

Utility Scale Wind Towers from Canada, Indonesia, South Korea, and Vietnam

Investigation Nos. 701-TA-627 and 629 and 731-TA-1458-1461 (Review)

Publication 5714

March 2026

U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual firms may not be published.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-627 and 629 and 731-TA-1458-1461 (Review)

Utility Scale Wind Towers from Canada, Indonesia, South Korea, and Vietnam

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty orders on utility scale wind towers from Canada, Indonesia, South Korea, and Vietnam and countervailing duty orders on utility scale wind towers from Canada and Vietnam would likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on July 1, 2025 (90 FR 28764) and determined on November 24, 2025 that it would conduct expedited reviews (91 FR 539, January 7, 2026).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty orders on utility scale wind towers (“wind towers”) from Canada, Indonesia, and Vietnam, and the antidumping duty orders on wind towers from Canada, Indonesia, South Korea, and Vietnam would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

A. The Original Investigations

In response to petitions filed on July 9, 2019, by the Wind Tower Trade Coalition (“Coalition”), a trade association consisting of two domestic producers of wind towers, the Commission determined in August 2020 that an industry in the United States was materially injured by reason of subject imports of wind towers from Canada, Indonesia, South Korea, and Vietnam.¹ The Department of Commerce (“Commerce”) issued countervailing and antidumping duty orders covering the subject merchandise on August 26, 2020.²

¹ *Utility Scale Wind Towers From Canada, Indonesia, Korea, and Vietnam*, 85 Fed. Reg. 52,357 (Aug. 25, 2020). The Commission also found that imports of wind towers from Indonesia, Korea, and Vietnam subject to Commerce’s affirmative critical circumstances determinations were not likely to undermine seriously the remedial effect of the countervailing duty order on wind towers from Indonesia and the antidumping duty orders on wind towers from Korea and Vietnam. Confidential Commission Views - Utility Scale Wind Towers from Canada, Indonesia, Korea, and Vietnam, EDIS Doc. No. 717940 (Aug. 24, 2020) (“*Confidential Original Determinations*”) at 1, 3; *Utility Scale Wind Towers from Canada, Indonesia, Korea, and Vietnam*, Inv. Nos. 701-TA-627-629 and 731-TA-1458-1461 (Final), USITC Pub. 5101 (Aug. 2020) (“*Original Determinations*”) at 3.

In the original investigations, the Coalition’s members were Arcosa Wind Towers, Inc. (“Arcosa”) and Broadwind Towers, Inc. (“Broadwind”). *Original Determinations* at 3 n.1.

² *Utility Scale Wind Towers From Canada, Indonesia, and the Socialist Republic of Vietnam: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Orders*, 85 Fed

B. The Current Reviews

In July 2025, the Commission instituted these five-year reviews.³ The Coalition, petitioner in the original investigations, submitted a response to the notice of institution.⁴ The Commission did not receive responses to the notice of institution from any respondent parties in these reviews.⁵ On November 24, 2025, the Commission determined that the domestic interested party group response was adequate for all orders and the respondent interested party group response was inadequate for all orders.⁶ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews pursuant to section 751(c)(3) of the Tariff Act.⁷ The Coalition filed comments with the Commission pursuant to 19 C.F.R. § 207.61(d) regarding the determinations that the Commission should reach in these expedited five-year reviews.⁸

U.S. industry data in these reviews are based on information supplied by the domestic interested parties in their response to the notice of institution, estimated to have accounted for

Reg. 52,543 (Aug. 26, 2020); *Utility Scale Wind Towers From Canada, Indonesia, the Republic of Korea, and the Socialist Republic of Vietnam: Antidumping Duty Orders*, 85 Fed. Reg. 52,546 (Aug. 26, 2020).

³ *Utility Scale Wind Towers From Canada, Indonesia, South Korea, and Vietnam; Institution of Five-Year Reviews*, 90 Fed. Reg. 28,764 (July 1, 2025).

⁴ Domestic Interested Party's Substantive Response to Notice of Institution, EDIS Doc. 858308 (July 31, 2025) ("Coalition Resp.") at 1. In these five-year reviews, the Coalition's members include Arcosa and Broadwind, in addition to Ventower Industries LLC ("Ventower"), a domestic producer of wind towers. *Id.* at 1-2.

⁵ Confidential Report, INV-XX-126 (Sept. 24, 2025) and INV-XX-137 (Nov. 21, 2025) (revision memorandum) ("CR") at B.3; Public Report, *Utility Scale Wind Towers From Canada, Indonesia, Korea, and Vietnam*, Investigation Nos. 701-TA-627-629 and 731-TA-1458-1461 (Review), USITC Pub. 5714 (Mar. 2026) ("PR") at B.3.

⁶ Explanation of Commission Determination on Adequacy, EDIS Doc. 865260 (Dec. 2, 2025).

⁷ Explanation of Commission Determination on Adequacy. Commissioner Johanson voted to conduct full reviews based on changes in competitive conditions since the original investigations. *Id.* at n.1.

⁸ Coalition Final Comments, EDIS Doc. No. 872731 (Feb. 17, 2026).

*** percent of domestic production of wind towers during 2024.⁹ U.S. import data and related information are based on Commerce’s official import statistics.¹⁰ Foreign industry data and related information are based on information from the original investigations, information submitted by the domestic interested parties in these expedited five-year reviews, and publicly available information compiled by the Commission.^{11 12}

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”¹³ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”¹⁴ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁵

⁹ CR/PR at 1.20, Table B.1.

¹⁰ See CR/PR at Tables 1.7, 1.8. Import data in these reviews are compiled from official Commerce statistics for HTS statistical reporting number 7308.20.0020 11, which may contain products outside the scope of these reviews and therefore overstate the presence of U.S. imports of in-scope wind towers. *Id.*

¹¹ See CR/PR at 1.28-1.34, Tables 1.9-1.15.

¹² Purchaser questionnaires were sent to two top purchasers of wind towers, as identified by the Coalition. CR/PR at D.3. None of these firms responded to the Commission’s questionnaires. *Id.*

¹³ 19 U.S.C. § 1677(4)(A).

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

¹⁵ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752

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

Certain wind towers, whether or not tapered, and sections thereof. Certain wind towers support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity in excess of 100 kilowatts and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (i.e., where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment, or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical buss boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section. Several wind tower sections are normally required to form a completed wind tower.

Wind towers and sections thereof are included within the scope whether or not they are joined with non-subject merchandise, such as nacelles or rotor blades, and whether or not they have internal or external components attached to the subject merchandise.

Specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Also excluded are any internal or external components which are not attached to the wind towers or sections thereof, unless those components are shipped with the tower sections.

Merchandise covered by these Orders is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheading 7308.20.0020 or 8502.31.0000. Wind towers of iron or steel are classified under HTSUS 7308.20.0020 when imported separately as a tower or tower section(s). Wind towers may be classified under HTSUS 8502.31.0000 when imported as

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

combination goods with a wind turbine (i.e., accompanying nacelles and/or rotor blades). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these Orders is dispositive.¹⁶

Wind towers are large tubular steel towers used in wind turbines. Wind turbines, comprising a nacelle, rotor and tower, convert wind energy to electricity.¹⁷

The wind towers within the scope definition are 50 meters or more in height and designed to support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity over 100 kilowatts. These towers are known in the wind industry as “utility scale” wind towers.¹⁸

We have considered our analysis of the domestic like product in the original investigations.¹⁹ In particular, we note that in the original determinations, the Commission found that all wind towers share common physical characteristics and uses; channels of distribution; manufacturing facilities, production processes, and employees; and producer and customer perceptions, notwithstanding a lack of interchangeability and some differences in price among wind towers produced to different

¹⁶ CR/PR at 1.4-1.5. Further, excluded from the scope of the antidumping duty order on wind towers from Vietnam are any products covered by the existing antidumping duty order on utility scale wind towers from the Socialist Republic of Vietnam. *Id.* See also *Utility Scale Wind Towers from the Socialist Republic of Vietnam: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 78 Fed. Reg. 11,150 (February 15, 2013).

¹⁷ CR/PR at 1.8.

¹⁸ CR/PR at 1.9-1.10.

¹⁹ *Original Determinations*, USITC Pub. 5101 at 9-10.

original equipment manufacturer (“OEM”) specifications.²⁰ Accordingly, the Commission defined a single domestic like product consisting of all wind towers coextensive with the scope.²¹

In these first five-year reviews, the Coalition urges the Commission to define the domestic like product as it had in the original investigations.²² The record in these reviews does not contain any new information suggesting that the pertinent product characteristics and uses of wind towers have changed since the original investigations.²³ Accordingly, we again define the domestic like product to encompass all wind towers coextensive with the scope.

B. Domestic Industry

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

²⁰ *Original Determinations*, USITC Pub. 5101 at 9-10. The Commission declined to define a separate domestic like product for wind towers for offshore applications, as no domestic firm reported producing such wind tower products. *Id.* at 9. The Commission also declined to exclude offshore wind tower products from the scope of the investigations, as it lacks authority to exclude products from Commerce’s scope. *Id.* at 9-10.

²¹ *Original Determinations*, USITC Pub. 5101 at 13.

²² Coalition Resp. at 25.

²³ CR/PR at 1.8-1.19, 1.22.

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

produced, captively consumed, or sold in the domestic merchant market.

We have considered our analysis of the domestic like industry in the original investigations.²⁵ In the original determinations, the Commission defined the domestic industry to encompass all domestic producers of wind towers.²⁶ The Commission found that two domestic producers potentially were subject to exclusion pursuant to the related parties provision because they were related to an importer or a producer and exporter of subject merchandise.²⁷ It concluded, however, that appropriate circumstances did not exist to exclude any of these producers from the domestic industry.²⁸

In these first five-year reviews, the Coalition contends that the Commission should adopt the domestic industry definition from the original investigations and does not argue for the exclusion of any producers from the domestic industry under the related parties provision.²⁹ The record in these reviews does not indicate that any of the domestic producers qualify as related parties or that there are other domestic industry issues.³⁰ Accordingly, consistent with our definition of the domestic like product, we again define the domestic industry as all domestic producers of wind towers.

16. ²⁵ *Confidential Original Determinations* at 13-16; *Original Determinations*, USITC Pub. 5101 at 13-

²⁶ *Original Determinations*, USITC Pub. 5101 at 16.

11. ²⁷ *Confidential Original Determinations* at 13-16; *Original Determinations*, USITC Pub. 5101 at 10-

²⁸ *Original Determinations*, USITC Pub. 5101 at 13-16.

²⁹ Coalition Resp. at 25.

³⁰ CR/PR at 1.20-1.21.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows:

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.³¹

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.³² The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

We have considered our analyses regarding cumulation in the original investigations.³³

In particular, in the original investigations, the Commission found that imports from each

³¹ 19 U.S.C. § 1675a(a)(7).

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

³³ *Confidential Original Determinations* at 18-20; *Original Determinations*, USITC Pub. 5101 at 17-20.

subject country are fungible with the domestic like product and each other, that wind towers from each source are sold in similar channels of distribution and geographic markets, and that subject imports from each subject country and the domestic like product have been simultaneously present in the U.S. market.³⁴ On this basis, the Commission found a reasonable overlap of competition among subject imports from each subject country and the domestic like product, as well as between subject imports from each country.³⁵

B. Arguments of the Domestic Interested Party

The Coalition argues that the Commission should again cumulate subject imports from each source as imports of wind towers from the each of the four subject countries remain likely to compete with each other and with the domestic like product in the U.S. market.³⁶ It contends that subject producers in each country are likely to export significant volumes of subject imports that would likely have significant adverse effects on prices of the domestic like product if the orders were revoked, such that subject imports from each subject country would not have no discernible adverse impact.³⁷

C. Analysis

The statutory threshold for cumulation is satisfied in these five-year reviews because all reviews were initiated on the same day: July 1, 2025.³⁸

In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject

³⁴ *Confidential Original Determinations* at 18-20; *Original Determinations*, USITC Pub. 5101 at 17-19.

³⁵ *Confidential Original Determinations* at 20; *Original Determinations*, USITC Pub. 5101 at 20.

³⁶ Coalition Resp. at 6.

³⁷ Coalition Resp. at 6-23.

³⁸ *Initiation of Five-Year (Sunset) Reviews*, 90 Fed. Reg. 28764 (July 1, 2025).

countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

i. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.³⁹ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁴⁰ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record in these five-year reviews, we do not find that imports from each of the subject countries, considered individually, would likely have no discernible adverse impact on the domestic industry in the event of revocation of the relevant antidumping and countervailing duty orders.

³⁹ 19 U.S.C. § 1675a(a)(7).

⁴⁰ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

Canada. In the original investigations, subject imports from Canada declined from *** units in 2017 to *** units in 2018, then increased to *** units in 2019, for an overall increase of *** percent.⁴¹ Imports declined during the current period of review (“POR”), from a high of 374 units in 2020 to a low of 2 units in 2024.⁴²

The record of these five-year reviews contains limited information concerning the wind towers industry in Canada because no producer in Canada responded to the notice of institution.⁴³ The Coalition identified a possible producer of wind towers in Canada in its response to the notice of institution,⁴⁴ and contends that the subject industry in Canada maintains large and available capacity to significantly increase wind towers exports to the United States after revocation.⁴⁵

Global Trade Atlas (“GTA”) data indicate that the value of exports from Canada of towers and lattice masts under HS subheading 7308.20, a category that includes wind towers and out-of-scope products, declined during the POR, with a high of \$195.6 million in 2020 and a low of \$37.8 million in 2023; it was \$57.5 million in 2024.⁴⁶ These same data show that the United States was by far the largest destination for such exports throughout the period of review.⁴⁷

In the original investigations, the Commission did not collect quarterly pricing data for imports from the subject countries because of the made-to-order nature of wind towers, and instead obtained bid data from five OEMs that accounted for virtually all purchases of the

⁴¹ *Confidential Original Determinations* at Table IV-2.

⁴² CR/PR at Table 1.7.

⁴³ CR/PR at 1.28.

⁴⁴ Coalition Resp., Exh. 1.

⁴⁵ Coalition Resp. at 8-9.

⁴⁶ CR/PR at Table 1.10.

⁴⁷ CR/PR at Table 1.10.

domestic like product and subject imports during the period of investigation (“POI”).⁴⁸ Subject imports from Canada overbid the domestic like product in *** of the available comparisons, by an average margin of *** percent.⁴⁹ No bid data concerning wind towers from Canada were obtained in these five-year reviews.

In light of these considerations, including the significant volume of subject imports from Canada in the original investigations, the continued presence of subject imports from Canada in the U.S. market while under the disciplining effect of the orders, and information available on the capacity and exports of the subject industry in Canada, we find that subject imports from Canada would not likely have no discernible adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

Indonesia. In the original investigations, subject imports from Indonesia increased from *** units in 2017 to *** units in 2018, then declined to *** units in 2019, for an overall increase of *** percent.⁵⁰ They declined during the POR, with a high of 387 units in 2020 and a low of zero units in 2023.⁵¹

The record of these five-year reviews contains limited information concerning the wind towers industry in Indonesia because no producer in Indonesia responded to the notice of institution.⁵² The Coalition identified a possible producer of wind towers in Indonesia in its response to the notice of institution,⁵³ and contends that the subject industry in Indonesia is

⁴⁸ *Original Determinations* at 34.

⁴⁹ *Confidential Original Determinations* at Table V-12.

⁵⁰ *Confidential Original Determinations* at Table IV-2.

⁵¹ CR/PR at Table 1.7.

⁵² CR/PR at 1.28.

⁵³ Coalition Resp., Exh. 1.

export-oriented, lacks sales opportunities in its home market, and maintains large and available capacity to significantly increase wind towers exports to the United States after revocation.⁵⁴

GTA data indicate that the value of exports from Indonesia of towers and lattice masts under HS subheading 7308.20 fluctuated upward during the POR, with a high of \$171.3 million in 2022 and a low of \$53.1 million in 2023; it was \$164.7 million in 2024.⁵⁵ These same data show that the United States was one of the largest destinations for such exports throughout the period of review.⁵⁶

In the original investigations, subject imports from Indonesia underbid the domestic like product in *** of the available comparisons, by an average margin of *** percent.⁵⁷ No bid data concerning wind towers from Indonesia were obtained in these five-year reviews.

In light of these considerations, including the significant and increasing volume of subject imports from Indonesia in the original investigations, the continued presence of subject imports from Indonesia in the U.S. market while under the disciplining effect of the orders, the information available on the capacity and exports of the subject industry in Indonesia, and the underbidding by subject imports from Indonesia during the original investigations, we find that subject imports from Indonesia would not likely have no discernible adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

⁵⁴ Coalition Resp. at 9-11.

⁵⁵ CR/PR at Table 1.11.

⁵⁶ CR/PR at Table 1.11.

⁵⁷ *Confidential Original Determinations* at Table V-12.

South Korea. In the original investigations, subject imports from South Korea declined from *** units in 2017 to *** units in 2018, then increased to *** units in 2019, for an overall increase of *** percent.⁵⁸ They fluctuated during the POR, with a high of 304 units in 2024 and a low of 41 units in 2023.⁵⁹

The record of these five-year reviews contains limited information concerning the wind towers industry in South Korea because no producer in South Korea responded to the notice of institution.⁶⁰ The Coalition identified three possible producers of wind towers in South Korea in its response to the notice of institution,⁶¹ and contends that the subject industry in South Korea is export-oriented, lacks sales opportunities in its home market, and maintains large and available capacity to significantly increase wind towers exports to the United States after revocation.⁶²

GTA data indicate that the value of exports from South Korea of towers and lattice masts under HS subheading 7308.20 fluctuated during the POR, with a high of \$109.4 million in 2024 and a low of \$59.2 million in 2023.⁶³ These same data show that the United States was by far the largest destination for such exports throughout the period of review.⁶⁴

⁵⁸ *Confidential Original Determinations* at Table IV-2.

⁵⁹ CR/PR at Table 1.7.

⁶⁰ CR/PR at 1.28.

⁶¹ Coalition Resp., Exh. 1.

⁶² Coalition Resp. at 11-13.

⁶³ CR/PR at Table 1.12.

⁶⁴ CR/PR at Table 1.12.

In the original investigations, subject imports from South Korea underbid the domestic like product in *** of *** of the available comparisons, by an average margin of *** percent.⁶⁵ No bid data concerning wind towers from South Korea were obtained in these five-year reviews.

In light of these considerations, including the significant and increasing volume of subject imports from South Korea in the original investigations, the continued presence of subject imports from South Korea in the U.S. market while under the disciplining effect of the order, the information available on the capacity exports of the subject industry in South Korea, and the underbidding by subject imports from South Korea during the original investigations, we find that subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry if the antidumping order covering these imports were revoked.

Vietnam. In the original investigations, subject imports from Vietnam increased from *** units in 2017 to *** units in 2018, and *** units in 2019, for an overall increase *** percent.⁶⁶ They totaled *** units in 2020, and were not present in the U.S. market for the remainder of the POR.⁶⁷

The record of these five-year reviews contains limited information concerning the wind towers industry in Vietnam because no producer in Vietnam responded to the notice of institution.⁶⁸ The Coalition identified three possible producers of wind towers from Vietnam in its response to the notice of institution,⁶⁹ and contends that the subject industry in Vietnam is

⁶⁵ *Confidential Original Determinations* at Table V-12.

⁶⁶ *Confidential Original Determinations* at Table IV-2.

⁶⁷ CR/PR at Table 1.7.

⁶⁸ CR/PR at 1.28.

⁶⁹ Coalition Resp., Exh. 1.

export-oriented, lacks sales opportunities in its home market, and maintains large and available capacity to significantly increase wind towers exports to the United States after revocation.⁷⁰

GTA data indicate that the value of exports from Vietnam of towers and lattice masts under HS subheading 7308.20 fluctuated during the POR, with a high of \$284.2 million in 2021 and a low of \$22.8 million in 2023.⁷¹ These same data show that the United States was the third largest destination for such exports during the period of review.⁷²

In the original investigations, subject imports from Vietnam underbid the domestic like product in *** available comparison, by a margin of *** percent.⁷³ No bid data concerning wind towers from Vietnam were obtained in these five-year reviews.

In light of these considerations, including the significant and increasing volume and increase in volume of subject imports from Vietnam in the original investigations, the substantial decline in that volume following imposition of the orders reflecting the disciplining effect of the orders, the information available on the capacity and exports of the subject industry in Vietnam, and the underselling by subject imports from Vietnam during the original investigations, we find that subject imports from Vietnam would not likely have no discernible adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

⁷⁰ Coalition Resp. at 13-15.

⁷¹ CR/PR at Table 1.14.

⁷² CR/PR at Table 1.14. Taiwan and Canada were the two largest destinations for exports of towers and lattice masts from Vietnam. *Id.*

⁷³ *Confidential Original Determinations* at Table V-12.

ii. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.⁷⁴ Only a “reasonable overlap” of competition is required.⁷⁵ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.⁷⁶

We have considered our analysis regarding the overlap of competition between and among subject imports from each subject country and the domestic like products in the original investigations.⁷⁷ In the original investigations, the Commission found that all four factors indicated a reasonable overlap of competition existed.⁷⁸

Fungibility. In the original investigations, the Commission found a reasonable degree of fungibility among subject imports from each country and the domestic like product, observing

⁷⁴ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

⁷⁵ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

⁷⁶ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

⁷⁷ *Original Determinations*, USITC Pub. 5101 at 17-20.

⁷⁸ *Original Determinations*, USITC Pub. 3546 at 24.

that market participants reported domestically produced wind towers and subject imports to have some degree of interchangeability.⁷⁹ The Commission found a substantial overlap in tower size for shipments of the domestic like product and subject imports, and between wind tower imports from each subject country, and observed that most importers and purchasers reported that U.S. and subject wind towers were comparable on most factors.⁸⁰

There is no new information in the record of these five-year reviews that suggests that the degree of fungibility between and among subject imports from each subject country and the domestic like product has changed since the original investigations.

Channels of Distribution. In the original investigations, the Commission found that U.S. producers and subject imports from each country were sold directly to end users, namely the OEMs.⁸¹

In the current five-year reviews, there is no new information on the record to indicate that the channels of distribution used by the domestic industry and imports from each subject country have changed since the original investigations, or that such channels would be different upon revocation of the orders.

Geographic Overlap. In the original investigations, the Commission found that the domestic like product and imports from subject sources were sold throughout the United States, with most shipments to the Lower Midwest and Central Southwest.⁸²

In the current reviews, imports from Canada entered eastern, northern, and southern

⁷⁹ *Original Determinations*, USITC Pub. 5101 at 18.

⁸⁰ *Original Determinations*, USITC Pub. 5101 at 18-19.

⁸¹ *Original Determinations*, USITC Pub. 5101 at 19.

⁸² *Original Determinations*, USITC Pub. 5101 at 19.

borders of entry in all years from 2020 through 2024; imports from Indonesia entered the southern border region in 2020 through 2022, and the western border region in 2020, 2021, and 2024; imports from South Korea entered through the eastern border region in 2022 and 2024, the northern border region in 2022 and 2024, the southern border region in 2020 through 2021, and in 2023 through 2024, and the western border region in 2023 and 2024; and imports from Vietnam entered through the southern border region in 2020 and 2024.⁸³

Simultaneous Presence. In the original investigations, the Commission found that bid data showed that the domestic like product and subject imports from all subject countries were present in the United States market in 2018 and 2019.⁸⁴

In the current reviews, imports from Canada were reported in 59 of the 60 months between 2020 and 2024, whereas imports from Indonesia were reported in 22 months, imports from South Korea were reported in 24 months, and imports from Vietnam were reported in 6 months.⁸⁵ As we have found in prior reviews, the absence of subject imports from several of the subject countries during the POR has been influenced by the orders, and there is no indication in the record that subject imports would not be simultaneously presence in the market as they were during the original investigations upon revocation.

Conclusion. In sum, the record in these expedited reviews indicates that there has not been any meaningful change in the considerations that led the Commission in the original investigations to conclude that there was a reasonable overlap or likely reasonable overlap, respectively, of competition among subject imports and between subject imports and the

⁸³ CR/PR at 1.25.

⁸⁴ *Original Determinations*, USITC Pub. 5101 at 19.

⁸⁵ CR/PR at 1.25.

domestic like product. In particular, there is no new information in the record that suggests that the degree of fungibility between and among subject imports from each subject country and the domestic like product has changed since the original investigations. There is also no indication in the record that overlaps in channels of distribution, geographic presence in the United States, and simultaneous presence in the market that were present during the original investigations would not recur upon revocation.

For these reasons, and absent any contrary argument, we find that there will be a likely reasonable overlap of competition between the domestic like product and subject imports, and among imports from the different subject countries, should the orders be revoked.

iii. Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate the subject imports, we consider whether subject imports from each subject country would likely compete under similar or different conditions in the U.S. market after revocation of the orders.

In these first five-year reviews, the Coalition argues that there have been no changes in the conditions of competition during the current period of review that would warrant the Commission not cumulating subject imports for the purposes of these reviews.⁸⁶

The record in these five-year reviews contains no information that imports from the subject countries are likely to compete under different conditions of competition in the event of revocation. Therefore, based on the information available, and in the absence of any argument to the contrary, we do not find any likely significant differences in conditions of competition that would warrant not cumulating subject imports from each subject country.

⁸⁶ Coalition Resp. at 6.

iv. Conclusion

In sum, we determine that subject imports from Canada, Indonesia, South Korea, and Vietnam, considered individually, are not likely to have no discernible adverse impact on the domestic industry if the orders were revoked. We also find that there would likely be a reasonable overlap of competition between and among subject imports from each subject country and the domestic like product if the orders were revoked. Finally, we do not find any likely significant differences in conditions of competition that would warrant not cumulating subject imports from each subject country. We therefore exercise our discretion to cumulate subject imports from all subject countries for purposes of our analysis of continuation or recurrence of material injury in these five-year reviews.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁸⁷ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of

⁸⁷ 19 U.S.C. § 1675a(a).

an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”⁸⁸ Thus, the likelihood standard is prospective in nature.⁸⁹ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.⁹⁰

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”⁹¹ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”⁹²

⁸⁸ SAA at 883-84. The SAA states that “[t]he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

⁸⁹ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

⁹⁰ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

⁹¹ 19 U.S.C. § 1675a(a)(5).

⁹² SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”⁹³ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁹⁴ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.⁹⁵

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.⁹⁶ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country;

⁹³ 19 U.S.C. § 1675a(a)(1).

⁹⁴ 19 U.S.C. § 1675a(a)(1). Commerce has made no duty absorption findings concerning wind towers from any of the subject countries. *Utility Scale Wind Towers From Canada, the Socialist Republic of Vietnam, Indonesia, and the Republic of Korea: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders*, 91 Fed. Reg. 678 (Jan. 8, 2026) and accompanying *Issues and Decision Memorandum* at 5-7, Case Nos. A-122-867, A-552-825, A-560-833, A-580-902 (Jan. 5, 2026).

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

⁹⁶ 19 U.S.C. § 1675a(a)(2).

(2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁹⁷

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.⁹⁸

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or

⁹⁷ 19 U.S.C. § 1675a(a)(2)(A-D).

⁹⁸ See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

more advanced version of the domestic like product.⁹⁹ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.¹⁰⁰

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the wind tower industry in each subject country. There also is limited information on the wind tower market in the United States during the POR. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigations and prior reviews, and the limited new information on the record in these first five-year reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁰¹ The following conditions of competition inform our determinations in these reviews.

⁹⁹ 19 U.S.C. § 1675a(a)(4).

¹⁰⁰ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

¹⁰¹ 19 U.S.C. § 1675a(a)(4).

i. Demand

We have considered the Commission’s findings regarding demand conditions in the original investigations.¹⁰² The information available also indicates that wind towers continue to be used for electrical power-generation projects, and demand for wind towers remains dependent on demand for wind turbines and the installation of wind turbines in wind projects.¹⁰³ The Coalition notes that in 2024, new wind turbine installations were at their lowest point in ten years, and argues that the One Big Beautiful Bill Act of 2025 (“OBBA”), which terminates and accelerates the phase-out of certain clean energy production credits and clean electricity investment tax credits, is expected to lower incentives that would have spurred demand for new wind turbine installations, and thus decrease expected demand for new wind towers.¹⁰⁴

Apparent U.S. consumption of wind towers by quantity has declined from *** units in 2019 to *** units in 2024, or by *** percent.¹⁰⁵

ii. Supply

We have considered the Commission’s findings regarding supply conditions in the original investigations.¹⁰⁶ Domestically produced wind towers were the second largest source of wind towers in the U.S. market, accounting for *** percent of apparent U.S. consumption by quantity in 2024.¹⁰⁷ South Korean producer CS Wind Corp. purchased Vestas American Wind

¹⁰² *Original Determinations*, USITC Pub. at 5101 at 26-28.

¹⁰³ *See generally* CR/PR at 1.8-1.13; Coalition Resp. at 28.

¹⁰⁴ Coalition Resp. at 20-21, 24-25.

¹⁰⁵ CR/PR at Table 1.8.

¹⁰⁶ *Original Determinations*, USITC Pub. at 5101 at 28-29.

¹⁰⁷ CR/PR at Table 1.8. As noted above, official import statistics used to measure imports in this review may overstate the volume of subject and non-subject imports in this review, given the relevant

Technology's production facility in Pueblo, Colorado in 2021, which it began expanding in 2023.¹⁰⁸ In addition, Arcosa began production at a new facility that opened in Belen, New Mexico in 2024.¹⁰⁹

Subject imports were the smallest source of wind towers in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2024.¹¹⁰

Nonsubject imports were the largest source of wind towers in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2024.¹¹¹ The largest sources of nonsubject imports in 2024 were Germany, Denmark, and India.¹¹²

iii. Substitutability and Other Conditions

We have considered the Commission's findings regarding substitutability and other conditions in the original investigations.¹¹³ The record in these reviews contains no new information indicating that the degree of substitutability between the domestic like product and cumulated subject imports or the importance of price has changed since the original investigations.¹¹⁴ The Coalition argues that subject imports and the domestic like product remain substitutable, and that price remains an important factor in purchasing decisions.¹¹⁵

HTSUS subheadings covers both in- and out-of-scope merchandise. Any overstatement of subject and nonsubject imports would in turn affect the calculation of apparent U.S. consumption resulting in understating the domestic industry's share of apparent U.S. consumption. In the original investigations, questionnaire data was used to measure imports and therefore data on volume and market share of subject imports in these reviews may not be directly comparable with such data in the original investigations.

¹⁰⁸ CR/PR at Table 1.5.

¹⁰⁹ CR/PR at Table 1.5.

¹¹⁰ CR/PR at Table 1.8.

¹¹¹ CR/PR at Table 1.8.

¹¹² CR/PR at Table 1.8.

¹¹³ *Original Determinations*, USITC Pub. at 5101 at 29-32.

¹¹⁴ See Coalition Resp. at 18.

¹¹⁵ Coalition Resp. at 18.

Accordingly, we again find a moderate-to-high degree of substitutability between domestically produced wind towers and subject imports, and that price is an important factor in purchasing decisions for wind towers.

Effective August 18, 2025, wind towers originating in Canada, Indonesia, South Korea, and Vietnam are subject to an additional 50 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962, as amended (“section 232 tariffs”).¹¹⁶

C. Likely Volume of Cumulated Subject Imports

We have considered our findings regarding the significant volume and increase in volume of subject imports in the original investigations.¹¹⁷ The record indicates that the discipline of the orders has limited, and continues to limit, cumulated subject imports. The volume of cumulated subject imports fluctuated downward over the POR, from 880 units in 2020 to 732 units in 2021, 326 units in 2022, 45 units in 2023, and 352 units in 2024, equivalent to *** percent of apparent U.S. consumption that year.¹¹⁸

The record in these five-year reviews contains limited information on the subject foreign industries. The Coalition identified a possible producer of wind towers in Canada, a possible producer of wind towers in Indonesia, three possible producers of wind towers in South Korea, and three possible producers of wind towers in Vietnam.¹¹⁹ The information available, however, indicates that subject foreign producers have the ability and incentive to increase their exports of wind towers to the U.S. market if the orders were revoked.¹²⁰

¹¹⁶ CR/PR at 1.6-1.7.

¹¹⁷ *Original Determinations*, USITC Pub. 5101 at 32-33.

¹¹⁸ CR/PR at Tables 1.7, 1.8.

¹¹⁹ Coalition Resp., Exh. 1.

¹²⁰ *See generally* Coalition Resp. at 8-16.

The record indicates that the subject industries are large producers and exporters of subject merchandise. As discussed in more detail in section III.C.ii.a, according to information submitted by the Coalition, there are numerous subject producers and exporters that maintain large and available capacity to significantly increase wind towers exports to the United States after revocation.¹²¹ Additionally, GTA value data for HS subheading 7308.20, which includes out-of-scope merchandise, support that wind tower producers in each subject country are large exporters: all together, subject countries' exports totaled \$531.2 million in 2020, \$641.2 million in 2021, \$548.7 million in 2022, \$172.9 million in 2023, and \$524.8 million in 2024, equivalent to *** percent of apparent U.S. consumption by value that year.¹²² Moreover, despite the discipline of the orders, GTA data indicate that during the POR the United States was the largest destination by far for exports of such merchandise from Canada and South Korea, and one of the largest destinations for exports from Indonesia and Vietnam.¹²³

Other information available also indicates that the U.S. market remains attractive to subject producers. Subject imports from each source remained in the U.S. market during the POR, thereby maintaining customers in the United States.¹²⁴

Thus, on a cumulated basis, subject producers have the means and the incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked.¹²⁵ In light of these considerations, including the

¹²¹ Coalition Resp. at 8-16, Exhs. 2-19.

¹²² *Derived from* CR/PR at Tables 1.8, 1.10, 1.11, 1.12, 1.14.

¹²³ CR/PR at Tables 1.10, 1.11, 1.12, 1.14.

¹²⁴ CR/PR at Table 1.7.

¹²⁵ Effective August 18, 2025, wind towers originating in Canada, Indonesia, Korea, and Vietnam are subject to 50 percent *ad valorem* duties under Section 232 of the Trade Expansion Act of 1962, as amended. CR/PR at 1.6. Any discussion of Section 232 duties in the original investigation was limited to

significant and increasing volume of cumulated subject imports during the original investigations, the continued presence of cumulated subject imports in the U.S. market during the POR, the information available regarding subject industries' capacity and exports, and the attractiveness of the U.S. market to subject producers, we find that the volume of cumulated subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

D. Likely Price Effects of Cumulated Subject Imports

We have considered our findings regarding the price effects of subject imports in the original investigations.¹²⁶ In particular, in the original investigations, the Commission found significant underselling, based on the importance of price in purchasing decisions, the moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports, the pervasive underbidding observed in the available pricing data,¹²⁷ the lower average sales values of cumulated subject imports, and a substantial volume of lost sales due at least in part to price.¹²⁸ The Commission further concluded that subject imports suppressed prices of domestic wind towers to a significant degree, as the domestic industry could not raise prices to cover increased costs when apparent U.S. consumption increased from 2018 to

their impact on input costs of flat-rolled steel for domestic wind tower producers as at the time Section 232 duties applied to flat-rolled steel but not wind towers or steel derivative products. *Original Determinations*, USITC Pub. 5101 at 32 & 36 n.203. There is no information on the current record of the impact of additional duties of 50 percent on wind towers from the subject countries under Section 232.

¹²⁶ *Original Determinations*, USITC Pub. 5101 at 33-39.

¹²⁷ Given wind tower procurements are typically made by bidding for sales of wind towers meeting OEM specifications, bid data was collected in the original investigations. *Original Determinations*, USITC Pub. 5101 at 31, 33-34.

¹²⁸ *Original Determinations*, USITC Pub. 5101 at 33-35.

2019.¹²⁹ On these bases, the Commission found that cumulated subject imports had significant adverse price effects on the domestic industry.¹³⁰

As discussed in section IV.B.iii above, in these reviews, we continue to find that subject imports and the domestic like product are moderately-to-highly substitutable and that price remains an important factor in purchasing decisions.

Based on the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that the likely significant volume of subject imports would likely underbid the domestic like product to a significant degree, as during the original investigations. There is no new information on the record indicating that the customer base for wind towers is any less concentrated than in the original investigations, or that customers would be any less likely to use subject imports in the bidding and negotiation process to extract lower prices from domestic producers, as occurred in the original investigations.¹³¹ Accordingly, absent the discipline of the orders, the likely significant volumes of low-priced subject imports would force the domestic industry to lower prices or forgo needed price increases, or else lose sales and market share to subject imports, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were to be revoked, subject imports would likely have significant price effects.

¹²⁹ *Original Determinations*, USITC Pub. 5101 at 36-39.

¹³⁰ *Original Determinations*, USITC Pub. 5101 at 39.

¹³¹ The record in these expedited five-year reviews does not contain recent bid data.

E. Likely Impact of Cumulated Subject Imports

We have considered our findings regarding the impact of subject imports in the original investigations.¹³² The record in these expedited five-year reviews contains limited information concerning the domestic industry's performance since the original period of investigation.

The information available indicates that the domestic industry's trade and financial performance in 2024 was generally *** than in the original investigations.¹³³

Reflecting the limited data concerning the domestic industry available in these reviews, domestic industry's capacity, production, and capacity utilization, at *** units, *** units, and *** percent, respectively, were lower in 2024 than in any year of the POI.¹³⁴ In 2024, the domestic industry's U.S. shipments by quantity, at *** units, and U.S. shipments by value, at \$***, were also lower than in any point of the POI, although the unit value of its U.S. shipments, at \$*** per unit, exceeded unit values examined during the original investigations.¹³⁵ The domestic industry's share of apparent consumption by quantity was *** percent, down from *** percent in 2019.¹³⁶

In 2024, the domestic industry's net sales value (\$***) and gross profit (\$***) were lower than in 2019.¹³⁷ The industry's operating income in 2024, of \$***, was also lower than in 2019, at \$***. However, the industry's operating income margin in 2024, of *** percent, exceeded margins observed throughout the POI.¹³⁸ Conversely, the industry's ratio of cost of

¹³² *Original Determinations*, USITC Pub. 5101 at 40-46.

¹³³ CR/PR at Table 1.6.

¹³⁴ CR/PR at Table 1.6.

¹³⁵ CR/PR at Table 1.6.

¹³⁶ CR/PR at Table 1.8.

¹³⁷ CR/PR at Table 1.6.

¹³⁸ CR/PR at Table 1.6.

goods sold (“COGS”) to net sales, at *** percent, was the lowest of any period examined.^{139 140}

The limited information on the record is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would likely undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volumes of low-priced cumulated subject imports likely after revocation would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo needed price increases in order to maintain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of subject imports and their likely price effects would likely have a significant adverse impact the domestic industry’s capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry’s profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Consequently, we conclude that if the orders were

¹³⁹ CR/PR at Table 1.6.

¹⁴⁰ Many of the domestic industry’s performance indicators in 2024 are likely understated relative to that in the original investigations, because the domestic industry data coverage is substantially lower in these reviews. Responding domestic producers accounted for *** percent of domestic production of wind towers in 2024, compared to *** percent in the original investigations. *Compare* CR/PR at Table B.1 *with Original Determinations* at Table III-1. The ***, did not provide information in response to the notice of institution in these reviews. CR/PR at Table B.2; *Confidential Original Determinations* at 15.

revoked, cumulated subject imports would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Although nonsubject imports' share of the U.S. wind towers market was substantial, accounting for *** percent of apparent U.S. consumption by quantity in 2024,¹⁴¹ their presence in the U.S. market would not preclude subject imports from taking market share from the domestic industry, or forcing the domestic industry to lower its prices to compete if the orders were revoked, given the subject industries' large capacity and exports and the relative attractiveness of the U.S. market. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to cumulated subject imports, and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry after revocation of the orders.

We also recognize that apparent U.S. consumption of wind towers was *** percent lower in 2024 than in 2019.¹⁴² Furthermore, the Coalition anticipates domestic demand for wind towers will decline, following enactment of OBBBA.¹⁴³ Given that subject imports and the domestic like product are moderately-to-highly substitutable, and that price is important in purchasing decisions, we find on the expedited record that declining U.S. demand for wind towers would not prevent the likely significant volume of low-priced subject imports from taking market share from the domestic industry and/or suppressing or depressing domestic prices

¹⁴¹ CR/PR at Table 1.8. The share of nonsubject imports is overstated, however, because almost *** of the domestic industry did not provide information in these reviews.

¹⁴² CR/PR at Table 1.8.

¹⁴³ Coalition Resp. at 24-25.

after revocation of the orders, but rather a declining market would exacerbate the likely adverse impact of subject imports on the domestic industry.

In sum, we conclude that if the orders were revoked, subject imports of wind towers from Canada, Indonesia, South Korea, and Vietnam would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For the above reasons, we determine that revocation of countervailing duty orders on wind towers from Canada, Indonesia, and Vietnam, and the antidumping duty orders on wind towers from Canada, Indonesia, South Korea, and Vietnam would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Information obtained in these reviews

Background

On July 1, 2025, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty orders on utility scale wind towers (“wind towers”) from Canada and Vietnam and the antidumping duty orders on utility scale wind towers from Canada, Indonesia, South Korea, and Vietnam would be likely to lead to continuation or recurrence of material injury.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ Table 1.1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
July 1, 2025	Notice of initiation by Commerce (90 FR 28722, July 1, 2025)
July 1, 2025	Notice of institution by Commission (90 FR 28764, July 1, 2025)
November 24, 2025	Commission’s vote on adequacy
January 8, 2026	Commerce’s results of its expedited reviews

¹ 19 U.S.C. 1675(c).

² 90 FR 28764, July 1, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

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

The original investigations

The original investigations resulted from petitions filed on July 9, 2019 with Commerce and the Commission by the Wind Tower Trade Coalition (Arcosa Wind towers, Inc. (Dallas, Texas) and Broadwind Towers, Inc. (Manitowoc, Wisconsin)).⁴ On August 25, 2020, Commerce determined that imports of wind towers from Canada, Indonesia, Korea, and Vietnam were being sold at less than fair value (“LTFV”) and to be subsidized by the governments of Canada, Indonesia, and Vietnam.⁵ The Commission determined on August 25, 2020 that the domestic industry was materially injured by reason of imports of utility scale wind towers from Canada, Indonesia, Korea, and Vietnam, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at LTFV, and to be subsidized by the governments of Canada, Indonesia, and Vietnam.⁶ On August 26, 2020, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 4.94 to 65.96 percent and net subsidy rates ranging from 1.13 to 5.90 percent.⁷

⁴ Utility Scale Wind towers from Canada, Indonesia, Korea, and Vietnam, Inv. Nos. 701-TA-627-629 and 731-TA-1458-1461 (Final), USITC Publication 5101, August 2020 (“Original publication”), p. 1.1.

⁵ 85 FR 40239, July 6, 2020; 85 FR 40243, July 6, 2020; 85 FR 40226, July 6, 2020; 85 FR 40231, July 6, 2020; 85 FR 40241, July 6, 2020; 85 FR 40245, July 6, 2020; and 85 FR 40229, July 6, 2020.

⁶ 85 FR 52357, August 25, 2020. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on Korea and Vietnam.

⁷ 85 FR 52546, August 26, 2020 and 85 FR 52543, August 26, 2020.

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on wind towers or similar merchandise, as presented in table 1.2.

Table 1.2 Wind towers: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
2011	731-TA-1196	Vietnam	Affirmative	Order issued on February 8, 2013
2020	701-TA-660	India	Affirmative	Order issued on December 6, 2021
2020	701-TA-661	Malaysia	Affirmative	Order issued on August 4, 2021
2020	731-TA-1543	India	Affirmative	Order issued on December 6, 2021
2020	731-TA-1544	Malaysia	Affirmative	Order issued on December 6, 2021
2020	731-TA-1545	Spain	Affirmative	Order issued on August 16, 2021

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

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

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of wind towers from Canada, Indonesia, South Korea, and Vietnam with the intent of issuing the final results of these reviews based on the facts available not later than October 29, 2025.⁸ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of wind towers from Canada, Indonesia, South Korea, and Vietnam are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise covered by this investigation consists of certain wind towers, whether or not tapered, and sections thereof. Certain wind towers support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity in excess of 100 kilowatts and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (i.e., where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise

⁸ Letter from Alex Villanueva, Senior Director, Office I, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, August 22, 2025.

attached) to form a steel shell, regardless of coating, end-finish, painting, treatment, or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical buss boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section. Several wind tower sections are normally required to form a completed wind tower.

Wind towers and sections thereof are included within the scope whether or not they are joined with non-subject merchandise, such as nacelles or rotor blades, and whether or not they have internal or external components attached to the subject merchandise.

Specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Also excluded are any internal or external components which are not attached to the wind towers or sections thereof, unless those components are shipped with the tower sections.

Further, excluded from the scope of the antidumping duty investigations are any products covered by the existing antidumping duty order on utility scale wind towers from the Socialist Republic of Vietnam. See Utility Scale Wind Towers from the Socialist Republic of Vietnam: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order, 78 FR 11150 (February 15, 2013).⁹

⁹ 85 FR 40239, July 6, 2020; 85 FR 40243, July 6, 2020; 85 FR 40226, July 6, 2020; 85 FR 40231, July 6, 2020; 85 FR 40241, July 6, 2020; 85 FR 40245, July 6, 2020; and 85 FR 40229, July 6, 2020.

U.S. tariff treatment

Wind towers are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 7308.20.0035. The general rate of duty is “free” for HTS subheading 7308.20.00.¹⁰ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Section 232 tariffs

Wind towers originating in Canada, Indonesia, South Korea, and Vietnam 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.¹¹

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)¹²

Wind towers originating in Canada, Indonesia, South Korea, and Vietnam are not subject to tariffs initiated in April 2025 under IEEPA.¹³

Table 1.3 Wind Towers: Additional tariffs on imports from Canada, Indonesia, South Korea, and Vietnam as of September 4, 2025.

Duty rates in percent ad valorem

Additional tariff	Canada	Indonesia	South Korea	Vietnam
Section 232 as of August 18, 2025	50	50	50	50
IEEPA – Canada specific	Not applicable	Not applicable	Not applicable	Not applicable

¹⁰ USITC, HTS (2025) Revision 21, Publication 5666, September 2025, pp. 73.25.

¹¹ Effective August 18, 2025, wind towers originating in Canada, Indonesia, South Korea, and Vietnam became subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product. 90 FR 9817, February 18, 2025; 90 FR 40326, August 19, 2025. See also HTS heading 9903.81.90 and U.S. note 16(m) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 21, Publication 5666, September 2025, pp. 99.3.30, 99.3.381.

¹² Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”). Tariffs specific to Canada, China, 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. See also *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.

¹³ Articles subject to section 232 tariffs, including wind towers, are not subject to the tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.33 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 19, Publication 5659, August 2025, pp. 99.3.5 to 99.3. 25, 99.3.345.

Additional tariff	Canada	Indonesia	South Korea	Vietnam
Tariffs initiated in August 2025 under IEEPA	Not applicable	Not applicable	Not applicable	Not applicable
Total additional ad valorem rate	50	50	50	50

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. Section 232 tariffs on wind towers currently imported under HTS subheading 7308.20.00 went into effect on August 18, 2025.

Description and uses¹⁴

Wind towers are a component of wind turbines. Wind turbines, whether designed for onshore or offshore electric-power generation, consist of three main components-- the nacelle, rotor, and tower. Wind turbines convert the energy from wind to electrical energy. The nacelle contains the wind turbine's main power-generating components (i.e., the gearbox, low- and high-speed shafts, generator, controller, and brake), while the horizontally mounted rotor typically consists of three blades (of aluminum or composite fiber) attached to the hub. The nacelle is mounted on top of the tower, which is typically of tubular-shaped steel for utility-scale wind turbines (figure 1.1).

Figure 1.1 Wind towers: Utility-scale wind turbine

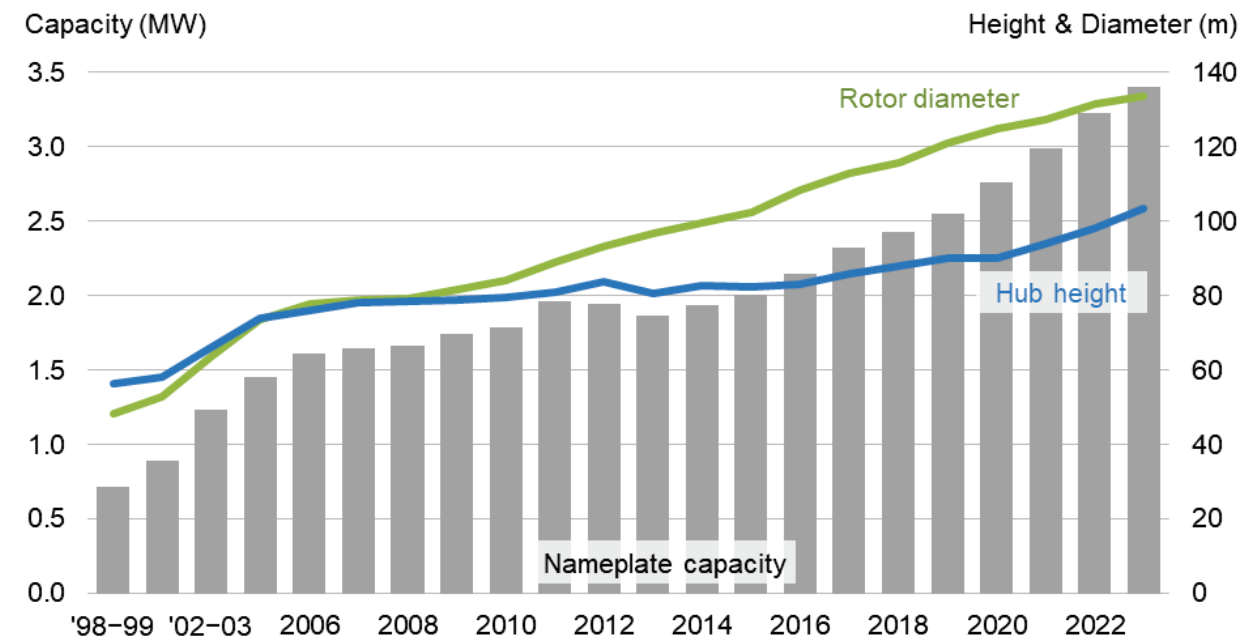


Source: U.S. Department of Energy, National Renewable Energy Laboratory ("DOE/NREL"), credit: Dennis Schroeder.

¹⁴ Unless otherwise noted, this information is based on Original publication, pp. 1.15 to 1.24.

Wind turbines have capacities ranging from less than 1 kilowatt (“kW”) to several megawatts (“MW,” equivalent to 1,000 kW). Utility-scale wind turbines are considered to be those with a capacity exceeding 100 kW. Utility-scale wind turbine capacities have increased over time, with the average capacity of a wind turbine installed in the United States increasing from 2.4 MW in 2018 to 3.4 MW in 2023 (figure 1.2).

Figure 1.2 Wind towers: Average turbine nameplate capacity, hub height, and rotor diameter for land-based wind projects, 1998 to 2023.



Source: Berkeley Lab, “Land-Based Wind Market Report: 2024 Edition,” August 2024 at https://emp.lbl.gov/sites/default/files/2024-08/Land-Based%20Wind%20Market%20Report_2024%20Edition.pdf

Wind turbines can be installed individually or as part of a larger wind project (also referred to as a “wind farm”). Favorable geographic locations for building wind projects include “tops of smooth, rounded hills; open plains and water; and mountain gaps that funnel and intensify wind” and sites “at higher elevations.” Installations of wind turbines for electric-power utilities and independent power producers can be a single turbine, but more commonly range from several turbines to more than 100 turbines. Wind projects and wind turbines, including towers, have a life expectancy of at least 20 years.

Utility-scale wind turbines generally use tubular steel towers that consist of multiple sections (base, one or more mid, and top) that are assembled on a foundation at the wind project site, with the complete tower height generally ranging from 60 meters (197 feet) to more than 100 meters (328 feet), as measured from the base of the tower to the hub (“hub height”). The base of the tower (figure 1.3) can be up to 4.5 meters (15 feet) in diameter, but

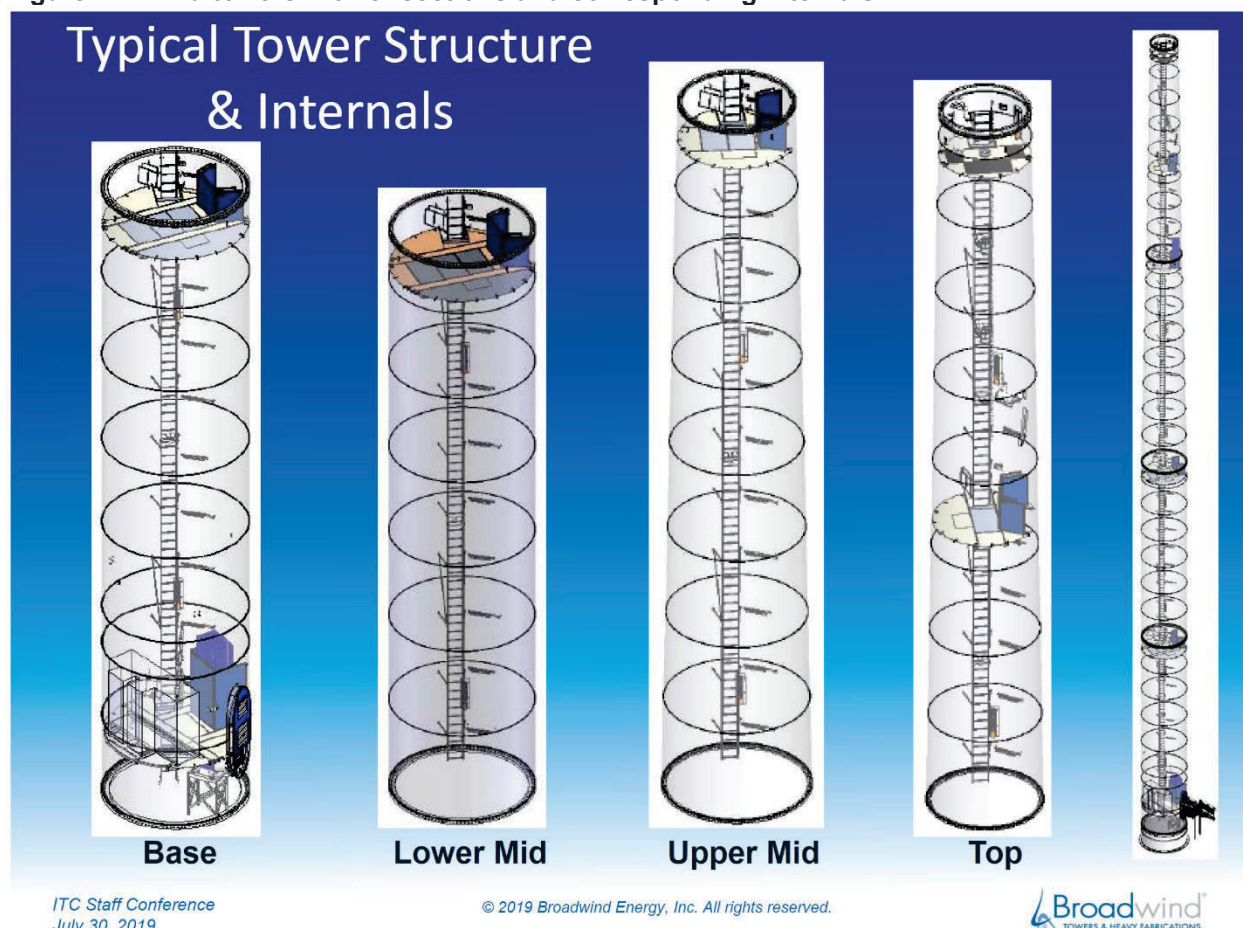
varies with tower size, as smaller towers tend to have a smaller-diameter base. The tower typically is tapered so that the diameter at the top is smaller than the diameter at the base. The weight of a complete tower can range from 100 short tons to more than 300 short tons, depending on the height and steel gauge (thickness). At the base of the tower there is a steel door that allows for entry into the tower, inside of which are the tower's internal mechanical and electrical fittings ("internals") such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and other accessories. For the typical structures and internals for each tower section, see figure 1.4.

Figure 1.3 Wind towers: Installed wind turbines



Source: DOE/NREL, credit: Iberdrola Renewables.

Figure 1.4 Wind towers: Tower sections and corresponding internals



Source: Janda, Dennis, "Wind Tower Manufacturing," Broadwind Energy Inc., 2019, p. 2

The average hub height of wind towers installed in the United States increased from 88 meters (289 feet) in 2018 to 103.4 meters (340 feet) in 2023 (figure 1.2).¹⁵ Taller towers offer advantages by accommodating longer blades¹⁶ that can capture more energy¹⁷ from the higher and more constant wind speeds occurring at higher altitudes, often with less turbulence which promotes longer service lifespans and lower operating and maintenance costs from the lower system loads on the turbine.

While tubular steel towers are the most common design for utility-scale wind turbines, other tower technologies are being used or are under development, often as a result of the increasing size and height of wind turbines. These include concrete (constructed on-site from

¹⁵ Berkeley Lab, "Land-Based Wind Market Report: 2024 Edition," August 2024.

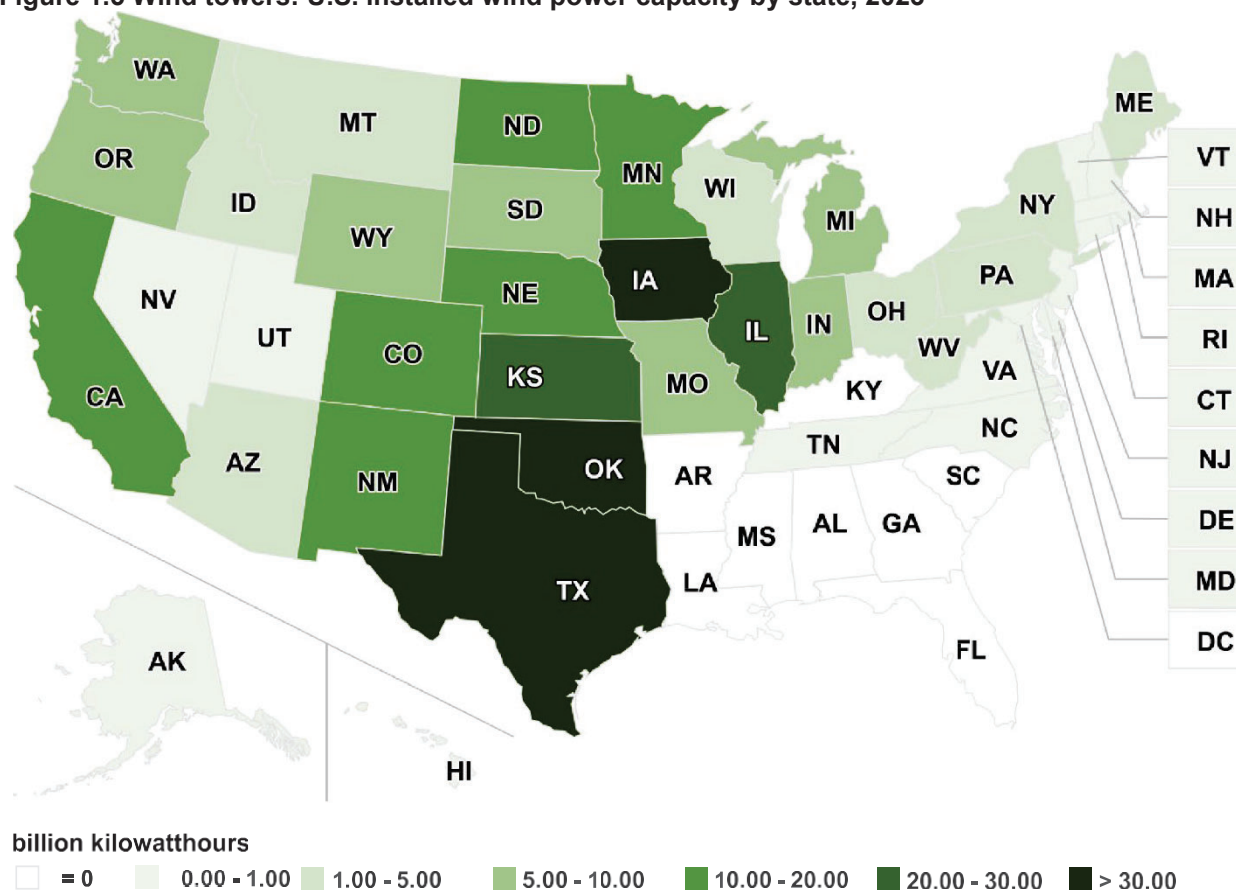
¹⁶ Depending on the specific model, towers that are 80-meters (262-feet) tall (hub height) can accommodate blades ranging from 38.5 meters (126 feet) to 50.0 meters (164 feet) in length (blade tip to hub center).

¹⁷ The power captured by a wind turbine is generally proportional to the sweep area of the blades.

segments either cast in-situ or assembled from precast, reinforced panels), hybrid (with both concrete and steel sections), and space frame (steel lattice towers with five legs covered with an architectural fabric) towers.

The installed generating capacity of U.S. wind turbines (totaling 150 GW in 2023)¹⁸ is concentrated between the Rocky Mountains and the Mississippi River— the “Wind Corridor”— where average annual wind speeds at an altitude of 80 meters (262 feet) are the fastest across the continental United States. Texas is the leading state, with 41 GW of installed capacity, about three times as much as the next two-highest states, Iowa (with 13 GW) and Oklahoma (with 12 GW) (figure 1.5).¹⁹ Twenty-three states had more than 1 GW of wind capacity at the end of 2023, with seven above 5 GW.²⁰

Figure 1.5 Wind towers: U.S. installed wind power capacity by state, 2023



Source: EIA, “Wind Explained: Where is Wind Power Harnessed,” June 12, 2024 at <https://www.eia.gov/energyexplained/wind/where-wind-power-is-harnessed.php>

¹⁸ Berkeley Lab, “Land-Based Wind Market Report: 2024 Edition,” August 2024

¹⁹ Berkeley Lab, “Land-Based Wind Market Report: 2024 Edition,” August 2024

²⁰ Berkeley Lab, “Land-Based Wind Market Report: 2024 Edition,” August 2024

As of May 2024, only 174 MW of U.S. operating wind power generating capacity was offshore.²¹ Three U.S. offshore wind projects (The Block Island Wind Farm ***, Coastal Virginia Offshore Wind Pilot ***, and South Fork Wind Farm ***) are currently operational.²² Wind-generating projects are being located offshore to take advantage of stronger, more consistent, and more abundant wind currents than those onshore; proximity to major coastal population and energy-consuming centers for reduced power-transmission costs; and stronger afternoon and evening offshore wind speeds (rather than stronger night-time onshore wind speeds) that match the timing of rising electric-power consumption and peak utility-load periods. By May 2024, an additional 4,097 MW of offshore wind power-generation projects were in various stages of planning, site leasing, permitting, or electric-power sale offtake agreement negotiations.²³ Project sites are located predominantly off the Atlantic Coast from Maine down to South Carolina, with others located off the Pacific Coast of both northern and central California, the Gulf of America, and around Hawaii's Oahu Island.

Manufacturing processes²⁴

Wind towers are produced by qualified manufacturers to the proprietary specifications of each individual OEM to support its nacelle. Each wind-turbine OEM usually has multiple tower designs. The wind-turbine model and characteristics of the wind project site determine which tower design will be used in a particular wind project.

Wind towers are manufactured from heavy gauge, cut-to-length steel plates, which are purchased by the tower manufacturer and are typically 3 meters (10 feet) wide, 12 meters (39 feet) long, and 0.5 to 2 or more inches thick. Plate thickness is related to the rotor diameter, weight, and design approach, with some wind turbine OEMs (who are generally the tower purchasers) using lighter towers. The plate for the base of the tower is the thickest and becomes thinner upward toward the top. The high-strength low-alloy steel plate typically meets either European specifications (e.g., S355J2 or S355N) or U.S.-equivalent specifications (e.g., ASTM A709 or A572).

Manufacturing of wind towers is a multi-step process which requires a wide variety of large-scale fabrication procedures. Depending on the overall height and design, the tower is

²¹ NREL, "Offshore Wind Market Report: 2024 Edition," August 2024.

²² NREL, "Offshore Wind Market Report: 2024 Edition," August 2024.

²³ NREL, "Offshore Wind Market Report: 2024 Edition," August 2024.

²⁴ Unless otherwise noted, this information is based on Utility Scale Wind Towers from Canada, Indonesia, Korea, and Vietnam (Final), Confidential Report, INV-SS-081, July 17, 2020 ("Original confidential report"), pp. 1.25 to 1.33.

generally manufactured and transported as three to five sections for assembly at the wind project site. The major steps are (1) plate cutting and rolling, (2) can welding, (3) can-to-can welding, (4) flange welding, (5) internal-supports installation, (6) door-frame installation, (7) metallizing and painting, and (8) final internals installation.

Plate cutting and rolling— After the steel plate is checked for quality and cleaned, it is shaped with a plasma and/or oxygen acetylene cutter and its edges may be beveled to facilitate welding. The plate is then passed through a roller, which bends it into a cylindrical or conical shape.

Can welding— The longitudinal edges of the rolled plate are welded together on both the inside and outside of the seam to create a “can.” A typical tower consists of 30 to 40 such cans (figure I-4). The quality of the welded joints is checked through ultrasonic testing.

Can-to-can welding— The individual cans are then fitted together and then circumferentially welded together to create a tower section. Tower sections vary in length and depend on the height of the tower and number and type of section.²⁵

Flange welding— A forged steel flange— a high-precision, machined steel ring with a flared rim into which a series of evenly spaced holes are drilled into its circumference— is welded onto the cans at the ends of each tower section, to fasten the sections together flange-to-flange with large structural nuts and bolts.

Internal-supports installation— The brackets, clips, and lugs (to which the internals will be attached) are welded onto the interior surface of the sections as supports for subsequent attaching the internal components. The brackets are generally fabricated from steel bars but can also be purchased as prefabricated brackets of steel angles.

Door-frame installation— A utility/service door is installed at the bottom of the base section by cutting an oval opening with an oxygen acetylene torch, installing a steel-plate frame to the opening, and attaching the steel-plate door.

Metallizing and painting— Both the inner and outer surfaces of tower sections are prepared by blasting with grit to remove debris and create a rough surface that improves paint adherence. The flanges and other portions of the section surface may be metalized by applying an aluminum-zinc alloy coating by a thermal spraying process to inhibit rust and corrosion. The sections are then painted with one or more layers of epoxy, urethane, or other coating materials on the interior and two or more layers on the exterior. The painted sections are allowed to dry and cure, which can require several hours, depending on the weather.

²⁵ A taller tower does not necessarily require longer sections as the section lengths for an 80-meter (262-foot) tower consisting of three sections can be longer than a 100-meter (328-foot) tower consisting of five sections. However, a 100-meter (328-foot) tower will be substantially heavier overall.

Final internals installation— After the mechanical and electrical internals are installed within, the tower sections undergo a final quality-control inspection process.

Post-manufacture, transportation, and assembly

The end of each tower section is covered with a tarp prior to being moved to a temporary storage area (“laydown yard”),²⁶ usually located directly adjacent to its manufacturing facility, for pick-up by the wind-turbine OEM customer. Transporting the individual tower sections, nacelles, hub, and blades for subsequent assembly at the wind project site is usually arranged by the OEM customer. After the OEM delivers all of the turbine components to the project site, a plant contractor undertakes the engineering, procurement, and construction (“EPC”) work which includes assembling the electrical interconnections and erecting and assembling the individual wind turbines. The OEM also tests the connected turbines and can be contracted to perform long-term turbine maintenance.

Transportation is a significant issue to the wind power generating industry²⁷ because the optimal geographic conditions for siting wind projects are often remote locations or complex terrains, and wind turbine components are large, heavy, and extremely difficult to transport.²⁸ Tower sections are usually transported by truck when the wind project site is within *** away from the storage yard. Some of the largest tower sections that are too large to be transported by rail are transported by truck or by ship (vessel) and barges.²⁹ Due to their sheer size (and fragility of nacelles and blades), there are highly complicated logistical considerations and hazards for transporting individual tower sections and other components (table 1.9). As the generating capacity of wind turbines grow and the tower heights and base diameters expand, the larger component dimensions and weights constrain the types of

²⁶ To organize and manage the temporary storage of wind turbine components for subsequent transfer to the wind project site, laydown-yard requirements include: (1) proximity to both wind farm clusters and to shipping ports, rail spurs, and major highway networks; (2) suitable equipment to off-load and load wind turbine components; (3) ample space for organization and placement of blades and nacelles; and (4) 24-hour security.

²⁷ Although capable of producing each type of tower section at both its U.S. and Canadian facilities, Marmen also ships the top sections from its Quebec facilities, which are lighter, easier, and less expensive to transport than the larger base and mid sections produced at its South Dakota facility located closer to the wind power-generation project sites.

²⁸ Additional factors that wind-project developers also consider include proximity to large utility transmission lines, environmental and wildlife impacts, land ownership, existing infrastructure, population density, regional land use, and state and local siting ordinances.

²⁹ Due to their massive sizes and weights, it can be more costly to transport tower sections over land than shipping by sea on a per-mile basis.

feasible routes, due to larger turning radius, tall clearance requirements, and road weight restrictions. The larger 2-MW to 3-MW turbines that have become the standard for land-based wind projects are reaching the upper limit for transit by road. For tower sections with diameters exceeding 4 meters (13 feet), road transit can require up to eight oversized loads for a single tower.

Table 1.4 Wind tower sections: Transportation factors, by mode, within the United States and between Canada and the United States

Factor	Truck	Rail	Vessels and barges
Number of sections	***.	***.	***.
Diameter of sections (maximum)	***.	***.	***.
Length of sections (total)	***.	***.	***.
Weight of sections (total)	***.	***.	***.

Source: Utility Scale Wind Towers from Canada, Indonesia, Korea, and Vietnam (Final), Confidential Report, INVSS-081, July 17, 2020 (“Original confidential report”).

At the wind project site, the base section of the tower is lifted by a crane and lowered straight down onto the foundation platform, over a power unit that sits in the base of the tower (figure 1.8). The flange at the base of the tower is attached to the foundation platform with large structural nuts and bolts, then the next section of the tower is added and the flanges at each end of the tower sections are bolted together. Once all sections of the tower are assembled, the nacelle is mounted onto the top-section flange and finally the rotor (hub and blades) assembly is attached to the generator shaft protruding from the front of the nacelle.

Figure 1.6 Wind towers: Turbine installation on land

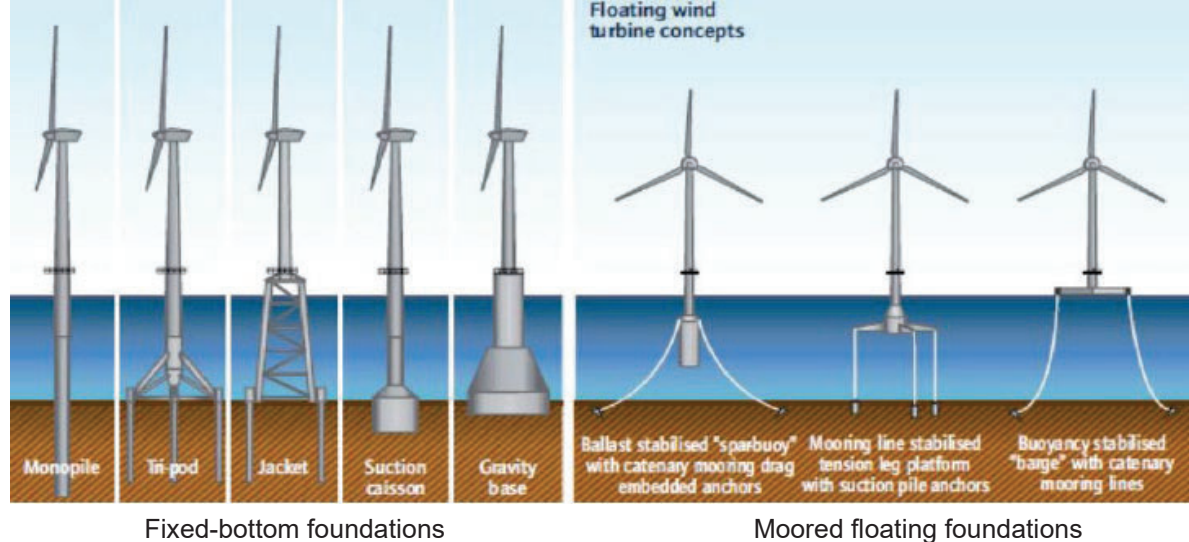


Source: DOE/NREL, credit: First Wind (top), Patrick Corkery (center), and Todd Spink (bottom).

For offshore wind projects, towers are constructed from high-grade steel to withstand the additional hydrodynamic loading from wave action and require dedicated corrosion protection systems with high-grade main coatings due to the more expensive offshore operating and maintenance conditions, according to the American Wind Energy Association (“AWEA”). In addition to being more rugged, offshore wind towers are larger, with base diameters varying as much as 5 meters (16 feet) to 10 meters (33 feet), and heavier with a 120

meters- (394 feet-) high tower weighing over 2,500 metric tons (2,756 short tons). Offshore towers are most commonly installed upon a tubular monopile foundation (substructure) set into the seafloor, which represent about 73.5 percent of the total global offshore wind market in 2018, due to the ease of installation in shallow to medium water depths. Other types of offshore tower support substructures include various fixed-bottom and moored floating foundations (figure 1.9). The turbine and foundation components are transported by “seajacking” (self-elevating) ships or barges to the project site (figure 1.9). After the monopile foundation base is set into the seabed by a shipboard hydraulic pile-driver, the transition piece is lowered and attached onto the top. This transition piece, which includes a boat-mooring fixture, access ladder, and top platform, serves as the mounting platform protruding above the surface of the water for attaching the base section of the tower.

Figure 1.7 Wind towers: Offshore fixed bottom and moored floating foundations



Source: Konstantinidis, E.I., and P.N. Botsaris, “Wind Turbines: Current Status, Obstacles, Trends, and Technologies,” *Materials Science and Engineering*, vol. 161, 2016, p. 3, <https://iopscience.iop.org/article/10.1088/1757-899X/161/1/012079>.

Figure 1.10 Wind towers: Turbine installation offshore



Source: Woodhatch, Matthew, "Offshore Wind Turbines— How Do You Install a Wind Turbine Out at Sea," Groundsure, April 21, 2017, <https://www.groundsure.com/resources/offshore-wind-turbines/>.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from six firms, which accounted for all known production of wind towers in the United States during 2018.³⁰

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of five known and currently operating U.S. producers of wind towers. Three firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of wind towers in the United States during 2024.³¹

Recent developments

Table 1.5 presents events in the U.S. industry since the Commission's original investigations.³²

Table 1.5 Wind Towers: Developments in the U.S. industry, since 2019³³

Item	Firm	Event
Acquisition	CS Wind	In June 2021, CS Wind acquired Vesta's tower manufacturing facility in Pueblo Colorado. This facility has a capacity to produce over 3,000 tower segments per year.
Plant opening	Arcosa	In March 2023, Arcosa announced a \$750 million of additional wind tower orders and plans for a new facility in Belen, New Mexico. The first shipments from this new plant occurred in May 2024.
Expansion	CS Wind	In April 2023, CS Wind broke ground on an expansion of their Pueblo Colorado facility, which is expected to increase the production capacity of this site to 10,000 wind turbine tower sections per year. The facility is expected to be completed in 2028.

Source: North American Wind Power, "[CS Wind Acquiring Vesta Pueblo Tower Factory](#)," June 3, 2021; Windfair, "[Arcosa, Inc. Announces \\$750 Million of Additional Wind Tower Orders and Plans a New Facility in New Mexico](#)," March 16, 2023; Burns McDonnell, "[CS Wind Breaks Ground on Expansion at World's](#)

³⁰ Original publication, p. 1-5.

³¹ Domestic interested parties' response to the notice of institution, July 31, 2025, p. 2.

³² For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

³³ On January 20, 2025, the Executive Office of the President released a memorandum entitled "Temporary withdrawal of all areas on the outer continental shelf from offshore wind leasing and review of the Federal Government's leasing and permitting practices for wind projects," halted the issuing of all new or renewed approvals, rights of way, permits, leases, or loans for onshore and offshore wind projects pending the completion of a comprehensive assessment and review of Federal wind leasing and permitting practices. EOP, 90 Fed. Reg. 8363, 2025-01966 (January 29, 2025).

Largest Wind Turbine Tower Manufacturing Plant, Plans to Create 850 New Jobs in Pueblo Colorado,”
April 4, 2023.

U.S. producers’ trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.2 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table 1.6 Wind towers: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2017	2018	2019	2024
Capacity	Quantity	***	***	***	***
Wind tower production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2017, 2018, and 2019, data are compiled using data submitted in the Commission’s original investigations. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested parties’ response to the notice of institution, July 31, 2025, exh. 1.

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

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like Wind towers constitutes a major proportion of the total domestic Wind tower production of the Wind towers. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.³⁴

In its original determinations, the Commission defined a single domestic like product consisting of wind towers coextensive with the scope of the investigations.³⁵ In its original determinations, the Commission defined the domestic industry as all U.S. producers of wind towers.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from seven firms, which accounted for the vast majority of total U.S. imports of wind towers from Canada, Indonesia, South Korea, and Vietnam during 2019.³⁶ Import data presented in the original investigations are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission’s notice of institution, the domestic interested parties provided a list of six potential U.S. importers of wind towers.³⁷

³⁴ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

³⁵ 90 FR 28764, July 1, 2025.

³⁶ Original confidential report, p. 4.1

³⁷ Domestic interested parties’ response to notice of institution, July 31, 2025, exh. 1.

U.S. imports

Table 1.7 presents the quantity, value, and unit value of U.S. imports from Canada, Indonesia, South Korea, and Vietnam as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity).

Table 1.7 Wind towers: U.S. imports, by source and period

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

U.S. imports from	Measure	2020	2021	2022	2023	2024
Canada	Quantity	374	284	91	5	2
Indonesia	Quantity	387	191	30	–	45
South Korea	Quantity	99	257	205	41	304
Vietnam	Quantity	20	–	–	–	–
Subject sources	Quantity	880	732	326	45	352
Denmark	Quantity	7		0	60	287
Germany	Quantity	1	–	7	561	1,359
India	Quantity	784	220	11	30	223
All other sources	Quantity	1,337	719	161	90	184
Nonsubject sources	Quantity	2,129	940	179	740	2,053
All import sources	Quantity	3,009	1,672	505	785	2,405
Canada	Value	143,252	90,926	40,397	10,837	1,283
Indonesia	Value	89,881	48,699	7,354	–	15,924
South Korea	Value	22,828	68,231	52,122	9,678	96,508
Vietnam	Value	3,613	–	–	–	261
Subject sources	Value	259,574	207,857	99,873	20,515	113,975
Denmark	Value	5,747	–	613	24,539	102,626
Germany	Value	6,981	706	673	177,025	546,233
India	Value	190,190	59,869	4,944	8,257	61,934
All other sources	Value	414,442	247,235	78,147	42,152	72,927
Nonsubject sources	Value	617,361	307,811	84,377	251,973	783,721
All import sources	Value	876,935	515,667	184,250	272,488	897,696
Canada	Unit value	383,372	320,470	444,606	2,347,956	764,787
Indonesia	Unit value	232,315	254,469	243,577	–	350,213
South Korea	Unit value	229,466	265,297	254,100	238,777	317,106
Vietnam	Unit value	181,315	–	–	–	693,682
Subject sources	Unit value	294,982	283,844	306,194	454,415	323,921
Germany	Unit value	12,499,118	2,516,752	94,864	315,725	401,905
Denmark	Unit value	826,335	–	9,768,090	410,864	357,023
India	Unit value	242,553	271,544	458,468	279,610	277,695
All other sources	Unit value	309,869	343,863	484,958	469,792	396,968
Nonsubject sources	Unit value	289,962	327,545	471,151	340,654	381,688
All import sources	Unit value	291,430	308,406	364,661	347,198	373,237

Source: Compiled from official Commerce statistics for HTS statistical reporting number 7308.20.0020, accessed September 3, 2025. These data may be overstated as HTS statistical reporting number 7308.20.0020 may contain wind towers outside the scope of these reviews. Quantity data for HTS statistical number 7308.20.0020 is only available in kilograms and has been converted into number of towers using the following conversion rate provided by the domestic interested party: 1 tower = 132,449 kilograms.

Note: Because of rounding, figure may not add to total shown. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Cumulation considerations³⁸

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like wind towers. Additional information concerning geographical markets and simultaneous presence in the market is presented below.³⁹

Imports from Canada were reported in 59 of the 60 months between 2020 and 2024. Imports from Indonesia were reported in 22 of the 60 months between 2020 and 2024. Imports from South Korea were reported in 24 of the 60 months between 2020 and 2024. Imports from Vietnam were reported in 6 of the 60 months between 2020 and 2024.

Imports from Canada entered through eastern, northern and southern border regions in all years from 2020 through 2024. Imports from Indonesia entered through the southern border region in 2020 through 2022, and the western border region in 2020, 2021, and 2024. Imports from South Korea entered through the eastern border region in 2022 and 2024, the northern border region in 2022 and 2024, the southern border region in 2020 through 2021 and in 2023 through 2024 and the western border region in 2023 and 2024. Imports from Vietnam entered through the southern border region in 2020 and 2024.

³⁸ Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting number 7308.20.0020.

³⁹ In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

Apparent U.S. consumption and market shares

Table 1.8 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.8 Wind towers: Apparent U.S. consumption and market shares, by source and period

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

Source	Measure	2017	2018	2019	2024
U.S. producers	Quantity	2,666	2,698	2,964	***
Canada	Quantity	***	***	***	2
Indonesia	Quantity	***	***	***	45
South Korea	Quantity	***	***	***	304
Vietnam	Quantity	***	***	***	—
Subject sources	Quantity	993	971	1,581	352
Nonsubject sources	Quantity	***	***	***	184
All import sources	Quantity	***	***	***	536
Apparent U.S. consumption	Quantity	***	***	***	1,213
U.S. producers	Value	843,586	859,598	995,108	***
Canada	Value	***	***	***	1,283
Indonesia	Value	***	***	***	15,924
South Korea	Value	***	***	***	96,508
Vietnam	Value	***	***	***	261
Subject sources	Value	261,474	239,515	496,489	113,975
Nonsubject sources	Value	***	***	***	783,721
All import sources	Value	***	***	***	897,696
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
Canada	Share of quantity	***	***	***	***
Indonesia	Share of quantity	***	***	***	***
South Korea	Share of quantity	***	***	***	***
Vietnam	Share of quantity	***	***	***	***
Subject sources	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
Canada	Share of value	***	***	***	***

Source	Measure	2017	2018	2019	2024
Indonesia	Share of value	***	***	***	***
South Korea	Share of value	***	***	***	***
Vietnam	Share of value	***	***	***	***
Subject sources	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2020, 2021, 2022 and 2023, data are compiled using data submitted in the Commission's original investigations. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 7308.20.0020, accessed September 3, 2025.

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

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

Note: Because of rounding, figures may not add to totals shown. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

The industry in Canada, Indonesia, South Korea, and Vietnam

Producers in Canada, Indonesia, South Korea, and Vietnam

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from six firms, which accounted for approximately all known production of wind towers in Canada, Indonesia, South Korea, and Vietnam during 2019, which account for all known production of wind towers from Canada, Indonesia, South Korea, and Vietnam to the United States during 2019.⁴⁰

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of nine possible producers of wind towers in Canada, Indonesia, South Korea, and Vietnam.⁴¹

The industry in Canada

Recent developments

Table 1.9 presents events in the Canadian industry since the Commission's original investigations.

Table 1.9 Wind towers: Developments in the Canadian, Indonesian, South Korean, and Vietnamese industry, 2019-2024.

Item	Firm	Event
Plant Restart	Marmen	In September 2024, Marmen announced it will be restarting its wind tower manufacturing activities in Matane, Quebec due to a signed supply contract with PPAW to supply 350 MW of renewable energy to the Quebec grid.

Source: Marmen Energie, "[Marmen Energie restarts its wind power manufacturing activities](#)," September 16, 2024.

⁴⁰ Original publication, p. 1.5.

⁴¹ Domestic interested parties' response to the notice of institution, August 1, 2025, exh. 1.

Exports

Table 1.10 presents export data for towers and lattice masts, a category that includes wind towers and out-of-scope from Canada (by export destination in descending order of quantity for 2024).

Table 1.10 Towers and lattice masts: Value of exports from Canada by destination and period.

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
United States	194,955	151,832	95,262	36,733	56,084
India	—	—	734	780	896
Saudi Arabia	—	—	1	11	447
U.S. Minor Outlying Is.	—	—	—	—	18
United Kingdom	—	—	—	1	7
South Korea	—	—	—	—	7
Chile	—	1	—	6	6
Cuba	5	—	260	—	5
Sint Maarten	—	—	—	—	1
Egypt	—	—	—	—	—
All other markets	618	1,069	1,454	316	—
All markets	195,578	152,902	97,711	37,848	57,472

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7308.20. These data may be overstated as HS subheadings 7308.20 may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to totals shown. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

The industry in Indonesia

Recent developments

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

Exports

Table 1.11 presents export data for towers and lattice masts, a category that includes wind towers and out-of-scope from Indonesia (by export destination in descending order of quantity for 2024).

Table 1.11 Towers and lattice masts: Value of exports from Indonesia, by destination and period.

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
Australia	254	4,062	20,892	3,360	49,885
Germany	–	2,019	509	–	35,772
Lithuania	–	–	–	14,669	24,444
United States	63,772	44,507	–	1	20,488
Estonia	–	–	–	29,413	20,000
Singapore	274	1,848	5,797	3,650	6,031
Sweden	–	9,352	–	–	4,197
China	4	–	167	15	1,110
India	81	3,135	455	–	950
Taiwan	12	47,763	95,916	–	546
All other markets	10,254	12,439	47,526	2,004	1,281
All markets	74,651	125,125	171,261	53,112	164,706

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7308.20. These data may be overstated as HS subheadings 7308.20 may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to totals shown. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

The industry in South Korea

Recent developments

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

Exports

Table 1.12 presents export data for towers and lattice masts, a category that includes wind towers and out-of-scope from South Korea (by export destination in descending order of quantity for 2024).

Table 1.12 Towers and lattice masts: Value of exports from South Korea, by destination and period.

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
United States	55,817	41,251	70,427	27,433	67,408
Japan	12,523	9,182	3,806	24,833	24,074
Netherlands	—	—	—	—	5,957
Germany	—	—	1,825	3,549	5,767
Taiwan	26	—	64	2,287	3,573
France	—	—	—	—	2,482
Vietnam	4	21,425	2	—	51
Poland	—	—	—	—	23
Canada	—	25	3,191	—	22
Indonesia	—	—	—	338	3
All other markets	7,485	7,126	24,815	727	1
All markets	75,856	79,009	104,130	59,167	109,361

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7308.20. These data may be overstated as HS subheadings 7308.20 may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to totals shown. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

The industry in Vietnam

Recent developments

Table 1.13 presents events in the Vietnamese industry since the Commission's original investigations.

Table 1.13 Wind towers: Developments in the Vietnamese industry, since 2019.

Item	Firm	Event
Plant Opening	SRE	In 2020, Southern Green Energy and Renewable Energy (SGE) co. Ltd. Signs its first contracts to manufacture wind tower sections and flanges for both domestic and international wind energy projects.
Acquisition	CS Wind	In August 2022, CS Wind Co. acquired 100 percent of Vina-Halla Heavy Industry Co., Ltd. from Halla Energy & Environment Co. Vina-Halla Heavy Industries is a producer of wind towers with an annual production capacity of 400 wind towers.
Expansion	CS Wind	In March 2024, CS Wind Vietnam completed an \$80-million expansion of its offshore tower facility in Phu My Town, Ba Ria Vung Tau Province. This facility is estimated to have a production capacity of 360,000 metric tons. It is capable of producing wider sections up to 10 meters.

Source: SRE, [“Our Milestones,”](#) accessed September 4, 2024; AEGC, [“Vietnam clears proposed by CS Wind Corporation, Halla Energy & Environment Co., Ltd. And Vina-Halla Heavy Industry Co., Ltd,”](#) October 3, 2022; CS Wind, [“CS Wind holds completion ceremony for offshore wind tower expansion in Vietnam,”](#) March 19, 2024.

Exports

Table 1.14 presents export data for towers and lattice masts, a category that includes wind towers and out-of-scope from Canada, Indonesia, South Korea, and Vietnam (by export destination in descending order of quantity for 2024).

Table 1.14 Towers and lattice masts: Value of exports from Vietnam, by destination and period.

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
Taiwan	12,322	–	8,584	3,183	95,029
Canada	–	–	3	3	64,943
United States	3,513	–	8	–	14,869
Indonesia	–	–	94	–	9,439
Romania	–	–	–	–	6,599
Australia	26,219	16,569	1,952	2,212	2,138
Malaysia	–	–	–	1,205	95
Philippines	–	219	–	–	93
Thailand	–	7	–	–	33
Peru	71	–	22	222	25
All other markets	142,956	267,411	164,911	15,940	8
All markets	185,082	284,205	175,575	22,765	193,272

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7308.20. These data may be overstated as HS subheadings 7308.20 may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to totals shown. Zeroes, null values, and undefined⁴² calculations are suppressed and shown as “–”.

⁴² South Korea and Canada were listed as the 12th and 13th leading exporters globally in 2024, respectively.

Third Country trade actions

Based on available information, wind towers from Canada, Indonesia, Korea, and Vietnam have not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Table 1.15 presents global export data for towers and lattice masts, a category that includes wind towers and out-of-scope products (by source in descending order of quantity for 2024).

Table 1.15 Towers and Lattice Masts: Value of global exports by country and period

Value in 1,000 dollars

Exporting country	2020	2021	2022	2023	2024
Turkey	317,958	382,329	595,074	742,089	621,788
China	482,773	541,097	588,263	501,763	537,259
Germany	237,679	84,253	110,466	365,568	483,785
Spain	356,744	368,688	403,639	433,420	479,535
India	354,367	294,406	528,781	469,472	411,926
Netherlands	219,266	59,438	134,587	206,580	369,202
Denmark	278,600	406,825	177,099	233,073	303,782
Portugal	68,969	137,452	140,511	178,137	244,732
Vietnam	185,082	284,205	175,575	22,765	193,272
Indonesia	74,651	125,125	171,261	53,112	164,706
All other exporters	1,202,873	1,419,986	1,196,083	1,057,811	565,311
All exporters	3,778,961	4,103,804	4,221,338	4,263,789	4,375,296

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7308.20. These data may be overstated as HS subheadings 7308.20 may contain products outside the scope of these reviews.

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

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
90 FR 28722 July 1, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-07-01/pdf/2025-12052.pdf
90 FR 28764 July 1, 2025	Utility Scale Wind Towers From Canada, Indonesia, South Korea, and Vietnam; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2025-07-01/pdf/2025-11841.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed by the Wind Tower Coalition (the “Coalition”) on behalf of its members, Arcosa Wind Towers, Inc. (“Arcosa”) and Broadwind, Inc. (“Broadwind”), as well as Ventower Industries LLC (“Ventower”). All three companies are domestic producers of wind towers (collectively referred to herein as “domestic interested parties”).

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

Table B.1 Wind towers: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. producer	3	***%

Note: The U.S. producer coverage figure is the estimated share of total U.S. production of wind towers in 2024 accounted for by responding firms. The estimate was calculated as the quantity of reported production (towers) divided by the total U.S. production (** towers). ** did not produce towers in 2024. Domestic interested parties' response to the notice of institution, July 31, 2025, exh. 1.

Company-specific information

Table B.2 Wind towers: Response checklist for U.S. producers

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

Item	Arcosa Wind Towers, Inc.	Broadwind, Inc.	Ventower Industries LLC
Nature of operation	Yes	Yes	Yes
Statement of intent to participate	Yes	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes	Yes
U.S. producer list	Yes	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes	Yes
List of sources for national/regional prices	Yes	Yes	Yes
Trade/financial data	Yes	Yes	No
Changes in supply/demand	Yes	Yes	Yes
Complete response	Yes	Yes	Yes

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the Coalition. The Coalition requests that the Commission conduct expedited reviews of the antidumping and/or countervailing duty orders on wind towers.¹

¹ Domestic interested parties' comments on adequacy, September 10, 2025, p. 2.

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1: Wind towers: Summary data concerning the total U.S. market	C-3
Table C-2: Wind towers: Summary data concerning the merchant U.S. market	C-6

Total Market

Table C-1

Wind towers: Summary data concerning the U.S. total market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. (total market) consumption quantity:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Importers' share (fn1):						
Canada.....	***	***	***	▲ ***	▼ ***	▲ ***
Indonesia.....	***	***	***	▲ ***	▲ ***	▼ ***
Korea.....	***	***	***	▼ ***	▼ ***	▲ ***
Vietnam.....	***	***	***	▲ ***	▲ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▼ ***	▲ ***
All import sources.....	***	***	***	▲ ***	▼ ***	▲ ***
U.S. (total market) consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Importers' share (fn1):						
Canada.....	***	***	***	▲ ***	▼ ***	▲ ***
Indonesia.....	***	***	***	▲ ***	▲ ***	▲ ***
Korea.....	***	***	***	▼ ***	▼ ***	▼ ***
Vietnam.....	***	***	***	▲ ***	▲ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▼ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▼ ***	▲ ***
All import sources.....	***	***	***	▲ ***	▼ ***	▲ ***
U.S. importers' U.S. shipments from.--						
Canada:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Indonesia:						
Quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Korea:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▼ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▼ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

Wind towers: Summary data concerning the U.S. total market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. importers' U.S. shipments from.--Continued						
Vietnam:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	993	971	1,581	▲ 59.2	▼ (2.2)	▲ 62.8
Value.....	261,474	239,515	496,489	▲ 89.9	▼ (8.4)	▲ 107.3
Unit value.....	\$263,317	\$246,668	\$314,035	▲ 19.3	▼ (6.3)	▲ 27.3
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Nonsubject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▲ ***
Value.....	***	***	***	▼ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▲ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***
All import sources:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▼ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
U.S. producers':						
Average capacity quantity.....	3,975	4,017	4,091	▲ 2.9	▲ 1.1	▲ 1.8
Production quantity.....	2,764	2,672	2,895	▲ 4.7	▼ (3.3)	▲ 8.3
Capacity utilization (fn1).....	69.5	66.5	70.8	▲ 1.2	▼ (3.0)	▲ 4.2
U.S. shipments:						
Quantity.....	2,666	2,698	2,964	▲ 11.2	▲ 1.2	▲ 9.9
Value.....	843,586	859,598	995,108	▲ 18.0	▲ 1.9	▲ 15.8
Unit value.....	\$316,424	\$318,606	\$335,731	▲ 6.1	▲ 0.7	▲ 5.4
Export shipments:						
Quantity.....	---	---	---	---	---	---
Value.....	---	---	---	---	---	---
Unit value.....	---	---	---	---	---	---
Ending inventory quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Inventories/total shipments (fn1).....	***	***	***	▼ ***	▼ ***	▼ ***
Production workers.....	2,309	2,149	2,186	▼ (5.3)	▼ (6.9)	▲ 1.7
Hours worked (1,000s).....	4,852	4,409	4,906	▲ 1.1	▼ (9.1)	▲ 11.3
Wages paid (\$1,000).....	159,858	156,739	164,875	▲ 3.1	▼ (2.0)	▲ 5.2
Hourly wages (dollars per hour).....	\$32.95	\$35.55	\$33.61	▲ 2.0	▲ 7.9	▼ (5.5)
Productivity (units per 10,000 hours).....	5.7	6.1	5.9	▲ 3.6	▲ 6.4	▼ (2.6)
Unit labor costs.....	\$57,836	\$58,660	\$56,952	▼ (1.5)	▲ 1.4	▼ (2.9)

Table continued on next page.

Table C-1--Continued

Wind towers: Summary data concerning the U.S. total market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. producers':--Continued						
Net sales:						
Quantity.....	2,666	2,698	2,964	▲11.2	▲1.2	▲9.9
Value.....	843,586	859,598	995,108	▲18.0	▲1.9	▲15.8
Unit value.....	\$316,424	\$318,606	\$335,731	▲***	▲***	▲***
Cost of goods sold (COGS).....	727,673	789,365	904,581	▲24.3	▲8.5	▲14.6
Gross profit or (loss) (fn2).....	115,913	70,233	90,527	▼(21.9)	▼(39.4)	▲28.9
SG&A expenses.....	28,110	25,317	28,143	▲0.1	▼(9.9)	▲11.2
Operating income or (loss) (fn2).....	87,803	44,916	62,384	▼(29.0)	▼(48.8)	▲38.9
Net income or (loss) (fn2).....	85,024	50,861	57,084	▼(32.9)	▼(40.2)	▲12.2
Capital expenditures.....	41,751	26,707	17,323	▼(58.5)	▼(36.0)	▼(35.1)
Research and development expenses.....	345	200	235	▼(31.9)	▼(42.0)	▲17.5
Net assets.....	411,357	433,347	335,183	▼(18.5)	▲5.3	▼(22.7)
Unit COGS.....	\$272,946	\$292,574	\$305,189	▲11.8	▲7.2	▲4.3
Unit SG&A expenses.....	\$10,544	\$9,384	\$9,495	▼(9.9)	▼(11.0)	▲1.2
Unit operating income or (loss) (fn2).....	\$32,934	\$16,648	\$21,047	▼(36.1)	▼(49.5)	▲26.4
Unit net income or (loss) (fn2).....	\$31,892	\$18,851	\$19,259	▼(39.6)	▼(40.9)	▲2.2
COGS/sales (fn1).....	86.3	91.8	90.9	▲4.6	▲5.6	▼(0.9)
Operating income or (loss)/sales (fn1).....	10.4	5.2	6.3	▼(4.1)	▼(5.2)	▲1.0
Net income or (loss)/sales (fn1).....	10.1	5.9	5.7	▼(4.3)	▼(4.2)	▼(0.2)

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

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

Merchant Market

Table C-2

Wind towers: Summary data concerning the U.S. merchant market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. (merchant market) consumption quantity:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Importers' share (fn1):						
Canada.....	***	***	***	▲ ***	▼ ***	▲ ***
Indonesia.....	***	***	***	▼ ***	▲ ***	▼ ***
Korea.....	***	***	***	▼ ***	▼ ***	▼ ***
Vietnam.....	***	***	***	▲ ***	▲ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▼ ***	▲ ***
All import sources.....	***	***	***	▲ ***	▼ ***	▲ ***
U.S. (merchant market) consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Importers' share (fn1):						
Canada.....	***	***	***	▲ ***	▼ ***	▲ ***
Indonesia.....	***	***	***	▲ ***	▲ ***	▲ ***
Korea.....	***	***	***	▼ ***	▼ ***	▼ ***
Vietnam.....	***	***	***	▲ ***	▲ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▼ ***	▲ ***
All import sources.....	***	***	***	▲ ***	▼ ***	▲ ***
U.S. importers' U.S. shipments from.--						
Canada:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Indonesia:						
Quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Korea:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▼ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▼ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued on next page.

Table C-2--Continued

Wind towers: Summary data concerning the U.S. merchant market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. importers' U.S. shipments from.--Continued						
Vietnam:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	993	971	1,581	▲ 59.2	▼ (2.2)	▲ 62.8
Value.....	261,474	239,515	496,489	▲ 89.9	▼ (8.4)	▲ 107.3
Unit value.....	\$263,317	\$246,668	\$314,035	▲ 19.3	▼ (6.3)	▲ 27.3
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
Nonsubject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▲ ***
Value.....	***	***	***	▼ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▲ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***
All import sources:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▼ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▼ ***
U.S. producers':						
Commercial U.S. shipments:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▼ ***	▲ ***

Table continued on next page.

Table C-2--Continued

Wind towers: Summary data concerning the U.S. merchant market, 2017-19

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. producers'--Continued						
Commercial sales:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▼ ***	▲ ***
Cost of goods sold (COGS).....	***	***	***	▲ ***	▲ ***	▲ ***
Gross profit or (loss) (fn2).....	***	***	***	▼ ***	▼ ***	▲ ***
SG&A expenses.....	***	***	***	▲ ***	▼ ***	▲ ***
Operating income or (loss) (fn2).....	***	***	***	▼ ***	▼ ***	▲ ***
Net income or (loss) (fn2).....	***	***	***	▼ ***	▼ ***	▼ ***
Unit COGS.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit SG&A expenses.....	***	***	***	▼ ***	▼ ***	▼ ***
Unit operating income or (loss) (fn2).....	***	***	***	▼ ***	▼ ***	▲ ***
Unit net income or (loss) (fn2).....	***	***	***	▼ ***	▼ ***	▼ ***
COGS/sales (fn1).....	***	***	***	▲ ***	▲ ***	▲ ***
Operating income or (loss)/sales (fn1).....	***	***	***	▼ ***	▼ ***	▲ ***
Net income or (loss)/sales (fn1).....	***	***	***	▼ ***	▼ ***	▼ ***

Notes:

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

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following two firms as top purchasers of utility scale wind towers: ***. Purchaser questionnaires were sent to these five two firms and none responded.

