fn1) | *** | *** | *** | ▼*** | ▼*** | ▼*** |
| Capital expenditures | *** | *** | *** | ▲*** | ▲*** | ▼*** |
| Research and development expenses | *** | *** | *** | *** | *** | *** |
| Total assets | *** | *** | *** | ▼*** | ▼*** | ▲*** |

Table continued.

Table C.2 Continued

Brake drums: Summary data concerning the U.S. market excluding U.S. producer *, by item and period**

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

| Item | Reported data | | | Period change comparisons | | |
|------|---------------|---------------|------|---------------------------|---------|---------|
| | 2022 | Calendar year | | Calendar year | | |
| | | 2023 | 2024 | 2022–24 | 2022–23 | 2023–24 |

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, 7, and appendices H and K of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

HIGH-RESOLUTION IMAGES OF MANUFACTURING PROCESS

Figure D.1 Brake drums: Stacks of rough brake drum castings

* * * * *

Source: Petitions, exh. I-3, p.1.

Figure D.2 Brake drums: De-palletizer

* * * * *

Source: Petitions, exh. I-3, p.1.

Figure D.3 Brake drums: Machining process step 1: The outer diameter and overall height is machined

* * * * *

Source: Petitions, exh. I-3, p.1.

Figure D.4 Brake drums: Step 2: The brake surface is machined

* * * * *

Source: Petitions, exh. I-3, p.1.

Figure D.5 Brake drums: Step 3: The inside backface, pilot diameter, and outside backface are machined

* * * * *

Source: Petitions, exh. I-3, p.1.

Figure D.6 Brake drums: Step 4: The bolt holes and wear indicator (if applicable) are machined

* * * * *

Source: Petitions, exh. I-3, p. 2.

Figure D.7 Brake drums: Parts dryer

* * * * *

Source: Petitions, exh. I-3, p. 2.

APPENDIX E

U.S. SHIPMENTS, BY CHANNELS OF DISTRIBUTION

Table E.1 Brake drums: U.S. producers' U.S. shipments of brake drums, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.2 Brake drums: U.S. importers' U.S. shipments of brake drums from China, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.3 Brake drums: U.S. importers' U.S. shipments of brake drums from Turkey, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.4 Brake drums: U.S. importers' U.S. shipments of brake drums from subject sources, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.5 Brake drums: U.S. importers' U.S. shipments of brake drums from nonsubject sources, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.6 Brake drums: U.S. importers' U.S. shipments of brake drums from all import sources, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table E.7 Brake drums: U.S. producers' and U.S. importers' U.S. shipments of brake drums from all sources, by channels of distribution and period

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

| Channel | Measure | 2022 | 2023 | 2024 |
|-------------------------|-------------------|-------|-------|-------|
| Truck OEM | Quantity | *** | *** | *** |
| Trailer OEM | Quantity | *** | *** | *** |
| OEM aftermarket | Quantity | *** | *** | *** |
| Independent aftermarket | Quantity | *** | *** | *** |
| All channels | Quantity | *** | *** | *** |
| Truck OEM | Value | *** | *** | *** |
| Trailer OEM | Value | *** | *** | *** |
| OEM aftermarket | Value | *** | *** | *** |
| Independent aftermarket | Value | *** | *** | *** |
| All channels | Value | *** | *** | *** |
| Truck OEM | Unit value | *** | *** | *** |
| Trailer OEM | Unit value | *** | *** | *** |
| OEM aftermarket | Unit value | *** | *** | *** |
| Independent aftermarket | Unit value | *** | *** | *** |
| All channels | Unit value | *** | *** | *** |
| Truck OEM | Share of quantity | *** | *** | *** |
| Trailer OEM | Share of quantity | *** | *** | *** |
| OEM aftermarket | Share of quantity | *** | *** | *** |
| Independent aftermarket | Share of quantity | *** | *** | *** |
| All channels | Share of quantity | 100.0 | 100.0 | 100.0 |
| Truck OEM | Share of value | *** | *** | *** |
| Trailer OEM | Share of value | *** | *** | *** |
| OEM aftermarket | Share of value | *** | *** | *** |
| Independent aftermarket | Share of value | *** | *** | *** |
| All channels | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Figure E.1 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by channels of distribution and period, 2024

* * * * *

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

Figure E.2 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for truck OEM, by source and period

* * * * *

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

Figure E.3 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for trailer OEM, by source and period

* * * * *

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

Figure E.4 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for OEM aftermarket, by source and period

* * * * *

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

Figure E.5 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for independent aftermarket, by source and period

* * * * *

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

APPENDIX F

U.S. SHIPMENTS, BY PALLET/NON-PALLET SALES

Table F.1 Brake drums: U.S. producers' U.S. shipments of brake drums, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|-------------------|-------------------|-------------|-------------|-------------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.2 Brake drums: U.S. importers' U.S. shipments of brake drums from China, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.3 Brake drums: U.S. importers' U.S. shipments of brake drums from Turkey, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.4 Brake drums: U.S. importers' U.S. shipments of brake drums from subject sources, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.5 Brake drums: U.S. importers' U.S. shipments of brake drums from nonsubject sources, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.6 Brake drums: U.S. importers' U.S. shipments of brake drums from all import sources, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Table F.7 Brake drums: U.S. producers' and U.S. importers' U.S. shipments of brake drums from all sources, by sales type and period

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

| Sales type | Measure | 2022 | 2023 | 2024 |
|------------------|-------------------|-------|-------|-------|
| Pallet sales | Quantity | *** | *** | *** |
| Non-pallet sales | Quantity | *** | *** | *** |
| All types | Quantity | *** | *** | *** |
| Pallet sales | Value | *** | *** | *** |
| Non-pallet sales | Value | *** | *** | *** |
| All types | Value | *** | *** | *** |
| Pallet sales | Unit value | *** | *** | *** |
| Non-pallet sales | Unit value | *** | *** | *** |
| All types | Unit value | *** | *** | *** |
| Pallet sales | Share of quantity | *** | *** | *** |
| Non-pallet sales | Share of quantity | *** | *** | *** |
| All types | Share of quantity | 100.0 | 100.0 | 100.0 |
| Pallet sales | Share of value | *** | *** | *** |
| Non-pallet sales | Share of value | *** | *** | *** |
| All types | Share of value | 100.0 | 100.0 | 100.0 |

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

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

Figure F.1 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for pallet sales, by source and period

* * * * *

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

Figure F.2 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments for non-pallet sales, by source and period

* * * * *

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

APPENDIX G

U.S. SHIPMENTS OF ASSEMBLIES CONTAINING BRAKE DRUMS

Table G.1 Brake drums: U.S. producers' and U.S. importers' U.S. shipments of brake drums, by attachment status, 2024

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

| Source | Measure | Attached to other merchandise | Not attached to other merchandise | All attachment statuses |
|--------------------|------------|-------------------------------|-----------------------------------|-------------------------|
| U.S. producers | Quantity | *** | *** | *** |
| China | Quantity | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** |
| U.S. producers | Value | *** | *** | *** |
| China | Value | *** | *** | *** |
| Turkey | Value | *** | *** | *** |
| Subject sources | Value | *** | *** | *** |
| Nonsubject sources | Value | *** | *** | *** |
| All import sources | Value | *** | *** | *** |
| U.S. producers | Unit Value | *** | *** | *** |
| China | Unit Value | *** | *** | *** |
| Turkey | Unit Value | *** | *** | *** |
| Subject sources | Unit Value | *** | *** | *** |
| Nonsubject sources | Unit Value | *** | *** | *** |
| All import sources | Unit Value | *** | *** | *** |

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

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

Figure G.1 Brake drums: U.S. producers' and U.S. importers' unit value of U.S. shipments, by attachment status, 2024

* * * * *

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

Figure G.2 Brake drums: U.S. producers' and U.S. importers' quantity of U.S. shipments, by attachment status, 2024

* * * * *

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

APPENDIX H

TRADE DATA EXCLUDING U.S. PRODUCER ***

Table H.1 Brake drums: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production excluding U.S. producer *, by period**

Capacity and production in units; utilization in percent

| Item | Measure | 2022 | 2023 | 2024 |
|-----------------------|-------------|------|------|------|
| Installed overall | Capacity | *** | *** | *** |
| Installed overall | Production | *** | *** | *** |
| Installed overall | Utilization | *** | *** | *** |
| Practical overall | Capacity | *** | *** | *** |
| Practical overall | Production | *** | *** | *** |
| Practical overall | Utilization | *** | *** | *** |
| Practical brake drums | Capacity | *** | *** | *** |
| Practical brake drums | Production | *** | *** | *** |
| Practical brake drums | Utilization | *** | *** | *** |

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

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

Figure H.1 Brake drums: U.S. producers' capacity, production, and capacity utilization excluding U.S. producer *, by period**

* * * * *

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

Table H.2 Brake drums: U.S. producers' total shipments excluding U.S. producer *, by destination and period**

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

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

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

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

Table H.3 Brake drums: U.S. producers' inventories and their ratio to select items excluding U.S. producer *, by period**

Quantity in units; inventory ratio in percent

| Item | 2022 | 2023 | 2024 |
|------------------------------------|------|------|------|
| End-of-period inventory quantity | *** | *** | *** |
| Inventory ratio to U.S. production | *** | *** | *** |
| Inventory ratio to U.S. shipments | *** | *** | *** |
| Inventory ratio to total shipments | *** | *** | *** |

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

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

Table H.4 Brake drums: U.S. producers' employment related information excluding U.S. producer *, by item and period**

| Item | 2022 | 2023 | 2024 |
|--|------|------|------|
| Production and related workers (PRWs) (number) | *** | *** | *** |
| Total hours worked (1,000 hours) | *** | *** | *** |
| Hours worked per PRW (hours) | *** | *** | *** |
| Wages paid (\$1,000) | *** | *** | *** |
| Hourly wages (dollars per hour) | *** | *** | *** |
| Productivity (units per hour) | *** | *** | *** |
| Unit labor costs (dollars per unit) | *** | *** | *** |

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

APPENDIX I

PRICE DATA SUMMARY ***

Table I.1 shows comparisons by product and channel, table I.2 shows comparisons by country source, and table I.3 shows comparisons by year, all excluding pricing data reported by U.S. importer ***, which represented *** percent of the quantity of reported pricing product data.¹ In these comparisons, prices of subject imports from China and Turkey were below those of U.S. producers in *** instances and the majority of comparisons by quantity (***) units); margins of underselling ranged from *** percent. In the remaining *** instances (***) units); margins of overselling ranged from *** percent.

Excluding ***, prices for product imported from China were below those for U.S.-produced product in *** instances (***) units); margins of underselling ranged from *** percent. In the remaining *** instances (***) units), prices for product from China were between *** percent above prices for the domestic product. Excluding ***, prices for product imported from Turkey were below those for U.S.-produced product in *** instances (***) units); margins of underselling ranged from *** percent. In the remaining *** instances (***) units), prices for product from Turkey were between *** percent above prices for the domestic product. As shown in table I.3, the volume of undersold brake drums increased by *** percent between 2023 and 2024.

¹ U.S. importer ***, an affiliate of ***, reported that its reported pricing data for China and Turkey ***. ***'s U.S. importers' questionnaire response at III-2e and correspondence with USITC staff, multiple dates.

Table I.1 Brake drums: Summary of underselling/overselling and the range and average of margins excluding *, by product**

Quantity in units; margin in percent

| Product | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-----------------------|--------------|--------------------|----------|----------------|------------|------------|
| Product 1 OEM | Underselling | 5 | *** | *** | *** | *** |
| Product 2 OEM | Underselling | 8 | *** | *** | *** | *** |
| Product 1 aftermarket | Underselling | 13 | *** | *** | *** | *** |
| Product 2 aftermarket | Underselling | 13 | *** | *** | *** | *** |
| Total, all products | Underselling | 39 | *** | *** | *** | *** |
| Product 1 OEM | Overselling | 6 | *** | *** | *** | *** |
| Product 2 OEM | Overselling | 4 | *** | *** | *** | *** |
| Product 1 aftermarket | Overselling | 11 | *** | *** | *** | *** |
| Product 2 aftermarket | Overselling | 11 | *** | *** | *** | *** |
| Total, all products | Overselling | 32 | *** | *** | *** | *** |

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Quantity represents the quantity for the subject pricing data included in the specified comparisons. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Margins shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive, underselling) and greater than “(0.05)” percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Table I.2 Brake drums: Summary of underselling/overselling and the range and average of margins excluding *, by source**

Quantity in units; margin in percent

| Source | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|----------------------------|--------------|--------------------|----------|----------------|------------|------------|
| China | Underselling | 25 | *** | *** | *** | *** |
| Turkey | Underselling | 14 | *** | *** | *** | *** |
| Total, all subject sources | Underselling | 39 | *** | *** | *** | *** |
| China | Overselling | 22 | *** | *** | *** | *** |
| Turkey | Overselling | 10 | *** | *** | *** | *** |
| Total, all subject sources | Overselling | 32 | *** | *** | *** | *** |

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Quantity represents the quantity for the subject pricing data included in the specified comparisons. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Margins shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive, underselling) and greater than “(0.05)” percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Table I.3 Brake drums: Summary of underselling/overselling and the range and average of margins excluding *, by period**

Quantity in units; margin in percent

| Year | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-------------|--------------|--------------------|----------|----------------|------------|------------|
| 2022 | Underselling | — | *** | *** | *** | *** |
| 2023 | Underselling | 18 | *** | *** | *** | *** |
| 2024 | Underselling | 21 | *** | *** | *** | *** |
| All periods | Underselling | 39 | *** | *** | *** | *** |
| 2022 | Overselling | 24 | *** | *** | *** | *** |
| 2023 | Overselling | 6 | *** | *** | *** | *** |
| 2024 | Overselling | 2 | *** | *** | *** | *** |
| All periods | Overselling | 32 | *** | *** | *** | *** |

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Quantity represents the quantity for the subject pricing data included in the specified comparisons. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Margins shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive, underselling) and greater than “(0.05)” percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

APPENDIX J

PRICE DATA SUMMARY EXCLUDING ***

Table J.1 shows comparisons by product and channel, table J.2. shows comparisons by country source, and table J.3 shows comparisons by year, all excluding pricing data reported by U.S. producer ***. Table J.5 shows the summary of price data, by product and source, table J.6 shows comparisons by product and channel, table J.7 shows comparisons by country source, and table J.8 shows comparisons by year, all excluding pricing data reported by U.S. producer ***.¹

In these comparisons, the quantity of brake drums for which subject imports undersold U.S.-produced brake drums was *** units; margins of underselling ranged from *** percent. The quantity of brake drums for which subject imports oversold U.S.-produced brake drums was *** units; margins of overselling ranged from *** percent.

¹ U.S. importer ***, an affiliate of ***, reported that its reported pricing data for China and Turkey ***. ***'s U.S. importers' questionnaire response at III-2e and correspondence with USITC staff, multiple dates.

Table J.1 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 OEM and margins of underselling/(overselling), by source and quarter**

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

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

Table continued.

Table J.1 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 OEM and margins of underselling/(overselling), by source and quarter**

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

| Period | U.S. price | U.S. quantity | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** |

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

Note: This table corresponds to table 5.4 in Part 5. Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***. No pricing product data were reported for Product 1 OEM from Turkey.

Figure J.1 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 OEM, by source and quarter**

Price of product 1 OEM

* * * * *

Volume of product 1 OEM

* * * * *

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

Note: This figure corresponds to figure 5.2 in Part 5. Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***. No pricing product data were reported for Product 1 OEM from Turkey.

Table J.2 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 OEM and margins of underselling/(overselling), by source and quarter**

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

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

Table continued.

Table J.2 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 OEM and margins of underselling/(overselling), by source and quarter**

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

| Period | U.S. price | U.S. quantity | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** |

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

Note: This table corresponds to table 5.5 in Part 5. Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***. No pricing product data were reported for Product 2 OEM from Turkey.

Figure J.2 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 OEM, by source and quarter**

Price of product 2 OEM

* * * * *

Volume of product 2 OEM

* * * * *

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

Note: This figure corresponds to figure 5.3 in Part 5. Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***. No pricing product data were reported for Product 2 OEM from Turkey.

Table J.3 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 AFM and margins of underselling/(overselling), by source and quarter**

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

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

Table continued.

Table J.3 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 AFM and margins of underselling/(overselling), by source and quarter**

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: This table corresponds to table 5.6 in Part 5. Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

Figure J.3 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 1 AFM, by source and quarter**

Price of product 1 AFM

* * * * *

Volume of product 1 AFM

* * * * *

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

Note: This figure corresponds to figure 5.4 in Part 5. Product 1: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

Table J.4 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 AFM and margins of underselling/(overselling), by source and quarter**

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

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

Table continued.

Table J.4 (Continued) Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 AFM and margins of underselling/(overselling), by source and quarter**

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

| Period | U.S. price | U.S. quantity | KIC price | KIC quantity | KIC margin | Subject sources price | Subject sources quantity | Subject sources margin |
|---------|------------|---------------|-----------|--------------|------------|-----------------------|--------------------------|------------------------|
| 2022 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2022 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2023 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q1 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q2 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q3 | *** | *** | *** | *** | *** | *** | *** | *** |
| 2024 Q4 | *** | *** | *** | *** | *** | *** | *** | *** |

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

Note: This table corresponds to table 5.6 in Part 5. Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

Figure J.4 Brake drums: Weighted-average f.o.b. prices and quantities of domestic excluding U.S. producer * and imported product 2 AFM, by source and quarter**

Price of product 2 AFM

* * * * *

Volume of product 2 AFM

* * * * *

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

Note: This figure corresponds to figure 5.5 in Part 5. Product 2: Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds, not including drums sold or imported as part of an assembly or finished good. KIC represents pricing data reported by US importer KIC ***.

**Table J.5 Brake drums: Summary of price data, by product and source, excluding U.S. producer
***, January 2022 to December 2024**

Quantity in units, price in dollars per unit

| Product | Source | Number of quarters | Quantity of shipments | Low price | High price | First quarter price | Last quarter price | Percent change in price over period |
|-----------------------|---------------|--------------------|-----------------------|-----------|------------|---------------------|--------------------|-------------------------------------|
| Product 1 OEM | United States | 10 | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | Turkey | — | *** | *** | *** | *** | *** | *** |
| Product 1 OEM | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | Turkey | 12 | *** | *** | *** | *** | *** | *** |
| Product 1 aftermarket | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | Turkey | — | *** | *** | *** | *** | *** | *** |
| Product 2 OEM | KIC | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | United States | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | China | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | Turkey | 12 | *** | *** | *** | *** | *** | *** |
| Product 2 aftermarket | KIC | 12 | *** | *** | *** | *** | *** | *** |

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2024. This table corresponds to table 5.8 in Part 5.

Table J.6 Brake drums: Instances of underselling and overselling and the range and average of margins, excluding U.S. producer *, by product**

Quantity in units; margin in percent

| Product | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-----------------------|--------------|--------------------|----------|----------------|------------|------------|
| Product 1 OEM | Underselling | 15 | *** | *** | *** | *** |
| Product 2 OEM | Underselling | 19 | *** | *** | *** | *** |
| Product 1 aftermarket | Underselling | 20 | *** | *** | *** | *** |
| Product 2 aftermarket | Underselling | 19 | *** | *** | *** | *** |
| Total, all products | Underselling | 73 | *** | *** | *** | *** |
| Product 1 OEM | Overselling | 5 | *** | *** | *** | *** |
| Product 2 OEM | Overselling | 5 | *** | *** | *** | *** |
| Product 1 aftermarket | Overselling | 16 | *** | *** | *** | *** |
| Product 2 aftermarket | Overselling | 17 | *** | *** | *** | *** |
| Total, all products | Overselling | 43 | *** | *** | *** | *** |

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product. This table corresponds to table 5.9 in Part 5.

Table J.7 Brake drums: Instances of underselling and overselling and the range and average of margins, excluding U.S. producer *, by source**

Quantity in units; margin in percent

| Source | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|----------------------------|--------------|--------------------|----------|----------------|------------|------------|
| China | Underselling | 25 | *** | *** | *** | *** |
| Turkey | Underselling | 13 | *** | *** | *** | *** |
| KIC | Underselling | 35 | *** | *** | *** | *** |
| Total, all subject sources | Underselling | 73 | *** | *** | *** | *** |
| China | Overselling | 21 | *** | *** | *** | *** |
| Turkey | Overselling | 11 | *** | *** | *** | *** |
| KIC | Overselling | 11 | *** | *** | *** | *** |
| Total, all subject sources | Overselling | 43 | *** | *** | *** | *** |

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product. This table corresponds to table 5.10 in Part 5.

Table J.8 Brake drums: Instances of underselling and overselling and the range and average of margins, excluding U.S. producer *, by year**

Quantity in units; margin in percent

| Year | Type | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|-------------|--------------|--------------------|----------|----------------|------------|------------|
| 2022 | Underselling | 9 | *** | *** | *** | *** |
| 2023 | Underselling | 33 | *** | *** | *** | *** |
| 2024 | Underselling | 31 | *** | *** | *** | *** |
| All periods | Underselling | 73 | *** | *** | *** | *** |
| 2022 | Overselling | 31 | *** | *** | *** | *** |
| 2023 | Overselling | 7 | *** | *** | *** | *** |
| 2024 | Overselling | 5 | *** | *** | *** | *** |
| All periods | Overselling | 43 | *** | *** | *** | *** |

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product. This table corresponds to table 5.11 in Part 5.

APPENDIX K

U.S. PRODUCER FINANCIAL DATA EXCLUDING RELATED PARTY ***

Table K.1 Brake drums: U.S. producers' results of operations excluding U.S. producer *, by item and period**

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

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

Table continued.

**Table K.1 (Continued) Brake drums: U.S. producers' results of operations excluding U.S. producer
***, by item and period**

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

| Item | Measure | 2022 | 2023 | 2024 |
|----------------------------|------------|-------|-------|-------|
| COGS: Raw materials | Share | *** | *** | *** |
| COGS: Direct labor | Share | *** | *** | *** |
| COGS: Energy and utilities | Share | *** | *** | *** |
| COGS: Other factory | Share | *** | *** | *** |
| COGS: Total | Share | 100.0 | 100.0 | 100.0 |
| Total net sales | Unit value | *** | *** | *** |
| COGS: Raw materials | Unit value | *** | *** | *** |
| COGS: Direct labor | Unit value | *** | *** | *** |
| COGS: Energy and utilities | Unit value | *** | *** | *** |
| COGS: Other factory | Unit value | *** | *** | *** |
| COGS: Total | Unit value | *** | *** | *** |
| Gross profit or (loss) | Unit value | *** | *** | *** |
| SG&A expenses | Unit value | *** | *** | *** |
| Operating income or (loss) | Unit value | *** | *** | *** |
| Net income or (loss) | Unit value | *** | *** | *** |
| Operating losses | Count | *** | *** | *** |
| Net losses | Count | *** | *** | *** |
| Data | Count | 1 | 1 | 1 |

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

Table K.2 Brake drums: Changes in AUVs between comparison periods excluding U.S. producer

Changes in percent

| Item | 2022–24 | 2022–23 | 2023–24 |
|----------------------------|---------|---------|---------|
| Total net sales | ▼*** | ▲*** | ▼*** |
| COGS: Raw materials | ▼*** | ▲*** | ▼*** |
| COGS: Direct labor | ▲*** | ▲*** | ▼*** |
| COGS: Energy and utilities | ▼*** | ▲*** | ▼*** |
| COGS: Other factory | ▲*** | ▲*** | ▲*** |
| COGS: Total | ▼*** | ▲*** | ▼*** |

Table continued.

Table K.2 (Continued) Brake drums: Changes in AUVs between comparison periods excluding U.S. producer ***

Changes in dollars per unit

| Item | 2022–24 | 2022–23 | 2023–24 |
|----------------------------|---------|---------|---------|
| Total net sales | ▼*** | ▲*** | ▼*** |
| COGS: Raw materials | ▼*** | ▲*** | ▼*** |
| COGS: Direct labor | ▲*** | ▲*** | ▼*** |
| COGS: Energy and utilities | ▼*** | ▲*** | ▼*** |
| COGS: Other factory | ▲*** | ▲*** | ▲*** |
| COGS: Total | ▼*** | ▲*** | ▼*** |
| Gross profit or (loss) | ▼*** | ▼*** | ▼*** |
| SG&A expense | ▲*** | ▲*** | ▲*** |
| Operating income or (loss) | ▼*** | ▼*** | ▼*** |
| Net income or (loss) | ▼*** | ▼*** | ▼*** |

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

Note: Shares and ratios shown as "0" represent values greater than zero, but less than "0.5" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

APPENDIX L

U.S. PRODUCERS' AND IMPORTERS' U.S. SHIPMENTS, BY INTERIM PERIODS

Table L.1 Brake drums: U.S. producers' and U.S. importers' U.S. shipments, by source and interim period

Quantity in units; share in percent

| Source | Measure | Q1 2023 | Q2-Q4 2023 | Q1 2024 | Q2-Q4 2024 |
|------------------------------------|----------|---------|------------|---------|------------|
| U.S. producers: Gunitite | Quantity | *** | *** | *** | *** |
| U.S. producers: Webb | Quantity | *** | *** | *** | *** |
| U.S. producers: All U.S. producers | Quantity | *** | *** | *** | *** |
| China | Quantity | *** | *** | *** | *** |
| Turkey | Quantity | *** | *** | *** | *** |
| Subject sources | Quantity | *** | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** | *** |
| All import sources | Quantity | *** | *** | *** | *** |
| All sources | Quantity | *** | *** | *** | *** |
| U.S. producers: Gunitite | Share | *** | *** | *** | *** |
| U.S. producers: Webb | Share | *** | *** | *** | *** |
| U.S. producers: All U.S. producers | Share | *** | *** | *** | *** |
| China | Share | *** | *** | *** | *** |
| Turkey | Share | *** | *** | *** | *** |
| Subject sources | Share | *** | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** | *** |
| All import sources | Share | *** | *** | *** | *** |
| All sources | Share | 100.0 | 100.0 | 100.0 | 100.0 |

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

Note: The dataset shown in this table removes the data of three U.S. importers that responded to the Commission's preliminary phase questionnaire but did not respond to the Commission's final phase questionnaire. It also removes thirteen U.S. importers that responded to the Commission's questionnaire in the final phase but did not respond in the preliminary phase of the investigations. The union of the two datasets (preliminary and final) required the removal of approximately one-fifth of the final phase data for U.S. importers' U.S. shipments of imports in 2024. Therefore, the data in this presentation should not be directly compared to full year data and market shares shown in part 4 of this report, as the presentation in this table understates the likely true market shares for import sources based on the more complete final phase dataset shown in part 4. 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 "—".

