Overhead Door Counterbalance Torsion Springs from China

Investigation Nos. 701-TA-746 and 731-TA-1724 (Final)

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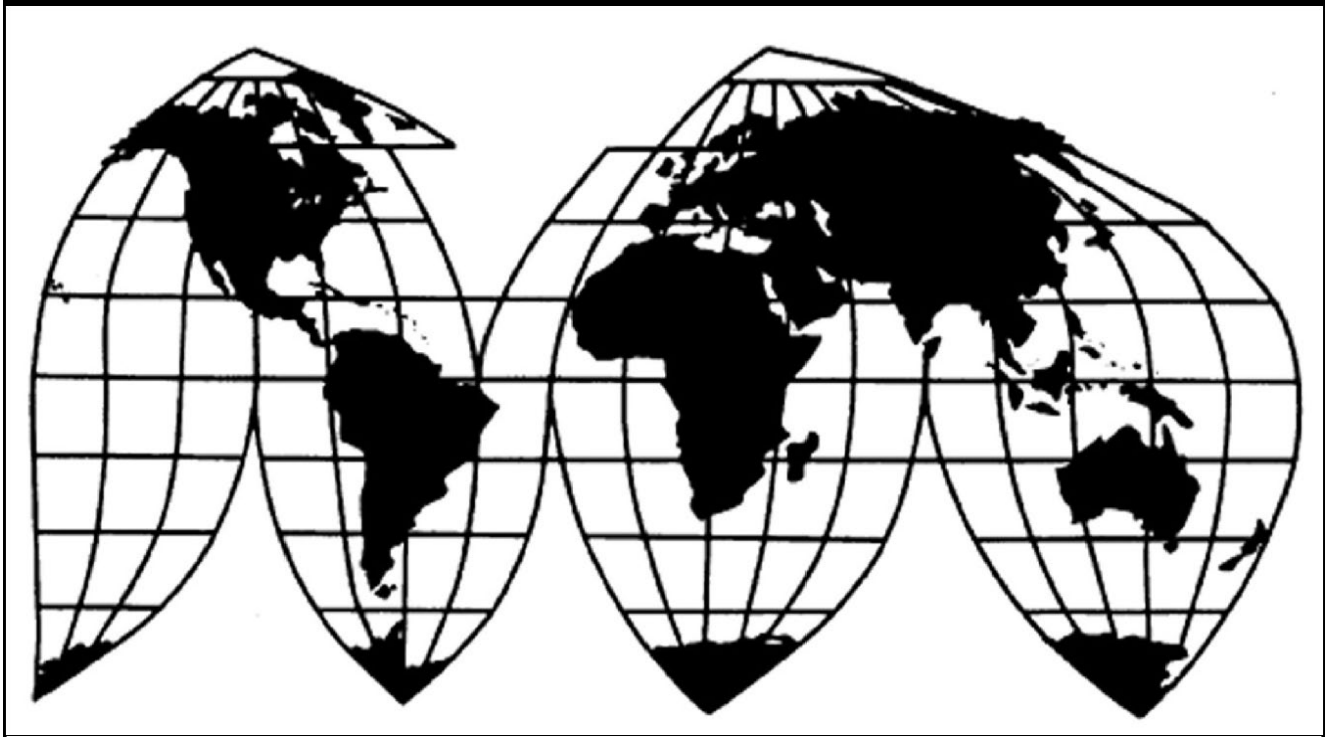
U.S. International Trade Commission



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U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-746 and 731-TA-1724 (Final)

Overhead Door Counterbalance Torsion Springs from China

DETERMINATIONS

On the basis of the record[1] 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 overhead door counterbalance torsion springs from China, provided for in subheading 7320.20.50 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 imports of the subject merchandise from China that have been found to be subsidized by the government of China.[2] [3]

BACKGROUND

The Commission instituted these investigations effective October 29, 2024, following receipt of petitions filed with the Commission and Commerce by IDC Group, Inc., Minneapolis, Minnesota, Iowa Spring Manufacturing, Inc., Adel, Iowa, and Service Spring Corp., Maumee, Ohio.[4] The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of overhead door counterbalance torsion springs from China 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

[1] The record is defined in § 207.2(f) of the Commission's Rules of Practice and Procedure (19 C.F.R. 207.2(f)).

[2] 90 Fed. Reg. 39369 (Aug. 15, 2025); 90 Fed. Reg. 39374 (Aug. 15, 2025).

[3] The Commission also finds that imports subject to Commerce's affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the countervailing and antidumping duty orders on overhead door counterbalance torsion springs from China.

[4] The petitions alleged that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and LTFV imports of overhead door counterbalance torsion springs from China and India. The investigations regarding overhead door counterbalance torsion springs from India are ongoing.

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 notices in the *Federal Register* on June 11, 2025 (90 Fed. Reg. 24665) and June 23 (90 Fed. Reg. 26608). The public hearing in connection with the investigations was cancelled.[5]

[5] 90 Fed. Reg. 39420 (Aug. 15, 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 overhead door counterbalance torsion springs ("overhead door springs" or "OHDS") from China 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 government of China. We also find that critical circumstances do not exist with respect to imports from China that are subject to the Department of Commerce's ("Commerce") final affirmative critical circumstances determinations in its antidumping and countervailing duty investigations.

I. Background

Staggered Investigation Schedules. The petitions in these investigations were filed on October 29, 2024, by IDC Group, Inc. ("IDC Spring"), Iowa Spring Manufacturing, Inc. ("Iowa Spring"), and Service Spring Corp. ("Service Spring") (collectively, "Petitioners"), domestic producers of overhead door counterbalance torsion springs.[1] However, the investigations became staggered when the U.S. Department of Commerce ("Commerce") postponed the final determination for its antidumping duty investigation regarding India, and aligned the final determination for its countervailing duty investigation regarding India with the corresponding antidumping duty investigation, but did not postpone the final determinations in the remaining antidumping and countervailing duty investigations regarding China.[2] This necessitates earlier Commission determinations in the final phase antidumping duty and countervailing duty investigations on overhead door springs from China than in the trailing antidumping duty and countervailing duty investigations regarding overhead door springs from India.[3] Pursuant to

[1] Petitions, EDIS Doc. 835843 (Oct. 29, 2024).

[2] *See Overhead Door Counterbalance Torsion Springs from India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 90 Fed. Reg. 23316 (June 2, 2025) ("*Preliminary Affirmative Determination of Sales at Less Than Fair Value*"); *see also Overhead Door Counterbalance Torsion Springs from the People's Republic of China and India: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*, 90 Fed. Reg. 11716 (Mar. 11, 2025).

[3] Commerce is currently scheduled to issue its final antidumping and countervailing duty determinations in the trailing investigations regarding subject imports from India no later than 135 days from June 2, 2025. O*verhead Door Counterbalance Torsion Springs From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 Fed. Reg. 23316, 23318 (June 2, 2025); *see also* Confidential Staff Report (Final), INV-XX-117, EDIS Doc. 861209 (Sept. 4, 2025) ("CR") at Table 1.1 (background and schedule). (Continued...)

the statutory cumulation provision on staggered investigations, the record for each of these investigations will be the same except that, prior to the Commission's determinations in the antidumping and countervailing duty investigations regarding India, the Commission shall include in the record the final Commerce antidumping and countervailing duty determinations with respect to India and the parties' final comments concerning Commerce's later determinations.[4]

Parties to the Investigations. Petitioners submitted a prehearing brief and final comments, but not a posthearing brief.[5] No respondent interested party participated in the final phase of these investigations.[6] On August 5, 2025, Petitioners filed a request that the Commission cancel the scheduled hearing for the final phase of the investigations due to the lack of respondent participation and offered to respond to any questions from the Commission in lieu of a hearing.[7] The Commission granted the request on August 12, 2025, but did not request the Petitioners to respond to written questions.[8]

Data Coverage. U.S. industry data are based on the questionnaire responses of six domestic producers, accounting for approximately 95 percent of U.S. production of overhead

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The Commission's final determinations in those trailing investigations must be made within 45 days after Commerce's affirmative final determinations. 19 U.S.C. §§ 1671d(b)(2)(B), 1673d(b)(2)(B).

[4] *See* 19 U.S.C. § 1677(7)(G)(iii).

[5] Petitioners' Prehearing Brief, EDIS Doc. 859256 (Aug. 11, 2025) ("Pet. Prehearing Br."); Petitioners' Final Comments, EDIS Doc. 861718 (Sept 11, 2025) ("Final Comments").

[6] On July 2, 2025, Alcomex Beheer B.V., Alcomex Springs Pvt Ltd., and Alcomex Springs Inc. (collectively, "Alcomex"), a U.S. importer of subject merchandise and foreign producer of overhead door springs in India, filed a notice of appearance and request to change the lead counsel designated in the preliminary phase of these investigations. Alcomex Request to Change Lead Attorney and Entry, EDIS Doc. 855829 (July 2, 2025) at 1. On July 30, 2025, Alcomex withdrew its notice of appearance and notified the Commission that it no longer intended to participate in the hearing or file any briefs in this final phase of these investigations. Alcomex Withdrawal of Notice of Appearance, EDIS Doc. 858102 (July 30, 2025). C.H.I. Overhead Doors ("CHI"), a U.S. purchaser of subject merchandise from China, filed an entry of appearance on July 11, 2025. C.H.I. Overhead Doors Entry of Appearance, EDIS Doc. 856541 (July 11, 2025) at 1. However, CHI did not file a request to appear at the hearing or any briefs in the final phase of these investigations. CHI's importer questionnaire response indicates that it *** import subject overhead door springs during the period of investigation ("POI"). Confidential Staff Report (Final), INV-XX-117, EDIS Doc. 861209 (Sept. 4, 2025) ("CR") at 4.2 n.4; Public Staff Report (Final), INV-XX-117, EDIS Doc. 861468 (Sept. 4, 2025) ("PR") at 4.2 n.4. *See also* CHI U.S. Importer Questionnaire Response, EDIS Doc. 856649 (July 14, 2025) at 1.

[7] Petitioners' Request for Cancellation of Hearing, EDIS Doc. 858746 (Aug 5, 2025), at 1-2.

[8] *See* O*verhead Door Counterbalance Torsion Springs From China and India: Cancellation of Hearing for Antidumping and Countervailing Duty Investigations*, 90 Fed. Reg. 39420 (Aug. 15, 2025).

door springs in 2024.[9] U.S. import data are based on a combination of data submitted in response to Commission questionnaires from 21 U.S. importers and third-party bill-of-lading data.[10] Importer questionnaire responses accounted for *** percent of imports from China and *** percent of U.S. imports from India under HTS subheadings 7320.20.5020, 7320.20.5045, 7320.20.5060, 8412.80.1000, 8412.90.9085, 7610.10.0030, 7320.20.9000, 7320.90.5060, and 7320.90.5020.[11] However, as these subheadings contain significant amounts of out-of-scope merchandise, except as otherwise indicated, staff calculated import data using questionnaire responses supplemented by bill-of-lading data provided by Petitioners.[12]

The Commission received responses to its questionnaires from two producers/exporters of subject merchandise in India, accounting for *** U.S. imports from India and approximately *** percent of production of subject merchandise in India in 2024.[13] It did not receive any responses to its questionnaires from producers or exporters in China.[14]

[9] CR/PR at 1.5 n.8, 1.6; *id*. at 3.1-3.2, & Table 3.1. The six U.S. firms that provided data are believed to account for almost all (95 percent) of U.S. production, with the three firms that did not provide data accounting for the remaining 5 percent of U.S. production. CR/PR at 1.5 n.8. We note that U.S. producer Overhead Door Corp. submitted useable trade data, but did not submit fully verifiable financial data. CR/PR at 3.1 & n.1. Overhead Door Corp. consumes its production of overhead door springs in its downstream production of garage door assemblies. CR/PR at 3.12; Petition at Exh. GEN-2 (Boldenow Decl.) at para. 8. *See* section VII.B.1., below.

[10] CR/PR at 1.6-1.7. Bill-of-lading data were gathered by Panjiva, and provided to the Commission by the Petitioners. U.S. importers' U.S. shipments of imports are based on data submitted in response to Commission questionnaire, as adjusted by a given firm's import volume as listed in the Panjiva data for those firms which did not provide a questionnaire response. CR/PR at 1.7. In contrast, in the preliminary phase of these investigations, U.S. import data reflected questionnaire responses from 15 U.S. importers, accounting for 6.5 percent of imports from China and *** percent of U.S. imports from India under HTS statistical reporting numbers 7320.20.5025, 7320.20.5045 and 7320.20.5060 in 2023, and Panjiva data with no adjustments were the basis of import volume for China. Confidential Preliminary Commission Views in Overhead Door Springs from China and India, Inv. Nos. 701-TA-746-747 and 731-TA-1724-1725, EDIS Doc. 839945 (Dec. 23, 2024) ("Conf. Prelim. Commission Views"), at 5.

[11] CR/PR at 1.6, 4.1.

[12] CR/PR at 1.6-1.7, 4.1-4.2. We conclude that the resulting data collectively cover essentially all imports of subject merchandise and represent the best information available to the Commission.

[13] CR/PR at 7.3 & Table 7.1.

[14] CR/PR at 7.3 & Table 7.1.

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."[15] 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."[16] 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."[17]

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.[18] 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."[19] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[20] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and

[15] 19 U.S.C. § 1677(4)(A).

[16] 19 U.S.C. § 1677(4)(A).

[17] 19 U.S.C. § 1677(10).

[18] 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).

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

[20] *Cleo*, 501 F.3d at 1298 n.1 ("Commerce's {scope} finding does not control the Commission's {like product} determination."); *Hosiden Corp. v. Advanced Display Mfrs.,* 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission's determination defining six like products in investigations where Commerce found five classes or kinds).

uses" on a case-by-case basis.[21] [22] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[23] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[24]

B. Product Description

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

> The merchandise covered by this investigation is helically-wound, overhead door counterbalance torsion steel springs (overhead door counterbalance torsion springs) and any cones, plugs or other similar fittings for mounting and creating torque in the spring (herein collectively referred to as cones) attached to or entered with and invoiced with the subject overhead door counterbalance

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[21] *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).

[22] In a semi-finished products analysis, the Commission examines the following: (1) the significance and extent of the processes used to transform the upstream into the downstream articles; (2) whether the upstream article is dedicated to the production of the downstream article or has independent uses; (3) differences in the physical characteristics and functions of the upstream and downstream articles; (4) whether there are perceived to be separate markets for the upstream and downstream articles; and (5) differences in the costs or value of the vertically differentiated articles. *See*, *e.g.*, *Glycine from India*, *Japan*, *and Korea*, Inv. Nos. 731-TA-1111-1113 (Preliminary), USITC Pub. No. 3921 at 7 (May 2007); *Artists' Canvas from China*, Inv. No. 731-TA-1091 (Final), USITC Pub. No. 3853 at 6 (May 2006); *Live Swine from Canada*, Inv. No. 731-TA-1076 (Final), USITC Pub. 3766 at 8 n.40 (Apr. 2005); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Preliminary), USITC Pub. No. 3533 at 7 (Aug. 2002).

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

[24] *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.").

torsion springs. Overhead door counterbalance torsion springs are helical steel springs with tightly wound coils that store and release mechanical energy by winding and unwinding along the spring's axis by an angle, using torque to create a lifting force in the counterbalance assembly typically used to raise and lower overhead doors, including garage doors, industrial rolling doors, warehouse doors, trailer doors, and other overhead doors, gates, grates, or similar devices. The merchandise covered by this investigation covers all overhead door counterbalance torsion springs with a coil inside diameter of 15.8 millimeters (mm) or more but not exceeding 304.8 mm (measured across the diameter from inner edge to inner edge); a wire diameter of 2.5 mm to 20.4 mm; a length of 127 mm or more; and regardless of the following characteristics:

- wire type (including, but not limited to, oil-tempered wire, hard-drawn wire, music wire, galvanized or other coated wire);
- wire cross-sectional shape (e.g., round, square, or other shapes);
- coating (*e.g.,* uncoated, oil- or water-based coatings, lubricant coatings, zinc, aluminum, zinc-aluminum, paint or plastic coating, *etc.*);
- winding orientation (left-hand or right-hand wind direction);
- end type (including, but not limited to, looped, double looped, clipped, long length, mini warehouse, Barcol, Crawford, Kinnear, Wagner, rolling steel or barrel ends); and
- whether the overhead door counterbalance torsion springs are fitted with hardware, including but not limited to fasteners, clips, and cones (winding or stationary cones).

For purposes of the diameters referenced above, where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

The steel torsion springs included in the scope of these investigations are produced from steel in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

Subject merchandise includes cones attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Such cones, which are typically cast aluminum, aluminum alloy or steel (but may be made from other materials) are made to mount the subject springs to the overhead door counterbalance system and create and maintain torque in the spring. Cones or other similar fittings that are not attached to the subject springs or are not entered with and invoiced with the subject springs are not included within the scope unless entered as parts of kits as described below.

Subject merchandise also includes all subject overhead door counterbalance torsion springs and cones or other similar fittings for mounting and tensioning the spring entered as a part of overhead door kits, overhead door mounting or assembly kits, or as a part of a spring-operated motor assembly or as a part of a spring winder assembly kit for torsion springs. When counterbalance torsion springs and cones or other similar fittings for attaching and tensioning the torsion spring are entered as a part of such kits, only the counterbalance spring and cones or other similar fittings in the kit are within scope.

Subject merchandise also includes overhead door counterbalance torsion springs that have been further processed in a third country, including but not limited to cutting to length, attachment of hardware, cones or end-fittings, inclusion in garage door kits or garage door mounting or assembly kits, or any other processing that would not remove the merchandise from the scope of these investigations if performed in the country of manufacture of the in-scope overhead door counterbalance torsion springs.

All products that meet the written physical description are within the scope of these investigations unless specifically excluded. The following products are specifically excluded from the scope of these investigations:

- leaf springs (slender arc-shaped length of spring steel of a rectangular cross-section);
- disc springs (conical springs consisting of a convex disc with the outer edge working against the center of the disc);

- extension springs (close-wound round helical wire springs that store and release energy by resisting the external pulling forces applied to the spring's ends in the direction of its length);
- compression springs (helical coiled springs with open wound active coils (such open winding is also known as pitch) that are designed to compress under load or force); and
- spiral springs (torsion springs wound as concentric spirals such as a clock spring or mainspring).

The products subject to these investigations are currently classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7320.20.5020, 7320.20.5045, and 7320.20.5060. They may also be classified under HTSUS subheading 8412.90.9085 if entered as parts of spring-operated motors. They may also be classified in HTSUS subheading 8412.80.1000 (spring operated motors) if entered as part of a spring counterweight assembly for an overhead door. They may also be classified in HTSUS subheading 7308.90.9590, a basket category that includes metal garage doors entered with mounting accessories or assemblies.

Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.[25]

Overhead door springs are helically wound steel springs that are specifically designed to provide the lifting force for overhead door counterbalance lift systems.[26] These springs are

[25] *Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Determination Sales at Less Than Fair Value and Final Affirmative Critical Circumstances Determination, in Part*, 90 Fed. Reg. 39369 (Aug. 15, 2025) ("*China Final Affirmative AD and Critical Circumstances Determinations*"), at Appendix I (scope of the investigation); *Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination in Part*, 90 Fed. Reg. 39374 (Aug. 15, 2025) ("*China Final Affirmative CVD and Critical Circumstances Determinations*"), at Appendix I (scope of the investigation). The scopes of the antidumping and countervailing duty investigations are identical. *See id*.; CR/PR at 1.12.

[26] CR/PR at 1.17. Overhead door springs are a well-established product and have been in use for more than a century, since the introduction of section garage doors. Staff Conference Transcript, EDIS (Continued...)

tightly wound as the overhead door is closed and release the stored energy when unwinding to counterbalance the weight of the door, thereby easing the effort needed to raise it.[27] The spring wire is commonly of either tempered high-carbon steel oil-tempered wire (covered by ASTM specification A229) or hard drawn wire (covered by ASTM specification A227) of high tensile strength and moderate ductility necessary for durability and maintenance of metal memory.[28] However, springs can also be of stainless or other alloy steel grades if requested by customers.[29] Industry standards that guide domestic manufacturing of overhead door springs include the referenced ASTM International specifications and Spring Manufacturers Institute ("SMI") specifications with respect to the spring wire, and Door and Access Systems Manufacturing Association ("DASMA") standards with respect to residential garage door counterbalance systems.[30]

Overhead door springs may be used in residential and commercial garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, and retail security gates, among others.[31] Overhead door springs exert sufficient force to offset the weight of an overhead door in the counterbalance lifting assembly.[32]

C. Petitioners' Arguments

Petitioners argue that the Commission should continue to define a single domestic like product, coextensive with the scope.[33]

Doc. 837895 (Nov. 19, 2024) ("Conf. Tr.") at 68 (Bianco). *See also* Pet. Prehearing Br. at 3-4 (domestic like product).

[27] CR/PR at 1.17; *see also* Petitioners' Postconference Brief, EDIS Doc. 837909 (Nov. 22, 2024) ("Pet. Postconference Br."), at 4, Exh. 16: ASTM Designation A229 Standard Specification.

[28] CR/PR at 1.17; Pet. Postconference Br. at 4.

[29] CR/PR at 1.17; Conf. Tr. at 16–17 (McAlear).

[30] CR/PR at 1.17; Conf. Tr. at 68–69 (Boldenow); Pet. Postconference Br., Exh. 14: DASMA Standard for Counterbalance Systems on Residential Sector Garage Doors; Exh. 15: Spring Manufacturing Institute Torsion Spring Standards; Exh. 16: ASTM Designation A229 Standard Specification; Exh. 17: ASTM Designation A227 Standard Specification.

[31] CR/PR at 1.21. Petitioners' customers for overhead door springs include original equipment manufacturers ("OEMs"), distributors, and garage-door dealers and installers. Conf. Tr. at 46 (Boldenow), 47 (McAlear), 47–48 (Bianco).

[32] CR/PR at 1.21.

[33] Pet. Prehearing Br. at 4.

D. Analysis

Based on the information on the record, we define a single domestic like product consisting of overhead door springs, coextensive with the scope in these investigations.[34]

Physical Characteristics and Uses. All overhead door springs share the same physical characteristics and uses.[35] They are all tightly and helically wound springs typically made from either high-carbon steel oil-tempered wire (ASTM A229) or hard-drawn wire (ASTM A227) with a high tensile strength and moderate ductility.[36] These characteristics are necessary for durability and the maintenance of metal memory.[37] Overhead door springs must be able to be torqued (twisted) and then have the torque released (untwisted) many thousands of times over their life span without significant metal fatigue or breakage.[38] They are manufactured within the range of wire diameters, coil lengths, and coil inside diameters set forth in the scope to provide the necessary power in overhead door counterbalance systems.[39]

Manufacturing Facilities, Production Processes, and Employees. All overhead door springs are produced in the same domestic facilities, on the same equipment and by the same employees.[40] Other types of springs are produced in different facilities and generally by different companies altogether.[41]

Channels of Distribution. All domestically produced overhead door springs are sold through the same channels of distribution, with approximately one-half shipped to end users

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[34] Unless otherwise noted, the discussion below of the factors relevant to the Commission's domestic like product determination reflects the record from the preliminary phase of the investigation. In the final phase of these investigations, no parties requested data or other information necessary for the analysis of an alternative definition of the domestic like product. CR/PR at 1.27.

[35] CR/PR at 1.17 to 1.22; *see also Overhead Door Counterbalance Torsion Springs from China and India*, Inv. Nos. 701-TA-746-747 and 731 TA 1724-1725 (Prelim.), USITC Pub. 5573 at 13, 1.5 to 1.9 (Dec. 2024) ("*Preliminary Determination*, USITC Pub. 5573"); *see also* Confidential Staff Report, INV-WW-153, EDIS Doc. 838754 (Dec. 6, 2024) ("Prelim. CR") at 1.5 to 1.9; Pet. Postconference Br. at 4.

[36] CR/PR at 1.17; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.8; Pet. Postconference Br. at 4.

[37] CR/PR at 1.17; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.8; Pet. Postconference Br. at 4.

[38] CR/PR at 1.18; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.9; Pet. Postconference Br. at 4-5.

[39] CR/PR at 1.12; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.6; Pet. Postconference Br. at 5.

[40] CR/PR at 1.24; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.16; Pet. Postconference Br. at 8.

[41] CR/PR at 1.25 & n.52; *see also Preliminary Determination*, USITC Pub. 5573 at 13, 1.16; Pet. Postconference Br. at 8.

such as garage door installers or truck trailer manufacturers, and the other half to distributors.[42]

Interchangeability. Overhead door springs are manufactured in a range of coil diameters, wire diameters, spring lengths, and wire types, as well as end configurations or coatings, depending on the weight of the overhead door, the type of door, and customer preference.[43] Different sizes and configurations of springs can sometimes be interchanged for the same use.[44]

Producer and Customer Perceptions. Producers and customers consider overhead door springs to be part of a continuum of products used in overhead counterbalance assemblies.[45] They do not consider other types of springs to be within the same continuum.[46] The websites of the Petitioners and purchasers all list overhead door torsion springs separately from extension springs and other industrial springs.[47]

Price. Petitioners argue that overhead door springs are all priced within a reasonable range of one another based on the weight of the wire in the springs, any additional processing or coating requested by the customer, and whether cones are included in the sale.[48] Domestic producers' prices for the four pricing products fluctuated *** in the range of $*** per pound during the POI.[49]

Conclusion. The record indicates that overhead door springs are produced in a range of dimensions and performance characteristics without clear dividing lines, serve the same end uses, are sold through the same channels of distribution, are interchangeable for the respective product types, and are perceived as part of a continuum of products with the same end uses. Further, the range of prices for the various products overlap to a significant extent. Therefore, we define a single domestic like product consisting of overhead door springs, coextensive with the scope definition.

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[42] CR/PR at 2.4, Table 2.2. Specifically, *** domestic producers sold to distributors while *** sold to both distributors and end users. *See* U.S. Producers' Questionnaire Responses, question II-12.

[43] Pet. Postconference Br. at 7; *Preliminary Determination*, USITC Pub. 5573 at 13-14, 1.6.

[44] *Preliminary Determination*, USITC Pub. 5573 at 14; *see also* Pet. Postconference Br. at 7; Conf. Tr. at 53-54 (Boldenow).

[45] *Preliminary Determination*, USITC Pub. 5573 at 14; Pet. Postconference Br. at 8; *see also* Conf. Tr. at 20 (McAlear).

[46] *Preliminary Determination*, USITC Pub. 5573 at 14; *see also* Pet. Postconference Br. at 8.

[47] *Preliminary Determination*, USITC Pub. 5573 at 14; *see also* Pet. Postconference Br. at 8.

[48] Pet. Postconference Br. at 8; *Preliminary Determination*, USITC Pub. 5573 at 14; Pet. Postconference Br. at 8.

[49] CR/PR at Tables 5.4 to 5.7, Figure 5.9 (indexed U.S. producer prices, by quarter, by pricing product); *see also* Pet. Postconference Br. at 8; *Preliminary Determination*, USITC Pub. 5573 at 14.

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."[50] 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.

These investigations raise concerns whether appropriate circumstances exist to exclude any domestic producer from the domestic industry pursuant to the related parties provision.

A. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[51] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[52]

In these final phase investigations, U.S. producers *** and *** qualify for possible exclusion under the related parties provision because they directly imported subject merchandise during the POI.[53]

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[50] 19 U.S.C. § 1677(4)(A).

[51] *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).

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

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

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

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

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

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

[53] CR/PR at 3.2.

1. Petitioners' Arguments

Petitioners argue that the Commission should find that appropriate circumstances do not exist to exclude *** or *** from the domestic industry.[54]

2. Analysis

***. The company accounted for *** percent of U.S. production, and *** with respect to the petitions.[55] Although the producer directly imported overhead door springs from ***, these imports represented *** percent of its total production of overhead door springs that year.[56] It had *** of overhead door springs from *** during the remainder of the POI.[57] In addition, the company asserts that ***.[58]

In light of the temporary nature of its imports of the subject merchandise and the low percentage of its subject imports to U.S. production, *** primary interest appears to be in domestic production and its inclusion in the domestic industry would not skew the industry data or thereby mask injury. As noted above, ***. In light of the above, and in the absence of any argument to the contrary, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.[59]

***. The company accounted for *** percent of U.S. production, and *** the petitions.[60] Although it directly imported overhead door springs from *** these imports represented *** percent and *** percent, respectively, of its total production of overhead door springs in those years.[61] In addition, the producer asserts that it ***. [62]

Given that *** temporarily imported a relatively small volume of imports during the POI due to ***, its principal interest appears to be in domestic production. The record in the final phase of these investigations also does not indicate that *** domestic production operations

[54] Pet. Prehearing Br. at 4-6.

[55] CR/PR at Table 3.1.

[56] CR/PR at 3.2, 3.16-3.17, Table 3.15.

[57] CR/PR at Table 3.15.

[58] CR/PR at 3.16 & n. 11, 3.17, Table 3.15; *** U.S. Producer's Questionnaire Response, EDIS Doc. 856912 (July 14, 2025), sections III-3g and III-15.

[59] ***

[60] CR/PR at Table 3.1.

[61] CR/PR at Table 3.14.

[62] CR/PR at 3.19, Table 3.19; *** U.S. Producer's Questionnaire Response, EDIS Doc. 859688 (Aug. 7, 2025), sections III-3g and III-15.

benefitted from subject imports in such a way that its inclusion in the domestic industry would skew the industry data or thereby mask injury to the domestic industry.[63]

In sum, we find that appropriate circumstances do not exist to exclude either *** or *** 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 overhead door springs.

IV. Cumulation[64]

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:

(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;

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[63] CR/PR at 3.19, Table 3.19; *see also* Pet. Prehearing Br. at 5-6, *citing Preliminary Determination*, USITC Pub. 5573 at 19-20.

[64] Pursuant to section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)). The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States. 19 U.S.C. § 1677(24)(A)(ii).

During October 2023 to September 2024, the 12-month period preceding the filing of the petitions, subject imports from China (for both the antidumping and countervailing duty investigations) accounted for *** percent of total U.S. imports of overhead door springs, and subject imports from India accounted for *** percent of total U.S. imports of overhead door springs. CR/PR at Table 4.4.

As imports from each subject country clearly exceed the three percent negligibility threshold, we find that imports from China and India subject to the antidumping and countervailing duty investigations are not negligible.

(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.[65]

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.[66] Only a "reasonable overlap" of competition is required.[67]

A. Petitioners' Arguments

Petitioners argue that imports of overhead door springs from China and India should be cumulated for purposes of assessing material injury by reason of subject imports.[68] They assert there is a reasonable overlap in competition between and among subject imports from China and India and the domestic like product because imports from China and India are fungible with each other and domestically produced overhead door springs, they compete in the same geographic markets, they are sold in the same channels of distribution, and they are simultaneously present in the U.S. market.[69]

B. Analysis and Conclusion

We consider subject imports from China and India on a cumulated basis as we find that the statutory criteria for cumulation are satisfied. As an initial matter, Petitioners filed the

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[65] *See Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), aff'd, 859 F.2d 915 (Fed. Cir. 1988).

[66] *See*, *e.g.*, *Wieland Werke, AG v. United State*s, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

[67] The Statement of Administrative Action ("SAA") to the Uruguay Round Agreements Act ("URAA"), expressly states that "the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition." H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; *see Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) ("cumulation does not require two products to be highly fungible"); *Wieland Werke, AG*, 718 F. Supp. at 52 ("Completely overlapping markets are not required.").

[68] Pet. Prehearing Br. at 14-17.

[69] Pet. Prehearing Br. at 14-17.

antidumping and countervailing duty petitions with respect to both China and India on the same day, October 29, 2024.[70] The record 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 overhead door springs and imports from China and India are fungible.[71] Regardless of source, overhead door springs imported into the United States are produced from steel and share common physical characteristics such as coil inside diameter and wire diameter.[72] All responding U.S. producers reported that U.S.-produced overhead door springs are "always" or "frequently" interchangeable with subject imports from both China and India.[73] Similarly, the majority of responding U.S. importers and all purchasers reported that the domestic like product is "always" or "frequently" interchangeable with subject imports.[74]

Petitioners maintain that the domestic industry produces all types of overhead door springs, which involve various sizes and finishes/coatings.[75] Subject importers similarly sell overhead door springs in an array of types, sizes, and coatings.[76]

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[70] None of the statutory exceptions to cumulation apply. We observe that these investigations involve dumping and subsidy findings regarding overhead door springs from China and India. 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 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).

[71] CR/PR at 2.12; *see also id.* at 4.9 to 4.17; Pet. Prehearing Br. at 15-16; *Preliminary Results*, USITC Pub. 5573 at 19; Petition at 20.

[72] *See* CR/PR at 1.17 to 1.22; Pet. Prehearing Br. at 15; *see also* Pet. Postconference Br. at 19.

[73] CR/PR at 2.21, Tables 2.14-2.16.

[74] CR/PR at 2.21, Table 2.15 (17 of 18 responding firms indicated the domestic like product was "always" or "frequently" interchangeable with the subject merchandise from China, and five of eight responding firms indicated the domestic like product was "always" or "frequently" interchangeable with subject merchandise from India), Table 2.16 (all but one purchaser reported that U.S.-produced springs were "always" interchangeable with subject imports from India and China); *see also* Pet. Prehearing Br. at 15-16.

[75] *See* Pet. Postconference Br. at 19, Exh. 4, para 7 (Boldenow Declaration ("Decl.")), Exh. 6. Para. 7 (McAlear Decl.); Exh. 5, para. 8 (Bianco Decl.).

[76] Pet. Prehearing Br. at 15, *citing* CR/PR at 4.9 to 4.15, Figures 4.2 to 4.4; *see also* CR/PR at 1.18 to `1.23, Figures 5.2 to 5.5.

Channels of Distribution. Subject imports from both subject countries and the domestic like product were sold through the same distribution channels.[77] Domestic producers and importers of subject overhead door springs from China and India all reported selling significant quantities to both end users and distributors in 2022 and 2023, and significant quantities to end users in 2024.[78] Many of the customers of overhead door springs, whether produced domestically or in the subject countries, are manufacturers of residential and commercial garage doors or other overhead doors and distributors who sell the springs to those overhead door producers, or garage door installers.[79]

Geographic Overlap. U.S. producers reported selling overhead door springs 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.[80] Importers reported selling overhead door springs from China to all regions, while importers reported selling overhead door springs from India to the Midwest, Southeast, and Central Southwest.[81]

Simultaneous Presence in Market. Domestically produced overhead door springs were available in the U.S. market throughout the POI.[82] Subject imports from each of the subject sources were present in the U.S. market throughout the POI.[83]

Conclusion. The record indicates that subject imports from China and India are fungible with the domestic like product and each other. There was an overlap in channels of distribution, with domestic producers and importers of subject overhead door springs from each subject source reporting selling directly to end users and to distributors. The record further indicates that imports from China and India and the domestic like product were sold in overlapping geographic markets and that overhead door springs from all three sources were

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[77] CR/PR at 2.4, Table 2.2; *see also* Pet. Prehearing Br. at 16, *citing Preliminary Determination*, USITC 5573 at 19.

[78] CR/PR at 2.4, Table 2.2; *see also* Pet. Prehearing Br. at 16. U.S. producers made *** and *** percent of their shipments in the distributors channel in 2022 and 2023, respectively, with the remainder to end users. Importers shipped *** and *** percent of subject merchandise from China in the distributors channel in 2022 and 2023, respectively, with the remainder to end users. Importers shipped *** and *** percent of subject merchandise from India in the distributors channel, with the remainder to end users. In 2024, *** resulted in *** percent of U.S. shipments of subject imports from India going to end users. In that same period, *** percent of U.S. producers' U.S. shipments and *** percent of importers' U.S. shipments of subject imports were to end users. *Id.* at 2.4.

[79] Pet. Postconference Br. at 20; *see also* Conf. Tr. at 46 (Boldenow), 47 (McAlear, Bianco).

[80] CR/PR at 2.5, Table 2.3; Pet. Prehearing Br. at 16, *citing* U.S. Producers' Questionnaire Responses at IV-10.

[81] CR/PR at 2.5, Table 2.3.

[82] CR/PR at Tables 5.4 to 5.10.

[83] CR/PR at Tables 4.2, 5.4 to 5.10.

simultaneously present in the U.S. market throughout all or most of the POI. In light of these considerations, we find that there is a reasonable overlap of competition between the domestic like product and imports from China and India and between imports from China and India.

Accordingly, we cumulate subject imports from China and India for our analysis of whether there is material injury by reason of subject imports.

V. 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 overhead door springs from China that Commerce has found to be sold in the United States at LTFV and subsidized by the government of China.

A. Legal Standards

In 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.[84] 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.[85] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[86] 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.[87] 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."[88]

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 imports,[89] it does not define the phrase "by reason of," indicating that this aspect of the injury

[84] 19 U.S.C. §§ 1671d(b), 1673d(b).

[85] 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).

[86] 19 U.S.C. § 1677(7)(A).

[87] 19 U.S.C. § 1677(7)(C)(iii).

[88] 19 U.S.C. § 1677(7)(C)(iii).

[89] 19 U.S.C. §§ 1671d(b), 1673d(b).

analysis is left to the Commission's reasonable exercise of its discretion.[90] 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.[91]

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.[92] In performing its examination, however, the Commission need not isolate

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[90] *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).

[91] 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).

[92] 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.[93] 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.[94] It is clear that the existence of injury caused by other factors does not compel a negative determination.[95]

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."[96] 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

[93] 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.").

[94] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

[95] *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.").

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

sources to the subject imports." [97] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[98]

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.[99] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[100]

B. Conditions of Competition and the Business Cycle

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

1. Captive Production

The captive production provision, 19 U.S.C. § 1677(7)(C)(iv), as amended by the Trade Preferences Extension Act of 2015 ("TPEA"), is potentially applicable to these investigations. The TPEA eliminated what had been the third statutory criterion of the captive production provision.[101]

The URAA Statement of Administrative Action ("SAA") states that "{i}f the captive production provision applies, the Commission will focus primarily on the merchant market in analyzing the market share and financial performance of the domestic industry. . . . {but that the} provision does not require the Commission to focus exclusively on the merchant market in its analysis of market share and financial performance. The basis for this analysis is the recognition that, in such a captive production situation, the imports compete primarily with sales of the domestic like product in the merchant market, not with the inventory internally

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[97] *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant "other factor" may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

[98] *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.").

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

[100] *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.").

[101] Pub. L. 114-27, § 503(c).

transferred for processing into a separate downstream article."[102] Even when the statutory provision is inapplicable, the Commission has frequently considered significant captive production to be a relevant condition of competition.[103]

During the POI, *** U.S. firms internally consumed a portion of their domestically produced overhead door springs: (1) ***[104] and (2) ***.[105] *** internally consumed *** of the overhead door springs it produced during the POI,[106] while *** internally consumed between *** and *** percent of the overhead door springs it produced during the period.[107] *** ratio of internal consumption to production was *** in interim 2025, at *** percent, than in interim 2024, at *** percent.[108]

We therefore consider the applicability of the statutory captive production provision, and whether we should focus our analysis primarily on the merchant market when assessing market share and the factors affecting the financial performance of the domestic industry.[109]

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[102] SAA at 852. The Commission has repeatedly rejected the notion that the statute allows it to exclude domestic production simply because it is captively consumed. *See, e.g., Stainless Steel Wire Rod from Brazil and France*, Inv. Nos. 731 TA 636 637 (Final), USITC Pub. 2721 at I 10 11 (Jan. 1994) (citing similar cases).

[103] *See, e.g., Emulsion Styrene-Butadiene Rubber from Czechia and Russia*, Inv. Nos. 731-TA-1575 and 731-TA-1577 (Final), USITC Pub. 5392 at 19 (Jan. 2023) (not applying the captive production provision but considering it as a condition of competition); *Carbon and Certain Alloy Steel Wire Rod from China,* Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 12 (Jan. 2015).

[104] *** U.S. manufacturing production plants: 1) ***, and 2) *** CR/PR at Table 3.1; *** U.S. producers' questionnaire response, at Question 1-2a. *** U.S. producers' questionnaire response, EDIS Doc. 856912, at Question I-2a. *** produces in-scope springs *** for manufacturing residential and commercial garage doors. CR/PR at 1.25 n.54. *** *Id*. *See also* Petition at Exh. GEN-2 (Boldenow Decl.) at para. 8.

[105] CR/PR at 3.12, 3.14-3.15; *** U.S. Producers' Questionnaire Response (July 14, 2025), EDIS Doc. 856912 at Questions II-11, II-16 & III-9a; *** U.S. Producers' Questionnaire Response (July 14, 2025), EDIS Doc. 856911 at Questions II-11, II-16 & III-9a. Consequently, the captive production provision of section 771(7)(C)(iv) of the Tariff Act of 1930 (19 U.S.C. § 1677(7)(C)(iv) may apply to the *** U.S. producers.

[106] CR/PR at 3.12 (*** internally consumed *** springs that it produced for use in and for sale as garage door assemblies); *** U.S. producers' questionnaire response, EDIS Doc. 856912 (July 14, 2025) at Questions II-11, II-16 & III-9a.

[107] *Calculated from* *** U.S. producers' questionnaire response, EDIS Doc. 856911 (July 14, 2025) at Question II-11 (For *** U.S. shipments: internal consumption versus commercial shipments). *See also id*. at Questions II-16 & III-9a; CR/PR at 3.14-3.15.

[108] *Calculated from* *** U.S. producers' questionnaire response, EDIS Doc. 856911 (July 14, 2025) at Question II-11 (For *** U.S. shipments: internal consumption versus commercial shipments). *See also id*. at Questions II-16 & III-9a; CR/PR at 3.14-3.15.

[109] The captive production provision, 19 U.S.C. § 1677(7)(C)(iv), as amended by the TPEA, provides:
(Continued...)

a. Petitioners' Arguments

Petitioners assert that the criteria for application of the captive production provision are not satisfied but provide no reasoning.[110]

b. Analysis and Recommendation

Threshold Criterion. The threshold criterion in the statute is that "domestic producers internally transfer significant production of the domestic like product for the production of a downstream article and sell significant production of the domestic like product in the merchant market."[111]

In these investigations, U.S. producers internally transferred between *** and *** percent of their U.S. shipments during the POI, and sold between *** and *** percent of their U.S. shipments commercially.[112] Because both internal transfers and merchant market sales

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

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

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

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

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

[110] Pet. Prehearing Br. at 30 n.13, *citing* Confidential Prehearing Staff Report, EDIS Doc. 858702 (Aug. 5, 2025) ("Prehearing CR") at 3.14-3.15. Although they do not address the merchant market data, Petitioners note that the merchant market and total market data show *** material injury to the domestic industry. *Id*., *citing* CR/PR at C.3 to C.6, Tables C-1 & C.2.

[111] *See* Memorandum GC-WW-129 at V-18-20.

[112] CR/PR at Table 3.11. We further note that in 2022 commercial sales were equivalent to *** percent of U.S. production and internal transfers were equivalent to *** percent of U.S. production. *Id*. In 2023 commercial sales were equivalent to *** percent of U.S. production and internal transfers are equivalent to *** percent of U.S. production. In 2024 commercial sales were equivalent to *** percent of U.S. production and non-internal transfers were equivalent to *** percent of U.S. production. In interim 2024 commercial sales were equivalent to *** percent of U.S. production and internal transfers were equivalent to *** percent of U.S. production. In interim 2025 commercial sales are equivalent to *** percent of U.S. production and internal transfers were equivalent to *** percent of U.S. production. *Calculated from* Tables 3.11 & C-1.

appear to constitute significant portions of the domestic industry's production, we find that the threshold criterion for applying the captive consumption provision is satisfied.

First Statutory Criterion. The first criterion tests whether the domestic like product produced that is internally transferred for processing into downstream articles does not enter the merchant market for the domestic like product.[113] Questionnaire responses indicate that *** the overhead door springs intended for internal consumption were diverted to the merchant market for the domestic like product in 2024.[114] Accordingly, we find that this criterion is satisfied.[115]

Second Statutory Criterion. In applying the second statutory criterion, the Commission generally considers whether the domestic like product is the predominant material input into a downstream product by referring to its share of the raw material cost of the downstream product.[116] In previous investigations, the Commission construed "predominant" material input to mean the main or strongest element, and not necessarily a majority of the inputs by value.[117] In these investigations, domestic producer *** reported that internally transferred overhead door springs accounted for *** percent of the value of the finished cost of its downstream garage doors,[118] while domestic producer *** reported that internally transferred overhead door springs accounted for *** percent of the value of the finished cost of its downstream garage doors.[119] Based on these *** shares, we find that the second criterion is not satisfied.[120]

Conclusion. Because the second criterion of the captive production provision is not satisfied, and no party has argued otherwise, we find that the captive production provision

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[113] *See* Memorandum GC-WW-129 at V-21-23; *Raw Flexible Magnets from China and Taiwan*, Inv. Nos. 701-TA-452 and 731-TA-1129-30 (Preliminary), USITC Pub. 3961 at 13 (Nov. 2007) ("No producer reported diverting raw flexible magnets intended for internal consumption to the merchant market.").

[114] CR/PR at 3.15 ("No U.S. producer … reporting diverting overhead door springs intended for internal consumption to the merchant market."), Table 3.11 (ratio of internal consumption to U.S. shipments).

[115] *See* CR/PR at 3.14, Table 3.11.

[116] *See, e.g.*, *Emulsion Styrene-Butadiene Rubber from Czechia and Russia,* Inv. Nos. 731-TA-1575 and 731-TA-1577 (Final), USITC Pub. 5392 at 19 (Jan. 2023).

[117] *Emulsion Styrene-Butadiene Rubber from Czechia and Russia,* Inv. Nos. 731-TA-1575 and 731-TA-1577 (Final), USITC Pub. 5392 at 19 (Jan. 2023).

[118] CR/PR at 3.15-3.16. As noted, *** is the *** of the two U.S. firms reporting internal consumption; it accounts for approximately *** percent of U.S. production. CR/PR at Table 3.1.

[119] CR/PR at Table 3.15-3.16. As noted, *** is the *** of the two U.S. firms that reported internal consumption. It accounts for approximately *** percent of U.S. production. CR/PR at Table 3.1.

[120] As noted, *** financial data was not included in the aggregated financial data for the domestic industry. *See* CR/PR at 3.1. n.1.

does not apply. However, we consider, as a condition of competition, that a significant portion of domestic production is internally transferred.

2. Demand Considerations

Overhead door springs provide the lifting force for counterbalance lift systems in applications such as residential and commercial garage doors, industrial rolling doors, and truck and trailer doors, among others.[121] U.S. demand for overhead door springs depends on the demand for these U.S.-produced downstream products.[122]

Petitioners contend that supply constraints in 2021, along with the COVID-19 pandemic spurring demand for home construction projects and a certain amount of panic buying by purchasers, led to a spike in demand in 2022.[123] Petitioners assert that by 2023, demand had normalized at a lower level, and was somewhat depressed given the build-up in importer and purchaser inventories that had carried over from 2022 to 2023.[124] They argue that a slight increase in apparent U.S. consumption of overhead door springs in 2024 signifies a corresponding increase in demand.[125] Petitioners assert that the lower apparent U.S. consumption in interim 2025 than in interim 2024 is attributable to the waning of the COVID-19-related home remodeling bubble, decreased housing starts, and relatively high interest rates.[126]

Three of five U.S. producers, one-half of all responding importers, and virtually all responding U.S. purchasers, indicated that the market was subject to business cycles.[127] Generally, the overhead door spring market follows new construction trends in both commercial and residential construction as well as remodeling industry trends. Firms reported seasonal variations in demand but differed as to which were the higher and lower seasons.[128]

Most responding U.S. producers reported that domestic demand for overhead door springs has fluctuated down since January 1, 2022. The responses of U.S. importers and purchasers were more mixed, with most importers evenly divided between demand having

[121] CR/PR at 1.18.

[122] CR/PR at 2.9; *see also* Pet. Prehearing Br. at 6 (demand for overhead door springs is tied to demand for garage doors, which is driven to a large degree by new residential and commercial construction, as well as renovation/replacement demand).

[123] Pet. Prehearing Br. at 6.

[124] Pet. Prehearing Br. at 6, *citing* Table C-1.

[125] Pet. Prehearing Br. at 6, *citing* Table C-1.

[126] Pet. Prehearing Br. at 7.

[127] CR/PR at 2.9.

[128] CR/PR at 2.9.

fluctuated up and down (seven each) and most purchasers evenly divided between demand having not changed and fluctuated down (four each).[129]

Apparent U.S. consumption of overhead door springs fluctuated down over the POI.[130] It decreased from 181.4 million pounds in 2022, to 157.6 million pounds in 2023, and slightly increased to 162.0 million pounds in 2024, a level 10.7 percent lower than in 2022.[131] Apparent U.S. consumption was 40.3 million pounds in interim 2025, 1.0 percent less than interim 2024's 40.7 million pounds.[132]

3. Supply Considerations

The domestic industry was the largest source of overhead door springs in the U.S. market throughout the POI, although they steadily lost market share over the period.[133] Its share of the U.S. market decreased overall by 6.0 percentage points from 2022 to 2024, decreasing by 1.7 percentage points from 2022 to 2023, and by 4.3 percentage points from 2023 to 2024. The industry's 83.6 percent market share in interim 2025 was 5.2 percentage points lower than its 88.8 percent share in interim 2024.[134]

According to Petitioners, domestic producers experienced supply constraints in early 2022, when supplies of wire (the primary raw material input for producing overhead door springs) were tight due to the pandemic.[135] They contend that after early 2022, including the years in which subject imports surged, U.S. producers did not have any supply constraints.[136]

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[129] CR/PR at 2.10, Table 2.6.

[130] CR/PR at Tables 4.10 & C-1.

[131] CR/PR at Tables 4.10 & C-1.

[132] CR/PR at Tables 4.10 & C-1.

[133] CR/PR at 4.24, Tables 4.14 & C-1. The domestic industry' share of apparent U.S. consumption declined from 94.9 percent in 2022 to 93.3 percent in 2023, and further declined to 88.9 percent in 2024. *Id*. at Tables 4.14 & C.1.

[134] CR/PR at Table C-1.

[135] Pet. Prehearing Br. at 7-8. U.S. producer *** stated COVID-19 related supply shortages forced them to place customers on allocation, but that these constraints were limited to the first quarter of 2022. U.S. producers *** and *** reported facing similar supply chain disruptions, however *** stated that they were resolved by mid-year 2023 rather than 2022. CR/PR at 2.9.

[136] Pet. Prehearing Br. at 8. U.S. producers were asked to provide responses regarding the timing of supply constraints. CR/PR at 2.8, Table 2.5. Most U.S. purchasers indicated that supply constraints were mostly in 2022. *Id*. Specifically, ten of 12 responding purchasers reported that they had experienced supply constraints, with all ten reporting supply shortages from domestic producers in 2022. *Id*. In contrast, none of the purchasers reported supply constraints from foreign producers or importers during 2022 to interim 2025. *Id*.

The domestic industry's practical capacity increased over the calendar years of the POI, from 206.4 million pounds in 2022 to 215.2 million pounds in 2023 and 2024;[137] it was 11.6 percent lower in interim 2025, at 49.8 million pounds, than in interim 2024, at 56.4 million pounds.[138] In contrast, the industry's practical capacity utilization for overhead door springs continuously declined from 2022 to 2024, decreasing from 83.4 percent in 2022 to 68.4 percent in 2023, and to 67.4 percent in 2024.[139] It was higher in interim 2025, at 71.7 percent, than in interim 2024, at 63.7 percent.[140]

Cumulated subject imports were the second largest source of supply to the U.S. market throughout the POI, and increasingly gained market share over the period.[141] Their share of the U.S. market increased overall by *** percentage points from 2022 to 2024, including *** percentage points from 2022 to 2023 and *** percentage points from 2023 to 2024.[142] Their share was *** percentage points higher, at *** percent, in interim 2025, than in interim 2024, at *** percent.

4. Substitutability and Other Conditions

Based on the record in the final phase of these investigations, we find that there is a high degree of substitutability between domestically produced overhead door springs and cumulated subject imports.[143] As discussed above, most responding market participants reported that subject imports from each subject country were *** interchangeable with domestically produced overhead door springs.[144]

We also find that price is an important factor in purchasing decisions. Responding U.S. producers report that differences other than price are "never" or only "sometimes" a significant factor for sales of domestically produced springs compared to subject imports.[145] Further, nearly all responding purchasers ranked price as one of the top three factors in purchasing decisions.[146] Moreover, a large majority of purchasers reported price as being "very important"

[137] CR/PR at Tables 3.5 & C.1.
[138] CR/PR at Tables 3.5 & C.1.
[139] CR/PR at Tables 3.5 & C.1.
[140] CR/PR at Tables 3.5 & C.1.
[141] CR/PR at 4.24, Tables 4.14 & C-1.
[142] CR/PR at 4.24, Tables 4.14 & C-1. The subject imports' share of apparent U.S. consumption increased from *** percent in 2022 to *** percent in 2023 and further increased to *** percent in 2024. *Id*. at Tables 4.14 & C-1.
[143] *See* PR/PR at 2.12-2.14.
[144] CR/PR at 2.21-2.23.
[145] Pet. Prehearing Br. at 10.
[146] Pet. Prehearing Br. at 10.

in purchasing decisions.[147] Five of 11 responding purchasers reported that they usually purchase the lowest priced product, while an additional four reported that they sometimes purchase the lowest-price product.[148]

U.S. producers reported selling most of their overhead door springs in the spot market (*** percent of commercial U.S. shipments in 2024), with the remainder sold under short-term contracts (*** percent, and annual contracts (*** percent).[149] U.S. importers reported selling most of their overhead door springs under short-term contracts (*** percent), long-term contracts (*** percent), and as spot sales (*** percent. [150] U.S. producers reported lead times averaging six days in 2024 for the nearly 78 percent of their shipments that are produced to order.[151] Importers reported short lead times for shipments from U.S. inventory, which accounted for 58 percent of their commercial shipments in 2024.[152]

The price of carbon steel wire increased from January to July 2022, then fluctuated downward until October 2024, when the price began to increase again, through the first quarter of 2025.[153] Overall, prices for carbon steel (the primary input for drawn wire) were lower at the end of POI than at the beginning.[154] Raw materials decreased from *** percent of U.S. producers' COGS in 2022 to *** percent in 2024, and remained essentially unchanged at *** percent in interim 2025.[155] Petitioners state that they buy raw materials on a spot basis.[156]

According to Petitioners, some major purchasers import subject overhead door springs directly from each of the subject countries for use in garage door manufacturing.[157] They note that *** importers reported import purchase cost data that collectively accounted for *** percent of the reported pricing data.[158] Petitioners assert that this direct sourcing of imports intensifies the competitive price effects of the subject imports, as U.S. producers are forced to compete with extremely low prices that foreign producers offer directly to U.S. purchasers.[159]

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[147] Pet. Prehearing Br. at 10, *citing* CR/PR at 2.14, Table 2.10.

[148] CR/PR at 2.14.

[149] CR/PR at 5.4, Table 5.3.

[150] CR/PR at 5.4, Table 5.3.

[151] CR/PR at 2.15.

[152] CR/PR at 2.15.

[153] CR/PR at 5.1.

[154] CR/PR at 5.1-5.2, Figure 5.1, Table 5.1.

[155] CR/PR at 6.4, Table 6.1. Notwithstanding these data, most responding U.S. producers and importers reported that the cost of raw materials has increased or fluctuated since January 1, 2022. CR/PR at 5.1-5.2, Figure 5.1, Table 5.1.

[156] CR/PR at 5.1.

[157] Pet. Prehearing Br. at 11-12; CR/PR at 2.3.

[158] Pet. Posthearing Br. at 11.

[159] Pet. Prehearing Br. at 11-12.

Effective September 1, 2019, overhead door springs originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974, which was reduced to 7.5 percent effective February 14, 2020.[160] Effective February 4, 2025, overhead door springs originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act ("IEEPA"), which increased to 20 percent on March 4, 2025.[161] Overhead door springs originating in China and India are subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, applied to the declared value of the steel content of the imported article.[162] The steel wire used to produce these springs and the wire rod from which the wire is drawn are also subject to the section 232 additional duty.[163]

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[164]

The volume of cumulated subject imports increased over the POI from *** pounds in 2022 to *** pounds in 2024, a level *** higher than the 2022 volume.[165] The volume of

[160] CR/PR at 1.16 & n.20. *See also* 84 Fed. Reg. 45821, August 30, 2019; 85 Fed. Reg. 3741, January 22, 2020. *See also* HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 73-45, 99.3.120 to 99.3.121 99.3.130, 99.3.287 to 99.3.288, 99.3.397, 99.3.399 to 99.3.403.

[161] CR/PR at 1.16. *See* Executive Order, *Modifying Reciprocal Tariff Rates to Reflect Discussions with The People's Republic of China* (May 12, 2025). *See Further Amended Notice of Implementation of Additional Duties on Products of the People's Republic of China Pursuant to the President's Executive Order 14195, Imposing Duties To Address the Synthetic Opioid Supply Chain in the People's Republic of China*, 90 Fed. Reg. 11,426 (Mar. 6, 2025). *See also* Executive Order, *Modifying Reciprocal Tariff Rates to Reflect Discussions with The People's Republic of China* (May 12, 2025).

[162] CR/PR at 1.16 & n.19. 90 Fed. Reg. 9817, Feb. 18, 2025; 90 Fed. Reg. 24199, June 9, 2025. *See also* HTS heading 9903.81.90 and U.S. note 16(m) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, Sept. 2025, pp. 99.3.30 and 99.3.382.

[163] *See* CR/PR at 1.16 & n.19.

[164] 19 U.S.C. § 1677(7)(C)(i).

[165] CR/PR at 4.24, Tables 4.2 & C-1. More specifically, the volume of cumulated subject imports decreased from *** pounds in 2022 to *** pounds in 2023, and then increased to *** pounds in 2024. *Id*.

cumulated subject imports was *** percent higher in interim 2025, at *** pounds, than in interim 2024, at *** pounds.[166]

Cumulated subject imports' share of apparent U.S. consumption increased over the POI, from *** percent in 2022 to *** percent in 2024, for an overall increase of *** percentage points from 2022 to 2024.[167] Cumulated subject imports' market share was *** percentage points higher in interim 2025, at *** percent, than in interim 2024, at *** percent.[168]

We find that the volume of cumulated subject imports and the increase in that volume are significant, both in absolute terms and relative to consumption in the United States.

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[169]

As discussed in section VII.B.3 above, we find that there is a high degree of substitutability between the domestic like product and cumulated subject imports and that price is an important factor in purchasing decisions for overhead door springs.[170]

The Commission collected quarterly f.o.b. pricing data on shipments of four types of overhead door springs to unrelated U.S. customers during the POI.[171] Four U.S. producers and

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[166] CR/PR at 4.24, Table 4.2. The volume of cumulated subject imports' U.S. shipments followed similar trends. *Id*. at Tables 4.14 & C-1. The volume of subject import's U.S. shipments increased from *** pounds in 2022 to *** pounds in 2023 and further increased to *** pounds in 2024, an increase of *** percent from 2022 to 2024. *Id*. at Tables 4.14 & C-1. The volume of cumulated subject imports' U.S. shipments was *** percent higher in interim 2025, at *** pounds, than in interim 2024, at *** pounds. *Id*.

[167] CR/PR at 4.24, Tables 4.14 & C-1.

[168] CR/PR at 4.24, Tables 4.14 & C-1.

[169] 19 U.S.C. § 1677(7)(C)(ii).

[170] *See* section VII.B.3 above.

[171] CR/PR at 5.6. These four pricing products were:

(Continued...)

five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[172] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' reported commercial U.S. shipments of overhead door springs, *** percent of reported commercial U.S. shipments of imports from China and *** percent of reported commercial U.S. shipments of imports from India during the POI.[173]

The pricing data show that subject imports pervasively undersold the domestic like product during the POI. Subject imports undersold the domestic like product in 40 of 46 (86.9 percent) quarterly comparisons, at an average margin of *** percent.[174] Subject imports oversold the domestic like product in the remaining six quarterly comparisons, at an average margin of *** percent.[175] The volume of subject import sales in quarters with underselling was *** pounds, representing *** percent of the total volume of subject imports of the pricing products, compared to *** pounds in the quarters with overselling, representing *** percent.[176] We also observe that the degree of underselling intensified in 2024, with subject imports underselling the domestic like product in all 15 quarterly comparisons, covering *** pounds (equivalent to *** percent of total volume of subject imports that undersold the domestic like product).[177]

The Commission also collected import purchase cost data from firms that imported subject merchandise for their own use or retail sale.[178] Six importers reported usable purchase

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Product 1: residential garage door torsion spring with the following characteristics: (a) wire diameter 0.207" – 0.234", (b) inner diameter 1.750" – 2.625", (c) overall length 20" – 40", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed;

Product 2: residential garage door torsion spring with the following characteristics: (a) wire diameter 0.243" – 0.262", (b) inner diameter 1.750" – 2.625", (c) overall length 20" – 40", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed;

Product 3: commercial garage door torsion spring with the following characteristics: (a) wire diameter 0.273" – 0.362", (b) inner diameter 2.500" – 6.000", (c) overall length 35" – 65", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed; and

Product 4: long length spring with the following characteristics: (a) wire diameter 0.192" – 0.437", (b) inner diameter 1.750" – 6.000", (c) overall length 96" – 144", (d) left wound or right wound, (e) description stenciled on spring, (f) plain ends – no aluminum castings/cones installed. *Id*.

[172] CR/PR at 5.7.

[173] CR/PR at 5.7.

[174] CR/PR at 5.26, Table 5.15.

[175] CR/PR at 5.26, Table 5.15.

[176] CR/PR at 5.26, Table 5.15.

[177] CR/PR at 5.27, Table 5.17.

[178] CR/PR at 5.15, 5.29, Table 5.19. Landed duty-paid purchase cost data for imports from China and India are presented in Tables 5.8 to 5.10, along with U.S. producers' sales prices. *Id*. at Tables 5.8-5.10.

cost data for pricing products 1 through 3 on a landed, duty-paid ("LDP") basis.[179] Purchase cost data reported by these firms accounted for *** percent of imports from China and *** percent of imports from India in 2024.[180]

Subject import LDP costs were below domestic prices in all 37 comparisons, representing *** pounds of subject imports; price-cost differentials ranged from *** to *** percent and averaged *** percent.[181]

We recognize that import purchase cost data may not reflect the total cost of importing.[182] Therefore, we requested that importers provide additional information regarding the costs and benefits of importing overhead door springs.[183] All responding U.S importers reported that they did not incur any additional costs beyond landed duty-paid costs (incurred due to the importation of overhead door springs rather than purchasing from a U.S. producer or U.S. importer).[184] Furthermore, ten U.S. importers identified benefits from importing overhead door springs themselves instead of purchasing from U.S. producers or importers, with six firms reporting supply chain-related reasons, including the need to supplement their supply due to limited domestic production, four firms reporting price or cost related reasons, and one firm reporting quality reasons.[185]

We also asked firms whether the import cost (both excluding and including additional costs) of overhead door springs they imported are lower than the price of purchasing overhead door springs from a U.S. producer or importer.[186] Six importers estimated that they saved between *** and *** percent of the purchase price by importing overhead door springs rather than purchasing from a U.S. producer, while two firms estimated saving between *** and ***

[179] CR/PR at 5.15.

[180] CR/PR at 5.15, 5.29, Tables 5.19 & 5.20.

[181] CR/PR at 5.29, Tables 5.19 & 5.20. Thus, based on pricing data of both price-to-price comparisons and cost-to price comparisons, subject imports undersold (or were priced lower than subject imports in) 71 of 77 (or 92.2 percent of) possible comparisons covering *** percent of the volume of reported subject imports pricing and purchase cost data. CR/PR at 5.27, 5.29, Tables 5.15 & 5.18; *see also* Pet. Prehearing Br. at 22.

[182] CR/PR at 5.15.

[183] CR/PR at 5.15.

[184] CR/PR at 5.15. Firms were also asked to identify specific additional costs they incurred as a result of importing overhead door springs. *Id*.

[185] CR/PR at 5.15. In addition, seven of 10 responding U.S. importers reported that comparing costs of importing to the cost of purchasing from a U.S. producer in determining whether to import overhead door springs, and three importers compared those costs to the cost of purchasing from a U.S. importer. *Id*.

[186] CR/PR at 5.15.

percent.[187] Thus, importers generally reported that there were cost benefits associated with such importing.

We have also considered purchasers' responses to the lost sales/lost revenue survey.[188] Of the 12 responding purchasers, six reported that, since 2022, they have purchased imported overhead door springs from China (three firms) and India (four firms) instead of U.S.-produced product.[189] Four of these purchasers reported that subject import prices were lower than U.S.-produced product, and three of these purchasers reported that price was a primary reason for purchasing *** pounds of subject imports instead of the domestic like product during the POI.[190]

Based on the foregoing, including the high degree of substitutability between domestically produced overhead door springs and cumulated subject imports from China and India, the importance of price in purchasing decisions for overhead door springs, the available pricing and purchase cost data, and lost sales information, we find that underselling by cumulated subject imports from China and India was significant. The significant underselling resulted in subject imports gaining market share at the expense of the domestic industry during the POI. Subject imports' market share increased by *** percentage points from 2022 to 2024, and was an additional *** percentage points higher in interim 2025 than in interim 2024.[191]

We have also examined whether subject imports depressed or suppressed domestic prices during the POI. Overall, domestic prices and purchase costs for imports from subject sources declined, while subject import prices increased.[192] Domestic price decreases ranged from *** to *** percent during January 2022 to March 2025, while import price increases ranged from *** to *** percent.[193]

Pricing products 1 and 2 featured constant competition between subject imports and the domestic like product during the POI.[194] In contrast, there was more sporadic competition with respect to pricing products 3 and 4.[195] Therefore, we primarily focus our price effects analysis on pricing for products 1 and 2.

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[187] CR/PR at 5.15.

[188] Pet. Prehearing Br. at 24-28; *see also* CR/PR at 5.30-5.34.

[189] CR/PR at 5.31, 5.33, Table 5.23.

[190] CR/PR at 5.31.

[191] CR/PR at 4.24, Tables 4.14, C-1.

[192] CR/PR at 5.2, Figure 5.9, Tables 5.4, 5.12 & C-1.

[193] CR/PR at 5.2, Figure 5.9, Table 5.12.

[194] CR/PR at 5.7-5.10, Figures 5.2 & 5.3, Tables 5.4 & 5.5.

[195] CR/PR at 5.11-5.14, Figures 5.4 & 5.5, Tables 5.6 & 5.7. We further note that pricing product 3 was relatively small in terms of volume. *Id*. at 5.11-5.12, Figure 5.4 & Table 5.6.

Domestic prices for pricing product 1 peaked in the second quarter of 2022 before steadily declining until the first quarter of 2025.[196] Similarly, domestic prices for pricing product 2 peaked in the second quarter of 2022 before steadily declining until the fourth quarter of 2024.[197] Specifically, domestic producer prices for pricing product 1 declined *** percent and for pricing product 2 declined *** percent from the first quarter of 2022 to the first quarter of 2025.[198] Documentary evidence submitted by Petitioners indicates that some purchasers cited subject import pricing to obtain price reductions from domestic suppliers. Two U.S. purchasers *** that they used prices for subject imports to obtain price concessions during the POI, with U.S. producers' estimated price reductions ranging from *** percent to *** percent.[199]

The domestic industry's COGS-to-net-sales ratio steadily increased from 71.5 percent in 2022 to 77.3 percent in 2023, and 81.0 percent in 2024, for an overall increase of 9.5 percentage points; it was 1.2 percent lower in interim 2025, at 79.7 percent, than in interim 2024, at 80.9 percent.[200] The industry's unit COGS decreased from $1.54 per pound in 2022 to $1.40 in 2023 and $1.37 in 2024, for an overall decrease of $0.17, or 11.0 percent.[201] The domestic industry net sales AUV decreased from $2.16 per pound in 2022 to $1.82 in 2023 and $1.69 in 2024, for an overall decrease of $0.47 per pound, or by 21.5 percent.[202] Accordingly, the domestic industry' increasing COGS to net sales ratio during the POI was attributable to the industry's net sales AUV declining to a greater degree than its unit COGS.[203]

Based on the foregoing, in particular the high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, the significant underselling by subject imports, the declines in domestic producer prices over the

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[196] CR/PR at 5.2, Figures 5.4, 5.9, Tables 5.4, 5.12 & C-1.

[197] CR/PR at 5.2, Figures 5.5, 5.9, Tables 5.4, 5.12 & C-1. In contrast, domestic prices for pricing product 3 peaked in the third and fourth quarter of 2022, and fluctuated during the remainder of the POI, decreasing to the lowest point in the second quarter of 2024, and then increased through the first quarter of 2025. CR/PR at 5.2, Figures 5.6, 5.9, Tables 5.4, 5.12 & C-1. Domestic prices for pricing product 4 peaked in the second quarter of 2022 before steadily declining until the first quarter of 2024. CR/PR at 5.2, Figures 5.7, 5.9, Tables 5.4, 5.12 & C-1.

[198] CR/PR at Table 5.11.

[199] CR/PR at Table 5.24 (***; ***). *See also* Pet. Prehearing Brief at 24, Exhs. 1-3.

[200] CR/PR at 6.3-6.4, Tables 6.1 & C-1.

[201] CR/PR at Table C.1. The domestic industry's unit COGS declined from $1.41 per pound to $1.34 per pound, or by 5.1 percent over the interim periods. *Id.* The record indicates that the steady decline in the industry's unit COGS was attributable to declining raw material costs. *See id*. at Table 6.1. The domestic industry's raw materials AUV declined from $*** in 2022 to $*** in 2023 and $*** in 2024; it was lower in interim 2025, at $***, than in interim 2024, at $***. *Id*.

[202] CR/PR at Table C.1. The domestic industry's net sales AUV declined from $1.74 per pound to $1.68 per pound, or by 3.7 percent, over the interim periods. *Id.*

[203] *See* CR/PR at Table C.1.

POI for the pricing products in constant competition with subject imports, and the evidence of subject import prices being used to pressure domestic producers to lower prices, we find that subject imports depressed domestic producer prices to a significant degree.[204]

In sum, we find that cumulated subject imports significantly undersold the domestic like product that resulted in subject imports gaining market share at the expense of the domestic industry during the POI. Further, we find that the cumulated subject imports depressed the domestic producer prices to a significant degree during the POI.[205] On this basis, we find that cumulated subject imports had significant adverse price effects.

E. Impact of the Subject Imports[206]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[207]

Most of the domestic industry's trade, employment, and financial indicators generally weakened during the POI, and many indicators continued to worsen in interim 2025. The

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[204] We acknowledge that domestic producer price declines occurred as apparent U.S. consumption declined during the full three-year period with apparent U.S. consumption ending 10.7 percentage points lower in 2024 than in 2022. However, for the reasons stated we find that subject imports depressed domestic prices to a significant degree.

[205] *See* CR/PR at Figures 5.2 & 5.3, Tables 5.4 & 5.5.

[206] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination with respect to overhead door springs from China, Commerce found a margin of dumping of 734.33 percent for imports from several producers/exporters and a margin of dumping of 778.31 percent for imports from the China-wide entity. *China Final Affirmative AD and Critical Circumstances Determinations*, 90 Fed. Reg. at 39370 (Commerce's final antidumping duty margins for China); *see also* CR/PR at Table 1.4. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China are selling subject imports in the United States at LTFV. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[207] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

domestic industry's capacity increased by 4.3 percent from 2022 to 2024,[208] but its production of overhead door springs decreased by 15.8 percent,[209] resulting in a 16.1 percentage point decline in capacity utilization.[210]

The domestic industry's U.S. shipments decreased by 16.4 percent from 2022 to 2024.[211] These decreases were accompanied by a marked 6.0 percentage point decline in the industry's share of apparent U.S. consumption.[212]

The domestic industry's employment-related indicators generally weakened during the POI, and many indicators continued to worsen in interim 2025. The number of production and related workers ("PRWs") was 7.1 percent lower in 2024 than in 2022.[213] The industry's total hours worked was 9.0 percent lower in 2024 than in 2022.[214] Wages paid were 11.1 percent lower in 2024 than in 2022.[215] Productivity decreased by 7.5 percent from 2022 to 2024.[216]

[208] The domestic industry's overhead door springs capacity increased from 206.4 million pounds in 2022 to 215.2 million pounds in 2023 and 2024; it was 11.6 percent lower in interim 2025, at 49.8 million pounds, than in interim 2024 at 56.4 million pounds. CR/PR at Tables 3.10 & C-1.

[209] Production decreased from 172.2 million pounds in 2022 to 147.3 million pounds in 2023 and 145.0 million pounds in 2024; production was 0.6 percent lower in interim 2025, at 35.7 million pounds, than in interim 2024, at 35.9 million pounds. CR/PR at Tables 3.10 & C-1.

[210] The industry's capacity utilization decreased from 83.4 percent in 2022 to 68.4 percent in 2023 and to 67.4 percent in 2024; it was 8.0 percentage points higher in interim 2025, at 71.7 percent, than in interim 2024, at 63.7 percent. CR/PR at Tables 3.10 & C-1.

[211] The industry's U.S. shipments decreased from 172.2 million pounds in 2022 to 147.0 million pounds in 2023, and to 144.1 million pounds in 2024; U.S. shipments were 6.8 percent lower in interim 2025, at 33.7 million pounds, than in interim 2024, at 36.2 million pounds. CR/PR at Tables 3.10 & C-1.

[212] The domestic industry's share of apparent U.S. consumption decreased from 94.9 percent in 2022 to 93.3 percent in 2023, decreased to 88.9 percent in 2024; it was 5.2 percentage points lower in interim 2025, it was 83.6 percent in interim 2025, and 88.8 percent in interim 2024. CR/PR at Tables 4.14 & C-1.

[213] The number of PRWs decreased from 624 in 2022 to 599 in 2023, and to 580 in 2024; the number of PRWs was 9.7 percent lower in interim 2025, at 524 PRWs, than in interim 2024, at 580 PRWs. CR/PR at Tables 3.17 & C-1.

[214] Total hours worked decreased from 1.2 million hours in 2022 to 1.1 million hours in 2023, and to 1.0 million in 2024; total hours were 10.0 percent lower in interim 2025, at 257,629 hours, than in interim 2024, at 286,315 hours. CR/PR at Tables 3.17 & C-1.

[215] Wages decreased from $29.4 million in 2022 to $26.4 million in 2023, and to $26.1 million in 2024; they were 11.9 percent lower in interim 2025, at $6.3 million, than in interim 2024, at $7.2 million. CR/PR at Tables 3.17 & C-1.

[216] Productivity decreased from 146.1 pounds per hour in 2022 to 129.3 pounds per hour in 2023, but then increased to 135.1 pounds per hour in 2024; it was 10.5 percent higher in interim 2025, at 138.7 pounds per hour, than in interim 2024, at 125.5 pounds per hour. CR/PR at Tables 3.17 & C-1.

The domestic industry's end-of-period inventories decreased by 25.7 percent from 2022 to 2024.[217] As a share of total shipments, the domestic industry's end-of-period inventories decreased by *** percentage points from 2022 to 2024.[218]

The domestic industry's financial performance generally weakened from 2022 to 2024, and further worsened at the end of the POI. The industry's net sales revenues decreased by *** percent from 2022 to 2024.[219] Its gross profits decreased by *** percent between 2022 and 2024, and were a further *** percent lower in interim 2025 than in interim 2024.[220] The industry's operating income decreased *** percent from 2022 to 2024.[221] Its operating income as a ratio of net sales decreased by 15.0 percentage points from 2022 to 2024.[222] Its net income decreased by *** percent from 2022 to 2024.[223] The industry's net income as a ratio of net sales decreased by 15.1 percentage points from 2022 to 2024.[224]

The domestic industry's capital expenditures decreased by *** percent from 2022 to 2024.[225] Its research and development ("R&D") expenses increased *** percent from 2022 to

[217] Inventories decreased from 8.3 million pounds in 2022 to 6.9 million pounds in 2023 and then to 6.2 million pounds in 2024; they were 21.7 percent higher in interim 2025, at 7.6 million pounds, than in interim 2024 at 6.3 million pounds. CR/PR at Tables 3.12 & C-1.

[218] The percentage decreased from *** percent in 2022 to *** percent in 2023, and to *** percent in 2024; but was *** percentage points higher in interim 2025, at *** percent, than in interim 2024, at *** percent. CR/PR at Tables 3.12 & C-1.

[219] CR/PR at Tables 6.1 & C-1. Net sales revenues declined from $*** 2022 to $*** in 2023 and $*** in 2024; they were $*** in interim 2024 and $*** in interim 2025. *Id*.

[220] Gross profits declined from $*** in 2022 to $*** in 2023, and to $*** in 2024; gross profits were $*** in interim 2024 and $*** in interim 2025. CR/PR at Tables 6.1 & C-1.

[221] The industry's operating income, decreased from $*** in 2022 to $*** in 2023, and further decreased to $*** in 2024; its operating income was *** percent lower in interim 2025, at $***, than in interim 2024, at $***. CR/PR at Tables 6.1 & C-1.

[222] The domestic industry's operating income as a ratio of net sales decreased from 19.2 percent in 2022 to 9.7 percent in 2023 and further decreased to 4.2 percent in 2024; it was 0.6 percentage points lower in interim 2025, at 4.2 percent than in interim 2024, at 4.8. CR/PR at Tables 6.1 & C-1.

[223] Its net income decreased from $*** in 2022 to $*** in 2023, and further decreased to $*** in 2024; the industry's net income was *** percent lower in interim 2025, at $***, than in interim 2024, at $***. CR/PR at Tables 6.1 & C-1.

[224] The industry's net income as a ratio of net sales decreased from 19.1 percent in 2022 to 9.5 percent in 2024, and further decreasing to 4.0 percent in 2024; it was 0.5 percentage points lower in interim 2025, at 4.2 percent, than in interim 2024, at 4.7 percent. CR/PR at Tables 6.1 & C-1.

[225] The domestic industry's capital expenditures decreased from $*** in 2022 to $*** in 2023, and further decreased to $*** in 2024; they were *** percent higher in interim 2025, at $***, than in interim 2024, at $***. CR/PR at Tables 6.5 & C-1.

2024.[226] The domestic industry's return on assets decreased *** percentage points from 2022 to 2024.[227]

We also note that five of six U.S. producers reported that the low-priced subject imports adversely affected their planned investments.[228]

As discussed above, cumulated subject import volume and market share increased significantly and at the expense of the domestic industry over the POI, driven by pervasive underselling of a product that is highly substitutable with the domestic like product and for which price is an important purchasing factor. Over the full years of the POI, the industry's output indicators (production, net sales, and U.S. shipments) declined by a greater rate than apparent U.S. consumption, as subject imports gained market share at the expense of the domestic industry. Although consumption increased over the interim periods, the industry's output indicators increased at a slower rate, as subject imports again gained market share at the expense of the domestic industry.[229] In addition, the domestic industry's financial performance was adversely impacted by the market share loss to subject imports during the POI, as well as the depressing effects of subject imports on domestic industry prices during the period. As the domestic industry lost sales to subject imports during the POI, it was increasingly forced to spread fixed costs over fewer sales, with the adverse impact of this further enhanced by downward pressure on its prices. As discussed above in section V.D., the domestic industry's net sales AUV declined to a greater extent than its unit COGS during the 2022-24 period. Although the decline in the industry's unit COGS outpaced the decline in its net sales AUV in interim 2025, its financial performance continued to deteriorate, as compared to interim 2024, which is largely explained by the domestic industry's declining U.S. shipments and continued market share loss to subject imports during that period. We thus find that subject imports, which took market share from the domestic industry and depressed domestic prices by significantly underselling the domestic like product, had a significant adverse impact on the domestic industry over the POI.

We have also considered whether there are other factors that may have had an impact on the domestic industry, to ensure that we are not attributing injury from such other factors to subject imports. Apparent U.S. consumption declined by 10.7 percent from 2022 to 2024; it

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[226] The industry's R&D expenses increased from $*** in 2022 to $*** in 2023 and then declined to $*** in 2024; they were *** percent lower in interim 2025, at $***, than in interim 2024, at $***. CR/PR at Tables 6.6 & C-1.

[227] The domestic industry's return on assets decreased from *** percent in 2022 to *** percent in 2023, and then falling to *** percent in 2024. CR/PR at Table 6.11.

[228] *See* CR/PR at 6.21-6.23, Tables 6.13 & 6.14.

[229] CR/PR at Tables 3.10, 4.14, C-1.

was 5.2 percent lower in interim 2025 than in interim 2024. However, declining apparent U.S. consumption cannot explain the market share shifts from the domestic industry to subject imports that occurred throughout the POI. The trends in apparent U.S. consumption also cannot fully explain the declines in domestic prices over the POI. Notably, the domestic industry's prices declined from 2023 to 2024, along with subject import prices, when apparent U.S. consumption increased by 2.8 percent. During that period of increasing apparent U.S. consumption, the domestic industry's net sales AUV declined to a greater extent than its unit COGS.[230]

As noted, there were virtually no nonsubject imports of overhead door springs in the U.S. market during the POI.[231] Consequently, nonsubject imports do not explain the declines in the domestic industry's market share losses or declining performance indicators during the POI.[232]

In the preliminary phase of these investigations, the respondents raised a number of non-attribution arguments, which the Commission addressed in its preliminary determination. We indicated that we would further consider and evaluate any non-attribution arguments raised in the final phase of these investigations.[233] Accordingly, we again address their non-attribution arguments in light of the information available on the record in the final phase of these investigations.[234]

Alcomex asserted that domestic producers cannot meet certain technical specifications for particular products.[235] Petitioners submitted documentation showing that U.S. producers sell both shot peened and powder coated overhead door springs in the U.S. market, but lost sales due to price.[236] Further, Petitioners also submitted documentation showing that they produce and sell the full range of overhead door spring products in the U.S. market.[237]

U.S. purchaser AlumaDoor argues that certain domestic producers' actions – including a refusal to sell to particular purchasers, delays in deliveries, and imposition of "unreasonable" price increases – are the cause of any domestic industry difficulties.[238] Petitioners note that "all

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[230] See CR/PR at Table C.1.

[231] CR/PR at 4.24, Tables 4.14, C-1; Pet. Prehearing Br. at 37 (asserting that nonsubject imports were "nearly non-existent over the POI"). *See also* section VII.C, above.

[232] *See* CR/PR at Table C-1.

[233] *See Preliminary Determination*, USITC Pub. 5573 at 39-40.

[234] The Petitioners briefly addressed the non-attribution arguments raised by the Respondents during the preliminary phase of these investigations. *See* Pet. Prehearing Br. at 37-42.

[235] AlumaDoor Postconference Br. at 2-4. *See also* Pet. Prehearing Br. at 36-42.

[236] Pet. Prehearing Br. at 38-40, Exhs. 1-2; *see also* CR/PR at 3.6 (***).

[237] Pet. Prehearing Br. at 38-40, Exhs. 1-3.

[238] AlumaDoor Postconference Br. at 2-4.

of {AlumaDoor's} arguments as to allegedly 'unreasonable' domestic prices, delays in delivery or not supplying certain purchasers all occurred in 2021."[239] They assert that the supply constraints occurred due to the COVID effects – and the supply constraints were limited to the earlier part of the POI.[240] The record in the final phase of these investigations does not indicate the existence of the practices alleged by AlumaDoor during the POI.

Both Alcomex and AlumaDoor further asserted that imports were necessary due to supply shortages in the U.S. market.[241] However, there was a general consensus among U.S. producers and purchasers that any COVID-related supply constraints in the U.S. market were resolved by 2023.[242]

Respondent Alcomex also argued that the Petitioners cannot meet U.S. purchaser's lead time requirements.[243] However, the record in this final phase of the investigations indicates that the domestic producers generally have shorter lead times than the subject imports.[244]

Therefore, we find that the information on the record in the final phase of these investigations does not support the existence of the factors that respondents in the preliminary phase alleged were responsible for any injury to the domestic industry.

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of overhead door springs from China that are sold in the United States at LTFV and subsidized by the government of China.

VI. Critical Circumstances

A. Legal Standards

With regard to China, on August 15, 2025, Commerce issued its final determination that critical circumstances exist with respect to imports of overhead door springs from the China-

[239] Pet. Prehearing Br. at 40 n.17.

[240] Pet. Prehearing Br. at 40 n.17. Further, the Petitioners' assert that none of AlumaDoor's arguments explain why low-priced imports surged and captured market share from subject producers over the current POI, after the COVID pandemic ended. *Id*.

[241] Alcomex Postconference Br. at 2-6; AlumaDoor Postconference Br. at 5.

[242] *See* CR/PR at 2.8. In the preliminary phase, U.S. producers reported shortages of wire material in 2021 and the first half of 2022, which led all four U.S. producers to put customers on allocation or decline orders. *See generally* Staff Report for Overhead Door Counterbalance Torsion Springs from China and India, Preliminary Phase Investigation, EDIS Doc. 838754 (Dec. 6, 2024) ("Prelim. Staff Report") at II-5 to II-6. In contrast, in the final phase investigations, most firms reported that they had not experienced supply constraints in the latter part of the POI, *i.e.*, 2023, 2024 and in interim 2025. CR/PR at 2.8, Table 2.5.

[243] *See also* Pet. Prehearing Br. at 36-42.

[244] Pet. Prehearing Br. at 40.

wide entity, and do not exist for all other producers and/or exporters granted a separate rate in the antidumping duty investigation.[245] On the same date, Commerce issued its final determination that critical circumstances exist with respect to imports of overhead door springs from Foshan Nanhai Xulong Spring Factory ("Xulong Spring"), Tianjin Wangxia Spring Co. Ltd. ("Tianjin Wangxia"), and the "non-responsive companies," and do not exist for all other producers and/or exporters in the countervailing duty investigation.[246]

Because we have determined that the domestic industry is materially injured by reason of subject imports from China in both the antidumping and countervailing duty determinations, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination . . . are likely to undermine seriously the remedial effect of the antidumping order to be issued."[247] The statute further provides that in making these findings:

> the Commission shall consider, among other factors it considers relevant –
>
> (I) the timing and the volume of the imports,

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[245] *Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Determination Sales at Less Than Fair Value and Final Affirmative Critical Circumstances Determination, in Part*, 90 Fed. Reg. 39369, 39370 (Aug. 15, 2025) ("*China Final Affirmative AD and Critical Circumstances Determinations*") (signed Aug. 11, 2025). *See also* Revision Memo to Post-Hearing Staff Report, INV-XX-118 (Sept. 8, 2025), EDIS Doc. 861407 ("Revision Memo") at 4.7. Commerce did not find critical circumstances for the following individually examined companies granted a separate rate (listing the producer first, followed by the exporter): 1) Suzhou Shunchi Hardware Co., Ltd. (Chi Hardware Corp. Limited), 2) Wuxi Xinhui Spring Factory (Chi Hardware Corp. Limited), 3) Hangzhou Fuxing Spring Co., Ltd. (Chi Hardware Corp. Limited), 4) Hangzhou Fuxing Spring Co., Ltd. (Hangzhou Fuxing Spring Co., Ltd.), 5) Tianjin Gangzhen Auto Parts Co., Ltd. (Hebei Meirui Metals & Minerals Co., Ltd.), 6) MFG Direct (Ningbo) Limited (MFG Direct (Ningbo) Limited), 7) Tianjin Wangxia Spring Co., Ltd. (Ningbo Well Lift Door Co., Ltd.), 8) Hangzhou Fuxing Spring Co., Ltd. (Ningbo Well Lift Door Co., Ltd.), 9) Hefei Wangqin Spring Co., Ltd. (Ningbo Well Lift Door Co., Ltd.), 10) Tianjin Wangxia Spring Co., Ltd. (Wuxi Jiupie Information Technology Co., Ltd.), 11) Wuxi New Fire Technology Co., Ltd. (Wuxi Jiupie Information Technology Co., Ltd.), 12) Hangzhou Fuxing Spring Co., Ltd. (Wuxi Jiupie Information Technology Co., Ltd.), and 13) Hangzhou Fuxing Spring Co., Ltd. (Wuxi Kop Door Technology Co., Ltd.). *Id.*, 90 Fed. Reg. at 39370 & n.8.

[246] *Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination in Part*, 90 Fed. Reg. 39374, 39375 & n.6 (Aug. 15, 2025) ("*China CVD Final Determination – Final Affirmative Critical Circumstances Determination*") (signed Aug. 11, 2025). In the CVD investigation, Commerce did not receive responses to its quantity and value questionnaire for the following "non-responsive companies": 1) Beled Co., Ltd./Beled (Shenzhen) Commerce Co., Ltd., 2) Jiaxing Taike Springs Co., Ltd., 3) Kowloon Metal Spring Factory, 4) Ningboo I Promise Import Export, and 5) Xiamen Globe Truth (GT) Industries. *Id*. at 39375 & n.6. Commerce found that critical circumstances also exist with respect to these companies. *Id*. *See also* Revision Memo at 4.8.

[247] 19 U.S.C. §§ 1671d(b)(4)(A)(i), 1673d(b)(4)(A)(i); 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii); 19 U.S.C. §§ 1671d(e)(2), 1673d(e)(2).

(II) a rapid increase in inventories of the imports, and

(III) any other circumstances indicating that the remedial effect of the antidumping order will be seriously undermined.[248]

An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period of 90 days prior to the suspension of liquidation.[249] If the Commission finds either no material injury by reason of subject imports or finds threat of material injury, it need not and should not make a critical circumstances finding.[250]

The Uruguay Round Agreements Act ("URAA") Statement of Administrative Action ("SAA") provides that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."[251] Prior legislative history indicates that the critical circumstances provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and the

[248] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[249] 19 U.S.C. §§ 1671d(e)(2), 1673d(e)(2).

[250] In pre-URAA cases, the Commission would not reach the issue of critical circumstances when it made a determination of threat of material injury on the basis that "a finding that retroactive imposition of antidumping duties is necessary to prevent recurrence of material injury would be inconsistent with {a} finding that the domestic industry is threatened with material injury at this time." *E.g., Stainless Steel Flanges from India and Taiwan*, Inv. Nos. 731-TA-639-640 (Final), USITC Pub. 2724 at I-21 n.112 (Feb. 1994). Congress amended the critical circumstances provision in the URAA and eliminated any statutory reference to "recurrence of material injury." The Commission has determined that the URAA did not require it to modify its practice of not reaching the issue of critical circumstances when it makes an affirmative threat determination. In *Collated Roofing Nails from China and Taiwan*, Inv. Nos. 731-TA-757 & 759 (Final), USITC Pub. 3070 at 24-25 (Nov. 1997), the Commission noted that a critical circumstances finding would not have any practical utility in a threat case where duties are imposed from the date of the final determination – not from the date of suspension of liquidation. Further, the Commission found that the statute still required a determination of material injury by reason of subject imports in order to trigger a critical circumstances finding, thus rendering a critical circumstances finding inappropriate in threat cases.

[251] URAA SAA, H.R. Doc. 103-316, vol. I at 877 (1994).

preliminary determination by Commerce."[252] Accordingly, the Commission's practice has been to base its critical circumstances determination on a comparison of import data from periods before and after the date of a petition's filing.[253]

The Commission generally relies on data gathered from the periods immediately preceding and following the filing of the petition unless there is evidence that the product under investigation involves seasonality.[254] The current practice is to compare the six-month periods before and after the filing of the petition, although these periods may be altered where warranted.[255] The Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis.[256]

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[252] *ICC Industries, Inc., v. United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. No. 317, 96th Cong., 1st Sess. 63 (1979).

[253] *See Certain Lined School Paper Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-443 and 731-TA-1095-1097 (Final), USITC Pub. 3884 at 47 (Sep. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-1061 (Final), USITC Pub. 3744 at 26 (Dec. 2004); and *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

[254] *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (Jun. 2007).

[255] In particular, the Commission has used five-month periods in recent investigations where timing of the first preliminary Commerce determination authorizing the imposition of provisional duties would have served to reduce subject import volume in the sixth month of the post-petition period. *See Cold-Rolled Steel Flat Products from China and Japan,* Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286 (Final), USITC Pub. 4619 (July 2016); *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman,* Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC Pub. 4604 at 31-32 (Apr. 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination caused reduction of subject import volume in sixth month). *See also Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey*, Inv. Nos. 731-TA-1319, 1326, and 1328 (Final), USITC Pub. 4664 (Jan. 2017) (using five-month periods when Commerce did not extend preliminary antidumping determinations) and *Certain Orange Juice from Brazil*, Inv. No. 731-TA-1089 (Final), USITC Pub. 3838 at 29 n.203 (using seven month period because the petition was filed late in the month). *But see Certain Magnesia Carbon Bricks from China and Mexico*, Inv. Nos. 701-TA-468 (Final) & 731-TA-1166 to 1167 (Final), USITC Pub. 4182 at 24 (Sept. 2010); *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Final), USITC Pub. 462 at 24 (Feb. 2009). The Commission may also use different periods when the product is seasonal. *See 1,1,1,2--Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 at 25 (Apr. 2017) (seasonal product); *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007) (declining to analyze different periods absent seasonality).

[256] *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

B. Background

In response to Petitioners' allegations of critical circumstances, the Commission sent critical circumstances questionnaires to *** U.S. importers, and received responses from *** of them.[257] In light of the relatively low response rate, Commission staff supplemented the questionnaire response data on pre- and post-petition imports using third-party bill-of-lading data,[258] following the same approach as with the overall import volume data.[259] Bills of lading do not provide information with respect to inventories, so the staff report data on importers' inventories includes only data with respect to the *** importers who responded to the critical circumstances questionnaires.[260]

As reviewed above, Commerce's affirmative critical circumstances determinations in the antidumping and countervailing duty determinations on August 15, 2025, covered different groups of producers.[261]

C. Petitioners' Arguments

Petitioners contend that the Commission should use a five-month period to evaluate critical circumstances because a six-month period would encompass April 3, 2024, the date Commerce issued its preliminary countervailing duty determination, which would distort the data.[262]

Specifically, Petitioners argue that critical circumstances exist for China because monthly imports increased *** percent and *** percent between the five-month pre-petition and post-petition periods in the antidumping and countervailing duty investigations,

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[257] *See* CR/PR at 4.8 and staff's critical circumstances extraction files.

[258] *See* CR/PR at 4.8 (using Panjiva data for a period ending March 31, 2025, the last month for which Panjiva data are available).

[259] *See* CR/PR at 1.7 (staff's methodology for estimating the subject import volume for China); *see also* section I., below.

[260] *See* CR/PR at Tables 4.5 & 4.7.

[261] Notably, Commerce found critical circumstances exist for Chinese producer Xulong Spring, one of the largest Chinese producers of subject door springs and a major exporter, in the countervailing duty investigation, but did not in the antidumping duty investigation. *China Final Affirmative CVD and Critical Circumstances Determinations*, 90 Fed. Reg. at 39375 (affirmative critical circumstances determination for Xulong Spring in the CVD investigation); *China Final Affirmative AD and Critical Circumstances Determinations*, 90 Fed. Reg. at 39370 (negative critical circumstances determination for Xulong Spring in the AD investigation). *See also* CR/PR at 4.8, Tables 4.5 & 4.7 and the staff's extraction files. *See also* Pet. Prehearing Br. at 44, Exh. 5.

[262] Pet. Prehearing Br. at 59-60, *citing China Prelim. Affirmative CVD Determination*, 90 Fed. Reg. at 14630-33; Final Comments at 11.

respectively.[263] Petitioners contend that after the filing of the petition subject imports from China surged into the U.S. market and continued to enter in significant volumes, but once Commerce imposed preliminary countervailing duties in April 2025, subject imports from China rapidly declined.[264]

Petitioners also assert that U.S. importers' end-of-period inventories increased during the POI.[265] They argue that the low response rate to the Commission's critical circumstances questionnaires means that the data understate actual inventories of subject merchandise from China. Petitioners assert that information from domestic producers indicates the existence of large volumes of inventories that are already adversely impacting domestic producers and will seriously undermine the relief of any potential orders on subject imports from China.[266] They contend that the volume of these inventories increased in interim 2025 compared to interim 2024, and that the ratios of these inventories to imports, U.S. shipments of imports, and total shipments of imports all increased in interim 2025 compared to interim 2024.[267]

In addition, the Petitioners argue that the sudden and steep decline in subject imports in May 2025 after Commerce imposed preliminary countervailing duties on China demonstrates strategic and opportunistic importing of springs from China.[268] They state that extensive underselling depressed prices and caused the domestic industry to lose market share, resulting in declining operational and financial performance.[269] Petitioners assert that as of the first quarter of 2025, because of the continued adverse price effects of subject imports, the domestic industry's market share fell to its lowest point of the POI and domestic producers continue to suffer declining production and sales, and were forced to lay off additional workers.[270] They argue that, therefore, the remedial effects of any antidumping and countervailing duty orders on overhead door springs from China will be seriously undermined absent an affirmative finding of critical circumstances for China.[271]

In the absence of respondent participation in these final phase investigations, no party argued against an affirmative finding of critical circumstances.

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[263] Final Comments at 11.

[264] Pet. Prehearing Br. at 61; Final Comments at 11-12.

[265] Pet. Prehearing Br. at 62-63; Final Comments at 11.

[266] Pet. Prehearing Br. at 64; Final Comments at 12.

[267] Pet. Prehearing Br. at 65, *citing* CR/PR at 7.18-7.19.

[268] Pet. Prehearing Br. at 65, Exh. 2, paras. 16-19, 29 (McAlear Decl.).

[269] *See* Pet. Prehearing Br. at 1-2, 22-24, 29-36.

[270] Pet. Prehearing Br. at 65-66, *citing* CR/PR at Table C-1.

[271] Pet. Prehearing Br. at 66 & n. 42, *citing* CR/PR at 4.1, 7.19 & Table 7.15; *see also* Final Comments at 11-13.

D. Analysis

1. Choice of Time Period

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from China. The Commission frequently relies on six-month comparison periods for its critical circumstances analysis.[272] However, it has relied on a shorter comparison period for both its antidumping and countervailing duty investigations when Commerce's preliminary determination applicable to the imports from the subject country fell within the six-month post-petition period the Commission typically considers.[273] That situation arises here for our critical circumstances analysis of imports from China because the petitions

[272] The Commission has relied on a shorter comparison period for both its antidumping duty and countervailing duty investigations when Commerce's preliminary determination applicable to the imports from the subject country fell within the six-month post-petition period the Commission typically considers. *See Carbon and Certain Steel Wire Rod from China,* Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination caused reduction of subject import volume in sixth month)*; Wire Rod Final I*, USITC Pub. 4752 at 46-47 (Jan. 2018) (regarding subject imports from Russia).

The Commission may also use different periods when the product is seasonal. *See 1,1,1,2-- Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 at 25 (Apr. 2017) (seasonal product); *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007) (declining to analyze different periods absent seasonality). *See* CR/PR at 2.9 ("Firms reported seasonal variations in demand with higher demand in the second and third quarters of the year and lower demand in the first and fourth quarters.").

[273] *See Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates*, Inv. Nos. 731-TA-1349, 1352, and 1357 (Final), USITC Pub. 4752 at 46-47 (Jan. 2018) (regarding subject imports from Russia); *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016) (regarding subject imports from Brazil); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4620 at 35-40 (July 2016) (regarding subject imports from China, Italy, and Korea); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512 and 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015).

The Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis. *See Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

were filed on October 29, 2024,[274] and Commerce's initial preliminary determination, which was in the countervailing duty investigation, was issued on April 3, 2025.[275] [276]

In light of the foregoing, we have determined to use a five-month comparison period. Specifically, we have determined to compare the volume of subject imports five months prior to and including the filing of the petition (June 2024-October 2024) with the volume of subject imports five months after the filing of the petition (November 2024 to March 2025) in our critical circumstances analysis of imports from China subject to the antidumping and countervailing duty investigations. We also note that no party has contested the five-month comparison periods for this analysis.[277]

2. Import Volume and Inventories

Subject imports from China subject to Commerce's affirmative critical circumstances determination in the antidumping investigation increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, which is an increase of *** pounds or *** percent.[278] Using the three-month interim 2025 period as a benchmark, which is the best and only data available for comparison, the increase in the post-petition period is equivalent to only: *** percent of U.S. importers' U.S. shipments of subject imports from China; *** percent of the domestic producers' U.S. shipments; and *** percent of apparent U.S. consumption in the three-month interim 2025 period.[279] The monthly subject import volumes during the post-

[274] Petitions at 1; CR/PR at 1.2, Table 1.1. Because the petition was filed at the end of October 2024, that month is included in the pre-petition period, per the Commission's typical practice.

[275] CR/PR at Table 1.1. Because Commerce's preliminary determination in the countervailing duty investigations was made at the beginning of April 2025, that month is not included in the post-petition period, per the Commission's typical practice.

[276] We note that Commerce's preliminary determination with respect to the antidumping duty investigation was rendered on June 2, 2025, subsequent to five months after the filing of the petition. CR/PR at Table 4.7; *Preliminary Affirmative Determination of Sales at Less Than Fair Value*, 90 Fed. Reg. 23316-17. However, consistent with previous cases, we used the same pre- and post-petition periods for both antidumping and countervailing duty critical circumstances analyses. *Certain Pea Protein from China*, Inv. Nos. 701-TA-692 and 731-TA-1628 (Final), USITC Pub. 5529 at 43 n.253 (Aug. 2024); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274 (Final), USITC Pub. 4620 at 35-36 (Sept. 2016); *Disposable Aluminum Containers, Pans, Trays, and Lids from China*, Inv. Nos. 701-TA-727 and 731-TA-1695 (Final), USITC Pub. 5611 at 36 n.255 (Apr. 2025). *See also* Pet. Prehearing Br. at 59-60.

[277] S*ee* CR/PR at 4.7-4.12; *see also* Pet. Prehearing Br. at 59-60; Final Comments at 11.

[278] CR/PR at Table 4.5.

[279] *Calculated from* CR/PR at Tables 4.5 & C-1. We note that these percentages would be appreciably smaller if the volume of imports at issue were measured against the full five-months of the post-petition period, rather than just the three-months interim period.

petition period fluctuated but there were sizeable spikes in December 2024 and February 2025.[280] Subject imports from China subject to Commerce's affirmative critical circumstances determination in the countervailing duty investigation increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, which is an increase of *** pounds or *** percent.[281] The post-petition increase in absolute terms of imports subject to Commerce's affirmative critical circumstances determination is equivalent to only: *** percent of U.S. importers' U.S. shipments of subject imports from China; *** percent of the domestic producers' U.S. shipments; and *** percent of apparent U.S. consumption in the three-month interim 2025 period.[282] The monthly subject import volumes during the post-petition period steadily increased to a peak level from November 2024 to February 2025, after which the monthly subject import volume dropped to its lowest level of the pre- and post-petition periods.[283]

Questionnaire data concerning end-of-period inventories of these imports from June 2024 through March 2025 are presented in the staff report at Tables 4.6 and 4.8.[284] Regarding both the antidumping and countervailing duty investigations, the questionnaire data show that inventories as of the end of March, 2025, were *** pounds or *** percent higher than at the end of October 2024, the month in which the petition was filed.[285] An increase in U.S. inventory levels of subject imports from China in March 2025 (the end of the post-petition period) is almost entirely responsible for the post-petition inventory increase, as the U.S. inventory level of subject imports from China in February 2025 was nearly equivalent to the inventory in October 2024.[286] End of period inventories for interim 2025, or March 31, 2025, equate to roughly *** percent of apparent U.S. consumption during that period.[287]

[280] CR/PR at Figure 4.2.

[281] CR/PR at Table 4.7.

[282] *Calculated from* CR/PR at Tables 4.5 & C-1. We note that these percentages would be appreciably smaller if the volume of imports at issue were measured against the full five-months of the post-petition period, rather than just the three-months interim period.

[283] CR/PR at Table 4.7 & Figure 4.3.

[284] CR/PR at Tables 4.6 & 4.8.

[285] CR/PR at Tables 4.6 & 4.8. The bill-of-lading data do not provide information on inventory levels, so reported inventory levels are likely understated. The reported changes represent the best information available to the Commission on changes in inventory levels between the two periods.

[286] CR/PR at Table 4.8.

[287] *Calculated from* CR/PR at Table C.1.

We have also considered other factors relevant to our assessment of critical circumstances, including pricing.[288] Given the limited pricing and purchase cost data for subject imports China in this record,[289] we primarily rely on subject import AUVs from China for our analysis of prices in the periods within closest proximity to the post-petition period.[290] The AUV of subject imports from China was $*** in 2024 and higher in interim 2025, at $***, than in interim 2024, at $***.[291] Importantly, these data tells us that Chinese subject import prices increased over the full year 2024, with the AUV for 2024 being substantially larger than the interim 2024 AUV, which represented the average of the first three months of 2024. We observe that the AUV for interim 2025 was even higher. Given that the post-petition inventory increase is largely accounted for by an inventory buildup in March 2025, the subject imports from China that resulted in the increased post-petition inventories entered the U.S. market at the elevated interim 2025 price.

Moreover, we note that there are minimal arranged imports from China pertaining to the second, third, and fourth quarters of 2025.[292]

3. Conclusion

In light of the foregoing, including the post-petition inventory level of subject imports being constituted of increasingly higher priced imports, as well as the relative increase in the volume of imports from China subject to Commerce's affirmative critical circumstances determinations, particularly within the context of the overall U.S. market, we do not find that

[288] We recognize that these prices are not specific to the producers subject to Commerce's critical circumstances determinations, but they are the best information available with respect to prices for those firms' exports to the United States.

[289] *See* CR/PR at Figures 5.2-5.8.

[290] We note that the available pricing and purchase cost data also do not support affirmative findings of critical circumstances in the antidumping and countervailing duty investigations. Domestic prices either remained constant or increased slightly from the fourth quarter of 2024 to the first quarter of 2025. Notably, for imports from China, pricing product 1 shows an increase in per unit price and a decline in volume between the third and fourth quarters of 2024, which were the most recent data available for that product from China. *Id*. at Figure 5.2, Table 5.4. Regarding the purchase cost data, for each of the pricing products (aside from product 4 which had no data for the entire POI), there were no reported purchase cost data for imports from China in the third and fourth quarters of 2024. *Id*. at Figures 5.6-5.8, Tables 5.8-5.10. There were reported imports from China in the first quarter of 2025 for pricing products 1, 2 and 3, but the volumes are ***, and the per-unit LDP costs recorded in the first quarter of 2025 are *** with those recorded in prior quarters of the POI. *See id*.

[291] CR/PR at Table C.1.

[292] CR/PR at Table 7.16. U.S. importers' arranged imports from all producers/exporters in China (which includes producers/exporters not covered by Commerce's affirmative critical circumstances determination) total just *** pounds in the second through fourth quarters of 2025. *Id*.

these imports are likely to undermine seriously the effect of the antidumping duty or countervailing duty orders. Consequently, we find that critical circumstances do not exist with respect to subject imports from China that are subject to Commerce's final affirmative determinations of critical circumstances in the antidumping and countervailing duty investigations.

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 overhead door springs from China that are sold in the United States at LTFV and subsidized by the government of China. Finally, we find that critical circumstances do not exist with respect to imports from China that are subject to Commerce's final affirmative critical circumstances determinations in its antidumping and countervailing duty investigations.

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 IDC Group, Inc. ("IDC Spring"), Minneapolis, Minnesota, Iowa Spring Manufacturing, Inc. ("Iowa Spring"), Adel, Iowa, and Service Spring Corp. ("Service Spring"), Maumee, Ohio (collectively, "Petitioners"), on October 29, 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 overhead door counterbalance torsion springs ("overhead door springs")[1] from China and India. Table 1.1 presents information relating to the background of these investigations.[2] [3]

[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 the Federal Register notice of the cancellation of the Commission's hearing.

Table 1.1 Overhead door springs: Information relating to the background and schedule of this proceeding

Effective date	Action
October 29, 2024	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (89 FR 87598, November 4, 2024)
November 18, 2024	Commerce's notice of initiation of LTFV investigations (89 FR 92895, November 25, 2024)
November 18, 2024	Commerce's notice of initiation of countervailing duty investigations (89 FR 92901, November 25, 2024)
December 13, 2024	Commission's preliminary determinations (89 FR 103877, December 19, 2024)
April 3, 2025	Commerce's preliminary CVD determinations with respect to China and India and alignment of final CVD determinations with final AD determinations (90 FR 14630 and 14602, April 3, 2025)
June 2, 2025	Commerce's preliminary AD determination with respect to China (90 FR 23311, June 2, 2025); Commerce's preliminary AD determinations with respect to India, postponement of final determination, and extension of provisional measures (90 FR 23316, June 2, 2025); scheduling of final phase of Commission's investigations (90 FR 24665, June 11, 2025)
June 17, 2025	Revision to the schedule of the Commission's final phase investigations (90 FR 26608, June 23, 2025)
July 16, 2025	Commerce's preliminary affirmative critical circumstances determinations with respect to China in the CVD investigation (90 FR 31960, July 16, 2025)
July 29, 2025	Commerce's preliminary affirmative critical circumstances determinations with respect to China and India in the LTFV investigations (90 FR 35662, July 29, 2025); Commerce's preliminary affirmative critical circumstances determinations with respect to India in the CVD investigation (90 FR 35660, July 29, 2025)
August 12, 2025	Cancellation of the Commission's hearing (90 FR 39420, August 15, 2025)
August 15, 2025	Commerce's final AD determination with respect to China, and final affirmative critical circumstances determination, in part (90 FR 39369, August 15, 2025); Commerce's final CVD determination with respect to China, and final affirmative critical circumstances determination, in part (90 FR 39374, August 15, 2025)
September 15, 2025	Commission's vote (China)
September 30, 2025	Commission's views (China)
Pending	Scheduled date for Commerce's final determinations (India)
TBD	Scheduled date for the Commission's vote (India)
TBD	Scheduled date for the Commission's views (administrative) (India)

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

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

> or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.
>
> In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[5]
>
> (J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

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

Overhead door springs provide the lifting force for counterbalance lift systems in applications such as residential and commercial garage doors, industrial rolling doors, and truck and trailer doors, among others. The leading U.S. producers of overhead door springs are IDC Spring, Iowa Spring, Service Spring, and Overhead Door Corporation while leading producers of overhead door springs outside the United States include Tianjin Wangxia Spring Co., Ltd of China and Alcomex Springs Private Limited ("Alcomex Springs") of India.[6] The leading U.S. importers of overhead door springs from China are ***, while the leading importers of overhead door springs from India are *** and ***. Imports of product from nonsubject countries constitute an exceedingly small portion of the U.S. market.

[5] Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.
[6] Petitioners' staff conference testimony, Attachment 2, p. 30.

U.S. purchasers of overhead door springs are end users involved in the manufacture and installation of residential garage doors, commercial overhead doors, rolling or curtain doors, and truck and trailer doors, that purchase overhead door springs as a component part, as well as distributors and dealers of overhead door springs; leading responding purchasers include ***.[7]

Apparent U.S. consumption of overhead door springs totaled approximately 162.0 million pounds ($241.8 million) in 2024. Currently, nine firms are known to produce overhead door springs in the United States.[8] U.S. producers' U.S. shipments of overhead door springs totaled 144.1 million pounds ($217.6 million)) in 2024 and accounted for 88.9 percent of apparent U.S. consumption by quantity and 90.0 percent by value. U.S. imports from all sources totaled 18.0 million pounds ($24.2 million) in 2024, and imports from China and India accounted for virtually all imports of overhead door springs in 2024.

[7] Conference transcript, pp. 10 (Boldenow), 19 (McAlear), and 24 (Bianco).

[8] As discussed in greater detail in Part 3, six firms accounting for an estimated 95 percent of U.S. production in 2024 provided questionnaire responses and three firms accounting for an estimated 5 percent of U.S. production in 2024 did not.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C. The Commission's questionnaires collected data for the years 2022 to 2024 and interim periods January through March of 2024 ("interim 2024") and January through March of 2025 ("interim 2025"). Except as noted, U.S. industry data are based on questionnaire responses of six firms that accounted for approximately 95 percent of U.S. production of overhead door springs during 2024. U.S. imports are based on data submitted in response to questionnaires and augmented by third party bill of lading data. Imports from India as reported in responses to Commission questionnaire represent approximately *** percent of imports from India in 2024, with the remainder drawn from third-party bill of lading data, as detailed below. Imports from China as reported in responses to Commission questionnaires represent approximately *** percent of imports from China in 2024, with the remainder drawn from third-party bill of lading data. Only one firm, ***, reported imports of overhead door springs from a nonsubject source in response to Commission questionnaires, and the third-party bill of lading data contained only one shipment of imports from a nonsubject source.[9] As noted in the preliminary phase of these investigations and confirmed in questionnaire responses in the final phase of these investigations, the subject merchandise may enter under any of at least nine distinct HTS statistical reporting numbers, each of which contain a substantial amount of nonsubject merchandise.[10]

To focus the outreach effort to potential importers of subject merchandise, Commission staff issued questionnaires to select firms that were associated with HTS statistical reporting numbers which had been identified as those used for overhead door springs, and focused its outreach on those firms believed to be importing relatively large volumes, and those that did not appear to be importing merchandise not covered by the scope of these investigations (e.g., extension springs, springs used in automotive vehicles, etc.). This included those HTS numbers labeled by the Commission staff as "primary" in the preliminary and final phases of these investigations, as well as additional HTS reporting numbers which may also contain in-scope merchandise. Additionally, Commission staff used a third-party dataset provided to it by

[9] Only one shipment of overhead door springs from a nonsubject source (South Korea) appears in the Panjiva data, with an unidentified foreign supplier and the consignee identified as Blueinsight Co Ltd, in March of 2024..

[10] Responding importers reported imports of overhead door springs under the following HTS statistical reporting numbers: 7320.20.5020, 7320.20.5045, 7320.20.5060, 8412.80.1000, 8412.90.9085, 7610.10.0030, 7320.20.9000, 7320.90.5060, and 7320.90.5020.

counsel to Petitioner, which consisted of bill of lading data gathered by Panjiva for the period January 1, 2022 through March 2025, and identified all shipments which fit the following keyword search criteria: “overhead" OR "torsion" OR "helical" OR "garage") AND ("spring" OR "springs”). Prior to submitting these data to the Commission, counsel then eliminated shipments that contained out-of-scope merchandise through a manual review (e.g., automotive springs, extension springs, other garage door parts). The imports contained in the Panjiva dataset are not specific to a single or a set of HTS reporting numbers, due to the number and mixed nature of the HTS reporting numbers under which overhead door springs enter, and these imports are drawn from subject and nonsubject sources.[11] Using this third-party bill of lading data, Commission staff then further focused its outreach on all firms which appeared in this dataset, and prioritized those that appeared to be the largest importers within the Panjiva data, and those that appeared in both the Panjiva data and the proprietary, Census-edited Customs’ import records.

Based on the data available in the proprietary, Census-edited Customs’ import records, the responses to Commission questionnaires, and the shipments contained in the Panjiva dataset, Commission staff believes that the most accurate source of data on imports from subject and nonsubject sources is data submitted in response to Commission questionnaires as a baseline, then adjusted based on the Panjiva dataset in the following manner: questionnaire data are used for shipments reported by firms that did not appear in the Panjiva data, but nonetheless reported imports of overhead door springs; shipments by firms which appear in the Panjiva data as importing overhead door springs, but affirmatively reported to the Commission that they had not or do not import overhead door springs, are removed from the dataset; firms which both appear in the Panjiva data as importing overhead door springs and also reported imports in their questionnaire response have the quantity and value of imports contained in the questionnaire used in place of the quantity listed in the Panjiva data; for firms which appear in the Panjiva data as importing overhead door springs but did not provide a questionnaire response, shipment quantities are drawn from the Panjiva data, and value is derived by taking the average unit value (“AUV”) of firms which provided a questionnaire response and multiplying the AUV by the quantity in the Panjiva data to derive a total value of shipments. Unless otherwise indicated, import data presented in this report are presented using the formulation described above, which staff believes to be the best data available to the Commission.

[11] Email from Jacob Jones, Georgetown Economic Services, LLC, July 25, 2025.

Previous and related investigations

Overhead door springs have not been the subject of any prior countervailing or antidumping duty investigations in the United States.

Nature and extent of subsidies and sales at LTFV

Subsidies

On April 3, 2025, Commerce published a notice in the Federal Register of its preliminary determination of countervailable subsidies for producers and exporters of overhead door springs from China and India.[12] On August 15, 2025, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of overhead door springs from China.[13] Tables 1.2 and 1.3 present Commerce's findings of subsidization of overhead door springs in China and India.

[12] 90 FR 14630 and 14602, April 3, 2025.
[13] 90 FR 39374, August 15, 2025.

Table 1.2 Overhead door springs: Commerce's subsidy determinations with respect to imports from China

Entity	Preliminary countervailable subsidy rate (percent)	Final countervailable subsidy rate (percent)
Tianjin Wangxia Spring Co., Ltd.	50.78	257.46
Foshan Nanhai Xulong Spring Factory	143.33	257.46
Beled Co., Ltd./Beled (Shenzhen) Commerce Co., Ltd	143.33	257.46
Chi Hardware Corp. Ltd	50.78	257.46
Hangzhou Fuxing Spring Co., Ltd	50.78	257.46
Hebei Meirui Metals & Minerals Co. Ltd	50.78	257.46
Jiaxing Taike Springs Co., Ltd	143.33	257.46
Kowloon Metal Spring Factory	143.33	257.46
MFG Direct (Ningbo) Limited	50.78	257.46
Ningbo I Promise Import Export	143.33	257.46
Ningbo Well Lift Door Co. Ltd	50.78	257.46
Wuxi Jiupie Information Technology Co.. Ltd	50.78	257.46
Wuxi Kop Door Technology Co. Ltd	50.78	257.46
Xiamen Globe Truth (GT) Industries	143.33	257.46
All others	50.78	257.46

Source: 90 FR 14630, April 3, 2025; 90 FR 39374, August 15, 2025.

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

Table 1.3 Overhead door springs: Commerce's preliminary subsidy determination with respect to imports from India

Entity	Preliminary countervailable subsidy rate (percent)	Final countervailable subsidy rate (percent)
Alcomex Springs Pvt Ltd	2.66	TBD
Asha Spring and Engineering & Spring Company	164.60	TBD
Balaji Springs Pvt. Ltd	164.60	TBD
Modern Engineering & Spring Company	164.60	TBD
Reliable Springs Ltd	164.60	TBD
All others	2.66	TBD

Source: 90 FR 14602, April 3, 2025.

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

Sales at LTFV

On June 2, 2025, Commerce published a notice in the Federal Register of its preliminary determination of sales at LTFV with respect to imports from China and India.[14] On August 15, 2025, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from China.[15] Tables 1.4 and 1.5 present Commerce's dumping margins with respect to imports of product from China and India (final determination and margins pending).

[14] 90 FR 23311 and 23316, June 2, 2025.
[15] 90 FR 39369, August 15, 2025.

Table 1.4 Overhead door springs: Commerce's weighted-average LTFV margins with respect to imports from China

Exporter	Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Suzhou Shunchi Hardware Co. Ltd	Chi Hardware Corporation Limited	734.33	723.79
Wuxi Xinhui Spring Factory	Chi Hardware Corporation Limited	734.33	723.79
Hangzhou Fuxing Spring Co., Ltd	Chi Hardware Corporation Limited	734.33	723.79
Hangzhou Fuxing Spring Co., Ltd	Hangzhou Fuxing Spring Co., Ltd	734.33	723.79
Tianjin Gangzhen Auto Parts Co., Ltd	Hebei Meirui Metals & Minerals Co. Ltd	734.33	723.79
MFG Direct (Ningbo) Limited	MFG Direct (Ningbo) Limited	734.33	723.79
Tianjin Wangxia Spring Co., Ltd	Ningbo Well Lift Door Co., Ltd	734.33	723.79
Hangzhou Fuxing Spring Co., Ltd	Ningbo Well Lift Door Co., Ltd	734.33	723.79
Hefei Wangqin Spring Co., Ltd	Ningbo Well Lift Door Co., Ltd	734.33	723.79
Tianjin Wangxia Spring Co. Ltd	Wuxi Jiupie Information Technology Co., Ltd	734.33	723.79
Wuxi New Fire Technology Co., Ltd	Wuxi Jiupie Information Technology Co., Ltd	734.33	723.79
Hangzhou Fuxing Spring Co., Ltd	Wuxi Jiupie Information Technology Co., Ltd	734.33	723.79
Hangzhou Fuxing Spring Co., Ltd	Wuxi Kop Door Technology Co. Ltd	734.33	723.79
China-wide entity		778.31	767.77

Source: 90 FR 23311, June 2, 2025; 90 FR 39369, August 15, 2025.

Table 1.5 Overhead door springs: Commerce's weighted-average LTFV margins with respect to imports from India

Exporter/producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Alcomex Springs Pvt Ltd	87.20	TBD
Asha Spring and Engineering Company	124.86[1]	TBD
Balaji Springs Pvt. Ltd	124.86	TBD
Modern Engineering & Spring Company	124.86	TBD
Reliable Springs Ltd	124.86	TBD
All others	87.20	TBD

Source: 90 FR 23316, June 2, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[16]

> The merchandise covered by this investigation is helically-wound, overhead door counterbalance torsion steel springs (overhead door counterbalance torsion springs) and any cones, plugs or other similar fittings for mounting and creating torque in the spring (herein collectively referred to as cones) attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Overhead door counterbalance torsion springs are helical steel springs with tightly wound coils that store and release mechanical energy by winding and unwinding along the spring's axis by an angle, using torque to create a lifting force in the counterbalance assembly typically used to raise and lower overhead doors, including garage doors, industrial rolling doors, warehouse doors, trailer doors, and other overhead doors, gates, grates, or similar devices. The merchandise covered by this investigation covers all overhead door counterbalance torsion springs with a coil inside diameter of 15.8 millimeters (mm) or more but not exceeding 304.8 mm (measured across the diameter from inner edge to inner edge); a wire diameter of 2.5 mm to 20.4 mm; a length of 127 mm or more; and regardless of the following characteristics:

- wire type (including, but not limited to, oil-tempered wire, hard-drawn wire, music wire, galvanized or other coated wire);
- wire cross-sectional shape (*e.g.,* round, square, or other shapes);
- coating (*e.g.,* uncoated, oil- or water-based coatings, lubricant coatings, zinc, aluminum, zinc-aluminum, paint or plastic coating, etc.);
- winding orientation (left-hand or right-hand wind direction);
- end type (including, but not limited to, looped, double looped, clipped, long length, mini warehouse, Barcol, Crawford, Kinnear, Wagner, rolling steel or barrel ends); and

[16] 90 FR 23316, June 2, 2025.

- whether the overhead door counterbalance torsion springs are fitted with hardware, including but not limited to fasteners, clips, and cones (winding or stationary cones).

  For purposes of the diameters referenced above, where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

  The steel torsion springs included in the scope of this investigation are produced from steel in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

  Subject merchandise includes cones attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Such cones, which are typically cast aluminum, aluminum alloy or steel (but may be made from other materials) are made to mount the subject springs to the overhead door counterbalance system and create and maintain torque in the spring. Cones or other similar fittings that are not attached to the subject springs or are not entered with and invoiced with the subject springs are not included within the scope unless entered as parts of kits as described below.

  Subject merchandise also includes all subject overhead door counterbalance torsion springs and cones or other similar fittings for mounting and tensioning the spring entered as a part of overhead door kits, overhead door mounting or assembly kits, or as a part of a spring-operated motor assembly or as a part of a spring winder assembly kit for torsion springs. When counterbalance torsion springs and cones or other similar fittings for attaching and tensioning the torsion spring are entered as a part of such kits, only the counterbalance spring and cones or other similar fittings in the kit are within scope.

  Subject merchandise also includes overhead door counterbalance torsion springs that have been further processed in a third country, including but not limited to cutting to length, attachment of hardware, cones or end-fittings, inclusion in garage door kits or garage door mounting or assembly kits, or any other processing that would not remove the merchandise from the scope of this investigation if performed in the country of manufacture of the in-scope overhead door counterbalance torsion springs.

All products that meet the written physical description are within the scope of this investigation unless specifically excluded. The following products are specifically excluded from the scope of this proceeding:

- leaf springs (slender arc-shaped length of spring steel of a rectangular cross-section);
- disc springs (conical springs consisting of a convex disc with the outer edge working against the center of the disc);
- extension springs (close-wound round helical wire springs that store and release energy by resisting the external pulling forces applied to the spring's ends in the direction of its length);
- compression springs (helical coiled springs with open wound active coils (such open winding is also known as pitch) that are designed to compress under load or force); and
- spiral springs (torsion springs wound as concentric spirals such as a clock spring or mainspring)

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is imported under the following provisions of the Harmonized Tariff Schedule of the United States ("HTS"): 7320.20.5020, 7320.20.5045, and 7320.20.5060.[17] The 2025 general rate of duty is 3.9 percent *ad valorem* for HTS subheading 7320.20.50.[18] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

[17] These HTS statistical reporting numbers for helical springs, other than those suitable for motor-vehicle suspensions, also include nonsubject products used in applications other than as counterbalance tension springs for overhead doors. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, p. 73.37.

The subject merchandise may also be imported under HTS statistical reporting numbers 7308.90.9590, 7320.90.5020, 7320.90.5060, 7610.10.0030, 8412.80.1000, or 8412.90.9085. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 73.25, 73.38, 76.10, and 84.19. See also footnote 9 in the "Summary data and data sources" section of this Part.

[18] USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, p. 73.37.

Section 232 tariffs

Overhead door springs originating in China and India are subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, applied to the declared value of the steel content of the imported article.[19]

Section 301 tariffs

Effective September 1, 2019, overhead door springs originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for overhead door springs was reduced to 7.5 percent.[20]

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[21]

Effective February 4, 2025, overhead door springs originating in China were subject to an additional 10 percent ad valorem duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent ad valorem.[22]

Overhead door springs originating in China and India are not subject to tariffs initiated in April 2025 under IEEPA.[23]

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[19] Effective March 12, 2025, overhead door springs originating in China and India became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product. 90 FR 9817, February 18, 2025; 90 FR 24199, June 9, 2025. See also HTS heading 9903.81.90 and U.S. note 16(m) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 99.3.30 and 99.3.382.

[20] 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 73-45, 99.3.120 to 99.3.121 99.3.130, 99.3.287 to 99.3.288, 99.3.397, and 99.3.399 to 99.3.403.

[21] Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act ("IEEPA"). Tariffs specific to Canada, China, India, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs under IEEPA have been amended over time.

[22] 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 21, USITC Publication 5666, September 2025, pp. 99.3.4 to 99.3.5, and 99.3.316 to 99.3.317.

[23] Articles subject to section 232 tariffs, including overhead door springs, are not subject to the tariffs initiated in April 2025 under IEEPA. However, any non-steel content of overhead door springs would be (continued...)

Effective August 27, 2025, products originating in India are subject to an additional 25 percent ad valorem duty under IEEPA. However, overhead door springs are not subject to this tariff.[24]

The additional tariffs on overhead door springs originating in China and India are summarized in table 1.6:

Table 1.6 Overhead door springs: Additional tariff treatment for China and India

Tariffs in percent ad valorem

Subject country	China	India
Section 232 – Derivative steel articles	50.0	50.0
Section 301	7.5	Not applicable
IEEPA – China specific	20.0	Not applicable
Tariffs initiated in April 2025 under IEEPA	Not applicable	Not applicable
IEEPA— India specific	Not applicable	Not applicable
Total additional ad valorem rate	77.5	50.0

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.

Note: But cf. V.O.S. Selections Inc. v. United States, U.S. Court of Appeals for the Federal Circuit Case Nos. 25-1812, 25-1813, August 29, 2025, https://www.cafc.uscourts.gov/opinions-orders/25-1812.OPINION.8-29-2025_2566151.pdf; Joanne E. Osendarp, Anthony Rapa, Eric S. Parnes, Timothy J. Hruby, Alan Kashdan, and Rachel D. Evans, "Court of Appeals Rules That President Lacks Authority for Broad Tariffs," National Law Review, September 4, 2025, https://natlawreview.com/article/court-appeals-rules-president-lacks-authority-broad-tariffs#google_vignette.

subject to the tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025; 90 FR 30823, July 10, 2025; 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25 and 9903.81.90, and U.S. notes 2(v)(vii) and 16(m) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 99.3.5 to 99.3.6, 99.3.11 to 99.3.14, 99.3.317, 99.3.319, and 99.3.327.

[24] 90 FR 38701, August 11, 2025. See also HTS heading 9903.01.84 and 9903.81.90, and U.S. notes 2(z)(i) and 2(z)(iv) for this duty treatment. USITC, HTS (2025) Revision 21, USITC Publication 5666, September 2025, pp. 99.3.19 to 99.3.20, and 99.3.337.

The product

Description and applications[25]

Overhead door springs are helically wound steel springs that are specifically designed to provide the lifting force for overhead door counterbalance lift systems.[26] These springs are tightly wound as the overhead door is closed and release the stored energy when unwinding to counterbalance the weight of the door, thereby easing the effort needed to raise it. The spring wire is commonly of either tempered high-carbon steel oil-tempered wire (ASTM A229)[27] or hard drawn wire (ASTM A227)[28] of high tensile strength and moderate ductility necessary for durability and the ability to maintain metal memory.[29] However, springs can also be of stainless or other alloy steel grades if requested by customers.[30] Industry standards that guide domestic manufacturing of overhead door springs include these ASTM International specifications for the dimensions and physical properties for the spring wire, Spring Manufacturers Institute ("SMI") specifications for dimensional tolerances for the torsion spring wire, and Door and Access Systems Manufacturing Association ("DASMA") standards for residential garage door counterbalance systems.[31] The cross-sectional shape of the spring wire is most commonly circular but also can be of other shapes. Standard coated springs are commonly sold with a black coating.[32] The subject springs are available shot peened, plated, or coated to improve resistance to fatigue, corrosion, and cracking; to enhance the spring's aesthetic appearance; or both.[33] Overhead door springs are designed to undergo 10,000 or more cycles of being torqued

[25] Unless otherwise noted, this information is based on the petition, pp. 8 to 12.

[26] Overhead door springs are a well-established product and have been in use for over a century since the introduction of section garage doors. Conference transcript, p. 68 (Bianco).

[27] Petitioners' postconference brief, exh. 16: ASTM Designation A229 Standard Specification.

[28] Petitioners' postconference brief, exh. 17: ASTM Designation A227 Standard Specification.

[29] Petitioners' postconference brief, p. 4.

[30] Conference transcript, pp. 16 to 17 (McAlear).

[31] Conference transcript, pp. 68 to 69 (Boldenow); Petitioners' postconference brief, exh. 14: DASMA Standard for Counterbalance Systems on Residential Sector Garage Doors; exh. 15: Spring Manufacturing Institute Torsion Spring Standards; exh. 16: ASTM Designation A229 Standard Specification; exh. 17: ASTM Designation A227 Standard Specification.

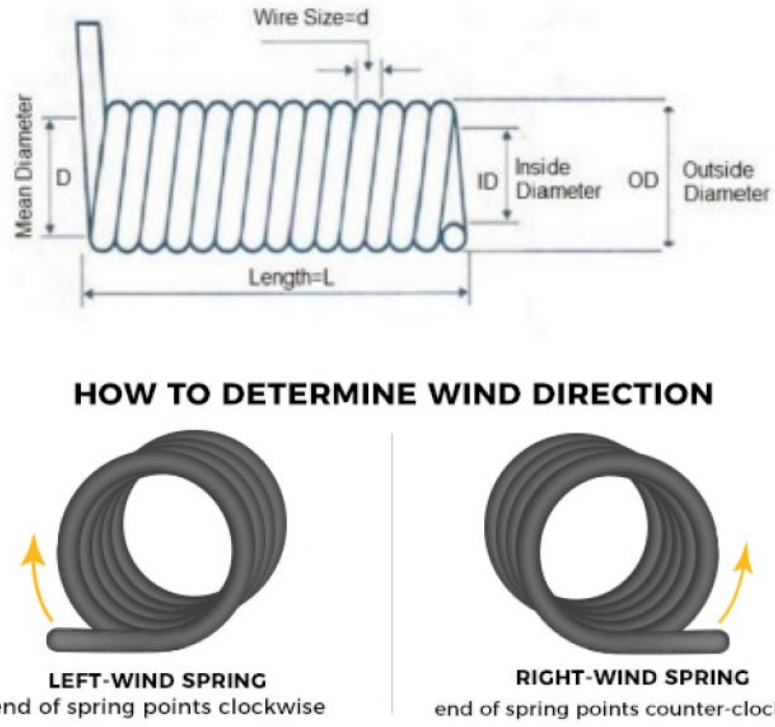
[32] Service Spring sells about 99 percent of its standard coated springs with this type of coating. Conference transcript, p. 41 (McAlear).

[33] Surfaces of the subject springs can be hardened by shot peening. In this process, spherical shot (metallic, glass or ceramic particles) strikes the spring with sufficient force to impart plastic deformation

(continued...)

(twisted or wound) followed by the torque being released (untwisted or unwound) over their seven years of service life without metal fatigue or breakage.[34] Shot peening can improve a spring's cycle life by 50 percent from 10,000 cycles to 15,000 cycles.[35] Overhead door springs are coiled in either a left-hand or a right-hand winding direction (figure 1.1). The average residential overhead door spring weighs about 10 pounds and those for commercial applications can weigh 100 pounds or more.[36]

Figure 1.1
Overhead door springs: Side and end views



Source: Petition, figures 1 and 2, p. 9.

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of exposed surfaces, resulting in compression stress and forming layers of compression dimples. Plating materials include zinc, aluminum, or zinc-aluminum. Coating materials include oil- or water-based substances including paints or polymers applied by powder coating or electrophoretic paint coating ("e-coating"). Coatings provide some corrosion protection but do not enhance either the mechanical performance or cycle life of the spring itself. Conference transcript, pp. 18, 41 to 42 (McAlear).

[34] Petitioners' postconference brief, p. 5.

[35] An additional method to improve spring cycle life is to increase the wire size. Conference transcript, pp. 43 (Bianco), 87 to 88 (McAlear).

[36] Conference transcript, p. 55 (Walkup).

The ends of overhead door springs are fitted with mounting hardware (commonly referred to as "cones" but also as "plugs," "spring plugs," or "couplers")[37] that are usually of cast aluminum or aluminum alloys but also can be of steel or other metals.[38] Their shapes reflect the different mounting functions at the opposite ends of the spring (figure 1.2).[39] The stationary cone secures one end of the spring with nuts and bolts to a mounting bracket affixed to the wall above the overhead door frame. On the other end, the winding cone secures the spring to the rotating torsion shaft. The four radial sockets are for inserting a torsion winding rod (tube) to adjust the spring's tension (rotational force or torque) and then the two set screws (bolts) are tightened to hold the spring in place at the proper tension.[40] The exterior surface of the cone is tapered and threaded to be twisted into the inside of the spring. Frictional contact with the spring coils retains the cones within the ends of the spring. Moreover, as the spring is wound, its diameter shrinks and grips tighter onto the cone to prevent it from sliding out.[41] Both domestic and imported overhead door springs are shipped fitted with cones, although some are shipped without to customers that install the cones themselves.[42] Overhead door springs ten feet or more in length (referred to as "snakes") are available without cones for customers, such as overhead door installers, that cut the spring to custom lengths.[43] [44]

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[37] Conference transcript, pp. 17 to 18 (McAlear).

[38] Conference transcript, pp. 18 to 19 (McAlear).

[39] Individual cones are available in a wide variety of shapes to fit the various end configurations of springs designed for the specific configuration of the door counterbalance system. For further information, see Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, pp. 6 to 7.

[40] Conference transcript, pp. 37, 71 (McAlear).

[41] Conference transcript, p. 71 (Walkup).

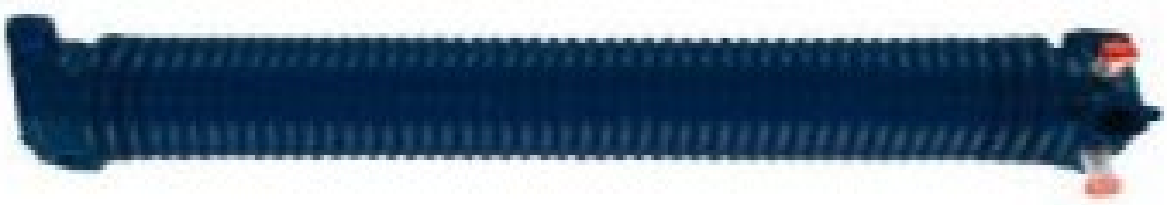
[42] Conference transcript, pp. 18 to 19 (McAlear).

A petitioners' witness estimated that 90 to 95 percent or more of tension springs are shipped fitted with cones. Examples of customers that install the cones themselves include OEM manufacturers who purchase the springs in bulk and small firms that repair overhead garage door lifting systems who purchase stock-length springs. Conference transcript, pp. 38 (McAlear), 38 to 39 (Bianco), 39 (McGrath).

[43] Conference transcript, pp. 17, 38 (McAlear).

[44] Petitioners intended to include within the scope the cones (or other mounting hardware) as well as the subject springs when they are either (1) already attached to the spring at the time of entry or (2) entered or invoiced with the subject springs. Exporters in China and India frequently invoice and enter longer springs, in uncut lengths of ten feet or more, together with the cones to assemble the intended number of cut-to-length springs. However, separate entries of cones that are not entered or invoiced with the subject springs are not included within the scope of the investigation. Petition, p. 9; Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, pp. 8 to 9.

Figure 1.2
Overhead door springs: End fittings for the opposite ends of the spring



An overhead door spring with the stationary cone fitted on the left and the winding cone fitted on right end

Stationary cone

Winding cone

Source: Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 5. Iowa Spring, "Garage Door Torsion Springs," no date, https://www.iowaspring.com/garage-door-springs/torsion, accessed December 3, 2024.

For other than residential overhead garage doors (e.g., overhead and roller doors for trucks and trailers, commercial and industrial facilities, etc.), there are various other end shapes of springs designed to fit into specially designed end fittings for various specific the door counterbalance systems (figure 1.3).[45]

[45] Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 7.

Figure 1.3
Overhead door springs: Other end shapes and fittings

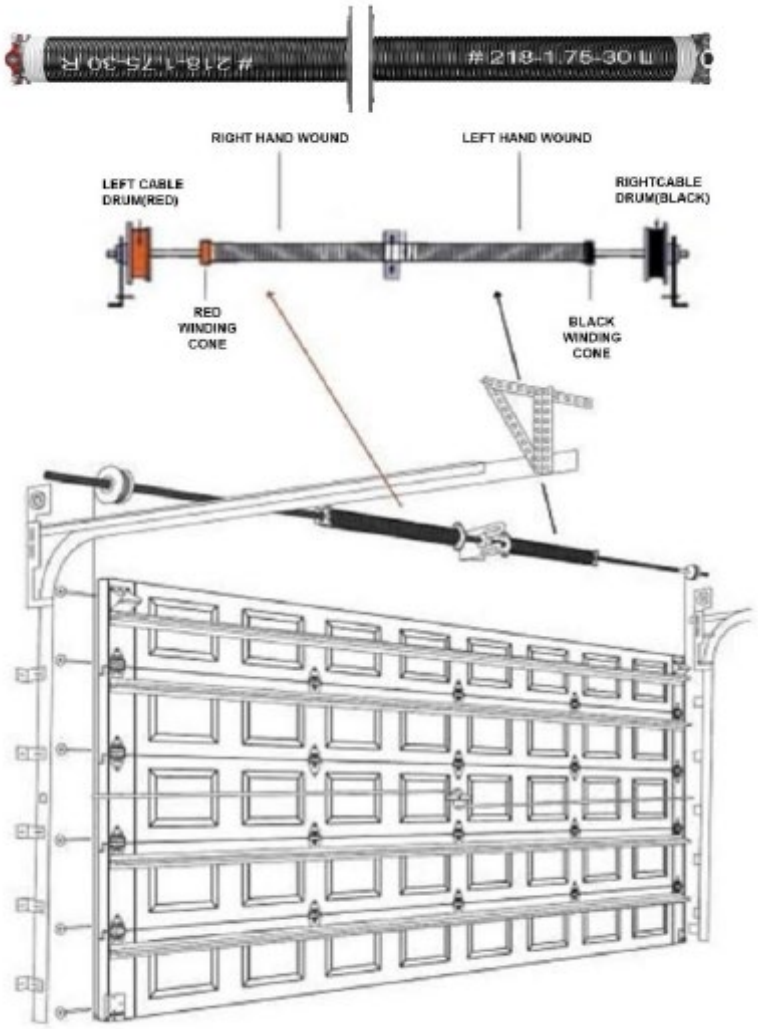
Source: Petition, p. 10; Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 7.

Overhead door springs are components of door counterbalance mechanisms that apply opposing forces to open and close overhead or rolling doors and gates, including residential and commercial garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, and retail security gates, among others.[46] Whether in standard lift (the most common system for residential garage doors and commercial overhead doors), vertical lift, or high-lift counterbalance systems, overhead door springs exert sufficient force for the weight of an overhead door in the counterbalance lifting assembly. More specifically, the springs store and release mechanical energy: winding up when the door is lowered and unwinding as the door is being raised, to apply torque as the lifting force to ease raising of the door. The spring's torque is conveyed through the rotating torsion shaft and paired drums (reels) on each side to steel cables attached at the bottom of the door (figure 1.4). Door counterbalance systems consist of either a single or multiple springs. Residential single-wide overhead door counterbalance systems rely on one spring while double-wide door counterbalance systems require two springs. Overhead door springs may also be nested inside of one another to

[46] Petitioners' customers for overhead door springs include original equipment manufacturers ("OEMs"), distributors, and garage-door dealers and installers. Conference transcript, pp. 46 (Boldenow), 47 (McAlear), and 47 to 48 (Bianco).

provide greater force in certain overhead door counterbalance systems.[47] For two overhead door springs to be wound in the same direction (when lowering the door), they are installed as pairs with a right-hand winding on the left side and a left-hand winding on the right side of the door counterbalance lifting assembly (figure 1.4).

Figure 1.4
Overhead door springs: Components of an overhead door counterbalance lift system



Source: Petition, figure 4, p. 11.

[47] One or two springs are placed inside a spring to generate more torque to lift a heavier door or to where there is less "head" space above the door frame. Conference transcript, pp. 50 to 51 (Bianco). Counsel to petitioners argues that nested springs are within the same domestic like product, being produced on the same equipment, by the same producers, and sold the same types of customers for the same general purpose. Conference transcript, p. 51 (Cannon).

Five other types of springs are specifically excluded from the scope of these investigations:[48]

- **Leaf springs**— are arc-shaped, flat-rolled spring steel rather than wire and are commonly utilized in motor-vehicle suspension systems.
- **Disc springs**— are conically shaped, flat-rolled steel rather than wire and are used for vibration control, thermal expansion control, bolt relaxation (loss of prestress) and creep (deformation) control, and in certain automotive applications (e.g., clutches).
- **Compression springs**— are open wound rather than tightly wound wire, designed to compress under load rather than wound to store energy. They are utilized for resisting compression to control motion, measuring forces, storing energy (e.g., in watches and toys), controlling vibrations, and operating valves.
- **Extension springs**— have close helical windings like torsion springs but are not designed for winding and will deform or break when subjected to torque. Rather, extension springs store energy by being stretched and release it by contracting to their original shape.[49] While some overhead door lifting systems include extension springs, this is a very small and declining part of the market.[50]
- **Suspension springs**— are mounted alongside the door tracks rather than over the door and connect to the door lifting system with different mounting hardware.[51] Not being mounted on a pole, these springs are considered more dangerous when they break. They are currently used principally as replacements in existing extension spring systems, as garage door manufacturers have moved away from the side-lift design.

Finally, there are other uses for out-of-scope torsion springs in mechanical applications such as machinery, hinges, toys, mousetraps, and clothespins.[52] However, these are not in the size range and wire gauges of the subject overhead door springs and have a wide variety of shapes and arms on their ends. Releasing the torque of such springs moves the arm on the end as a lever.[53]

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[48] 90 FR 23316, June 2, 2025.
[49] Conference transcript, p. 76 (Bianco).
[50] Producer questionnaire responses at III-4, preliminary phase.
[51] Conference transcript, p. 72 (Bianco).
[52] Conference transcript, p. 76 (Cannon).
[53] Petitioners' postconference brief, pp. 6 to 7.

Manufacturing processes[54]

At the Commission's staff conference, petitioners' witnesses testified that both domestic and subject producers rely on the same processes and equipment to manufacture overhead door springs.[55] They also testified that the production equipment is specifically designed for overhead door springs and is not suitable for producing other types of springs.[56]

The manufacturing process for overhead door springs consists of four successive processing stages: (1) wire winding, (2) heat treating, (3) coating and finishing, and (4) fabricating.

Wire winding— Steel wire (typically, high-carbon steel wire containing 0.55 percent or more carbon) is fed into machines that straighten, coil, and form it into a helical shape with a specific inside diameter. Spring coiling is accomplished on a spring coiler machine that conveys the wire onto rollers and coils the wire backwards to form a spring. Spring forming is accomplished on a spring former machine that shapes the spring with various types of bends, hoops, and radii. The spring coiling and forming processes, whether operator guided or computer numeric controlled ("CNC"), can be used either individually or in combination, depending on the spring specification.

Heat treating— The spring is heat treated in a conveyor belt oven. The time and temperature at which the spring is heat treated depends on the type and amount of the component wire and the manufacturing process for the spring. Heat treating can also include additional steps or be repeated, depending on the material and its processing. After heat treating is completed, the spring is cooled and prepared for the subsequent manufacturing

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[54] Unless otherwise noted, this information is based on the petition, pp. 12 to 13.

[55] Conference transcript, p. 17 (McAlear), p. 27 (Johnson).

[56] All three petitioners provide both tension springs and other types of springs for overhead door lifting systems. IDC Spring and Iowa Spring also provide other types of springs other industry sectors. IDC Spring, "Your Source for Garage Door and Mechanical Springs" webpage, ©2024, https://idcspring.com, accessed December 3, 2024; Iowa Spring, "We are Iowa Spring: Mechanical, Agricultural and Overhead Garage Door Springs" webpage, no date, https://www.iowaspring.com, accessed December 3, 2024; Service Spring, "Experience the SSC Difference Your Trusted Provider of American-Made and Locally-Sourced Garage Door Springs" webpage, ©2023, https://www.servicespring.com, accessed December 3, 2024. None of the petitioning domestic producers utilize the same equipment to manufacture both overhead door springs and other types of springs. At Iowa Spring, other spring types are produced not only on separate equipment but also in a separate facility from that for overhead door springs. Conference transcript, p. 74 (Boldenow and Bianco). Of the other three domestic producers that submitted U.S. producer questionnaire responses, only *** reported production of other types of springs (***) on shared equipment and machinery. *** U.S. producer questionnaire response, section II-3a.

steps. The wire chemistry and heat treatment provide the tensile strength for the spring to perform many repeated coiling and uncoiling cycles over the course of its service life.

Coating and finishing— As described above, spring surfaces may be shot peened or otherwise surface finished, plated or coated to further strengthen; improve fatigue resistance; and enhance resistance to chipping, scratching, fading, and corrosion. All petitioning domestic producers claim the ability to perform these operations within their respective facilities,[57] but some also outsource certain specific processes[58] due to capacity constraints.[59] Purchaser *** and subject foreign producer *** claimed that certain shot-peened and powder-coated springs were not available from domestic suppliers.[60] Conversely, the petitioners assert they have the ability to supply overhead door springs in all the sizes, types, and finishes available from the subject sources.[61]

Fabricating— After the spring is cut to the desired length, mounting cones can be installed on the opposite ends.[62] Springs are often stenciled and color coded for common coil diameters by being fed through a striping machine that sprays colored paint in a line along the longitudinal length of the helix. The finished springs are packaged and stacked on pallets for shipping. Springs may be packaged separately or in pairs. When springs are packaged in pairs, the set typically consist of one right-hand wind and one left-hand wind spring. Springs may also

[57] Conference transcript, pp. 43 (Boldenow), 45 (Walkup), 45 to 46 (Cannon).

[58] IDC Spring applies the basic black painting within its own facilities but outsources powder coating and e-coating. Conference transcript, p. 65 (Boldenow).

[59] Service Spring performs coating and finishing operations both internally as well as outsourcing. Conference transcript, p. 65 (McAlear). Iowa Spring, which produces both overhead door springs and nonsubject springs for other applications, resorts to outsourcing when it reaches capacity constraints of its shot peening and powder coating lines. Conference transcript, p. 65 (Bianco).

More specifically, each petitioner reported their capabilities, whether in-house or via third-party vendors, to provide overhead door springs that have undergone shot peening and powder coating. ***. Producer questionnaire responses at II.5 and II.6.

[60] *** purchaser questionnaire response at I.2, preliminary phase; *** foreign producer questionnaire responses at II-11, preliminary phase, and at II-14, final phase; *** postconference brief, pp. 2 to 3; exh. 1: Sworn Declaration of ***; exh. 3: Sworn Declaration of ***.

[61] Petitioners' postconference brief, pp. 12 to 13; exh. 4: Declaration of Jodi Boldenow, paras. 6 to 7; exh. 5: Declaration of Tim Bianco, para. 8; exh. 6: Declaration of Matthew McAlear, paras. 7, 11; conference transcript, p. 14 (Boldenow). For additional considerations regarding domestic supply, see email from ***, September 2, 2025.

[62] Domestic producers of overhead door springs purchase the cones from aluminum casters. Conference transcript, p. 19 (McAlear).

be packaged with other parts of a spring counterweight assembly for an overhead door, with door mounting hardware kits or with garage door kits.[63]

Domestic like product issues

In the preliminary phase of these investigations, the Commission defined a single domestic like product, coextensive with the scope.[64] In the final phase of these investigations, no parties requested data or other information necessary for the analysis of the domestic like product.[65]

[63] Witnesses for two of the petitioning domestic producers testified that their firms do not sell overhead door springs with other components as a kit for overhead door counterbalance systems. Conference transcript, p. 74 (Boldenow and McClear).

[64] Overhead Door Counterbalance Torsion Springs from China and India, Inv. Nos. 701-TA-746-747 and 731-TA-1725-1726 (Preliminary), USITC Publication 5573, December 2024 ("Preliminary publication"), p. 13.

[65] See generally comments on draft questionnaires provided by IDC Spring, Iowa Spring, and Service Spring.

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

U.S. market characteristics

Overhead door springs are used in door counterbalance systems. A door counterbalance system is a mechanism using opposing forces or weights to ease in the raising and lowering of overhead gates or doors, including garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, security gates for retail storefronts, and other overhead doors and gates.[1] The size of the overhead door spring used in a particular application is based on the weight of the door being lifted. Generally, this is calculated by an "inch pounds per turn" formula, meaning each inch turned on a revolution of the spring will lift a certain amount of weight, and uses the wire diameter, the outer and inner diameter of the spring, and the length of the spring, as well as the weight of the door, to determine the inch pounds per turn.

Typically, residential single-wide overhead door counterbalance systems have one spring while double-wide door systems have two springs. The springs are used in door counterbalance systems that include, for example, high-lift and vertical-lift doors, transit and trucking doors, rolling steel garage doors, heavy-duty overhead doors at industrial loading docks, commercial and residential garage doors, and sectional and one-piece garage doors. A single door counterbalance system may include multiple springs.[2] The average cycle life of an overhead door spring is 10,000 cycles and the spring itself should last approximately seven years.[3] Different finishings, such as shot peening, can increase the cycle life of overhead door springs by 50 percent, or up to 15,000 cycles.[4] Demand for overhead door springs is tied to new residential and commercial construction, as well as renovation/replacement demand.[5]

[1] Petition, p. 10.

[2] Petition, pp. 11 to 12.

[3] Conference transcript, pp. 55 to 56 (McAlear).

[4] Conference transcript, pp. 88 to 89 (McAlear).

[5] Conference transcript, p. 56 (Boldenow, McAlear). U.S. producer IDC Spring stated that its business is primarily tied to new construction while U.S. producer Service Spring stated that its business is tied to more of the replacement market.

Five U.S. producers and 15 of 18 responding importers reported that there were no changes in the product mix or marketing of overhead door springs since January 1, 2022. Petitioners stated that both their customer mix and product mix remained consistent year-over-year.[6] Importer *** reported that sellers of overhead door springs were beginning to market volume purchasing and direct shipping to end users rather than sell through local brick and mortar distributors. Importer *** reported that the "product trended to kits versus individual components," while importer *** reported marketing spring kits at 40 percent off the regular price of springs.

Two of five responding U.S. producers and 4 of 18 responding importers indicated that the market was subject to distinct conditions of competition. Specifically, U.S. producer *** reported that some distributors of imported overhead door springs are advertising themselves as U.S. producers. U.S. producer *** stated that customers follow the lowest price available in the market and importer *** reported that there has been more competition from China and India which drives the prices down. Importer *** reported there were only distinct conditions of competition in instances where "competition is unable to deliver sufficient supply to fill demand." Importer *** reported that search engine rankings impacted sales, specifying that its sales improved as its website was moved higher in search result listings.

Apparent U.S. consumption of overhead door springs has fluctuated, decreasing in 2023 and then increasing in 2024. Overall, apparent U.S. consumption in 2024 was lower than in 2022, and lower during January to March ("interim") 2025 than in interim 2024.

[6] Conference transcript, pp. 59 to 60 (Boldenow, McAlear, and Bianco).

U.S. purchasers

The Commission received 12 usable questionnaire responses from firms that had purchased overhead door springs since January 2022.[7] [8] [9] Five responding purchasers are garage door manufacturers, four are other end users, three are distributors, and one is a contract packager. Large purchasers of overhead door springs include ***.

Impact of new or modified tariffs

U.S. producers, importers, and purchasers were asked to report the impact of tariff announcements and tariff changes associated with recent executive orders since January 2025 on overall demand, supply, prices, or raw material costs (table 2.1). A majority of responding producers, importers, and purchasers reported that the tariff announcements and changes have had an impact on the domestic overhead door springs industry. U.S. producer *** stated the tariff announcements and changes have had an inflationary impact on raw material costs domestically, resulting in higher "exit" pricing, while U.S. producer *** reported there was a slight increase in the cost of raw materials. U.S. producer *** stated that increases in raw material costs since the COVID-19 pandemic have caused the cost of finished goods to increase substantially, making it more difficult for the firm to compete with subject imports.

Responding importers reported impacts of the new or modified tariffs include increased costs for domestic springs, imports, and raw materials. Importer *** stated that in response to new tariffs, domestic prices for springs have been unstable. In addition, *** stated domestic suppliers have limited purchase quantities and have offered uncertain delivery times. Among importers that reported that they did not know whether the new and modified tariffs have impacted the overhead door springs industry, *** stated that the inconsistency of rates and timing of tariffs have made it difficult to identify the net effect on the overhead door springs market.

[7] See table 5.21 for a list of firms that provided usable purchaser questionnaire responses.

[8] Of the 12 responding purchasers, 11 purchased the domestic overhead door springs, 4 purchased imports of the subject merchandise from China, 4 imported themselves or purchased imports of the subject merchandise from India, and one purchased imports of overhead door springs from other sources.

[9] Of the 12 responding purchasers, 12 indicated they had marketing/pricing knowledge of domestic overhead door springs, 6 of overhead door springs from China, 3 of overhead door springs from India, and 2 of overhead door springs from nonsubject countries.

Generally, responding purchasers reported that the new and modified tariffs have resulted in increased raw material costs, including for steel spring wire and aluminum cones, and increased prices for overhead door springs.

Table 2.1 Overhead door springs: Count of firms' responses regarding the impact of new or modified tariffs

Firm type	Yes	No	Don't know
U.S. producers	3	1	1
Importers	13	1	7
Purchasers	7	1	4

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

Channels of distribution

As shown in table 2.2, U.S. shipments of domestically produced overhead door springs were relatively evenly divided between distributors and end users during 2022 to 2024 and during interim 2025. U.S. shipments of imported overhead door springs, in contrast, were generally shipped to end users. In interim 2025, the vast majority of imports were shipped to end users.

Table 2.2 Overhead door springs: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January through March

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	53.8	50.2	51.5	53.6	53.1
United States	End users	46.2	49.8	48.5	46.4	46.9
China	Distributors	***	***	***	***	***
China	End users	***	***	***	***	***
India	Distributors	***	***	***	***	***
India	End users	***	***	***	***	***
Subject	Distributors	***	***	***	***	***
Subject	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	24.8	75.5	47.9	84.2	1.2
All imports	End users	75.2	24.5	52.1	15.8	98.8

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 "—".

Geographic distribution

Responding U.S. producers reported selling overhead door springs to all regions in the contiguous United States (table 2.3). Responding importers reported selling imports of overhead door springs from China to all regions, while commercial sales of imports from India were limited to the Midwest, Southeast, and Central Southwest. For U.S. producers, 32.2 percent of sales were within 100 miles of their production facility, 61.8 percent were between 101 and 1,000 miles, and 6.0 percent were over 1,000 miles. Importers sold 69.4 percent within 100 miles of their U.S. point of shipment, 30.4 percent between 101 and 1,000 miles, and 0.2 percent over 1,000 miles.

Table 2.3 Overhead door springs: Count of U.S. producers' and U.S. importers' geographic markets

Count in number of firms reporting

Region	U.S. producers	China	India	Subject sources
Northeast	4	1	0	1
Midwest	4	4	1	5
Southeast	4	2	1	3
Central Southwest	4	6	1	7
Mountains	4	3	0	3
Pacific Coast	4	7	0	7
Other	4	2	0	2
All regions (except Other)	4	1	0	1
Reporting firms	4	11	1	12

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

Note: Other U.S. markets include AK, HI, PR, and VI. Firm counts only include firms that reported commercial shipments of overhead door springs.

Supply and demand considerations

U.S. supply

Table 2.4 provides a summary of the supply factors regarding overhead door springs from U.S. producers and producers in subject countries. Overall, responding U.S. producers and producers in India reported increased production capacity, decreased capacity utilization, and a small decline in their ratios of inventories to total shipments. While U.S. producers reported the vast majority of their shipments as home market shipments, responding producers in India reported a majority of their shipments as exports to non-U.S. markets and less than one percent of shipments as home market shipments.

Table 2.4 Overhead door springs: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 pounds; ratios and shares in percent; Count in number of firms reporting

Factor	Measure	United States	China	India
Capacity 2022	Quantity	206,427	***	***
Capacity 2024	Quantity	215,248	***	***
Capacity utilization 2022	Ratio	83.4	***	***
Capacity utilization 2024	Ratio	67.4	***	***
Inventories to total shipments 2022	Ratio	***	***	***
Inventories to total shipments 2024	Ratio	***	***	***
Home market shipments 2024	Share	***	***	***
Non-US export market shipments 2024	Share	***	***	***
Ability to shift production	Count	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of overhead door springs in 2024. Responding foreign producer/exporter firms accounted for *** U.S. imports of overhead door springs from India during 2024. No foreign producer questionnaire responses were received from producers in China. For additional data on the number of responding firms and their share of U.S. production and of exports from each subject country, please refer to Parts 3 and 7.

Domestic production

Based on available information, U.S. producers of overhead door springs have the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of U.S.-produced overhead door springs 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 a limited ability to shift shipments from alternate markets, an inability to shift production from alternate products, and a limited amount of inventories.

Subject imports from China

No responses to the Commission's foreign producer questionnaire were received from firms in China. For additional information regarding foreign producers see Part 7.

Subject imports from India

Based on available information, producers of overhead door springs from India have the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of overhead door springs to the U.S. market. Contributing factors to this degree of responsiveness of supply include the ability to quickly increase capacity, the ability to shift shipments from alternate markets, and some availability of unused capacity. Factors mitigating responsiveness of supply include limited availability of inventories and limited ability to shift production from alternate products. Additionally, importer and foreign producer Alcomex stated that it *** and the terms *** which may *** into the U.S. market.[10]

Imports from nonsubject sources

One importer, ***, reported imports from a nonsubject source, specifically ***, which accounted for a small fraction of total reported U.S. imports in 2024. [11]

[10] Respondent Alcomex's postconference brief, p. 8, and Exhibit 1, Attachment A.
[11] For more information regarding reported U.S. imports, see Part 4.

Supply constraints

Three of 5 U.S. producers and 11 of 20 responding importers reported that they had experienced supply constraints since January 1, 2022. Of the firms that reported they had experienced supply constraints, 13 reported the constraints occurred during 2022, 6 reported they occurred during 2023, 3 during 2024, and 3 during 2025 (table 2.5). U.S. producer *** stated COVID-19 related supply shortages forced them to place customers on allocation, but that these constraints were limited to the first quarter of 2022. U.S. producers *** and *** reported facing similar supply chain disruptions, however *** stated that they were resolved by mid-year 2023 rather than 2022. Most responding U.S. importers reporting supply constraints in 2022 and 2023 stated that U.S. suppliers faced supply shortages.

Ten of 12 responding purchasers reported that they had experienced supply constraints, with all 10 reporting supply shortages from domestic producers in 2022. No purchasers reported supply constraints from foreign producers or importers during 2022 to 2025.

Table 2.5 Overhead door springs: Count of firms' responses regarding timing of supply constraints, by firm type and source

Count in number of firms reporting

Period of constraint	U.S. producers	Importers	Purchasers: Domestic	Purchasers: Foreign / imported
2022	3	10	10	0
2023	1	5	4	0
2024	0	3	3	0
2025	0	3	2	0

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

New suppliers

Five of 12 purchasers indicated that new suppliers entered the U.S. market since January 1, 2022. Purchasers cited Alcomex, Arrow Tru Line, Balaji Spring, KOP Door, and SGD Springs as new suppliers.

U.S. demand

Based on available information, the overall demand for overhead door springs is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small cost share of overhead door springs in most of its end-use products.

End uses and cost share

Overhead door springs are used in door counterbalance systems, such as garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, security gates for retail storefronts, and other overhead doors and gates.[12] U.S. demand for overhead door springs depends on the demand for U.S.-produced downstream products. Overhead door springs account for a small-to-moderate share of the cost of the end-use products in which they are used. Purchasers' reported end uses and cost shares included enclosed cargo door spring assists (50 percent); spring replacements (50 percent); garage doors (6 to 14 percent share); rollup doors (10 to 11 percent); barrel replacements (12 percent); rolling shutters (1 percent); and trailers (1 percent).

Business cycles

Three of five responding U.S. producers, half of all responding importers, and virtually all responding U.S. purchasers, indicated that the market was subject to business cycles. Generally, the overhead door spring market follows new construction trends in both commercial and residential construction as well as remodeling industry trends. Firms reported seasonal variations in demand, however high demand seasons differed by firm. U.S. producer *** and importer *** reported higher demand in the second and third quarters of the year, while U.S. producer *** reported higher demand during the third and fourth quarter of the year. Importer and purchaser ***, reported that in a typical year, demand is highest during the first half of the year.

[12] Petition, p. 10.

Demand trends

Most responding U.S. producers and importers reported that domestic demand for overhead door springs has fluctuated since January 1, 2022, with the majority of U.S. producers reporting that it fluctuated downwards and a majority of importers indicated that demand fluctuated but were evenly divided with respect to the direction (table 2.6). A majority of purchasers reported that domestic demand either decreased or remained unchanged (four firms each).

Table 2.6 Overhead door springs: Count of firms' responses regarding overall domestic and foreign demand, by firm type

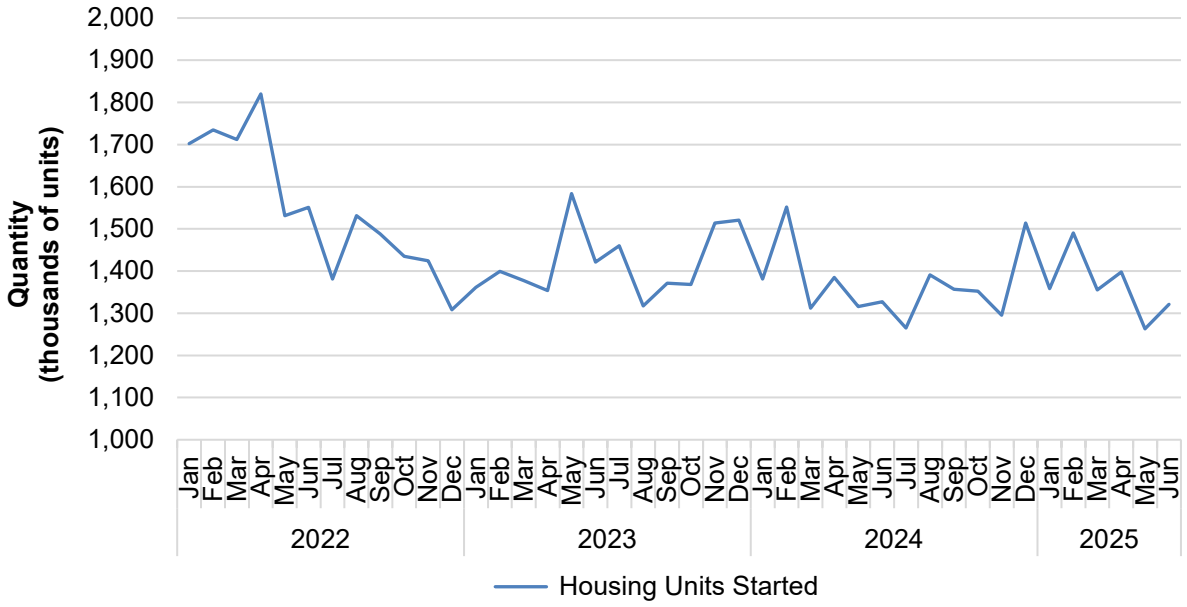
Count in number of firms reporting

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

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

As shown in figure 2.1 and table 2.7, seasonally adjusted U.S. housing unit starts declined sharply after April 2022 and then fluctuated thereafter, reaching a period low in May 2025. Housing starts declined by 22.4 percent between January 2022 and June 2025.

Figure 2.1 U.S. housing starts: Total new privately-owned housing units started, monthly, seasonally adjusted at annual rates, January 2022 to June 2025



Source: U.S. Census Bureau and U.S. Department of Housing and Urban Development, New Privately-Owned Housing Units Started: Total Units HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis, available at https://fred.stlouisfed.org/series/HOUST, retrieved July 24, 2025.

Table 2.7 U.S. housing starts: Total new privately-owned housing units started, monthly, seasonally adjusted at annual rates, January 2022 to June 2025

Quantity in thousands of housing units

Month	2022	2023	2024	2025
January	1,702	1,361	1,381	1,358
February	1,735	1,399	1,552	1,490
March	1,712	1,377	1,312	1,355
April	1,820	1,354	1,385	1,398
May	1,531	1,584	1,316	1,263
June	1,551	1,421	1,327	1,321
July	1,381	1,460	1,265	NA
August	1,531	1,317	1,391	NA
September	1,488	1,371	1,357	NA
October	1,435	1,368	1,352	NA
November	1,424	1,514	1,295	NA
December	1,308	1,521	1,514	NA

Source: U.S. Census Bureau and U.S. Department of Housing and Urban Development, New Privately-Owned Housing Units Started: Total Units HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis, available at https://fred.stlouisfed.org/series/HOUST, retrieved July 24, 2025.

Substitute products

All responding U.S. producers, importers, and purchasers reported that there were no substitutes for overhead door springs. Petitioner Service Spring stated that the industry is standardized on torsion springs and the only reason a customer may use an extension spring is if the customer's prior door setup is already an extension spring setup.[13]

Substitutability issues

This section assesses the degree to which U.S.-produced overhead door springs and imports of overhead door springs from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of overhead door springs from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced overhead door springs and overhead door springs imported from subject sources.[14] Factors contributing to this level of substitutability include most responding U.S. producers, importers, and purchasers reporting that U.S.-produced and subject overhead door springs are always or frequently interchangeable and purchasers reporting U.S.-produced overhead door springs as comparable to springs from subject sources across most purchasing factors, responding firms' limited domestic content requirements, the general ability of domestic and subject source suppliers to meet minimum quality standards, and similarities in reported lead times.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table 2.8, a small majority of purchasers reported that they sometimes or never make purchasing decisions based on the producer, while a larger majority reported that they always or usually make purchasing decisions based on country of origin. With respect to their customers, a large majority of purchasers reported that their customers sometimes or never make their purchasing decisions based on the manufacturer or country of origin.

[13] Conference transcript, pp. 99 to 100 (McAlear).

[14] The degree of substitution between domestic and imported overhead door springs depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced overhead door springs to the overhead door springs 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.).

Table 2.8 Overhead door springs: Count of purchasing decisions by purchaser or their customer, based on producer and country origin

Count in number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	3	2	3	4
Customer	Producer	1	0	3	5
Purchaser	Country	5	3	0	4
Customer	Country	0	1	2	5

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

Importance of purchasing domestic product

Ten of 12 purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Three purchasers reported making some purchases that were required by law or regulation to be domestic product, two reported that it was required by their customers, and two reported other preferences for domestic product.

Most important purchase factors

The most often cited top three factors that firms consider in their purchasing decisions for overhead door springs were price/cost (9 firms), quality (9 firms), and availability/supply (8 firms) as shown in table 2.9. Quality was the most frequently cited first-most important factor (cited by 5 firms), followed by price/cost (3 firms); price/cost, quality, and lead time/delivery were the most frequently reported second-most important factors (3 firms each); and availability/supply was the most frequently reported third-most important factor (5 firms).

Table 2.9 Overhead door springs: 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	3	3	3	9
Quality	5	3	1	9
Availability / Supply	2	1	5	8
Lead time / Delivery	1	3	1	5
All other factors	2	1	0	3

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

Note: Other factors include customer preferences and predetermined vendors. Purchaser *** reported both quality and delivery as their first most important purchasing factor. Purchasers *** and *** only reported two and one purchase factor, respectively.

Five of eleven responding purchasers reported that they usually purchase the lowest-priced product, while an additional four reported that they sometimes purchase the lowest-priced product. Two firms, ***, reported that they never purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table 2.10). The factors rated as very important by more than half of responding purchasers were availability, delivery time, durability or lifespan, price, product consistency, quality meets industry standards, and reliability of supply. Factors rated as sometimes or not important by at least a plurality of purchasers were discounts offered, minimum quantity requirements, packaging, and finishing processes.

Table 2.10 Overhead door springs: 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	11	0	1
Delivery terms	6	4	2
Delivery time	10	1	1
Discounts offered	2	8	2
Durability or lifespan	11	0	1
Finishing process	3	4	5
Minimum quantity requirements	2	5	5
Packaging	2	6	4
Payment terms	5	5	2
Price	8	3	1
Product consistency	10	1	1
Product range	6	4	2
Quality meets industry standards	10	1	1
Quality exceeds industry standards	6	4	2
Reliability of supply	11	0	1
Technical support/service	4	7	1
U.S. transportation costs	4	7	1

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

Lead times

U.S. producers and importers were asked to report the average lead time for their commercial shipments of overhead door springs by treatment type[15] and whether they were produced to order or shipped from inventories. Responding U.S. producers reported most of their sales of standard coated overhead door springs (78.0 percent) and additionally treated overhead door springs (94.1 percent) were produced to order with lead times averaging six days and three days, respectively. Responding U.S. importers' sales of standard coated overhead door springs were entirely shipped from foreign inventories with lead times averaging 10 days, while a majority of importers' sales of additionally treated overhead door springs (58.0 percent) were shipped from U.S. inventories with lead times averaging 2 days.

Supplier certification

Half (6 of 12) of responding purchasers require their suppliers to become certified or qualified to sell overhead door springs to their firm. Purchasers reported that the time to qualify a new supplier ranged from 14 days to more than 60 days. One purchaser, ***, reported that some foreign suppliers in China had failed their qualification process because the steel wire used was inferior (e.g., surface imperfections). In addition, ***, reported that although no U.S. domestic producers failed to meet certification/qualification requirements, they were unable to provide shot-peened and powder-coated overhead door springs in the quantities and volumes required.

Minimum quality specifications

As can be seen from table 2.11, most responding purchasers reported that domestically produced product always or usually met minimum quality specifications. A plurality or majority of purchasers reported they do not know whether overhead door springs imported from China and India, respectively, typically meet quality specifications. Among purchasers that were able to comment on subject suppliers' ability to meet minimum quality standards, the most commonly reported response was that suppliers from China and India were usually able to meet minimum quality specifications.

[15] Treatment types include: 1) standard coating finish with no additional machining or coating (e.g., black water-based coating) ("standard coating"), 2) shot peened, powder coated, e-coated, or any combination thereof ("additionally treated"), and 3) other.

Table 2.11 Overhead door springs: 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	8	3	0	0	1
China	0	4	1	1	5
India	0	3	0	0	8
All other sources	1	0	0	0	8

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

Note: Purchasers were asked how often domestically produced or imported overhead door springs meets minimum quality specifications for their own or their customers' uses.

All 12 responding purchasers reported factors that determined quality, with most firms reporting the life cycle or durability of the overhead door spring as a quality factor. In addition, some purchasers reported appearance, tension testing, rust resistance, tempering, coating, and stenciling as quality factors.

Changes in purchasing patterns

Eight purchasers reported that they had changed suppliers since January 1, 2022, while four reported that they had not. Four firms reported adding suppliers from subject sources. Four firms added or returned to purchasing from U.S. suppliers, with purchaser *** stating it was allowed to start purchasing again from its U.S.-based supplier after raw materials became available in the U.S. market. Purchaser *** reported adding a U.S. supplier due to market volatility resulting from these investigations. One purchaser, ***, reported purchasing from domestic suppliers until it began manufacturing its own overhead door springs in 2025. Purchaser *** reported adding Alcomex in 2023 because domestic suppliers could not or would not provide adequate volumes of additionally treated overhead door springs; it also reported adding a U.S. supplier in 2023 for specific products requested by its customer. Purchaser *** reported adding a new supplier in 2022 due to procurement constraints but did not specify the name or location of the company.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2022 (table 2.12). With respect to domestically produced overhead door springs, five purchasers reported an overall decline in their purchases, four reported an overall increase in their purchases, and four reported either no change or no purchases of domestic product. A majority of responding purchasers reported they did not purchase from either subject or nonsubject sources.

Table 2.12 Overhead door springs: 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	3	1	3	4	1	1
China	0	1	0	2	0	6
India	1	2	1	0	0	6
All other sources	0	0	2	0	0	8
Sources unknown	0	0	1	0	0	8

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 overhead door springs produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 17 factors (table 2.13) for which they were asked to rate the importance. Most responding purchasers reported that U.S.-produced overhead door springs were comparable when compared to overhead door springs from China and India on most factors. However, of the seven factors that were rated as very important,[16] most purchasers reported that U.S.-produced overhead door springs are superior to Chinese overhead door springs (in terms of availability, delivery time, and product consistency), and inferior (more expensive) in terms of price. Most responding purchasers reported that U.S.-produced overhead door springs are superior to Indian overhead door springs in regard to one factor (delivery time), and responses were split for two factors (availability and price).

[16] The factors rated as very important by more than half of responding purchasers were availability, delivery time, durability or lifespan, price, product consistency, quality meets industry standards, and reliability of supply. See table 2.10.

Table 2.13 Overhead door springs: 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	4	2	0
Delivery terms	U.S. vs China	5	1	0
Delivery time	U.S. vs China	4	2	0
Discounts offered	U.S. vs China	0	4	1
Durability or lifespan	U.S. vs China	1	4	0
Finishing process	U.S. vs China	1	5	0
Minimum quantity requirements	U.S. vs China	4	2	0
Packaging	U.S. vs China	1	4	0
Payment terms	U.S. vs China	2	3	0
Price	U.S. vs China	1	1	3
Product consistency	U.S. vs China	3	2	0
Product range	U.S. vs China	1	5	0
Quality meets industry standards	U.S. vs China	1	4	0
Quality exceeds industry standards	U.S. vs China	1	4	0
Reliability of supply	U.S. vs China	1	4	0
Technical support/service	U.S. vs China	2	3	0
U.S. transportation costs	U.S. vs China	5	1	0

Table continued.

Table 2.13 (Continued) Overhead door springs: 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 India	1	1	1
Delivery terms	U.S. vs India	2	1	0
Delivery time	U.S. vs India	2	1	0
Discounts offered	U.S. vs India	0	3	0
Durability or lifespan	U.S. vs India	0	2	1
Finishing process	U.S. vs India	0	3	1
Minimum quantity requirements	U.S. vs India	1	2	1
Packaging	U.S. vs India	0	3	0
Payment terms	U.S. vs India	1	2	0
Price	U.S. vs India	0	2	2
Product consistency	U.S. vs India	1	2	1
Product range	U.S. vs India	0	4	0
Quality meets industry standards	U.S. vs India	0	3	1
Quality exceeds industry standards	U.S. vs India	0	3	1
Reliability of supply	U.S. vs India	1	3	0
Technical support/service	U.S. vs India	1	2	1
U.S. transportation costs	U.S. vs India	2	1	1

Table continued.

Table 2.13 (Continued) Overhead door springs: 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	China vs India	0	1	1
Delivery terms	China vs India	0	1	1
Delivery time	China vs India	0	2	0
Discounts offered	China vs India	1	1	0
Durability or lifespan	China vs India	0	1	1
Finishing process	China vs India	0	1	1
Minimum quantity requirements	China vs India	0	2	0
Packaging	China vs India	0	1	0
Payment terms	China vs India	0	0	1
Price	China vs India	1	1	0
Product consistency	China vs India	0	1	0
Product range	China vs India	0	2	0
Quality meets industry standards	China vs India	0	2	0
Quality exceeds industry standards	China vs India	0	1	1
Reliability of supply	China vs India	0	2	0
Technical support/service	China vs India	0	1	1
U.S. transportation costs	China vs India	0	2	0

Table continued.

Table 2.13 (Continued) Overhead door springs: 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	1	1	0
Delivery terms	U.S. vs Nonsubject sources	2	0	0
Delivery time	U.S. vs Nonsubject sources	2	0	0
Discounts offered	U.S. vs Nonsubject sources	0	1	0
Durability or lifespan	U.S. vs Nonsubject sources	1	0	0
Finishing process	U.S. vs Nonsubject sources	1	1	0
Minimum quantity requirements	U.S. vs Nonsubject sources	2	0	0
Packaging	U.S. vs Nonsubject sources	0	2	0
Payment terms	U.S. vs Nonsubject sources	2	0	0
Price	U.S. vs Nonsubject sources	1	0	0
Product consistency	U.S. vs Nonsubject sources	1	0	0
Product range	U.S. vs Nonsubject sources	1	1	0
Quality meets industry standards	U.S. vs Nonsubject sources	1	0	0
Quality exceeds industry standards	U.S. vs Nonsubject sources	1	0	0
Reliability of supply	U.S. vs Nonsubject sources	0	1	0
Technical support/service	U.S. vs Nonsubject sources	0	1	0
U.S. transportation costs	U.S. vs Nonsubject sources	2	0	0

Table continued.

Table 2.13 (Continued) Overhead door springs: 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	China vs Nonsubject sources	0	1	0
Delivery terms	China vs Nonsubject sources	0	0	1
Delivery time	China vs Nonsubject sources	0	0	1
Discounts offered	China vs Nonsubject sources	0	1	0
Durability or lifespan	China vs Nonsubject sources	0	0	1
Finishing process	China vs Nonsubject sources	0	1	0
Minimum quantity requirements	China vs Nonsubject sources	0	0	1
Packaging	China vs Nonsubject sources	0	1	0
Payment terms	China vs Nonsubject sources	0	0	1
Price	China vs Nonsubject sources	0	0	1
Product consistency	China vs Nonsubject sources	0	0	1
Product range	China vs Nonsubject sources	0	1	0
Quality meets industry standards	China vs Nonsubject sources	0	0	1
Quality exceeds industry standards	China vs Nonsubject sources	0	0	1
Reliability of supply	China vs Nonsubject sources	0	1	0
Technical support/service	China vs Nonsubject sources	0	1	0
U.S. transportation costs	China vs Nonsubject sources	0	0	1

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. No purchaser provided comparisons of product from India relative to product from nonsubject sources.

Comparison of U.S.-produced and imported overhead door springs

In order to determine whether U.S.-produced overhead door springs can generally be used in the same applications as imports from China and India, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.14 to 2.16, all responding U.S. producers and the majority of responding purchasers reported that overhead door springs produced in the United States are always or frequently interchangeable with overhead door springs produced in China and India. A majority of responding importers reported that overhead door springs produced in the United States are always or frequently interchangeable with overhead door springs produced in China, while half of responding importers reported U.S.-produced overhead door springs are always or frequently interchangeable with overhead door springs from India.

Table 2.14 Overhead door springs: 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
United States vs. China	3	2	0	0
United States vs. India	3	2	0	0
China vs. India	3	1	0	0
United States vs. Other	3	1	0	0
China vs. Other	3	1	0	0
India vs. Other	3	1	0	0

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

Table 2.15 Overhead door springs: 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
United States vs. China	7	10	1	0
United States vs. India	2	3	3	0
China vs. India	2	0	2	0
United States vs. Other	1	0	2	0
China vs. Other	1	2	0	0
India vs. Other	1	0	2	0

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

Table 2.16 Overhead door springs: 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
United States vs. China	5	0	0	1
United States vs. India	3	0	0	1
China vs. India	2	0	0	1
United States vs. Other	0	0	0	1
China vs. Other	0	0	0	1
India vs. Other	0	0	0	1

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 overhead door springs from the United States, subject, or nonsubject countries. As seen in tables 2.17 to 2.19, all responding U.S. producers reported differences other than price were sometimes or never significant when comparing domestically produced overhead door springs to imports from China and India. Half of responding importers reported that differences other than price were sometimes or never significant when comparing domestically produced overhead door springs to imports from China, while most reported that factors other than price were sometimes significant when comparing domestically produced overhead door springs to imports from India. Among purchasers, most responding firms reported that differences other than price were sometimes significant when comparing domestically produced overhead door springs to imports from China and that factors other than price were always significant when comparing domestically produced overhead door springs to imports from India.

Importer *** reported availability, lead time, and the need for additionally treated overhead door springs as factors other than price. Importer *** reported that Chinese quality is better, but order processing and delivery typically takes three months. Importers *** and *** reported that Chinese producing process and technique are more advanced and can get a higher quality and higher production capacity compared to spring producing firms in the USA. Similarly, purchaser *** reported adequate volumes of additionally treated overhead door springs as a significant non-price factor.

Table 2.17 Overhead door springs: 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
United States vs. China	0	0	1	4
United States vs. India	0	0	1	4
China vs. India	0	0	1	3
United States vs. Other	0	0	1	3
China vs. Other	0	0	1	3
India vs. Other	0	0	1	3

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

Table 2.18 Overhead door springs: Count of importers 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
United States vs. China	5	3	8	2
United States vs. India	2	1	4	1
China vs. India	0	0	1	2
United States vs. Other	1	0	2	0
China vs. Other	3	0	0	0
India vs. Other	1	0	2	0

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

Table 2.19 Overhead door springs: Count of purchasers 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
United States vs. China	2	0	4	0
United States vs. India	3	0	1	0
China vs. India	2	0	1	1
United States vs. Other	1	0	0	0
China vs. Other	1	0	0	0
India vs. Other	1	0	0	0

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing brief. No parties commented on these estimates.

U.S. supply elasticity

The domestic supply elasticity for overhead door springs measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of overhead door springs. 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 overhead door springs. Analysis of these factors above indicates that the U.S. industry has the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of U.S.-produced overhead door springs to the U.S. market; an estimate in the range of 6 to 7 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for overhead door springs measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of overhead door springs. 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 overhead door springs in the production of any downstream products. Based on the available information, the aggregate demand for overhead door springs is likely to be highly 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.[17] Product differentiation, in turn, depends upon 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 overhead door springs and imported overhead door springs is likely to be in the range of 4 to 6. Factors contributing to this level of substitutability include most responding U.S. producers, importers, and purchasers reporting U.S.-produced overhead door springs as superior or comparable to springs from subject sources across all factors other than price, responding firms' limited domestic content requirements, the limited number of purchasers reporting domestic and subject source suppliers being unable to meet minimum quality standards, and similarities in reported lead times.

[17] 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.

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

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of six firms that accounted for approximately 95 percent of U.S. production of overhead door springs during 2024.

U.S. producers

The Commission issued a U.S. producer questionnaire to nine firms based on information contained in the petition and publicly available sources. Six firms provided usable data on their operations, in whole or in part.[1] An additional three firms are believed to produce overhead door springs but did not provide usable data.[2] Table 3.1 lists U.S. producers of overhead door springs, their production locations, positions on the petition, and shares of total production.

[1] U.S. producer Overhead Door Corporation submitted usable trade data, but did not submit fully verifiable financial data.

[2] Three additional firms confirmed receipt of the U.S. producer questionnaire, but despite multiple contacts did not respond: American Spring, Inc.; Torque Springs; and Dura-Lift Hardware. In correspondence with Commission staff in the preliminary phase of these investigations, Dura-Lift Hardware indicated that it has *** domestic production facilities for "torsion springs for overhead door companies," and provided an estimate of 2023 production (*** pounds). In correspondence with Commission staff in the final phase of these investigations, American Spring, Inc. and Torque Springs, Inc. reported collectively producing *** pounds of overhead door springs in 2024. Email from ***, August 7, 2025.

Table 3.1 Overhead door springs: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2024

Shares in percent

Firm	Position on petition	Production location(s)	Share of production
IDC Spring	Petitioner	Coon Rapids, MN Piqua, OH Mesa, AZ	***
Iowa Spring	Petitioner	Adel, IA Granite Quarry, NC	***
Napoleon	***	Archbold, OH Phoenix, AZ	***
Overhead Door	***	Mount Hope, OH Grand Island, NE	***
Penn Central Spring	***	Middletown, PA	***
Service Spring	Petitioner	Maumee, OH Visalia, CA	***
All firms	Various	Various	100.0

Source: Compiled from data submitted in response to Commission questionnaires. Does not include U.S. producers American Spring, Inc.; Torque Springs; and Dura-Lift Hardware.

Table 3.2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table 3.2 Overhead door springs: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
Overhead Door	Ownership: Sanwa Holdings Corporation (Japan)	100 percent
Iowa Spring	Related producer: Southern Atlantic Spring (USA)	Sister company
Napoleon	Related producer: Lynx Industry (Canada)	Wholly owned
Overhead Door	Related producer: Sanwa Shutter Corporation (Japan)	Shared parent company
Overhead Door	Related producer: Novoferm Group (Germany)	Shared parent company

Source: Compiled from data submitted in response to Commission questionnaires. Overhead Door Corporation webpage, The History of Overhead Door Corporation, accessed August 1, 2025. Southern Atlantic Spring webpage, Southern Atlantic Spring, accessed August 1, 2025. Novoferm Group webpage, https://www.sanwa-hldgs.co.jp/english/story/novoferm.html, accessed August 1, 2025. Napoleon/Lynx webpage, ABOUT - Napoleon/Lynx, accessed August 20, 2025. Announcement of the acquisition of Door Control and Door Concepts, USA, https://pdf.irpocket.com/C5929/KHnJ/ZxuJ/BXgX.pdf, accessed August 27, 2025.

As indicated in table 3.2, Overhead Door Corporation and Napoleon are related to foreign producers of overhead door springs in nonsubject countries and none of the responding U.S. producers are related to U.S. importers of overhead door springs. In addition, as discussed in greater detail below, Overhead Door Corporation and Napoleon directly imported overhead door springs. None of the responding U.S. producers reported purchasing overhead door springs from China or India from U.S. importers.

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

Table 3.3 Overhead door springs: Important industry events since 2022

Item	Firm	Event
Acquisition	ODC, Door Control, Door Concepts	January 2023— Japan-based Sanwa Holdings Corp. (“Sanwa”) announced that its wholly owned subsidiary, Overhead Door Corp. (“ODC”), acquired 100 percent of the shares of Door Control Inc. and the assets of Door Concepts Inc., which are leading US automatic door service and installation firms.
Capital investment cutbacks	IDC Spring	2023 to 2024— IDC Spring scaled-back its planned capital investments.
Workforce reduction	Service Spring	2023 to 2024— Service Spring relied on attrition rather than lay-offs to reduce its workforce as sales subsided, after previously expanded hiring to meet surges during 2021 and 2022.
New facility	Iowa Spring	April 2023— Iowa Spring expanded its corporate production capacity by opening a second facility located near its original facility, in Ames, Iowa.
Acquisition	Iowa Spring	September 2023— Iowa Spring completed its acquisition of Northeast Spring Inc. an overhead door spring manufacturer with facilities in Reading, Pennsylvania, and Villa Rica, Georgia. Northeast Spring will retain its corporate name and management team during a three-year transition period.
Lay-offs	Iowa Spring	First through third quarters of 2024— Iowa Spring reduced its workforce, curtailed the number of production shifts available, and continued to operate at a low-capacity utilization rate.
Facility expansion	IDC Spring	July 2024— IDC Spring received city council approval to expand its corporate and production facility in Coon Rapids, Minnesota. The two additions will expand the floor space for manufacturing, warehousing, and shipping of overhead doors and components, including overhead door springs.
Lay-offs	IDC Spring	November 2024— IDC Spring eliminated 23 positions at its facility in Piqua, Ohio.
New service center	Service Spring	December 2024— Service Spring opened a new customer service center located in Maryland Heights, Missouri, to provide same-day and two-day deliveries of in-stock springs, operators, and standard replacement parts to garage door firms operating within a 150-mile radius.

Table 3.3 (Continued) Overhead door springs: Important industry events since 2022

Item	Firm	Event
B2B partnership	HomeService and Wayne-Dalton	May 2025— HomeSphere, a business-to-business ("B2B") platform that connects building products manufacturers with mid-market homebuilders, announced its partnership with Wayne-Dalton Corp., a manufacturer of garage doors, door openers, and components, including overhead door springs.

Source: Petition, p. 32, exh. 12; Petitioners' postconference brief, pp. 38 to 39, exh. 4: Declaration of Jodi Boldenow, para. 10; conference transcript, pp. 15 (Boldenow), 26 (Bianco), 86 (McAlear);
Sanwa, "Announcement of the Acquisition of Door Control and Door Concepts USA," News Release, January 13, 2023, https://pdf.irpocket.com/C5929/KHnJ/ZxuJ/BXgX.pdf;
ODC, "Overhead Door Corporation Announces the Purchase of Door Control and Door Concepts," Press Release, January 17, 2023, https://doorservicescorporation.com/resources/press-releases/overhead-door-corporation-announces-the-purchase-of-door-control-and-door-concepts;
Allison Ullmann, "Iowa Spring Manufacturing Breaks Ground on $7.4M Expansion in Adel," Des Moines Register, December 19, 2021, https://www.desmoinesregister.com/story/news/2021/12/19/iowa-spring-manufacturing-breaks-ground-7-4-m-expansion-adel/8668203002/#:~:text=in%20Adel%20and%20the%20new,and%205%2C000%20for%20office%20space;
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Wayne-Dalton, "TorqueMaster® Plus Counterbalance," ©2025, https://www.wayne-dalton.com/about/torque-master-counterbalance, retrieved July 25, 2025.

U.S. producers were asked to report any change in the character of their operations or organization relating to the production of overhead door springs since 2022. Four of six producers indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

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

Item	Firm name and narrative response on changes in operations
Prolonged shutdowns	***
Production curtailments	***
Other	***
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.[3] Installed overall capacity increased from 2022 to 2023, and remained unchanged from 2023 to 2024. The increase from 2022 to 2023 was due entirely to an increase in the installed capacity at ***, as described in table 3.4. Production levels, however, declined continuously.

Following an initial increase from 2022 to 2023, practical overall capacity remained stable from 2023 to 2024. Practical overall capacity was lower in interim 2025 compared to interim 2024. Overall production (all production on shared equipment) was lower in each successive full and partial year.

[3] "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 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.

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

Capacity and production in 1,000 pounds; utilization in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	310,676	325,790	325,790	86,712	86,712
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	211,987	219,796	219,700	57,594	50,890
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical OHDS	Capacity	206,427	215,248	215,248	56,362	49,811
Practical OHDS	Production	172,240	147,322	144,995	35,921	35,722
Practical OHDS	Utilization	83.4	68.4	67.4	63.7	71.7

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

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints. A majority of U.S. producers identified "supply of material inputs," and "existing labor force" as capacity constraints since January 1, 2022, while one producer reported "other constraints" (specifically "***").

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

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

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

Table 3.7 presents U.S. producers' reported capabilities to perform specified finishing processes on overhead door springs. With respect to shot peening, *** reported no capability, whereas *** reported some ability to provide overhead door springs which had undergone shot peening, whether in-house or via a third-party. *** were the only U.S. producers which reported no capability to provide overhead door springs which had undergone powder coating.

Thus, ***. Iowa Spring ***, IDC Spring ***,[4] and Service Spring ***.[5]

Several firms reported the capability to perform additional finishing processes. ***.[6]

[4] Correspondence provided to the Commission indicated that ***. Email from ***, attachment B, September 1, 2025.

[5] U.S. producer questionnaire, sections II-5, II-6, and II-7.

[6] Email from ***, July 28, 2025.

Table 3.7 Overhead door springs: Count of U.S. producers' responses regarding finishing process capabilities, by finishing process

Count in number of firms reporting

Finishing process	Not at all	Exclusively through third parties	Both in-house and through third parties	Exclusively in-house
Shot peening	3	1	1	1
Powder coating	2	1	1	2
Additional finishing processes	1	2	2	1

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

Table 3.8 and figure 3.1 present U.S. producers' production, capacity, and capacity utilization. U.S. producer's aggregate practical capacity for overhead door springs increased from 2022 to 2023, was stable from 2023 to 2024, but was lower in interim 2025 relative to interim 2024. While the increase from 2022 to 2023 was due solely to ***, the lower capacity in interim 2025 reflected lower capacity reported by ***.[7]

*** firms reported net declines in production from 2022 to 2024, reflected in a continuous aggregate decline in production across that period. Although production by *** was higher in interim 2025 relative to interim 2024, the comparatively lower production by *** resulted in lower aggregate production in interim 2025.

Consistent with lower levels of production, U.S. producers' capacity utilization declined from 2022 to 2024, with all firms reporting net declines over that period. *** reported the single largest decline from 2022 to 2024, the result of an increase in capacity and reduced production volume. In interim 2025, however, all firms other than *** reported higher capacity utilization in compared to interim 2024.

[7] ***. *** U.S. producer questionnaire response, section II-3d.

Table 3.8 Overhead door springs: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 pounds; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon	***	***	***	***	***
Overhead Door	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	206,427	215,248	215,248	56,362	49,811

Table continued.

Table 3.8 (Continued) Overhead door springs: U.S. producers' output, by firm and period

Production

Production in 1,000 pounds; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon	***	***	***	***	***
Overhead Door	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	172,240	147,322	144,995	35,921	35,722

Table continued.

Table 3.8 (Continued) Overhead door springs: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon	***	***	***	***	***
Overhead Door	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	83.4	68.4	67.4	63.7	71.7

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

Table continued.

Table 3.8 (Continued) Overhead door springs: U.S. producers' output, by firm and period

Share of production

Share in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon	***	***	***	***	***
Overhead Door	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure 3.1 Overhead door springs: U.S. producers' output, by period

* * * * * * *

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

Alternative products

As shown in table 3.9, the vast majority of U.S. producers' production on shared equipment from 2022 to 2024 and the interim periods was overhead door springs. *** reported producing ***, but no other firms reported production of out-of-scope merchandise using the same equipment as in-scope production.

Table 3.9 Overhead door springs: U.S. producers' overall production on shared equipment, by period

Quantity in 1,000 pounds; share in percent; interim is January through March

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Overhead door springs	Quantity	172,240	147,322	144,995	35,921	35,722
Extension springs	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Overhead door springs	Share	***	***	***	***	***
Extension springs	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	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. producers' U.S. shipments and exports

Table 3.10 presents U.S. producers' U.S. shipments, export shipments, and total shipments. Total shipments by U.S. producers, both in terms of quantity and value, declined continuously from 2022 to 2024, and likewise were lower in interim 2025 compared to interim 2024. *** was the only U.S. producer which did not report a net decline both in the quantity and value of total shipments from 2022 to 2024. The single largest decline in total shipments from 2022 to 2024, both in absolute quantity and value, was reported by ***. While *** reported net 2022 to 2024 declines in the quantity of total shipments, they did report increases from 2023 to 2024, and *** reported greater total shipments in interim 2025 compared to interim 2024, the only U.S. producers to do so. As the decline in the value of total shipments outpaced the concurrent decline in quantity, the average unit value ("AUV") of total shipments of overhead door springs decreased in 2023 and 2024, and was lower in interim 2025 relative to interim 2024.

The vast majority of all shipments of overhead door springs by U.S. producers were domestic,[8] and accordingly the trends in U.S. shipments reflect the trends in total shipments, both quantity, value, and AUVs. U.S. shipments by quantity and value declined on an annual basis from 2022 to 2024 and were lower in interim 2025 compared to interim 2024.[9] The AUV of U.S. producers' U.S. shipments likewise declined from 2022 to 2024, and was lower in interim 2025 than in interim 2024.

[8] ***.

[9] As discussed in more detail in table 3.11, *** reported only commercial shipments, *** reported a mix of commercial shipments and internal consumption, and *** reported only internal consumption for U.S. shipments.

Table 3.10 Overhead door springs: U.S. producers' shipments, by destination and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	172,269	147,004	144,071	36,179	33,726
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	334,582	240,260	217,598	55,757	51,001
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1.94	1.63	1.51	1.54	1.51
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	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	100.0	100.0

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

Table 3.11 presents U.S. producers' U.S. shipments by type. The vast majority of all U.S. shipments throughout the period for which data was collected were commercial U.S. shipments, with internal consumption comprising the remainder, as *** reported transfers to related firms. Although the quantity and value of commercial shipments and internal consumption each declined from 2022 to 2024 and were subsequently lower in interim 2025 than in interim 2024, the share of total shipments held by each type of shipment remained consistent. While the AUV of internally consumed overhead door springs was lower than the AUV of commercial shipments in all periods, the AUVs of each shipment type declined from 2022 to 2024 and either remained flat or was lower in interim 2025 compared to interim 2024.

*** and Overhead Door Corporation were the only firms to report internal consumption. Overhead Door Corporation internally consumed *** springs which it produced, for use in and sale as garage door assemblies. *** reported a mix of commercial shipments and internal consumption, with commercial shipments accounting for the vast majority of its reported U.S. shipments. Consequently, ***

accounts for the vast majority of all reported internal consumption among responding U.S. producers.[10]

Table 3.11 Overhead door springs: U.S. producers' U.S. shipments, by type and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	172,269	147,004	144,071	36,179	33,726
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	334,582	240,260	217,598	55,757	51,001
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	1.94	1.63	1.51	1.54	1.51
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	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 "—".

[10] Commission questionnaires also requested U.S. producers to report U.S. shipments by level of assembly, i.e., as overhead door springs with or without cones, not in kits or further assembled; overhead door springs in kits; or springs as parts of components (e.g., motors, counterweight assemblies) or as parts of garage doors. *** were the only firms which reported U.S. shipments of overhead door springs as parts of components or as parts of garage doors, as all other responding producers reported U.S. shipments of only overhead door springs with or without cones, not in kits or further assembled.

Captive production

Section 771(7)(C)(iv) of the Act states that–[11]

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

Transfers and sales

As reported in table 3.11, internal consumption accounted for between *** percent (interim 2025) and *** percent (interim 2024) of U.S. producers' U.S. shipments of overhead door springs.

First statutory criterion in captive consumption

The first requirement for application of the captive consumption provision is that the domestic like product that is internally transferred for processing into that downstream article not enter the merchant market for the domestic like product. Overhead Door Corporation and *** reported internal consumption of overhead door springs for the production of garage doors.[12] No U.S. producer, however, reported diverting overhead door springs intended for internal consumption to the merchant market.

Second statutory criterion in captive consumption

The second criterion of the captive consumption provision concerns whether the domestic like product is the predominant material input in the production of the downstream article that is captively produced. With respect to the downstream articles resulting from captive production, overhead door springs reportedly constituted *** percent of the finished

[11] Amended by PL 114–27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.
[12] Conference transcript, p. 49 (Cannon).

cost of the downstream product sold by Overhead Door Corporation and *** percent of the downstream product sold by ***.

U.S. producers' inventories

Table 3.12 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. The aggregate inventories of responding U.S. producers continuously declined from 2022 to 2024, and inventories as a ratio to production, U.S. shipments, and total shipments remained relatively flat. Inventories were higher in interim 2025 relative to interim 2024, however, and were likewise higher as a ratio to production, U.S. shipments, and total shipments. With the exception of ***, which did not report inventories, all responding U.S. producers reported a decline in inventories from 2022 to 2024, reflected in the aggregate trend, and likewise all responding U.S. producers, with the exception of ***, reported higher inventory levels in interim 2025.

Table 3.12 Overhead door springs: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratio in percent; interim is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	8,323	6,872	6,185	6,260	7,619
Inventory ratio to U.S. production	4.8	4.7	4.3	4.4	5.3
Inventory ratio to U.S. shipments	4.8	4.7	4.3	4.3	5.6
Inventory ratio to total shipments	***	***	***	***	***

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

Table 3.13 presents U.S. producers' end-of-period inventories by period and by coating applied to the overhead door springs, and the shares of these inventories. *** was the only responding U.S. producer which reported inventories of overhead door springs which had been shot peened, powder coated, and/or e-coated.[13] However, even for *** these inventories represented a fraction of their total reported inventories, the vast majority of which consisted of the standard black water-based coated overhead door springs. For all other responding firms, inventories consisted entirely of overhead door springs with the standard coating.

[13] As noted in table 3.7 and the associated discussion, *** is the only responding producer which reported in-house capabilities to both shot peen and powder coat overhead door springs.

Table 3.13 Overhead door springs: U.S. producers' inventories, by period and coating

Quantity in 1,000 pounds; share in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Black water-based coating	Quantity	***	***	***	***	***
Shot peened, powder coated, and/or e-coated	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
End-of-period inventory quantity	Quantity	8,323	6,872	6,185	6,260	7,619
Black water-based coating	Share	***	***	***	***	***
Shot peened, powder coated, and/or e-coated	Share	***	***	***	***	***
Other	Share	***	***	***	***	***
End-of-period inventory quantity	Share	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. producers' imports from subject sources

U.S. producers' imports of overhead door springs are presented in tables 3.14 and 3.15. *** reported imports from subject sources and only reported such imports in 2022 and 2023.[14] ***.[15] *** imports by *** underwent shot peening, powder coating, e-coating, or any other additional finishing processes prior to or after importation.

[14] ***. *** U.S. producer questionnaire, sections III-3g and III-15.

[15] Commission staff issued foreign producer questionnaires to each of these foreign producers, but did not receive a response.

Table 3.14 Overhead door springs: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity In 1,000 pounds; ratio in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from India	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
All imports	Quantity	***	***	***	***	***
Imports from China to U.S. production	Ratio	***	***	***	***	***
Imports from India to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***
All imports to U.S. production	Ratio	***	***	***	***	***

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

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

Table 3.15 Overhead door springs: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity In 1,000 pounds; ratio in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from India	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from nonsubject sources	Quantity	***	***	***	***	***
All imports	Quantity	***	***	***	***	***
Imports from China to U.S. production	Ratio	***	***	***	***	***
Imports from India to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***
Imports from nonsubject sources to U.S. production	Ratio	***	***	***	***	***
All imports to U.S. production	Ratio	***	***	***	***	***

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

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

Table 3.16 Overhead door springs: U.S. producers' reasons for importing

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

No responding U.S. producer reported purchases of overhead door springs during the period for which data were collected.

U.S. employment, wages, and productivity

Table 3.17 shows U.S. producers' employment-related data.[16] U.S. producers' PRWs continuously declined from 2022 to 2024 and were lower still in interim 2025 compared to interim 2024, with total hours worked and total wages paid following the same trend. Hourly wages fluctuated, but nonetheless declined overall from 2022 to 2024, and were lower in interim 2025. Productivity declined from 2022 to 2023, then increased from 2023 to 2024, nonetheless resulting in a net decline from 2022 to 2024. Productivity was then higher in interim 2025 compared to interim 2024, despite both production and total hours worked being lower in interim 2025 than in interim 2024.

*** reported decreases in the number of PRWs from 2022 to 2024, as reflected in the overall industry trend. *** stated that, *** while

[16] Employment figures for Overhead Door Corporation, which represents *** percent of responding producers' 2024 production quantity are ***. Overhead Door Corporation's U.S. producer questionnaire, section II-18.

*** stated that, ***. While *** reported an increase in the number of PRWs from 2022 to 2024, it stated that, *** reflected in fewer PRWs in interim 2025 compared to interim 2024.[17] In regards to its reported increases in PRWs from 2022 to 2024, ***.[18]

Table 3.17 Overhead door springs: U.S. producers' employment related information, by period

Interim is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	624	599	580	580	524
Total hours worked (1,000 hours)	1,179	1,140	1,073	286	258
Hours worked per PRW (hours)	1,889	1,903	1,850	494	492
Wages paid ($1,000)	29,409	26,383	26,141	7,200	6,346
Hourly wages (dollars per hour)	$24.94	$23.15	$24.36	$25.15	$24.63
Productivity (pounds per hour)	146.1	129.3	135.1	125.5	138.7
Unit labor costs (dollars per pound)	$0.17	$0.18	$0.18	$0.20	$0.18

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

[17] *** U.S. producer questionnaire response, section II-18. ***. Petitioner prehearing brief, p. 26.

[18] *** U.S. producer questionnaire, section II-18.

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

U.S. importers

The Commission issued importer questionnaires to 314 firms potentially importing subject overhead door springs, as well as to all U.S. producers of overhead door springs.[1] Usable questionnaire responses were received from 21 companies, representing approximately *** percent of U.S. imports from China, approximately *** percent of U.S. imports from India, and approximately *** percent of imports from combined subject sources in 2024, based on third-party import statistics submitted to the Commission by counsel.[2] [3] Multiple firms confirmed receipt of a Commission questionnaire, but despite repeated efforts by staff did not submit a questionnaire response, most notably ***, firms accounting for approximately one-third of all identified imports from China in 2024 in the Panjiva dataset.[4]

As described in Part 1 of this report, Commission staff believes that responses to Commission questionnaires, adjusted by third-party Panjiva bill of lading data, represent the most accurate picture of subject and nonsubject imports, as opposed to official import statistics, questionnaire data, or questionnaire-adjusted official import statistics. Unless otherwise indicated, imports are presented using responses to Commission questionnaire, adjusted by third-party Panjiva bill of lading data. As the Panjiva data contained data on the quantity of imports, but not the value of imports, value data for imports listed in the Panjiva

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

[2] Even under the primary HTS statistical reporting numbers 7320.20.5025, 7320.20.5045, and 7320.205060, each of which cover a variety of products in addition to overhead door springs, data submitted in questionnaire responses represents approximately *** percent of U.S. imports from India.

[3] Fifty-four firms identified as possible importers of overhead door springs submitted questionnaire responses indicating that they had not imported overhead door springs from any source since January 1, 2022. These submissions include firms which the Commission contacted due to one or more of the following data sources: the petitions; the Panjiva dataset provided to the Commission by counsel; proprietary, Census-edited Customs' import records; and publicly available information discovered during staff research.

[4] ***. Additionally, U.S. importer ***.

dataset are derived by multiplying the quantity of imports from a given source and in a given period (as reported in the third-party dataset and adjusted by responses to Commission questionnaires) by the average unit value of imports from a given source as reported in Commission questionnaire responses.

Table 4.1 lists all responding U.S. importers of overhead door springs from China and India and other sources, their locations, and their shares of U.S. imports, in 2024.

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

Share in percent

Firm	Headquarters	China	India	Subject sources	Nonsubject sources	All import sources
Alcomex Springs	Pittston, OH	***	***	***	***	***
Apex	Littleton, CO	***	***	***	***	***
BDM	Galt, CA	***	***	***	***	***
BTKT	Gold River, CA	***	***	***	***	***
Cynergy Cargo	Douglas, GA	***	***	***	***	***
DDM	West Chicago, IL	***	***	***	***	***
Installed Building Products	Columbus, OH	***	***	***	***	***
Jammy	Fort Worth, TX	***	***	***	***	***
MDM Utah	South Salt Lake, UT	***	***	***	***	***
MFG Direct	Corona, CA	***	***	***	***	***
Overhead Door	Lewisville, TX	***	***	***	***	***
Provision	Lakewood, WA	***	***	***	***	***
Roll Up	Blackshear, GA	***	***	***	***	***
TBS Garage Doors	Carrollton, TX	***	***	***	***	***
Texdoor	San Antonio, TX	***	***	***	***	***
The Raynor Company	Fitzgerald, GA	***	***	***	***	***
Tradex Global	Tomball, TX	***	***	***	***	***
Napoleon	Archbold, OH	***	***	***	***	***
Better Buy	Ontario, CA	***	***	***	***	***
Feng's	Jurupa Valley, CA	***	***	***	***	***
Veteran	Grand Prairie, TX	***	***	***	***	***
All other firms	Various	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

Source: Import data are compiled from data submitted in response to Commission questionnaires and third-party bill of lading data (Panjiva) provided to the Commission by counsel to the petitioners, accessed on June 9, 2025.

Note: “All other firms” in the table above is a comprehensive row for those firms which appear in the Panjiva data as having reported imports of merchandise which Petitioners believe likely to be in-scope merchandise, but did not submit a response to Commission questionnaires.

U.S. imports

Table 4.2 presents data for U.S. imports of overhead door springs from China, India, and all other sources. The quantity and value of total imports initially declined from 2022 to 2023, and then increased sharply from 2023 to 2024, with a net increase in terms of both quantity and value. Following the increases from 2023 to 2024, the quantity and value of imports from all sources were also higher in interim 2025 compared to interim 2024. During this period, the average unit value ("AUV") of imports from all sources decreased from 2022 to 2024. However, the AUV of imports from all sources was higher in interim 2025 relative to interim 2024.

With the exception of 2024, when ***, subject imports accounted for *** of all imports, the majority of which were from China throughout the period for which data were collected.[5] U.S. imports from the subject sources exhibited net increases in both quantity and value from 2022 to 2024 and were higher in interim 2025 than in interim 2024, although the rate of change was more irregular for imports from India than for imports from China. AUVs of subject imports declined from 2022 to 2024 in aggregate, although imports from China and India exhibited different trends. Aggregate subject imports AUVs were higher in interim 2025 than in interim 2024 (a period characterized by sharply lower AUVs for imports from China).

[5] ***. Email from ***, August 14, 2025.

Table 4.2 Overhead door springs: U.S. imports by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pounds; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	11,237	10,104	19,699	5,972	7,596
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	12,973	9,669	19,595	5,110	8,586
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	1.15	0.96	0.99	0.86	1.13

Table continued.

Table 4.2 (Continued) Overhead door springs: Share of U.S. imports by source and period

Shares and ratio in percent; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Subject sources	Share of value	100.0	100.0	99.6	100.0	99.5
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	6.5	6.9	13.6	16.6	21.3

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by counsel to the petitioners, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires.

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

Table 4.3 Overhead door springs: Changes in U.S. imports by source and period

Shares and ratio in percent; interim is January through March

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to 2025
China	%Δ Quantity	▲***	▲***	▲***	▲***
India	%Δ Quantity	▲***	▼***	▲***	▲***
Subject sources	%Δ Quantity	▲***	▼***	▲***	▲***
Nonsubject sources	%Δ Quantity	▲***	***	▲***	▲***
All import sources	%Δ Quantity	▲75.3	▼(10.1)	▲95.0	▲27.2
China	%Δ Value	▲***	▼***	▲***	▲***
India	%Δ Value	▲***	▼***	▲***	▲***
Subject sources	%Δ Value	▲***	▼***	▲***	▲***
Nonsubject sources	%Δ Value	▲***	***	▲***	▲***
All import sources	%Δ Value	▲51.0	▼(25.5)	▲102.7	▲68.0
China	%Δ Unit value	▼***	▼***	▼***	▲***
India	%Δ Unit value	▲***	▲***	▲***	▼***
Subject sources	%Δ Unit value	▼***	▼***	▲***	▲***
Nonsubject sources	%Δ Unit value	▲***	***	▲***	▲***
All import sources	%Δ Unit value	▼(13.8)	▼(17.1)	▲3.9	▲32.1
China	ppt Δ Quantity	▲***	▲***	▼***	▼***
India	ppt Δ Quantity	▼***	▼***	▲***	▲***
Subject sources	ppt Δ Quantity	▼***	***	▼***	▼***
Nonsubject sources	ppt Δ Quantity	▲***	***	▲***	▲***
All import sources	ppt Δ Quantity	—	—	—	—
China	ppt Δ Value	▼***	▲***	▼***	▼***
India	ppt Δ Value	▲***	▼***	▲***	▲***
Subject sources	ppt Δ Value	▼***	***	▼***	▼***
Nonsubject sources	ppt Δ Value	▲***	***	▲***	▲***
All import sources	ppt Δ Value	—	—	—	—
China	ppt Δ Ratio	▲***	▲***	▲***	▲***
India	ppt Δ Ratio	▲***	▼***	▲***	▲***
Subject sources	ppt Δ Ratio	▲***	▲***	▲***	▲***
Nonsubject sources	ppt Δ Ratio	▲***	***	▲***	▲***
All import sources	ppt Δ Ratio	▲7.1	▲0.3	▲6.7	▲4.6

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the counsel to the petitioners, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaire.

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.

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

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the counsel to the petitioners, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaire.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[6] 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

[6] 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)).

imports from such countries are deemed not to be negligible.[7] Imports from China and India accounted for *** percent of total imports of overhead door springs by quantity from October 2023 through September 2024.

Table 4.4 Overhead door springs: U.S. imports in the twelve-month period preceding the filing of the petition, October 2023 through September 2024

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
India	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	20,335	100.0

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the counsel to the petitioners, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaire.

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 "—".

Critical circumstances

On July 29, 2025, Commerce issued its preliminary determinations that "critical circumstances" exist with respect to imports of overhead door springs from producers and exporters in India in the countervailing duty and LTFV investigations.[8] Petitioners subsequently filed a timely withdrawal of their allegations of critical circumstances at Commerce regarding imports of overhead door springs from India, in both the CVD and LTFV investigations. With regard to China, on August 15, 2025, Commerce issued its final determination that "critical circumstances" exist, in part, with respect to imports of overhead door counterbalance torsion springs (overhead door springs) from the China-wide entity, and do not exist for all other producers and/or exporters granted a separate rate in the LTFV investigation.[9] Also on August 15, 2025, Commerce issued its final determination that "critical circumstances"

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

[8] 90 FR 35660 and 90 FR 35662, July 29, 2025.

[9] 90 FR 39369, August 15, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

exist, in part, with respect to imports of overhead door springs from Xulong Spring, Tianjin Wangxia, and the non-responsive companies, and do not exist for all other producers and/or exporters in the countervailing duty investigation.[10] In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from April 3, 2025, the effective date of Commerce's preliminary affirmative countervailing duty determination, and subject to antidumping duties retroactive from June 2, 2025, the effective date of Commerce's preliminary affirmative antidumping duty determinations. Tables 4.5 through 4.8 and figures 4.2 and 4.3 present these data for a period ending March 31, 2025, the last month for which Panjiva data are available.[11]

Table 4.5 Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
June 2024	Before	***
July 2024	Before	***
August 2024	Before	***
September 2024	Before	***
October 2024	Before	***
November 2024	After	***
December 2024	After	***
January 2025	After	***
February 2025	After	***
March 2025	After	***

Table continued.

[10] 90 FR 39374, August 15, 2025.

[11] One firm which submitted supplemental questionnaire response, ***, further submitted revised monthly inventory data too late for staff to reconcile with inventory data submitted in the primary U.S. importer questionnaire response. Additionally, while *** confirmed that the monthly import data submitted in the supplemental questionnaire was accurate, it then subsequently revised imports data submitted in its primary U.S. importer questionnaire response, too late for inclusions in the staff report. This revision accounted for *** percent of U.S. imports from China in 2024. Email from ***, September 2, 2025. Email from ***, September 2, 2025.

Table 4.5 (Continued) Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the AD investigation, by month, before and after the filing of the petitions, 2024

Quantity in 1,000 pounds

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions 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 4.2 Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the AD investigation, by month

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires.

Table 4.6 Overhead door springs: U.S. inventories from China subject to final Commerce critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds; Index in percent where October 31, 2024 = 100.0 percent

Date	Quantity	Index
October 31, 2024	***	100.0
November 30, 2024	***	***
December 31, 2024	***	***
January 31, 2025	***	***
February 28, 2025	***	***
March 31, 2025	***	***

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

Note: Data reflect only supplemental questionnaire responses as third-party Panjiva data were not available on inventories.

Table 4.7 Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
June 2024	Before	***
July 2024	Before	***
August 2024	Before	***
September 2024	Before	***
October 2024	Before	***
November 2024	After	***
December 2024	After	***
January 2025	After	***
February 2025	After	***
March 2025	After	***

Table continued.

Table 4.7 (Continued) Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the CVD investigation, by month, before and after the filing of the petitions, 2024

Quantity in 1,000 pounds

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires.

Figure 4.3 Overhead door springs: U.S. imports from China subject to final Commerce critical circumstances determination in the CVD investigation, by month

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires.

Table 4.8 Overhead door springs: U.S. inventories from China subject to final Commerce critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 pounds; Index in percent where October 31, 2024 = 100.0 percent

Date	Quantity	Index
October 31, 2024	***	100.0
November 30, 2024	***	***
December 31, 2024	***	***
January 31, 2025	***	***
February 28, 2025	***	***
March 31, 2025	***	***

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

Note: Data reflect only supplemental questionnaire responses as third-party Panjiva data were not available for inventories.

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

Table 4.9 and figure 4.4 present U.S. producers' U.S. shipments and U.S. importers' imports of overhead door springs by level of assembly in 2024. Among all sources, the most common level of assembly for U.S. shipments of overhead door springs was as standalone springs. U.S. shipments of imports from India and from nonsubject sources consist of standalone springs, whereas U.S. producers predominately shipped standalone springs, but also reported shipments of ***.[12] China was the only source of

[12] Among responding U.S. producers, *** reported U.S. shipments of overhead door springs attached to other goods, specifically as components of complete garage door assemblies.

overhead door springs which reported U.S. shipments in ***, although shipments of standalone springs nonetheless predominated.[13]

Table 4.9 Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and levels of assembly, 2024

Quantity in 1,000 pounds.

Source	Standalone springs	Springs in kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	144,071
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	10,990
All sources	***	***	***	155,060

Table continued.

Table 4.9 (Continued) Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and levels of assembly, 2024

Share across in percent

Source	Standalone springs	Springs in kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

[13] *** reported imports from China that were imported as springs within kits. ***. *** U.S. importer questionnaire response, section III-16. *** sells completed roll up door assemblies, not standalone springs. *** U.S. importer questionnaire response, sections III-4, III-5. Only *** reported imports from China that were imported as springs attached to other goods. ***. Email from ***, July 17, 2025.

Table 4.9 (Continued) Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and levels of assembly, 2024

Share down in percent

Source	Standalone springs	Springs in kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	92.9
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	7.1
All sources	100.0	100.0	100.0	100.0

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

Figure 4.4 Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and levels of assembly, 2024

* * * * * * *

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

Table 4.10 and figure 4.5 present U.S. producers' and U.S. importers' U.S. shipments of overhead door springs by wire diameter in 2024. Overhead door springs with a wire diameter ≥5.1 mm and <12.7 mm were the most common category of U.S. shipments among all sources, both individually and in aggregate. While U.S. shipments of overhead door springs with a wire diameter ≥2.5 mm and <5.1 mm were reported from all sources other than nonsubject sources, only U.S. producers reported U.S. shipments of overhead door springs with a wire diameter ≥12.7 mm and <=20.4 mm.[14]

Table 4.10 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and wire diameter, 2024

Quantity in 1,000 pounds.

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and <=20.4 mm	All wire diameters
U.S. producers	***	***	***	144,071
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	9,169
All sources	***	***	***	153,240

Table continued.

Table 4.10 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and wire diameter, 2024

Share across in percent

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and <=20.4 mm	All wire diameters
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

[14] Among responding U.S. producers, only *** reported that the majority of its U.S. shipments were overhead door springs of a wire diameter ≥2.5 mm and <5.1 mm.

Table 4.10 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and wire diameter, 2024

Share down in percent

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and <=20.4 mm	All wire diameters
U.S. producers	***	***	***	94.0
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	6.0
All sources	100.0	100.0	100.0	100.0

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

Figure 4.5 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and wire diameter, 2024

* * * * * * *

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

Table 4.11 and figure 4.6 present U.S. producers' and U.S. importers' U.S. shipments by source and spring length in 2024. With the exception of nonsubject imports of overhead door springs of a spring length ≥80 inches, all sources reported U.S. shipments of overhead door springs in each spring length category. For all sources of overhead door springs, ≥5 and <40 inches was the most common spring length, followed by ≥40 and <80 inches. The source with

the highest proportion of overhead door springs of a spring length ≥40 and <80 inches was U.S. producers.[15]

Table 4.11 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and spring length, 2024

Quantity in 1,000 pounds

Source	≥5 and <40 inches	≥40 and <80 inches	≥80 inches	All spring lengths
U.S. producers	***	***	***	144,071
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	9,169
All sources	***	***	***	153,240

Table continued.

Table 4.11 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and spring length, 2024

Share across in percent

Source	≥5 and <40 inches	≥40 and <80 inches	≥80 inches	All spring lengths
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

[15] At the staff conference in the preliminary phase of these investigations, Petitioner stated that, in regards to length, diameter, wire gauge, weight and other product dimensions, both domestic and foreign producers are able to provide any and all dimensions of torsion springs required by the U.S. market.

Table 4.11 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and spring length, 2024

Share down in percent

Source	≥5 and <40 inches	≥40 and <80 inches	≥80 inches	All spring lengths
U.S. producers	***	***	***	94.0
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	6.0
All sources	100.0	100.0	100.0	100.0

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

Figure 4.6 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and spring length, 2024

* * * * * * *

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

Table 4.12 and figure 4.7 present U.S. producers' and U.S. importers' U.S. shipments of overhead door springs by source and coating in 2024. U.S. shipments of overhead door springs with either a black water-based coating or which had undergone additional finishing processes (shot peening, powder coating, and/or e-coating) were reported for all sources with the exception of nonsubject sources, which did not report U.S. shipments in 2024 of overhead door springs which had undergone these additional finishing processes. Among U.S. producers in 2024, a small minority of U.S. shipments underwent additional finishing processes, whereas the vast majority of U.S. shipments of subject imports (both from China and India) had undergone

additional finishing processes.[16] Responding firms did not report any U.S. shipments in 2024 of overhead door springs which had undergone additional finishing processes other than shot peening, powder coating, and/or e-coating.

Table 4.12 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and coating, 2024

Quantity in 1,000 pounds.

Source	Black water-based coating	Shot peened, powder coated, and/or e-coated	Other coatings	All coatings
U.S. producers	***	***	***	144,071
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	9,265
All sources	***	***	***	153,336

Table continued.

Table 4.12 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and coating, 2024

Share across in percent

Source	Black water-based coating	Shot peened, powder coated, and/or e-coated	Other coatings	All coatings
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

[16] Ten of 21 responding importers reported U.S. shipments of subject imports which had undergone shot peening, powder coating, and/or e-coating.

Table 4.12 (Continued) Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and coating, 2024

Share down in percent

Source	Black water-based coating	Shot peened, powder coated, and/or e-coated	Other coatings	All coatings
U.S. producers	***	***	***	94.0
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	6.0
All sources	100.0	100.0	—	100.0

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

Figure 4.7 Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and coating, 2024

* * * * * * *

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

Geographical markets

Table 4.13 presents U.S. import quantities of overhead door springs as reported under HTS statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060 by source and border of entry region during 2024.[17] According to unadjusted official import statistics, imports (broadly defined) from China and India entered the United States through ports in each region during 2024. However, while imports from China were broadly dispersed, imports from India were concentrated in the North.

Table 4.13 Overhead door springs: U.S. imports by source and border of entry, 2024

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	3,573	6,751	6,059	5,435	21,819
India	203	6,257	255	23	6,738
Subject sources	3,776	13,008	6,314	5,458	28,557
Nonsubject sources	14,682	14,547	42,717	4,681	76,627
All import sources	18,459	27,555	49,031	10,139	105,184

Table continued.

Table 4.13 (Continued) Overhead door springs: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
China	16.4	30.9	27.8	24.9	100.0
India	3.0	92.9	3.8	0.3	100.0
Subject sources	13.2	45.6	22.1	19.1	100.0
Nonsubject sources	19.2	19.0	55.7	6.1	100.0
All import sources	17.5	26.2	46.6	9.6	100.0

Table continued.

[17] In the absence of border of entry data available from the third-party Panjiva dataset, Commission staff used official import statistics as reported under the HTS statistical reporting numbers believed to contain the greatest quantity of overhead door springs. Because each of the above listed HTS statistical reporting numbers contains out-of-scope merchandise, the figures presented in table 4.9 are overstated.

Table 4.13 (Continued) Overhead door springs: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
China	19.4	24.5	12.4	53.6	20.7
India	1.1	22.7	0.5	0.2	6.4
Subject sources	20.5	47.2	12.9	53.8	27.1
Nonsubject sources	79.5	52.8	87.1	46.2	72.9
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 numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed June 5, 2025. Imports are based on the imports for consumption data series.

Presence in the market

According to official U.S. import statistics provided under HTS statistical reporting numbers 7320.20.5025, 7320.20.5045, and 7320.205060, each of which contains out-of-scope merchandise, overhead door springs from China and from India entered the country in all months between January 2022 and March 2025. According to monthly U.S. import statistics, as reported in publicly available third-party import data provided to the Commission and adjusted by data received in response to Commission questionnaires,[18] overhead door springs from China entered the country in all months, and overhead door springs from India entered the country in 27 of 39 months between January 2022 and March 2025.

[18] The Panjiva dataset contains precise dates for each shipment of imports, and these data were adjusted in the following manner based on questionnaire responses: firms which appeared in the Panjiva dataset as potentially importing overhead door springs, but which answered "no" to the Commission questionnaire, are removed from the import dataset; all other firms, including those which answered "yes" to the Commission questionnaires, and those which did not respond to Commission outreach and which staff believes imported overhead door springs, are included using import shipments listed in the Panjiva data. Email from Jacob Jones, Georgetown Economic Services, LLC, June 24, 2025.

Apparent U.S. consumption and market shares

Total market

Total market by quantity

Table 4.14 and figure 4.8 present data on apparent U.S. consumption and U.S. market shares by quantity for the total market for overhead door springs. Total apparent U.S. consumption, by quantity, of overhead door springs decreased from 2022 to 2023, and then increased from 2023 to 2024, resulting in a net decrease. In interim 2025, apparent U.S. consumption was lower than in interim 2024. Throughout the period for which data was collected, U.S. producers accounted for the largest share of total apparent U.S. consumption, although U.S. producers' U.S. shipments continuously declined from 2022 to 2024, while the quantity of U.S. shipments of imports continuously increased. Likewise, in interim 2025 the quantity of U.S. shipments of imports was higher than in interim 2024 whereas U.S. producers reported fewer U.S. shipments of overhead door springs in interim 2025. As a result, interim 2025 was the period in which U.S. producers reported the lowest share of total apparent U.S. consumption.

Among subject sources, imports from China accounted for the majority of U.S. shipments of subject imports in all periods, although both imports from China and India increased from 2022 to 2024 and were higher in interim 2025 compared to interim 2024, absolutely and as a share of apparent U.S. consumption. U.S. shipments by U.S. producers exhibited the opposite trends.

Table 4.14 Overhead door springs: Apparent total market U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds; shares in percent; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	172,269	147,004	144,071	36,179	33,726
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	9,178	10,636	17,974	4,566	6,602
All sources	Quantity	181,447	157,640	162,044	40,745	40,328
U.S. producers	Share	94.9	93.3	88.9	88.8	83.6
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	5.1	6.7	11.1	11.2	16.4
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Figure 4.8 Overhead door springs: Apparent total market U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Total market by value

Table 4.15 and figure 4.9 presents data on apparent U.S. consumption and U.S. market shares by value for the total market for overhead door springs. The value of the total domestic market for overhead door springs continuously decreased from 2022 to 2024, and was lower in interim 2025 compared to interim 2024. The value of imports, however, increased from 2022 to 2024, following an initial 2022 to 2023 decrease. The increase in the value of imports of overhead door springs was reflected in imports from both China and India, and the value of imports from each subject source was likewise higher in interim 2025 compared to interim 2024. As the value of U.S. producers' U.S. shipments declined, and the value of U.S. shipments of subject imports increased, the market share of U.S. producers correspondingly declined from 2022 to 2024, and was lowest in interim 2025.

Table 4.15 Overhead door springs: Apparent total market U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	334,582	240,260	217,598	55,757	51,001
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	17,579	11,490	24,205	4,873	10,449
All sources	Value	352,161	251,750	241,803	60,631	61,450
U.S. producers	Share	95.0	95.4	90.0	92.0	83.0
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	5.0	4.6	10.0	8.0	17.0
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Figure 4.9 Overhead door springs: Apparent total market U.S. consumption based on value, by source and period

* * * * * * *

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Merchant market

Merchant market by quantity

Table 4.16 and figure 4.10 presents data on shipments and shares by quantity for overhead door springs for the merchant market. The data presented below have been adjusted to remove the internal consumption reported by ***.

Table 4.16 Overhead door springs: Apparent merchant market U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	9,178	10,636	17,974	4,566	6,602
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Figure 4.10 Overhead door springs: Apparent merchant market U.S. consumption based on value, by source and period

* * * * * * *

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Merchant market by value

Table 4.17 and figure 4.11 presents data on apparent U.S. consumption and U.S. market shares by value for overhead door springs for the merchant market The data presented below have been adjusted to remove the internal consumption reported by ***.

Table 4.17 Overhead door springs: Apparent merchant market U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	17,579	11,490	24,205	4,873	10,449
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Figure 4.11 Overhead door springs: Apparent merchant market U.S. consumption based on value, by source and period

* * * * * * *

Source: Data for U.S. producers are compiled from data submitted in response to Commission questionnaires. Import data are compiled from data submitted in response to Commission questionnaires and supplemented with third-party bill of lading data (Panjiva) provided to the Commission by petitioners.

Part 5: Pricing data

Factors affecting prices

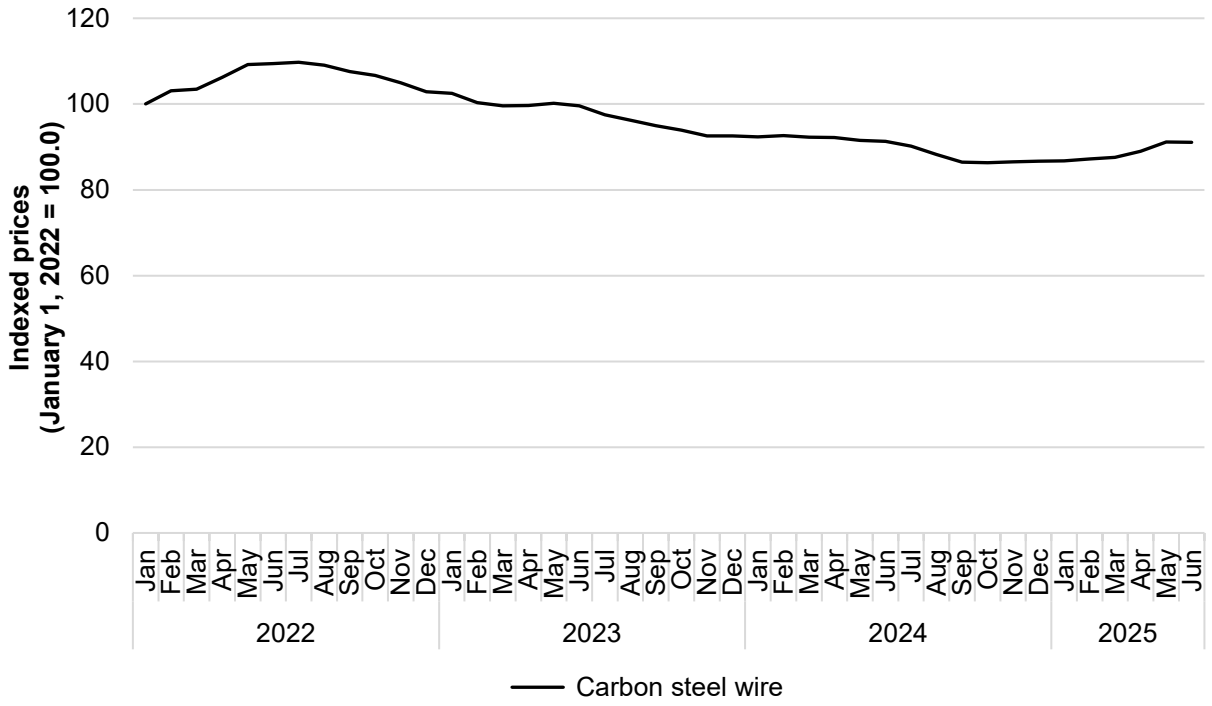
Raw material costs

Overhead door springs are produced by winding raw wire (typically high carbon steel wire containing 0.55 percent carbon or more), heat treating the wire, and then coating and finishing it.[1] Overhead door springs are made with a wide variety of wire types, including (but not limited to) oil-tempered wire, hard-drawn wire, music wire, galvanized wire, and black or other coated wire.[2]

Raw materials, as a share of U.S. producers' cost of goods sold (COGS), decreased from *** percent in 2022 to *** percent in 2024, and constituted *** percent in interim 2025.[3] Most responding U.S. producers and importers reported that the cost of raw materials steadily increased or fluctuated upward since January 1, 2022. Petitioners stated that they buy raw materials on a spot basis and that, notwithstanding raw material input, every other input of cost of production has increased over the last several years: energy, labor, employee benefits, commercial property liability insurance, consumables, torch tips, forklift, repairs, etc.[4] The price of carbon steel wire increased from January 2022 until July 2022, and fluctuated downward through October 2024, at which point it began to increase again and rose sharply in the second quarter of 2025. Overall, carbon steel wire prices were 8.9 percent lower in June 2025 than in January 2022 (figure 5.1 and table 5.1).

[1] Petition, p. 12.
[2] Petition, p. 9.
[3] See Part 6 for additional information regarding U.S. producers' reported financial data.
[4] Conference transcript, p. 61 (Bianco) and p. 62 (Boldenow and Bianco).

Figure 5.1 Raw materials: Price index for carbon steel wire, by month



Source: U.S. Bureau of Labor Statistics, Producer Price Index by Industry: Steel Wire Drawing: Carbon Steel Wire (PCU3312223312225A), retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/PCU3312223312225A, retrieved July 28, 2025.

Table 5.1 Raw materials: Price index for carbon steel wire, by month

Index in percent, 2022 = 100.0 percent

Month	2022	2023	2024	2025
January	100.0	102.5	92.3	86.8
February	103.1	100.3	92.6	87.2
March	103.5	99.6	92.3	87.6
April	106.2	99.6	92.2	89.0
May	109.2	100.2	91.5	91.2
June	109.4	99.6	91.3	91.1
July	109.7	97.5	90.2	NA
August	109.0	96.3	88.3	NA
September	107.5	95.0	86.5	NA
October	106.6	93.9	86.3	NA
November	104.9	92.5	86.5	NA
December	102.8	92.6	86.6	NA

Source: U.S. Bureau of Labor Statistics, Producer Price Index by Industry: Steel Wire Drawing: Carbon Steel Wire (PCU3312223312225A), retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/PCU3312223312225A, retrieved July 28, 2025.

Transportation costs to the U.S. market

Transportation costs for overhead door springs shipped from subject countries to the United States averaged 6.8 percent for China and 15.2 percent for India during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.[5]

U.S. inland transportation costs

Three of 4 responding U.S. producers and 10 of 14 responding importers reported that they typically arrange transportation to their customers. Responding U.S. producers' reported U.S. inland transportation costs ranged from 2 to 6 percent, while most importers reported costs of 2 to 10 percent.

Pricing practices

Pricing methods

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations and/or price lists, however one U.S. producer and one importer reported using contracts (table 5.2).

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

Count in number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	3	8
Contract	1	1
Set price list	3	10
Other	0	1
Responding firms	4	15

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.

[5] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060.

U.S. producers reported selling most of their overhead door springs in the spot market and secondarily under short-term contracts, while U.S. importers reported selling most of their overhead door springs under short-term or long-term contracts (table 5.3).[6]

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

Share in percent

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

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

Four purchasers reported that they purchase product daily, five purchase weekly, one purchases monthly, one purchases quarterly, and one purchases annually. Eleven of 12 responding purchasers reported that their purchasing frequency had not changed since 2022. A plurality of responding purchasers (5 of 11) reported contacting one to two suppliers before making a purchase.

Sales terms and discounts

Three U.S. producers reported they typically quote prices on an f.o.b. basis while one reported quoting prices on a delivered basis. Among responding importers, five reported typically quoting prices on an f.o.b. basis while nine reported quoting prices on a delivered basis. Two U.S. producers reported offering quantity discounts, one U.S. producer reported offering total volume discounts, and one U.S. producer reported offering no discount policy. A slight majority of responding importers (8 of 15) reported offering no discount policy, while five reported offering quantity discounts and four reported offering total volume discounts.

[6] Shares are the calculated weighted average of reported commercial shipments. Three U.S. producers, *** reported *** while U.S. producer *** reported a mix of short-term contracts, annual contracts, and spot sales. Importer *** reported *** while nine importers reported all of their sales were spot sales.

Price leadership

Most purchasers (8 of 12) reported that there were no price leaders in the overhead door springs market. Firms reported by responding purchasers as price leaders include Iowa Spring (2 firms), Service Spring (2 firms), IDC Spring (1 firm), SGD Springs (1 firm), and OHD Parts (1 firm). Most purchasers indicating the presence of price leaders indicated that these price leaders led by offering discounts and/or lower prices, while one purchaser, ***, reported Iowa Springs and IDC as price leaders based on "general sentiment."

Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following overhead door springs products shipped to unrelated U.S. customers during January 2022 to March 2025. Firms that imported these products from China and India for internal consumption were requested to provide import purchase cost data.

***Product 1*.-- Residential garage door torsion spring with the following characteristics:**

a. Wire diameter 0.207" – 0.234"
b. Inner diameter 1.750" – 2.625"
c. Overall length 20" – 40"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 2*.-- Residential garage door torsion spring with the following characteristics:**

a. Wire diameter 0.243" – 0.262"
b. Inner diameter 1.750" – 2.625"
c. Overall length 20" – 40"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 3*.-- Commercial garage door torsion spring with the following characteristics:**

a. Wire diameter 0.273" – 0.362"
b. Inner diameter 2.500" – 6.000"
c. Overall length 35" – 65"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 4*.-- Long length spring with the following characteristics:**

a. Wire diameter 0.192" – 0.437"
b. Inner diameter 1.750" – 6.000"
c. Overall length 96" – 144"
d. Left wound or right wound
e. Description stenciled on spring
f. Plain ends – no aluminum castings/cones installed

Price data

Five U.S. producers and five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[7] [8] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' reported commercial U.S. shipments of overhead door springs in 2024, *** percent of reported commercial U.S. shipments of imports from China in 2024, and *** percent of reported commercial U.S. shipments of imports from India in 2024. Price data for products 1-4 are presented in tables 5.4 to 5.7 and figures 5.2 to 5.5.

Table 5.4 Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Quantity in 1,000 pounds, Prices in dollars per pound; Margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207" – 0.234", Inner diameter 1.750" – 2.625", Overall length 20" – 40", Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Note: Importer *** was the only importer to report price data for ***. Importer *** was the only importer to report data for ***.

[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] Importer *** provided price data too late to be verified by staff and included in the staff report.

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

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table 5.5 Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Quantity in 1,000 pounds, Prices in dollars per pound; Margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Note: Importer *** was the only importer to report data for ***.

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

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table 5.6 Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Quantity in 1,000 pounds, Prices in dollars per pound; Margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

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

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table 5.7 Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Quantity in 1,000 pounds, Prices in dollars per pound; Margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 4: Long length spring with the following characteristics: Wire diameter 0.192” – 0.437”, Inner diameter 1.750” – 6.000”, Overall length 96” – 144”, Left wound or right wound, Description stenciled on spring, Plain ends – no aluminum castings/cones installed.

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

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Long length spring with the following characteristics: Wire diameter 0.192” – 0.437”, Inner diameter 1.750” – 6.000”, Overall length 96” – 144”, Left wound or right wound, Description stenciled on spring, Plain ends – no aluminum castings/cones installed.

Import purchase cost data

Six importers reported useable import purchase cost data for products 1-3.[9] Purchase cost data reported by these firms accounted for *** percent of imports from China, and *** percent of imports from India in 2024. Importers with the largest reported purchase cost volumes include ***. Landed duty-paid purchase cost data for imports from China and India are presented in tables 5.8 to 5.11, along with U.S. producers' sales prices.[10]

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of importing overhead door springs themselves. No importers reported that they incurred additional costs beyond landed duty-paid costs by importing overhead door springs themselves rather than purchasing from a U.S. producer or U.S. importer.

Seven of 10 responding importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer in determining whether to import overhead door springs, 3 importers compare costs to purchasing from a U.S. importer, and 3 importers do not compare costs of purchasing from either U.S. producers or importers.

Ten importers identified reasons or benefits to importing overhead door springs themselves instead of purchasing from U.S. producers or importers. Six firms reported supply chain-related reasons, including the need to supplement their supply due to limited domestic production, four firms reported price or cost related reasons, and one firm reported quality.

Firms were also asked whether the import cost (both excluding and including additional costs) of overhead door springs they imported are lower than the price of purchasing overhead door springs from a U.S. producer or importer. Six importers estimated that they saved between *** percent of the purchase price by importing overhead door springs rather than purchasing from a U.S. producer, while two firms estimated saving between *** percent compared to purchasing the product from an importer.

[9] No importers reported purchase cost data for product 4.

[10] LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

Table 5.8 Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Quantity in 1,000 pounds, Prices and unit LDP values in dollars per pound; Differentials in percent.

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China price/cost differential	India unit LDP value	India quantity	India price/cost differential
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

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

Figure 5.6 Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter

U.S. price and import purchase cost of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table 5.9 Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter

Quantity in 1,000 pounds, Prices and unit LDP values in dollars per pound; Differentials in percent.

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China price/cost differential	India unit LDP value	India quantity	India price/cost differential
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

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

Figure 5.7 Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter

U.S. price and import purchase cost of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table 5.10 Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter

Quantity in 1,000 pounds, Prices and unit LDP values in dollars per pound; Differentials in percent.

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China price/cost differential	India unit LDP value	India quantity	India price/cost differential
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

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

Figure 5.8 Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 3, by quarter

U.S. price and import purchase cost of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Price and purchase cost trends

Tables 5.11 to 5.14 and figures 5.9 to 5.11 summarize the price trends, by country and by product. Overall, prices for U.S.-produced overhead door springs and purchase costs for imports from subject sources declined, while prices for imports from subject sources increased. Domestic price decreases ranged from *** to *** percent during January 2022 to March 2025, while import price increases ranged from *** to *** percent.

Table 5.11 Overhead door springs: Summary of price and cost data, by product and source

Prices and unit LDP values in dollars per pound; Quantity in 1,000 pounds; Change in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	13	***	***	***	***	***	***
Product 1	China price	9	***	***	***	***	***	***
Product 1	India price	11	***	***	***	***	***	***
Product 1	China cost	9	***	***	***	***	***	***
Product 1	India cost	8	***	***	***	***	***	***
Product 2	United States	13	***	***	***	***	***	***
Product 2	China price	2	***	***	***	***	***	***
Product 2	India price	11	***	***	***	***	***	***
Product 2	China cost	9	***	***	***	***	***	***
Product 2	India cost	5	***	***	***	***	***	***
Product 3	United States	13	***	***	***	***	***	***
Product 3	China price	1	***	***	***	***	***	***
Product 3	India price	6	***	***	***	***	***	***
Product 3	China cost	6	***	***	***	***	***	***
Product 3	India cost	—	***	***	***	***	***	***
Product 4	United States	13	***	***	***	***	***	***
Product 4	China price	2	***	***	***	***	***	***
Product 4	India price	4	***	***	***	***	***	***
Product 4	China cost	—	***	***	***	***	***	***
Product 4	India cost	—	***	***	***	***	***	***

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

Note: Percentage change from the first quarter in which data were available in 2022 to the last quarter in which data were available in 2025.

Table 5.12 Overhead door springs: Indexed U.S. producer sales prices, by quarter

Index in percent

Period	Product 1	Product 2	Product 3	Product 4
2022 Q1	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***
2025 Q1	***	***	***	***

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

Figure 5.9 Overhead door springs: Indexed U.S. producer sales prices, by quarter

Index in percent

* * * * * * *

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

Table 5.13 Overhead door springs: Indexed U.S. importer sales prices, by quarter

Index in percent

Period	Product 1	Product 2
2022 Q1	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	***	***
2025 Q1	***	***

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

Note: 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 "—". Data for products 3 and 4 are not presented due to limited reported sales of the product.

Figure 5.10 Overhead door springs: Indexed U.S. importer sales prices, by quarter

Index in percent

* * * * * * *

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

Table 5.14 Overhead door springs: Indexed U.S. importer purchase costs, by quarter

Index in percent

Period	Product 1	Product 2
2022 Q1	100.0	—
2022 Q2	***	100.0
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***
2023 Q4	***	***
2024 Q1	***	***
2024 Q2	***	***
2024 Q3	***	***
2024 Q4	***	***
2025 Q1	***	***

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

Note: 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 "—". Cost data for product 3 are not presented due to limited reported purchases of the product.

Figure 5.11 Overhead door springs: Indexed U.S. importer purchase costs, by quarter

Index in percent

* * * * * * *

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

Price and purchase cost comparisons

Price comparisons

As shown in tables 5.15 to 5.17, prices for product imported from subject countries were below those for U.S.-produced product in 40 of 46 instances and above prices for the domestic product in the remaining 6 instances. Prices for product imported from China were below those for U.S.-produced product in 10 of 14 instances (*** pounds); margins of underselling ranged from *** to *** percent. In the remaining four instances (*** pounds), prices for product from China were between *** and *** percent above prices for the domestic product. Prices for product imported from India were below those for U.S.-produced product in 30 of 32 instances (*** pounds); margins of underselling ranged from *** to *** percent. In the remaining two instances (*** pounds), prices for product from India were between *** and *** percent above prices for the domestic product.

Table 5.15 Overhead door springs: Instances and quantities of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 pounds; Margins in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	15	***	***	***	***
Product 2	Underselling	12	***	***	***	***
Product 3	Underselling	7	***	***	***	***
Product 4	Underselling	6	***	***	***	***
All products	Underselling	40	***	***	***	***
Product 1	Overselling	5	***	***	***	***
Product 2	Overselling	1	***	***	***	***
Product 3	Overselling	—	***	***	***	***
Product 4	Overselling	—	***	***	***	***
All products	Overselling	6	***	***	***	***

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

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

Table 5.16 Overhead door springs: Instances and quantities of underselling and overselling and the range and average of margins, by source

Quantity in 1,000 pounds; Margins in percent

Sources	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
China	Underselling	10	***	***	***	***
India	Underselling	30	***	***	***	***
All subject sources	Underselling	40	***	***	***	***
China	Overselling	4	***	***	***	***
India	Overselling	2	***	***	***	***
All subject sources	Overselling	6	***	***	***	***

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

Note: Margins shown as "0.0" percent represent non-zero values less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 5.17 Overhead door springs: Instances and quantities of underselling and overselling and the range and average of margins, by period

Quantity in 1,000 pounds; Margins in percent

Period	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	Underselling	14	***	***	***	***
2023	Underselling	10	***	***	***	***
2024	Underselling	15	***	***	***	***
January through March 2025	Underselling	1	***	***	***	***
All periods	Underselling	40	***	***	***	***
2022	Overselling	2	***	***	***	***
2023	Overselling	2	***	***	***	***
2024	Overselling	—	***	***	***	***
January through March 2025	Overselling	2	***	***	***	***
All periods	Overselling	6	***	***	***	***

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

Note: Margins shown as "0.0" percent represent non-zero values less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Price-cost comparisons

As shown in tables 5.18 to 5.20, landed duty-paid costs for overhead door springs imported from China were below the sales price for U.S.-produced product in all of 24 instances (*** pounds); price-cost differentials ranged from *** to *** percent. Landed duty-paid costs for overhead door springs imported from India were below the sales price for U.S.-produced product in all of 13 instances (*** pounds); price-cost differentials ranged from *** to *** percent.

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

Quantity in 1,000 pounds; Differentials in percent

Products	Type	Number of instances	Quantity	Average differential	Min differential	Max differential
Product 1	Lower than US	17	***	***	***	***
Product 2	Lower than US	14	***	***	***	***
Product 3	Lower than US	6	***	***	***	***
Product 4	Lower than US	—	***	***	***	***
All products	Lower than US	37	***	***	***	***
Product 1	Higher than US	—	***	***	***	***
Product 2	Higher than US	—	***	***	***	***
Product 3	Higher than US	—	***	***	***	***
Product 4	Higher than US	—	***	***	***	***
All products	Higher than US	—	***	***	***	***

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

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

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

Quantity in 1,000 pounds; Differentials in percent

Sources	Type	Number of instances	Quantity	Average differential	Min differential	Max differential
China	Lower than US	24	***	***	***	***
India	Lower than US	13	***	***	***	***
All subject sources	Lower than US	37	***	***	***	***
China	Higher than US	—	***	***	***	***
India	Higher than US	—	***	***	***	***
All subject sources	Higher than US	—	***	***	***	***

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

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

Table 5.20 Overhead door springs: Instances and quantities of lower/(higher) average unit purchase costs compared to U.S. prices and the range and average price/cost differentials, by period

Quantity in 1,000 pounds; Differentials in percent

Period	Type	Number of instances	Quantity	Average differential	Min differential	Max differential
2022	Lower than US	11	***	***	***	***
2023	Lower than US	12	***	***	***	***
2024	Lower than US	11	***	***	***	***
January through March 2025	Lower than US	3	***	***	***	***
All periods	Lower than US	37	***	***	***	***
2022	Higher than US	—	***	***	***	***
2023	Higher than US	—	***	***	***	***
2024	Higher than US	—	***	***	***	***
January through March 2025	Higher than US	—	***	***	***	***
All periods	Higher than US	—	***	***	***	***

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

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

Lost sales and lost revenue

In the preliminary phase of these investigations, the Commission requested that U.S. producers of overhead door springs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of overhead door springs from China and India during January 2021 to June 2024. Three U.S. producers (Petitioners IDC, Iowa Spring, and Service Spring) submitted lost sales and lost revenue allegations. Petitioners identified 35 firms with which they lost sales or revenue (17 consisting of lost sales allegations and 18 consisting of both types of allegations). These alleged lost sales or lost revenue transactions occurred during 2023 and 2024, and the majority were specifically with respect to competing imports from China.[11]

In the final phase of these investigations, of the responding U.S. producers, three firms (the petitioners) reported that they had to reduce prices, roll back announced price increases, and that they had lost sales.

Staff contacted 56 purchasers and received responses from 12 purchasers.[12] Responding purchasers reported purchasing *** pounds of overhead door springs during January 2022 to March 2025 (table 5.21).

[11] Thirty allegations specifically with respect to China, four with respect to India, and one to both sources.

[12] Three purchasers submitted lost sales lost revenue survey responses in the preliminary phase, but did not submit purchaser questionnaire responses in the final phase.

Table 5.21 Overhead door springs: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 pounds, Change in shares in percentage points

Firm	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject share	Change in all other share
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Of the 12 responding purchasers, 6 reported that, since 2022, they had purchased imported overhead door springs from China and India instead of U.S.-produced product. Four of these purchasers reported that subject import prices were lower than U.S.-produced product, and three of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Three purchasers estimated the quantity of overhead door springs from China and India purchased instead of domestic product; quantities ranged from *** to *** pounds (table 5.22). Three purchasers identified supply shortages during the COVID-19 pandemic as non-price reasons for purchasing imported rather than U.S.-produced product, while one purchaser, ***, reported domestic producers declined to meet *** desired volume for shot peened and powder coated springs, necessitating the purchase of imported springs.

Table 5.22 Overhead door springs: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table 5.22 (Continued) Overhead door springs: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 6; No: 6	Yes: 4; No: 2	Yes: 3; No: 3	***	NA

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

Note: *** reported purchasing *** pounds of overhead door springs from India instead of domestic product.

Table 5.23 Overhead door springs: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Count in number of firms reporting; Quantity in 1,000 pounds

Source	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity
China	3	3	1	***
India	4	2	2	***
Subject sources	6	4	3	***

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

Of the 12 responding purchasers, one reported that U.S. producers had reduced prices in order to compete with lower-priced imports from China, and one reported that U.S. producers reduced prices in order to compete with lower-priced imports from both China and India; eight reported that they did not know (table 5.24). The reported estimated price reductions were *** and *** percent in order to compete with imports from China, and *** percent in order to compete with imports from India. In describing the price reductions, purchaser *** stated that U.S. producers reduced prices *** purchasing Chinese springs, while purchaser *** stated their U.S. supplier has been working with them on pricing when they can. In addition, ***.

Table 5.24 Overhead door springs: Purchasers' responses to U.S. producer price reductions, by firm

Count in number of firms reporting; Price reductions in percent

Firm	Producers lowered prices	Price reduction	Narrative on producer price reductions
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes: 2; No: 2	***	NA

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

Table 5.25 Overhead door springs: Purchasers' responses to U.S. producer price reductions, by source

Price reductions in percent

Source	Producers lowered prices	Average price reduction	Range of price reductions
China	2	***	***
India	1	***	***
Subject sources	2	***	***

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

Part 6: Financial experience of U.S. producers

Background[1]

Five U.S. producers (IDC Spring, Iowa Spring, Napoleon Spring, Penn Central Spring, and Service Spring) provided usable financial results on their overhead door springs operations. All five are privately held companies. The financial results for most of the U.S. producers are based on information from accounting systems designed to generate/report overall financial results on the basis of U.S. GAAP. *** U.S. producers have fiscal years that reflect the calendar year.[2]

A sixth U.S. producer, Overhead Door Corporation, provided financial data that could not be verified. Accordingly, its financial data are not included in this chapter.[3] Overhead Door Corporation is owned by Sanwa Holdings Corporation, a publicly traded company on the Tokyo Stock Exchange ("TSE").[4]

Total net sales primarily reflect commercial sales and include a small amount of internal consumption. Internal consumption is included in the data presented but not shown separately in this section of the report.[5] [6]

Figure 6.1 presents each responding firm's share of the total reported net sales quantity in 2024.

[1] The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] ***. *** U.S. producers questionnaire response, section 3.2.

[3] ***.

[4] Overhead Door Corporation submitted usable trade data, but did not submit fully verifiable financial data.

[5] Internal consumption accounted for *** of total sales quantity in 2024, and was reported by ***.

[6] Staff conducted a verification of *** trade and financial data. All adjustments that resulted from the verification were incorporated into this report.

Figure 6.1 Overhead door springs: U.S. producers' share of net sales quantity in 2024, by firm

* * * * * * *

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

Operations on overhead door springs

Table 6.1 presents aggregated data on U.S. producers' operations in relation to overhead door springs, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data. Appendix E presents U.S. producers' operations in relation to overhead door springs including Overhead Door Corporation's data, and also presents U.S. producers' operations in the merchant market.

Table 6.1 Overhead door springs: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense/income (net)	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	71.5	77.3	81.0	80.9	79.7
Gross profit or (loss)	Ratio to NS	28.5	22.7	19.0	19.1	20.3
SG&A expenses	Ratio to NS	9.4	13.0	14.8	14.2	16.0
Operating income or (loss	Ratio to NS	19.2	9.7	4.2	4.8	4.2
Net income or (loss)	Ratio to NS	19.1	9.5	4.0	4.7	4.2

Table continued.

Table 6.1 (Continued) Overhead door springs: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	2.16	1.82	1.69	1.74	1.68
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	1.54	1.40	1.37	1.41	1.34
Gross profit or (loss)	Unit value	0.62	0.41	0.32	0.33	0.34
SG&A expenses	Unit value	0.20	0.24	0.25	0.25	0.27
Operating income or (loss)	Unit value	0.41	0.18	0.07	0.08	0.07
Net income or (loss)	Unit value	0.41	0.17	0.07	0.08	0.07
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	5	5	5	5	5

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

Note: Shares represent the share of COGS.

Table 6.2 Overhead door springs: Changes in AUVs between comparison periods

Changes in percent; interim is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Total net sales	▼***	▼***	▼***	▼***
COGS: Raw materials	▼***	▼***	▼***	▼***
COGS: Direct labor	▼***	▼***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▼(11.0)	▼(8.9)	▼(2.4)	▼(5.1)

Table continued.

Table 6.2 (Continued) Overhead door springs: Changes in AUVs between comparison periods

Changes in dollars per pound; interim is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Total net sales	▼***	▼***	▼***	▼***
COGS: Raw materials	▼***	▼***	▼***	▼***
COGS: Direct labor	▼***	▼***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▼(0.17)	▼(0.14)	▼(0.03)	▼(0.07)
Gross profit or (loss)	▼(0.29)	▼(0.20)	▼(0.09)	▲0.01
SG&A expenses	▲0.05	▲0.03	▲0.02	▲0.02
Operating income or (loss)	▼(0.34)	▼(0.24)	▼(0.11)	▼(0.01)
Net income or (loss)	▼(0.34)	▼(0.24)	▼(0.11)	▼(0.01)

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

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

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

Net sales quantity

Quantity in 1,000 pounds; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Net sales value

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

COGS

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Gross profit or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

SG&A expenses

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Operating income or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Net income or (loss)

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

COGS to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	71.5	77.3	81.0	80.9	79.7

Table continued.

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

Gross profit or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	28.5	22.7	19.0	19.1	20.3

Table continued.

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

SG&A expenses to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	9.4	13.0	14.8	14.2	16.0

Table continued.

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

Operating income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	19.2	9.7	4.2	4.8	4.2

Table continued.

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

Net income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	19.1	9.5	4.0	4.7	4.2

Table continued.

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

Unit net sales value

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	2.16	1.82	1.69	1.74	1.68

Table continued.

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

Unit raw material costs

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Unit direct labor costs

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Unit other factory costs

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Unit COGS

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	1.54	1.40	1.37	1.41	1.34

Table continued.

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

Unit gross profit or (loss)

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	0.62	0.41	0.32	0.33	0.34

Table continued.

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

Unit SG&A expenses

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	0.20	0.24	0.25	0.25	0.27

Table continued.

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

Unit operating income or (loss)

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	0.41	0.18	0.07	0.08	0.07

Table continued.

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

Unit net income or (loss)

Unit values in dollars per pound; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	0.41	0.17	0.07	0.08	0.07

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.

Net sales

As shown in table 6.1, total sales quantity decreased each year from 2022 to 2024 and was lower in interim 2025 compared with interim 2024. Total sales value also decreased each year from 2022 to 2024, and was lower in interim 2025 compared with interim 2024. U.S. producers were generally uniform in directional trends with *** firms reporting an overall decrease in sales quantity and value from 2022 to 2024, and the majority reporting a lower sales quantity and value in interim 2025 compared with interim 2024 (see table 6.3).[7]

While sales quantity and value had the same directional trends, the decrease in sales value was approximately double that of sales quantity from 2022 to 2024. On an average per pound value, total sales value decreased each year from 2022 to 2024 (with the majority of the decrease occurring between 2022 and 2023), and was lower in interim 2025 compared with interim 2024. As shown in table 6.3, U.S. producers were uniform in directional trends from 2022 to 2024 and in the comparable interim periods, with *** U.S. producers reporting a decrease in varying magnitudes in their per pound sales value from 2022 to 2024, and *** reporting lower per pound values in interim 2025 compared with interim 2024.[8] [9] As shown in table 6.2, average per pound net sales value and raw material cost were directionally the same during the period in which data were collected, and only slightly varied in magnitudes. To the extent that the majority of U.S. producers (***) indicated that product mix did not change notably during the period,[10] raw material cost appears to have a substantial impact on overall and company-specific changes in average per pound net sales value.

[7] ***. Email from ***, July 17, 2025.
[8] ***. Email from ***, August 15, 2025.
[9] ***. Email from ***, July 17, 2025.
[10] U.S. producers' questionnaire response section 4.15. ***.

Cost of goods sold and gross profit or loss

Raw materials cost, which primarily reflects steel wire cost, is the largest component of COGS, ranging between *** percent during the period in which data were collected.[11] As shown in table 6.1, raw materials cost decreased in absolute value and on a per-pound basis each year from 2022 to 2024, and was lower in interim 2025 compared with interim 2024. On a firm-by-firm basis, *** U.S. producers reported a decrease in their per pound raw materials cost from 2022 to 2024, and a lower per pound value in interim 2025 compared with interim 2024 (see table 6.3).[12] [13]

Table 6.4 presents raw materials, by type. The table shows that steel wire is the primary raw material for overhead door springs, followed by other material inputs. Other material inputs include ***.[14]

Table 6.4 Overhead door springs: U.S. producers' raw material costs in 2024

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

Item	Value	Share of value
Steel wire	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

Direct labor cost and other factory costs are two smaller components of COGS. Direct labor cost ranged between *** percent of total COGS, while other factory costs ranged between *** percent of total COGS during the period in which data were collected.

Direct labor cost decreased in absolute value and fluctuated within a narrow range on a per-pound basis from 2022 to 2024, while other factory costs increased in absolute value and

[11] Steel wire, the primary variable cost, plays an important role in determining the level of overhead door springs COGS. Conference transcript, p. 63 (McAlear).

[12] ***. U.S. producers questionnaire response, section 4.19.

[13] ***. *** U.S. producers' questionnaire response, section 3.7a.

[14] U.S. producers' questionnaire response, section 3.9e.

on a per-pound basis. Direct labor cost and other factory costs were lower in absolute value and on a per-pound basis in interim 2025 compared with interim 2024.[15] [16]

As shown in table 6.1, total COGS, primarily reflecting raw materials cost's trends decreased each year in absolute value and a per-pound basis from 2022 to 2024 by *** percent, respectively. Total COGS was *** percent lower in interim 2025 compared with interim 2024, in absolute value and on a per-pound basis, respectively. On a firm-by-firm basis, U.S. producers were uniform in directional trends, with *** reporting an overall decrease in per pound total COGS from 2022 to 2024, and lower per pound values in interim 2025 compared with interim 2024 (see table 6.3). As a ratio to net sales, total COGS increased each year from 2022 to 2024, but was somewhat lower in interim 2025 compared with interim 2024.

As shown in table 6.1, gross profit decreased each year from 2022 to 2024 and was lower in interim 2025 compared with interim 2024. On a firm-by-firm basis, *** U.S. producers reported a decrease in gross profit from 2022 to 2024, and *** reported a higher gross profit in interim 2025 compared with interim 2024 (see table 6.3). As a ratio to net sales, gross profit decreased from 2022 to 2024 but was higher in interim 2025 compared with interim 2024.[17]

[15] ***. Email from ***, July 15, 2025.

[16] ***. *** U.S. producers' response, sections 3.10a and 3.10b.

[17] ***.

SG&A expenses and operating income or loss

As shown in table 6.1, total SG&A expenses increased irregularly from 2022 to 2024 and was higher in interim 2025 compared with interim 2024. The SG&A expense ratio (SG&A expenses divided by net sales revenue) increased each year from 2022 to 2024, and was higher in interim 2025 compared with interim 2024. As shown in table 6.3, company-specific SG&A expenses ratios cover a relatively wide range, reflecting, at least in part, differences in underlying business models; e.g., Service Spring, ***, operates a network of distribution centers whereas IDC Spring and Iowa Spring do not.[18] On a firm-by-firm basis, *** U.S. producers reported an overall increase in SG&A expenses from 2022 to 2024, and higher SG&A expenses in interim 2025 compared with interim 2024.[19]

As shown in table 6.1, operating income decreased each year from 2022 to 2024, and was somewhat lower in interim 2025 compared with interim 2024. On a firm-by-firm basis, *** U.S. producers reported a decrease in operating income from 2022 to 2024, and *** reported a lower operating income in interim 2025 compared with interim 2022. ***.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income items. In table 6.1, these items are aggregated and only the net amount is shown as "other expense/(income)." Total net other expense/income increased irregularly from 2022 to 2024, and was lower in interim 2025 compared with interim 2024.

Operating income and net income shared the same directional pattern throughout the period in which data were collected. As compared to operating income, the level of net income reflects interest expense and other expenses, varying in terms of their relative importance during the period in which data were collected and to the extent to which they were partially offset by other income.

[18] Conference transcript, p. 66 (McAlear).
[19] ***. Email from ***, July 15, 2025.

Variance analysis

A variance analysis for the operations of U.S. producers of overhead door springs is presented in table 6.5.[20] The information for this variance analysis is derived from table 6.1.

Table 6.5 Overhead door springs: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars; interim is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Net sales price variance	***	***	***	***
Net sales volume variance	***	***	***	***
Net sales total variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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

Note: These data are derived from the data in table 6.1. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

[20] The Commission's variance analysis is calculated in three parts: Net sales variance, COGS variance, and SG&A expense variance. Each part consists of a price variance (in the case of the net sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variances are calculated as the change in unit price or per-unit cost/expense, respectively, times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the operating income price variance is from sales; the operating income cost/expense variance is the sum of the cost components in the COGS and SG&A expense variances, and the operating income volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances.

Capital expenditures and research and development expenses

Table 6.6 presents capital expenditures, by firm, and table 6.8 presents R&D expenses, by firm. Tables 6.7 and 6.9 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. Capital expenditures decreased each year from 2022 to 2024, but were higher in interim 2025 compared with interim 2024. R&D expenses increased irregularly from 2022 to 2024, but were lower in interim 2025 compared with interim 2024.

Table 6.6 Overhead door springs: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	13,425	7,052	6,531	1,290	2,731

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

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

Table 6.7 Overhead door springs: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
IDC Spring	***
Iowa Spring	***
Napoleon Spring	***
Penn Central Spring	***
Service Spring	***
IDC Spring	***

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

Table 6.8 Overhead door springs: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Penn Central Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

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

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

Table 6.9 Overhead door springs: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
IDC Spring	***
Iowa Spring	***
Napoleon Spring	***
Penn Central Spring	***
Service Spring	***

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

Assets and return on assets

Table 6.10 presents data on the U.S. producers' total assets while table 6.11 presents their operating ROA.[21] Table 6.12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets decreased each year from 2022 to 2024. ROA notably decreased each year from 2022 to 2024 (***).

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

Table 6.10 Overhead door springs: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
IDC Spring	***	***	***
Iowa Spring	***	***	***
Napoleon Spring	***	***	***
Penn Central Spring	***	***	***
Service Spring	***	***	***
All firms	112,130	106,325	102,067

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

Table 6.11 Overhead door springs: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
IDC Spring	***	***	***
Iowa Spring	***	***	***
Napoleon Spring	***	***	***
Penn Central Spring	***	***	***
Service Spring	***	***	***
All firms	***	***	***

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

Note: ***.

Table 6.12 Overhead door springs: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
IDC Spring	***
Iowa Spring	***
Napoleon	***
Penn Central Spring	***
Service Spring	***

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

Capital and investment

The Commission requested U.S. producers of overhead door springs to describe any actual or potential negative effects of imports of overhead door springs from Japan on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.13 presents the number of firms reporting an impact in each category and table 6.14 provides the U.S. producers' narrative responses.

Table 6.13 Overhead door springs: 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	1
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	4
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	1
Any negative effects on investment	Investment	4
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	1
Other growth and development effects	Growth	2
Any negative effects on growth and development	Growth	3
Anticipated negative effects of imports	Future	5

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

Note: ***.

Table 6.14 Overhead door springs: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

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

Table 6.14 (Continued) Overhead door springs: 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
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part 7: Threat considerations and information on nonsubject countries

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

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

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

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

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

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

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

Information on the 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 producers' or exporters' questionnaires to 63 firms believed to produce and/or export overhead door springs from China and India.[3] Usable responses to the Commission's questionnaire were received from two Indian producers.

Table 7.1 presents the number of producers/exporters that responded to the Commission's questionnaire, their estimated share of total production of overhead door springs, and their exports to the United States as a share of U.S. imports, by each subject country in 2024.

Table 7.1 Overhead door springs: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports, by subject foreign industry, 2024

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
China	0	***	***
India	2	***	***

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 overhead door springs 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/exporter questionnaire with third-party bill of lading data (Panjiva) provided to the Commission by counsel, adjusted to remove merchandise certified as out-of-scope in response to Commission questionnaires.

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

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

Table 7.2 presents information on the overhead door spring operations of the responding producers in India.

Table 7.2 Overhead door springs: Summary data on responding subject foreign producers in 2024, by firm

Subject foreign industry: Firm name	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
India: Alcomex	***	***	***	***	***	***
India: Balaji Springs	***	***	***	***	***	***
All individual producers	***	***	***	***	***	***

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

Table 7.3 presents events in the subject countries' industries since January 1, 2022.

Table 7.3 Overhead door springs: Important industry events in the subject foreign industry since January 1, 2022

Item	Firm: Event
Capacity expansion	India: Alcomex Springs: Second quarter of 2023— Alcomex Springs Group invested €1.9 million ($2.0 million) to upgrade and expand the manufacturing facility (including a new production line) and expand the warehouse at its facility in Pune, Maharashtra State. The additional production line includes new coiling, shaping, and assembly equipment. There are also additional finishing lines for shot peening, painting, powder coating, printing, and waxing. These investments are anticipated to more than double the production capacity of this facility, specifically "opening the way for a successful entry in the North American market," according to the group's managing directors.
New market entrant	India: Balaji Springs: April 2024— For the International Door Association's ("IDA") IDAExpo+ manufacturing conference held in Las Vegas, Nevada, Balaji Springs sponsored a full-page advertisement in the conference program guide which described the firm as "India's premier torsion spring manufacturer" and solicited collaboration with manufacturer representatives and distributors to "introduce the most robust torsion springs to the American market."

Source: Alcomex Springs, "Manufacturing Expansion in Alcomex India Will Also Supply the US Door Spring Market," March 21, 2023, https://www.alcomex.com/alcomex-india-will-supply-in-the-us;
Alcomex Springs, "Alcomex India: A 15-Year Journey with Continuous Improvement," November 16, 2022, https://www.alcomex.com/15-years-alcomex-india;
Petitioners' postconference brief, pp. 45–48, exh. 5: Declaration of Tim Bianco, para. 10 and attachment 4: IDAExpo+ Program Guide, April 23 to 26, 2025, Las Vegas; and exh. 8: Alcomex, "Alcomex Will Supply in the US (United States of America)," ©2017; Petitioner's prehearing brief, exh. 3: Declaration of Tim Bianco, para. 10 and attachment 4: IDAExpo+ Program Guide, April 23 to 26, 2025, Las Vegas; and exh. 5: Lesjöfors Group, "Manufacturing Expansion in India Will Supply the US Door Spring Market," March 6, 2023.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of overhead door springs since 2022. One Indian producer, ***, indicated in its questionnaire that it had experienced such changes. Tables 7.4 presents the changes identified by this producer.

Table 7.4 Overhead door springs: Reported changes in operations in the subject countries since January 1, 2022, by change, subject foreign industry, and firm

Item	Subject foreign industry: Firm name and accompanying narrative response regarding changes in operations
Production curtailments	***
Expansions	***

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

Table 7.5 presents anticipated changes in operations identified by subject producers.

Table 7.5 Overhead door springs: Reported anticipated changes in operations in the subject countries since January 1, 2022, by change, subject foreign industry, and firm

Subject foreign industry: Firm name	Narrative on anticipated changes in operations
***	***

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

Installed and practical overall capacity

Table 7.6 presents data on subject producers' installed capacity, practical overall capacity, and practical overhead door springs capacity and production on the same equipment. Subject producers' installed and practical overall capacity remained constant from 2022 to 2023, and then increased from 2023 to 2024. The increase from 2023 to 2024 reflected increases by both Balaji Springs and the larger producer Alcomex. As detailed in table 7.5, ***. Each firm likewise reported a 2022 to 2024 increase in practical overall capacity. Practical overall capacity was higher interim 2025 relative to interim 2024, due entirely to ***.[4]

Table 7.6 Overhead door springs: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 pounds; utilization in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical OHDS	Capacity	***	***	***	***	***
Practical OHDS	Production	***	***	***	***	***
Practical OHDS	Utilization	***	***	***	***	***

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

[4] ***. Email from ***, July 16, 2025.

Constraints on capacity

Tables 7.7 and 7.8 present subject producers' reported production and capacity constraints since January 1, 2022. Both responding subject producers reported constraints in the manufacturing process.

Table 7.7 Overhead door springs: Constraints on practical overall capacity, by subject foreign industry

Count in number of firms reporting

Item	China	India	All subject foreign industries
Production bottlenecks	***	***	***
Existing labor force	***	***	***
Supply of material inputs	***	***	***
Fuel or energy	***	***	***
Storage capacity	***	***	***
Logistics/transportation	***	***	***
Other constraints	***	***	***

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

Table 7.8 Overhead door springs: Subject producers' reported practical overall capacity constraints since January 1, 2022, by constraint and firm

Constraint	Subject foreign industry: Firm name and narrative response regarding practical overall capacity constraints
Production bottlenecks	***
Supply of material inputs	***
Other constraints	***

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

Operations on overhead door springs

Aggregate overhead door springs operations in the subject countries

Table 7.9 presents information on the overhead door spring operations of the responding producers/exporters. Subject producers' overhead door springs capacity was flat from 2022 to 2023, and then increased from 2023 to 2024, reflected by responding subject producers, though largely driven by ***. Capacity was then higher in interim 2025 relative to interim 2024, and is projected to be slightly higher in 2026 than 2025, although nonetheless below 2024 levels.[5] Subject producers' production also increased from 2022 to 2024, though primarily from 2023 to 2024, and likewise was higher in interim 2025 and is projected to be slightly higher in 2026 relative to 2025. Consequently, capacity utilization remained above *** percent in all periods for which data was collected, though was lowest in calendar year 2024, when the capacity expansion outpaced the additional production.

Export shipments accounted for almost the entirety of responding subject producers' total shipments of overhead door springs, and home market shipments consisted solely of ***. Export shipments were principally to non-U.S. markets.[6] Exports to all other markets remained relatively constant from 2022 to 2024, were comparable across the two interim periods, and are projected to decline in 2025 before then returning in 2026 to 2024 levels. Exports to the United States reached a peak in 2024, following an initial decline from 2022 to 2023, and were also higher in interim 2025 than in interim 2024.[7] In 2025, however, exports to the United States are projected to decline relative to 2024, but remain higher than 2022 and 2023 levels. Responding subject producers then project *** to

[5] As noted earlier in this section, ***.

[6] ***. *** foreign producer questionnaire, section II-9.

[7] ***. Email from ***, July 18, 2025.

the United States in 2026.[8] While subject producers reported inventories in all periods, the volumes remained relatively low as a ratio to both production and total shipments.

Table 7.9 Overhead door springs: Data on subject foreign industries, by item and period

Quantity in 1,000 pounds, interim period is January through March

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

Table continued.

[8] ***. *** foreign producer questionnaire, section II-14.

Table 7.9 (Continued) Overhead door springs: Data on subject foreign industries, by item and period

Ratio and share in percent, interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Practical overhead door springs capacity and production by subject foreign industry

Table 7.10 presents information on subject producers' production, capacity, and capacity utilization by subject country. The capacity of responding Indian producers increased from 2023 to 2024, due to the ***, and was higher in interim 2025 compared to interim 2024. In 2025 and 2026, capacity is projected to remain relatively stable, though lower than 2024 levels. Trends in production were similar to those in capacity, as production increased continuously from 2022 to 2024, with the majority of the overall increase coming from 2023 to 2024.[9] While production in 2026 is projected to be slightly higher than in 2025, both years are projected to have lower production volumes than the peak experienced in 2024. Responding producers' capacity utilization was higher in 2022 and 2023 than in 2024, as the magnitude of the 2023 to 2024 increase in capacity outstripped the simultaneous increase in production.[10]

Table 7.10 Overhead door springs: Subject producers' output: Practical capacity, by source and period

Practical capacity

Capacity in 1,000 pounds, interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

[9] *** reported production of overhead door springs in 2022 and 2023, and it's production volumes were driven, in part, ***. Email from ***, July 16, 2025.

[10] In 2023, Alcomex reported operating at a capacity utilization rate of *** percent. In a response to a request for further clarification by Commission staff, Alcomex stated that, ***. Email from ***, July 16, 2025.

Table 7.10 (Continued) overhead door springs: Subject producers' output: Production, by source and period

Production

Production in 1,000 pounds; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.10 (Continued) Overhead door springs: Subject producers' output: Capacity utilization, by source and period

Capacity utilization

Capacity utilization in percent; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

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

Table 7.10 (Continued) Overhead door springs: Subject producers' output: Share of production, by source and period

Share of production

Share in percent; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	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 "—".

Overhead door spring exports, by subject country

Table 7.11 presents information on subject producers' exports of overhead door springs by subject country.[11] Almost the entirety of responding subject producers' total shipments of overhead door springs were exported, and the majority of those exports were to non-U.S. markets. However, while exports to the United States did not account for a majority of total exports in any period reported, they did increase from 2023 to 2024, following an initial decline from 2022 to 2023. Exports to the United States in interim 2025 were then higher than in interim 2024, but projected exports to the United States for calendar year 2025 represent a decline from the 2024 peak, though nonetheless above 2022 and 2023 levels. Responding foreign producers project *** in 2026.[12]

Table 7.11 Overhead door springs: Subject producers' exports: Exports to the United States, by source and period

Exports to the United States

Quantity in 1,000 pounds; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.11 (Continued) Overhead door springs: Subject producers' exports: Share of total shipments exported to the United States, by source and period

Share of total shipments exported to the United States

Share in percent; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

[11] *** reported resales of overhead door springs not produced by its firm.

[12] As previously noted, ***. *** foreign producer questionnaire, section I-4.

Table 7.11 (Continued) Overhead door springs: Subject producers' exports: Exports to all destination markets, by source and period

Total exports

Quantity in 1,000 pounds; interim is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.12 (Continued) Overhead door springs: Subject producers' exports: Share of total shipments exported to all destinations, by source and period

Share of total shipments exported

Share in percent

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
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 "—".

Overhead door spring inventories, by subject foreign industry

Table 7.12 presents information on ending inventory of the responding producers by subject foreign country. Of the two responding subject producers, ***. *** ending inventories rose from 2022 to 2023, then declined in 2024 for a net decrease from 2022 to 2024. Although interim 2025 inventories were lower than in interim 2024, calendar year 2025 inventories are projected to be higher than in calendar year 2024, and 2026 inventories are projected to represent a peak for the period for which data were collected. Even at the projected peak in 2026, however, inventories remained small as a ratio to total shipments.

Table 7.12 Overhead door springs: Subject foreign industries' ending inventories: Ending inventories, by source and period

Quantity in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table 7.12 (Continued) Overhead door springs: Subject foreign industries' ending inventories: Ratio of ending inventories to total shipments, by source and period

Ratio in percent; interim periods is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Alternative products

As shown in table 7.13, responding firms in India produced other products on the same equipment and machinery used to produce overhead door springs. Of the two responding subject producers, *** reported production of out-of-scope merchandise, as ***. Although production of extension springs never accounted for more than a small portion of total production on shared equipment and machinery used to produce in-scope product, production of both overhead door springs and extension springs increased continuously from 2022 to 2024, with the majority of that increase occurring from 2023 to 2024. While production of overhead door springs was higher in interim 2025 than in interim 2024, production of extension springs was lower.

Table 7.13 Overhead door springs: Subject foreign industries' overall production on the same equipment as in-scope production, by product type and period

Quantity in 1,000 pounds; share in percent; interim is January through March

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
OHDS	Quantity	***	***	***	***	***
Extension springs	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
OHDS	Share	***	***	***	***	***
Extension springs	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Exports

Table 7.14 presents Global Trade Atlas ("GTA") data for exports of helical springs of iron or steel from subject countries to the United States and to all destination markets. Exports from subject countries as a whole to the United States increased from 2022 to 2024, and exports from subject countries to all other destination markets increased over the same period. In both cases, the aggregate trend was driven primarily by exports from China, which accounted for the vast majority of exports of helical springs of iron of steel from subject countries in each period. Exports to the United States as a share of total exports was higher for China than India, in all periods other than 2024, when exports to the United States comprised one-third of total global exports from India.

Table 7.14 Helical springs of iron or steel: Global exports from subject foreign industries: Exports to the United States, by subject foreign country and period

Quantity in 1,000 pounds

Exporter	Measure	2022	2023	2024
China	Quantity	38,224	31,813	38,865
India	Quantity	1,648	1,334	7,778
Subject exporters	Quantity	39,871	33,148	46,644

Table continued.

Table 7.14 (Continued) Helical springs of iron or steel: Global exports from subject foreign industries: Exports to all destination markets, by subject foreign country and period

Quantity in 1,000 pounds

Exporter	Measure	2022	2023	2024
China	Quantity	208,104	247,708	306,179
India	Quantity	15,467	14,750	23,208
Subject exporters	Quantity	223,571	262,458	329,387

Table continued.

Table 7.14 (Continued) Helical springs of iron or steel: Global exports from subject foreign industries: Share of exports exported to the United States, by subject foreign country and period

Share in percent

Exporter	Measure	2022	2023	2024
China	Share	18.4	12.8	12.7
India	Share	10.7	9.0	33.5
Subject exporters	Share	17.8	12.6	14.2

Source: Official exports statistics and official global imports statistics from China and India under HS subheadings 7320.20 as reported by China Customs and India's Ministry of Commerce in the Global Trade Atlas Suite database, accessed July 23, 2025.

U.S. inventories of imported merchandise

Table 7.15 presents data on U.S. importers' reported inventories of overhead door springs. Inventories from all sources initially declined from 2022 to 2023 and then increased in 2024 for a net increase from 2022 to 2024. Despite the 2022 to 2024 increase in inventories, inventories as a ratio to imports, U.S. shipments of imports, and total shipments of imports each declined from 2022 to 2024. Inventories as a ratio to imports were then slightly higher in interim 2025 compared to interim 2024, as inventories were likewise higher in interim 2025, while inventories as a ratio to U.S. shipments of imports and total shipments of imports were slightly lower.

Importers' inventories consisted entirely of inventories from subject sources, with the exception of imports from nonsubject sources (***) reported by *** in 2024.[13] Inventories of imports from China irregularly decreased from 2022 to 2024, while inventories of imports from India increased over the same period, and inventories from total subject sources were higher in interim 2025. While inventories of imports from China as a ratio to imports, U.S. shipments of imports, and total imports peaked at *** percent in 2022 and declined thereafter, the equivalent ratios for inventories of imports from India were never lower than *** percent. In the interim 2024 period, inventories of imports from India as a ratio to U.S. and total shipments reached a peak of *** percent, due to ***.[14]

[13] The imports ***. Email from ***, August 14, 2025.
[14] ***. Email from ***, July 18, 2025.

Table 7.15 Overhead door springs: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds; ratio in percent; interim is January through March

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	2,100	1,542	3,241	2,895	4,011
Ratio to imports	All import sources	18.7	15.3	16.5	12.1	13.2
Ratio to U.S. shipments of imports	All import sources	22.9	14.5	18.0	15.9	15.2
Ratio to total shipments of imports	All import sources	22.9	14.5	18.0	15.8	15.2

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

Note: The inventory data presented in this table for China are drawn from responses to Commission questionnaires, while elsewhere in this report the quantity of imports from China consists of questionnaire-adjusted Panjiva data. As such, the inventory data for China presented in this table represent a relatively smaller sample of total imports from China.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of overhead door springs from China and India after March 31, 2025. Their reported data are presented in table 7.16. Importers reported arranged imports from China in *** and reported arranged imports from India in ***. Only *** reported arranged imports from India, whereas *** reported arranged imports from China.[15]

Table 7.16 Overhead door springs: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Total
China	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

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

Third-country trade actions

According to counsel, the petitioners are not aware of any third-country trade actions or any known trade remedy actions on the subject overhead door springs in third-country markets.[16] Moreover, review of the World Trade Organization's ("WTO") antidumping measures[17] and countervailable subsidy measures[18] on or after January 1, 2020, found no additional import-injury orders on the subject product in third-country markets.

[15] ***. Email from ***, July 21, 2025.

[16] Conference transcript, p. 78 (Cannon).

[17] WTO, "Database of Anti-dumping Measures," Trade Remedies Data Portal, ©2025, https://trade-remedies.wto.org/en/antidumping/measures, retrieved July 29, 2025.

[18] WTO, "Database of Countervailing Measures," Trade Remedies Data Portal, ©2025, https://trade-remedies.wto.org/en/countervailing/measures, retrieved July 29, 2025.

Information on nonsubject countries

Table 7.17 presents global export data for helical springs of iron or steel, a category that includes subject and out-of-scope products, (by exporting country in descending order of value for 2024). During 2024, Germany was the top exporter, accounting for nearly one-quarter (23.4 percent) of the total global export quantity, followed by the United States (12.6 percent), and China (11.8 percent), which together accounted for nearly one-half (47.8 percent) of the total.

Table 7.17 Helical springs of iron or steel: Global exports by reporting country and period

Value in 1,000 dollars; share in percent

Exporting country	Measure	2022	2023	2024
United States	Value	498,864	517,037	499,324
China	Value	401,634	411,875	464,308
India	Value	13,201	13,604	22,995
Subject exporters	Value	414,835	425,478	487,304
Germany	Value	899,009	949,828	924,747
Japan	Value	258,356	228,265	250,692
Mexico	Value	177,578	205,116	216,983
Czech Republic	Value	158,443	193,478	206,586
Poland	Value	129,651	144,829	182,921
France	Value	79,153	102,512	107,912
Netherlands	Value	80,500	87,600	96,345
United Kingdom HMRC	Value	93,490	92,817	96,277
Italy	Value	79,091	94,503	96,259
All other exporters	Value	753,502	769,270	784,123
All reporting exporters	Value	3,622,472	3,810,734	3,949,473
United States	Share of value	13.8	13.6	12.6
China	Share of value	11.1	10.8	11.8
India	Share of value	0.4	0.4	0.6
Subject exporters	Share of value	11.5	11.2	12.3
Germany	Share of value	24.8	24.9	23.4
Japan	Share of value	7.1	6.0	6.3
Mexico	Share of value	4.9	5.4	5.5
Czech Republic	Share of value	4.4	5.1	5.2
Poland	Share of value	3.6	3.8	4.6
France	Share of value	2.2	2.7	2.7
Netherlands	Share of value	2.2	2.3	2.4
United Kingdom HMRC	Share of value	2.6	2.4	2.4
Italy	Share of value	2.2	2.5	2.4
All other exporters	Share of value	20.8	20.2	19.9
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7320.20 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 23, 2025.

Note: HS subheading 7320.20 includes out of scope products and therefore data are likely overstated. The United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2024 data.

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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 87598, November 4, 2024	*Overhead Door Counterbalance Torsion Springs From China and India; Notice of Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25551.pdf
89 FR 92895, November 25, 2024	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-25/pdf/2024-27495.pdf
89 FR 92901, November 25, 2024	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-25/pdf/2024-27494.pdf
89 FR 103877, December 19, 2024	*Overhead Door Counterbalance Torsion Springs From China and India*	https://www.govinfo.gov/content/pkg/FR-2024-12-19/pdf/2024-30086.pdf
90 FR 84, January 2, 2025	*Overhead Door Counterbalance Torsion Springs From India and the People's Republic of China: Postponement of Preliminary Determinations in the Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-01-02/pdf/2024-31485.pdf
90 FR 11716, March 11, 2025	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-03-11/pdf/2025-03835.pdf
90 FR 14630, April 3, 2025	*Overhead Door Counterbalance Torsion Springs 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-2025-04-03/pdf/2025-05758.pdf
90 FR 14602, April 3, 2025	*Overhead Door Counterbalance Torsion Springs From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.govinfo.gov/content/pkg/FR-2025-04-03/pdf/2025-05759.pdf

90 FR 15447, April 11, 2025	*Overhead Door Counterbalance Torsion Springs From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination; Correction*	https://www.govinfo.gov/content/pkg/FR-2025-04-11/pdf/2025-06224.pdf
90 FR 23311, June 2, 2025	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2025-06-02/pdf/2025-09944.pdf
90 FR 23316, June 2, 2025	*Overhead Door Counterbalance Torsion Springs From India: 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-2025-06-02/pdf/2025-09945.pdf
90 FR 24665, June 11, 2025	*Overhead Door Counterbalance Torsion Springs From China and India; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-06-11/pdf/2025-10543.pdf
90 FR 26608, June 23, 2025	*Overhead Door Counterbalance Torsion Springs From China and India; Revised Schedule for the Subject Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-06-23/pdf/2025-11464.pdf
90 FR 31960, July 16, 2025	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Preliminary Affirmative Determination of Critical Circumstances, in Part, in the Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2025-07-16/pdf/2025-13323.pdf
90 FR 35662, July 29, 2025	*Overhead Door Counterbalance Torsion Springs From India and the People's Republic of China: Preliminary Affirmative Determinations of Critical Circumstances, in Part, in the Less-Than-Fair Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-07-29/pdf/2025-14337.pdf
90 FR 35660, July 29, 2025	*Overhead Door Counterbalance Torsion Springs From India: Preliminary Affirmative Determination of Critical Circumstances in the Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2025-07-29/pdf/2025-14338.pdf
90 FR 39369, August 15, 2025	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Determination Sales at Less Than Fair Value and Final Affirmative Critical Circumstances Determination, in Part*	https://www.govinfo.gov/content/pkg/FR-2025-08-15/pdf/2025-15522.pdf

90 FR 39374, August 15, 2025	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination in Part*	https://www.govinfo.gov/content/pkg/FR-2025-08-15/pdf/2025-15525.pdf
90 FR 39420, August 15, 2025	*Overhead Door Counterbalance Torsion Springs From China and India; Cancellation of Hearing for Antidumping and Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2025-08-15/pdf/2025-15532.pdf

APPENDIX B

CANCELLATION OF HEARING

90 FR 39420, AUGUST 15, 2025

and BPI service list.—Pursuant to § 207.7(a) of the Commission's rules, the Secretary will make BPI gathered in these investigations available to authorized applicants representing interested parties (as defined in 19 U.S.C. 1677(9)) who are parties to the investigations under the APO issued in the investigations, provided that the application is made not later than seven days after the publication of this notice in the **Federal Register**. A separate service list will be maintained by the Secretary for those parties authorized to receive BPI under the APO.

Conference.—The Office of Investigations will hold a staff conference in connection with the preliminary phase of these investigations beginning at 9:30 a.m. on September 2, 2025. Requests to appear at the conference should be emailed to *preliminaryconferences@usitc.gov* (DO NOT FILE ON EDIS) on or before noon on August 28, 2025. Please provide an email address for each conference participant in the email. Information on conference procedures, format, and participation, including guidance for requests to appear as a witness via videoconference, will be available on the Commission's Public Calendar (Calendar (USITC) | United States International Trade Commission). A nonparty who has testimony that may aid the Commission's deliberations may request permission to participate by submitting a short statement.

Please note the Secretary's Office will accept only electronic filings during this time. Filings must be made through the Commission's Electronic Document Information System (EDIS, *https://edis.usitc.gov*). No in-person paper-based filings or paper copies of any electronic filings will be accepted until further notice.

Written submissions.—As provided in §§ 201.8 and 207.15 of the Commission's rules, any person may submit to the Commission on or before 5:15 p.m. on September 5, 2025, a written brief containing information and arguments pertinent to the subject matter of the investigations. Parties shall file written testimony and supplementary material in connection with their presentation at the conference no later than 4:00 p.m. on August 29, 2025. All written submissions must conform with the provisions of § 201.8 of the Commission's rules; any submissions that contain BPI must also conform with the requirements of §§ 201.6, 207.3, and 207.7 of the Commission's rules. The Commission's *Handbook on Filing Procedures,* available on the Commission's website at *https://www.usitc.gov/documents/handbook_on_filing_procedures.pdf,* elaborates upon the Commission's procedures with respect to filings.

In accordance with §§ 201.16(c) and 207.3 of the rules, each document filed by a party to the investigations must be served on all other parties to the investigations (as identified by either the public or BPI service list), and a certificate of service must be timely filed. The Secretary will not accept a document for filing without a certificate of service.

Certification.—Pursuant to § 207.3 of the Commission's rules, any person submitting information to the Commission in connection with these investigations must certify that the information is accurate and complete to the best of the submitter's knowledge. In making the certification, the submitter will acknowledge that any information that it submits to the Commission during these investigations may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of these or related investigations or reviews, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. All contract personnel will sign appropriate nondisclosure agreements.

Authority: These investigations are being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to § 207.12 of the Commission's rules.

By order of the Commission.

Issued: August 12, 2025.

Lisa Barton,

Secretary to the Commission.

[FR Doc. 2025–15518 Filed 8–14–25; 8:45 am]

BILLING CODE 7020–02–P

INTERNATIONAL TRADE COMMISSION

[Investigation Nos. 701–TA–746–747 and 731–TA–1724–1725 (Final)]

Overhead Door Counterbalance Torsion Springs From China and India; Cancellation of Hearing for Antidumping and Countervailing Duty Investigations

AGENCY: United States International Trade Commission.

ACTION: Notice.

DATES: August 12, 2025.

FOR FURTHER INFORMATION CONTACT: Peter Stebbins (202–205–2035), Office of Investigations, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. Hearing-impaired individuals are advised that information on this matter can be obtained by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its internet server (*https://www.usitc.gov*). The public record for these investigations may be viewed on the Commission's electronic docket (EDIS) at *https://edis.usitc.gov*.

SUPPLEMENTARY INFORMATION: On June 2, 2025, the Commission established a schedule for the final phase of the subject antidumping and countervailing duty investigations (90 FR 24665, June 11, 2025), and on June 17, 2025, the Commission issued a revision to this schedule (90 FR 26608, June 23, 2025). On July 30, 2025, counsel for Alcomex Beheer B.V., Alcomex Springs Pvt Ltd., and Alcomex Springs Inc. (collectively, ''Alcomex'') informed the Commission that Alcomex was withdrawing its appearance in these investigations, and no longer planned to appear at any hearing or file any briefs. On August 5, 2025, counsel for IDC Group, Inc., Iowa Spring Manufacturing, Inc., and Service Spring Corp. (collectively, ''Petitioners'') filed a request that the Commission cancel the scheduled hearing for this proceeding and indicated a willingness to respond to any Commission questions in lieu of an actual hearing. On August 11, 2025, counsel for Petitioners filed a request to appear at the hearing, in the event that the Commission did not cancel the hearing, and stated that they continue to request a cancellation of the hearing, due to the reasons set forth in their August 5, 2025 submission. No other parties submitted a request to appear at the hearing. Consequently, the public hearing in connection with this proceeding, scheduled to begin at 9:30 a.m. on August 15, 2025, is cancelled. Parties to this proceeding should respond to any written questions posed by the Commission in their posthearing briefs, which are due to be filed on August 22, 2025.

For further information concerning this proceeding, see the Commission's notice cited above and the Commission's Rules of Practice and Procedure, part 201, subparts A and B

(19 CFR part 201), and part 207, subparts A and C (19 CFR part 207).

Authority: This proceeding is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to § 207.21 of the Commission's rules.

By order of the Commission.

Issued: August 12, 2025.

Lisa Barton,

Secretary to the Commission.

[FR Doc. 2025–15532 Filed 8–14–25; 8:45 am]

BILLING CODE 7020–02–P

DEPARTMENT OF JUSTICE

Antitrust Division

Notice Pursuant to the National Cooperative Research and Production Act of 1993—ODVA, Inc.

Notice is hereby given that, on July 14, 2025, pursuant to section 6(a) of the National Cooperative Research and Production Act of 1993, 15 U.S.C. 4301 *et seq.* (''the Act''), ODVA, Inc. (''ODVA'') has filed written notifications simultaneously with the Attorney General and the Federal Trade Commission disclosing changes in its membership. The notifications were filed for the purpose of extending the Act's provisions limiting the recovery of antitrust plaintiffs to actual damages under specified circumstances. Specifically, GP Systems GmbH, Munchen, FEDERAL REPUBLIC OF GERMANY; Moore Industries-International, Inc., North Hills, CA; Highlight Tech Corp., Tainan City, REPUBLIC OF CHINA (TAIWAN); NDW BV, Waalwijk, KINGDOM OF THE NETHERLANDS; Hollysys Technology Group Co., Ltd., Beijing, PEOPLE'S REPUBLIC OF CHINA; Zhejiang HuaRay Technology Co., Ltd., Hangzhou, PEOPLE'S REPUBLIC OF CHINA; Laumas Elettronica s.r.l., Montechiarugolo, ITALY; and Leonton Technologies Co., Ltd., New Taipei City, REPUBLIC OF CHINA (TAIWAN), have been added as parties to this venture.

Also, Industrial Indexing Systems, Inc., Victor, NY; Herkules-Resotec Elektronik GmbH, Baunatal, FEDERAL REPUBLIC OF GERMANY; Mecco Partners, LLC, Cranberry Township, PA; and Microchip Technology Inc., Chandler, AZ, have withdrawn as parties to this venture.

No other changes have been made in either the membership or planned activity of the group research project. Membership in this group research project remains open, and ODVA intends to file additional written notifications disclosing all changes in membership.

On June 21, 1995, ODVA filed its original notification pursuant to section 6(a) of the Act. The Department of Justice published a notice in the **Federal Register** pursuant to section 6(b) of the Act on February 15, 1996 (61 FR 6039).

The last notification was filed with the Department on April 9, 2025. A notice was published in the **Federal Register** pursuant to section 6(b) of the Act on April 21, 2025 (90 FR 16705).

Suzanne Morris,

Deputy Director Civil Enforcement Operations, Antitrust Division.

[FR Doc. 2025–15498 Filed 8–14–25; 8:45 am]

BILLING CODE P

DEPARTMENT OF JUSTICE

Antitrust Division

Notice Pursuant to the National Cooperative Research and Production Act of 1993—National Armaments Consortium

Notice is hereby given that, on July 11, 2025, pursuant to section 6(a) of the National Cooperative Research and Production Act of 1993, 15 U.S.C. 4301 *et seq.* (''the Act''), National Armaments Consortium (''NAC'') has filed written notifications simultaneously with the Attorney General and the Federal Trade Commission disclosing changes in its membership. The notifications were filed for the purpose of extending the Act's provisions limiting the recovery of antitrust plaintiffs to actual damages under specified circumstances. Specifically, Temper Corp., Fonda, NY; Composite Energy Technologies, Inc., Bristol, RI; FIDELIUM LLC, Virginia Beach, VA; Two Six Labs LLC dba Two Six Technologies, Arlington, VA; Busek Co., Inc., Natick, MA; ITT Enidine, Orchard Park, NY; Kurt Manufacturing Company, Minneapolis, MN; MGCX Solutions LLC, Glen Allen, VA; GrammaTech, Ithaca, NY; CGI Federal, Inc., Fairfax, VA; AISensation LLC, Mission Viejo, CA; Onebrief, Honolulu, HI; Jabil Defense and Aerospace Services LLC, St Petersburg, FL; Synergistic, Inc., New Baltimore, MI; Star Cases LLC dba Zero Manufacturing, North Salt Lake, UT; PavCon LLC, Latrobe, PA; UT–BATTELLE LLC, Oak Ridge, TN; Elementum 3D, Inc., Erie, CO; PARADORN LLC, La Plata, MD; Teleios Defense Solutions LLC, Huntsville, AL; TEC–MASTERS, INC., Huntsville, AL; Walaris LLC, Peachtree Corners, GA; Repkon USA—Defense LLC, Tampa, FL; Velocity Magnetics, Inc., New Castle, PA; Allen Control Systems, Inc., Austin, TX; Katz Water Technologies, Inc., Houston, TX; Global Business Solutions LLC (GBSI), Pensacola, FL; RJ Lee Group, Inc., Pittsburgh, PA; SATCOM Direct Government LLC, Melbourne, FL; Chronos AI, Inc., Bellevue, WA; Parts Life, Inc., Moorestown, NJ; Scout AI, Inc., Sunnyvale, CA; Next Tier Concepts, Inc., Vienna, VA; One Kappa Corp. (Icarus, fka) dba Ikaros Industries East, Amherst, NY have been added as parties to this venture.

No other changes have been made in either the membership or planned activity of the group research project. Membership in this group research project remains open, and NAC intends to file additional written notifications disclosing all changes in membership.

On May 2, 2000, NAC filed its original notification pursuant to section 6(a) of the Act. The Department of Justice published a notice in the **Federal Register** pursuant to section 6(b) of the Act on June 30, 2000 (65 FR 40693).

The last notification was filed with the Department on February 17, 2025. A notice was published in the **Federal Register** pursuant to section 6(b) of the Act on April 21, 2025 (90 FR 16701).

Suzanne Morris,

Deputy Director Civil Enforcement Operations, Antitrust Division.

[FR Doc. 2025–15576 Filed 8–14–25; 8:45 am]

BILLING CODE P

DEPARTMENT OF JUSTICE

Antitrust Division

Notice Pursuant to the National Cooperative Research and Production Act of 1993—UHD Alliance

Notice is hereby given that, on July 25, 2025, pursuant to section 6(a) of the National Cooperative Research and Production Act of 1993, 15 U.S.C. 4301 *et seq.* (''the Act''), UHD Alliance, Inc. (''UHD Alliance'') filed written notifications simultaneously with the Attorney General and the Federal Trade Commission disclosing changes in its membership. The notifications were filed for the purpose of extending the Act's provisions limiting the recovery of antitrust plaintiffs to actual damages under specified circumstances. Specifically, Sony Corporation, Tokyo, JAPAN has withdrawn as a party to this venture.

Also, Top Victory Investments Limited, has changed its name to MMD Hong Kong Holding Limited, Amsterdam, KINGDOM OF THE NETHERLANDS.

APPENDIX C

SUMMARY DATA

Total market

Table C.1

Overhead door springs: Summary data concerning the U.S. total market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through March

Item	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. total market consumption quantity:									
Amount	181,447	157,640	162,044	40,745	40,328	▼(10.7)	▼(13.1)	▲2.8	▼(1.0)
Producers' share (fn1)	94.9	93.3	88.9	88.8	83.6	▼(6.0)	▼(1.7)	▼(4.3)	▼(5.2)
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	***	▲***	▲***
All import sources	5.1	6.7	11.1	11.2	16.4	▲6.0	▲1.7	▲4.3	▲5.2
U.S. total market consumption value:									
Amount	352,161	251,750	241,803	60,631	61,450	▼(31.3)	▼(28.5)	▼(4.0)	▲1.4
Producers' share (fn1)	95.0	95.4	90.0	92.0	83.0	▼(5.0)	▲0.4	▼(5.4)	▼(9.0)
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▼***	▲***	▲***
India	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	***	▲***	▲***
All import sources	5.0	4.6	10.0	8.0	17.0	▲5.0	▼(0.4)	▲5.4	▲9.0
U.S. importers' U.S. shipments of imports from (fn2):									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
India:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	***	▲***	▲***
Value	***	***	***	***	***	▲***	***	▲***	▲***
Unit value	***	***	***	***	***	▲***	***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity	9,178	10,636	17,974	4,566	6,602	▲95.8	▲15.9	▲69.0	▲44.6
Value	17,579	11,490	24,205	4,873	10,449	▲37.7	▼(34.6)	▲110.7	▲114.4
Unit value	$1.92	$1.08	$1.35	$1.07	$1.58	▼(29.7)	▼(43.6)	▲24.7	▲48.3
Ending inventory quantity	2,100	1,542	3,241	2,895	4,011	▲54.3	▼(26.6)	▲110.1	▲38.6
U.S. producers':									
Practical capacity quantity	206,427	215,248	215,248	56,362	49,811	▲4.3	▲4.3	—	▼(11.6)
Production quantity	172,240	147,322	144,995	35,921	35,722	▼(15.8)	▼(14.5)	▼(1.6)	▼(0.6)
Capacity utilization (fn1)	83.4	68.4	67.4	63.7	71.7	▼(16.1)	▼(15.0)	▼(1.1)	▲8.0
U.S. shipments:									
Quantity	172,269	147,004	144,071	36,179	33,726	▼(16.4)	▼(14.7)	▼(2.0)	▼(6.8)
Value	334,582	240,260	217,598	55,757	51,001	▼(35.0)	▼(28.2)	▼(9.4)	▼(8.5)
Unit value	$1.94	$1.63	$1.51	$1.54	$1.51	▼(22.2)	▼(15.8)	▼(7.6)	▼(1.9)
Export shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Value	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***

Table continued.

Table C.1 Continued

Overhead door springs: Summary data concerning the U.S. total market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through March

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. producers': Continued									
Ending inventory quantity	8,323	6,872	6,185	6,260	7,619	▼(25.7)	▼(17.4)	▼(10.0)	▲21.7
Inventories/total shipments (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Production workers	624	599	580	580	524	▼(7.1)	▼(4.0)	▼(3.2)	▼(9.7)
Hours worked (1,000s)	1,179	1,140	1,073	286	258	▼(9.0)	▼(3.3)	▼(5.8)	▼(10.0)
Wages paid ($1,000)	29,409	26,383	26,141	7,200	6,346	▼(11.1)	▼(10.3)	▼(0.9)	▼(11.9)
Hourly wages (dollars per hour)	$24.94	$23.15	$24.36	$25.15	$24.63	▼(2.3)	▼(7.2)	▲5.2	▼(2.0)
Productivity (pounds per hour)	146.1	129.3	135.1	125.5	138.7	▼(7.5)	▼(11.5)	▲4.5	▲10.5
Unit labor costs	$0.17	$0.18	$0.18	$0.20	$0.18	▲5.6	▲4.9	▲0.7	▼(11.4)
Net sales:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	$2.16	$1.82	$1.69	$1.74	$1.68	▼(21.5)	▼(15.7)	▼(6.8)	▼(3.7)
Cost of goods sold (COGS)	***	***	***	***	***	▼***	▼***	▼***	▼***
Gross profit or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses	***	***	***	***	***	▲***	▼***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS	$1.54	$1.40	$1.37	$1.41	$1.34	▼(11.0)	▼(8.9)	▼(2.4)	▼(5.1)
Unit SG&A expenses	$0.20	$0.24	$0.25	$0.25	$0.27	▲24.4	▲16.7	▲6.5	▲8.2
Unit operating income or (loss) (fn3)	$0.41	$0.18	$0.07	$0.08	$0.07	▼(82.8)	▼(57.2)	▼(59.8)	▼(15.1)
Unit net income or (loss) (fn3)	$0.41	$0.17	$0.07	$0.08	$0.07	▼(83.5)	▼(58.0)	▼(60.8)	▼(14.8)
COGS/sales (fn1)	71.5	77.3	81.0	80.9	79.7	▲9.5	▲5.8	▲3.7	▼(1.2)
Operating income or (loss)/sales (fn1)	19.2	9.7	4.2	4.8	4.2	▼(15.0)	▼(9.4)	▼(5.5)	▼(0.6)
Net income or (loss)/sales (fn1)	19.1	9.5	4.0	4.7	4.2	▼(15.1)	▼(9.6)	▼(5.5)	▼(0.5)
Capital expenditures	***	***	***	***	***	▼***	▼***	▼***	▲***
Research and development expenses	***	***	***	***	***	▲***	▲***	▼***	▼***
Total assets	112,130	106,325	102,067	NA	NA	▼(9.0)	▼(5.2)	▼(4.0)	NA

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Value data for imports listed in the Panjiva dataset are derived by multiplying the quantity of imports from a given source and period (as reported in the third-party dataset and adjusted by responses to Commission questionnaires) by the average unit value of imports from a given source and period as reported in Commission questionnaire responses.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

Merchant market

Table C.2

Overhead door springs: Summary data concerning the U.S. merchant market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through March

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. merchant market consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▲***	▲***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. merchant market consumption value:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers' share (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▼***	▲***	▲***
India	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▼***	▲***	▲***
U.S. importers' U.S. shipments of imports from (fn2):									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
India:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	***	▲***	▲***
Value	***	***	***	***	***	▲***	***	▲***	▲***
Unit value	***	***	***	***	***	▲***	***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity	9,178	10,636	17,974	4,566	6,602	▲95.8	▲15.9	▲69.0	▲44.6
Value	17,579	11,490	24,205	4,873	10,449	▲37.7	▼(34.6)	▲110.7	▲114.4
Unit value	$1.92	$1.08	$1.35	$1.07	$1.58	▼(29.7)	▼(43.6)	▲24.7	▲48.3
Ending inventory quantity	2,100	1,542	3,241	2,895	4,011	▲54.3	▼(26.6)	▲110.1	▲38.6

Table continued.

Table C.2 Continued

Overhead door springs: Summary data concerning the U.S. merchant market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through March

Item	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. producers':									
Commercial shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Commercial sales:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Cost of goods sold (COGS)	***	***	***	***	***	▼***	▼***	▼***	▼***
Gross profit or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses	***	***	***	***	***	▲***	▼***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires, and from third-party bill of lading data (Panjiva) provided to the Commission by the (petitioner) counsel, accessed on June 9, 2025. Third-party data were used to report for data not accounted for in submissions to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 5, 6, 7, and appendix E of this report.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Value data for imports listed in the Panjiva dataset are derived by multiplying the quantity of imports from a given source and period (as reported in the third-party dataset and adjusted by responses to Commission questionnaires) by the average unit value of imports from a given source and period as reported in Commission questionnaire responses.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

APPENDIX D

U.S. SHIPMENTS AND U.S. IMPORTS BY LEVEL OF ASSEMBLY

Table D.1 Overhead door springs: U.S. producers' U.S. shipments, by level of assembly and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound; share in percent; interim period is January through March

Level of assembly	Measure	2022	2023	2024	Interim 2024	Interim 2025
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	172,269	147,004	144,071	36,179	33,726
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	334,582	240,260	217,598	55,757	51,001
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	1.94	1.63	1.51	1.54	1.51
Standalone springs	Share of quantity	***	***	***	***	***
Springs within kits	Share of quantity	***	***	***	***	***
Springs attached to other goods	Share of quantity	***	***	***	***	***
All levels of assembly	Share of quantity	100.0	100.0	100.0	100.0	100.0
Standalone springs	Share of value	***	***	***	***	***
Springs within kits	Share of value	***	***	***	***	***
Springs attached to other goods	Share of value	***	***	***	***	***
All levels of assembly	Share of value	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 "— ".

Table D.2 Overhead door springs: U.S. imports from subject sources, by level of assembly and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound; share in percent; interim period is January through March

Level of assembly	Measure	2022	2023	2024	Interim 2024	Interim 2025
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	***	***	***	***	***
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	***	***	***	***	***
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	***	***	***	***	***
Standalone springs	Share of quantity	92.7	95.0	97.8	98.7	99.5
Springs within kits	Share of quantity	7.3	4.2	1.4	0.9	—
Springs attached to other goods	Share of quantity	—	0.9	0.9	0.4	0.5
All levels of assembly	Share of quantity	100.0	100.0	100.0	100.0	100.0
Standalone springs	Share of value	91.6	91.9	96.6	97.6	99.1
Springs within kits	Share of value	8.4	5.9	1.5	1.4	—
Springs attached to other goods	Share of value	—	2.2	1.9	1.0	0.9
All levels of assembly	Share of value	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 “— “. ***.

APPENDIX E

U.S. PRODUCERS' OPERATIONS

INCLUDING *** AND MERCHANT MARKET FINANCIALS

Table E.1 Overhead door springs: U.S. producers' results of operations including *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expenses and incomes	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit or (loss)	Ratio to NS	***	***	***	***	***
SG&A expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table Continued.

Table E.1 (Continued) Overhead door springs: U.S. producers' results of operations including *, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Total	Share	***	***	***	***	***
Commercial sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	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	***	***	***	***	***

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

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

Note: ***.

Table E.2 Overhead door springs: Changes in AUVs between comparison periods including *

Changes in percent; interim period is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Commercial sales	▼***	▼***	▼***	▼***
Internal consumption	▼***	▼***	▼***	▼***
Transfers to related firms	***	***	***	***
Total net sales	▼***	▼***	▼***	▼***
COGS: Total	▼***	▼***	▼***	▼***

Table continued.

Table E.2 (Continued) Overhead door springs: Changes in AUVs between comparison periods including *

Changes in dollars per ton; interim period is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Commercial sales	▼***	▼***	▼***	▼***
Internal consumption	▼***	▼***	▼***	▼***
Transfers to related firms	***	***	***	***
Total net sales	▼***	▼***	▼***	▼***
COGS: Total	▼***	▼***	▼***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▲***
SG&A expenses	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▼***

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

Note: Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" 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 E.3 Overhead door springs: U.S. producers results of operations for merchant market, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expenses and incomes	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit or (loss)	Ratio to NS	***	***	***	***	***
SG&A expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table E.3 (Continued) Overhead door springs: U.S. producers results of operations for merchant market, by item and period

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Table E.4 Overhead door springs: Changes in AUVs between comparison periods for the merchant market

Changes in percent; interim period is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Commercial sales	▼***	▼***	▼***	▼***
COGS: Raw materials	▼***	▼***	▼***	▼***
COGS: Direct labor	▼***	▼***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▼***	▼***	▼***	▼***

Table continued.

Table E.4 (Continued) Overhead door springs: Changes in AUVs between comparison periods for the merchant market

Changes in dollars per pound; interim period is January through March

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to interim 2025
Commercial sales	▼***	▼***	▼***	▼***
COGS: Raw materials	▼***	▼***	▼***	▼***
COGS: Direct labor	▼***	▼***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▼***	▼***	▼***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▲***
SG&A expenses	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▼***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.005". 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.