Aluminum Lithographic Printing Plates from China and Japan

Investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary)

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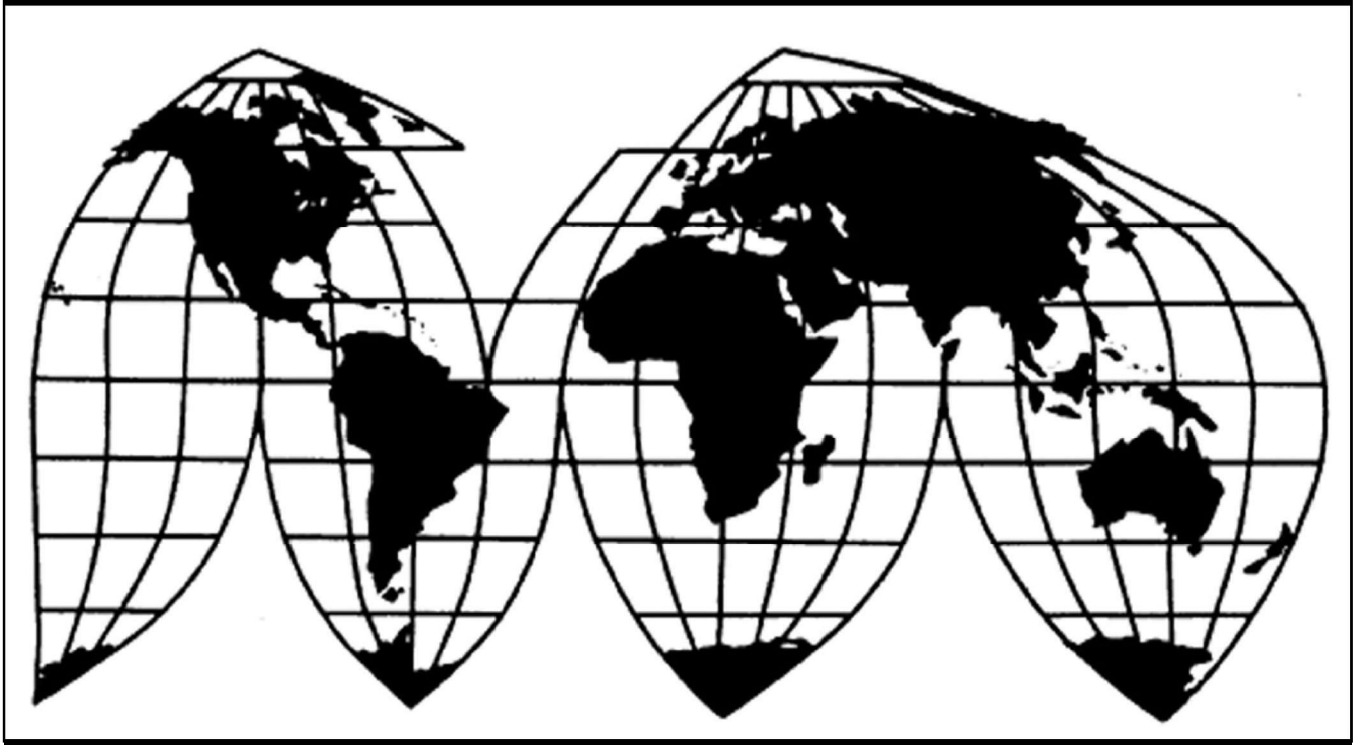
U.S. International Trade Commission



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CONTENTS

Page

CONTENTS

Page

CONTENTS

Page

CONTENTS

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary)

Aluminum Lithographic Printing Plates from China and Japan

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of aluminum lithographic printing plates (ALPs) from China and Japan, provided for in subheadings 3701.30.00 and 3701.99.60 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value ("LTFV") and to be subsidized by the government of China.[2]

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing

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

[2] 88 FR 73316 and 88 FR 73313 (October 25, 2023).

duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations.

BACKGROUND

On September 28, 2023, Eastman Kodak Company, Rochester, New York, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of ALPs from China and LTFV imports of ALPs from China and Japan. Accordingly, effective September 28, 2023, the Commission instituted antidumping and countervailing duty investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 4, 2023 (88 FR 68669). The Commission conducted its conference on October 19, 2023. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of aluminum lithographic printing plates ("ALPs") from China and Japan that are allegedly sold in the United States at less than fair value and imports of ALPs from China that are allegedly subsidized by the government of China.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.[1] In applying this standard, the Commission weighs the evidence before it and determines whether "(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation."[2]

II. Background

Eastman Kodak Company ("Kodak" or "Petitioner"), a domestic producer of ALPs, filed the petitions in these investigations on September 28, 2023. Petitioner appeared at the staff conference accompanied by counsel and submitted a postconference brief.

Three respondent entities participated in these investigations. FUJIFILM North America Corporation ("Fujifilm USA"), an importer of subject merchandise, FUJIFILM Corporation ("Fujifilm Japan"), a producer and exporter of subject merchandise in Japan, and FUJIFILM Printing Plate (China) Co., Ltd. ("Fujifilm China"), a producer and exporter of subject

[1] 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States, 2*0 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

[2] *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

merchandise in China (collectively "Fujifilm Group" or "Respondents"), appeared at the staff conference accompanied by counsel and submitted a joint postconference brief.

U.S. industry data are based on the questionnaire response of two firms (***), which accounted for *** U.S. production of ALPs in 2022.[3] U.S. import data are based on the questionnaire responses of five importers, which accounted for *** of U.S. imports from subject sources based on official import statistics.[4] The Commission received responses to its questionnaire from four producers/exporters of subject merchandise: two producer/exporters of ALPs in China accounting for approximately *** percent of overall production of ALPs from China in 2022, and two producer/exporters of ALPs in Japan accounting for *** production of ALPs in Japan in 2022.[5]

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the "domestic like product" and the "industry."[6] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines the relevant domestic industry as the "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[7] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[8]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by the U.S.

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[3] Confidential Staff Report, Memorandum INV-VV-095 (Nov. 3, 2023) ("CR"); *Aluminum Lithographic Printing Plates from China and Japan*, Inv. Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary), USITC Pub. 5475 (November 2023) ("PR") at I-4 and III-1.

[4] CR/PR at IV-1. Questionnaire coverage was calculated based on official import statistics using HTS statistical reporting numbers 3701.30.0000, a "basket category" that may include out-of-scope merchandise. Although subject merchandise may also enter under HTS statistical number reporting numbers 3701.99.6060, 3701.99.3000, or 8442.50.1000, Petitioner asserts that the overwhelming majority of subject imports ALPs enter the United States under HTS subheading 3701.30.00. *Id*. at IV-1 n.3.

[5] CR/PR at VII-3, VII-10.

[6] 19 U.S.C. § 1677(4)(A).

[7] 19 U.S.C. § 1677(4)(A).

[8] 19 U.S.C. § 1677(10).

Department of Commerce ("Commerce").[9] Therefore, Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at LTFV is "necessarily the starting point of the Commission's like product analysis."[10] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[11] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[12] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[13] The Commission looks for clear dividing lines among possible like products and

[9] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

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

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

[12] *See*, *e.g.*, *Cleo*, 501 F.3d at 1299; *NEC Corp. v. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

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

disregards minor variations.[14] It may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[15]

In its notice of initiation, Commerce defined the imported merchandise within the scope of these investigations as:

> {A}luminum lithographic printing plates. Aluminum lithographic printing plates consist of a flat substrate containing at least 90 percent aluminum by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the production of newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials through an offset printing process, where an aluminum lithographic printing plate facilitates the transfer of an image onto the printed media.
>
> Aluminum lithographic printing plates within the scope of these investigations include all aluminum lithographic printing plates, irrespective of the dimensions or thickness of the underlying aluminum substrate, whether the plate requires processing after an image is applied to the plate, whether the plate is ready to be mounted to a press and used in printing operations immediately after an image is applied to the plate, or whether the plate has been exposed to light or heat to create an image on the plate or remains unexposed and is free of any image.
>
> Subject merchandise also includes aluminum lithographic printing plates produced from an aluminum sheet coil that has been coated with a light-

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

[15] *See*, *e.g.*, *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington,* 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, coextensive with the scope).

> sensitive image-recording layer in a subject country and that is subsequently unwound and cut to the final dimensions to produce a finished plate in a third country (including the United States), or exposed to light or heat to create an image on the plate in a third country (including in a foreign trade zone within the United States).
>
> Excluded from the scope of this investigation are lithographic printing plates manufactured using a substrate produced from a material other than aluminum, such as rubber or plastics.
>
> Aluminum lithographic printing plates are currently classifiable under HTSUS subheadings 3701.30.0000 and 3701.99.6060. Further, merchandise that falls within the scope of these investigations may also be entered into the United States under HTSUS subheadings 3701.99.3000 and 8442.50.1000. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.[16]

ALPs are image carriers that are used in offset printing processes. They are commonly used to produce printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials. ALPs are put into a device called a platesetter or image setter which imparts the desired image onto the ALP. The platesetter may transfer the image by two different methods, computer to film ("CTF") or computer-to-plate ("CTP"). In CTF printing, the image is first imparted onto photographic film and then applied to the plates through an exposure process. In CTP printing, the image is directly applied to the plates. Once the image is etched onto the ALP, wet plates are then fed through a plate developer, whereas process free plates do not require any additional processing step.[17] ALPs are then mounted in printing presses and used with fountain solutions and inks to reproduce the image on a suitable receiving material (*e.g.*, cloth, paper, or plastic). Each ALP carries a specific color record, and thus, multiple plates and inks must be used to generate a colored image.[18]

ALPs are manufactured using lithographic aluminum plate, a flat substrate containing at least 90 percent aluminum by weight. The aluminum substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more

[16] Aluminum Lithographic Printing Plates From the People's Republic of China and Japan: Initiation of Less-Than-Fair-Value Investigations, 88 Fed. Reg. 73316 (Dep't Commerce Oct. 25, 2023); Aluminum Lithographic Printing Plates From the People's Republic of China: Initiation of Countervailing Duty Investigation, 88 Fed. Reg. 73313 (Dep't Commerce Oct. 25, 2023).

[17] CR/PR at I-8.

[18] CR/PR at I-7 – I-9.

anodizing treatments that form a hydrophilic layer on the substrate. An image-recording, oleophilic layer that is sensitive to light is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer of the ALP.[19]

A. Arguments of the Parties

Petitioner's Argument. Petitioner argues that the Commission should define a single domestic like product, coextensive with the scope.[20] In Petitioner's view, the Commission's traditional domestic like product factors support defining a single domestic like product coextensive with the scope, given that all ALPs have similar physical characteristics and end uses; share the same production processes and manufacturing facilities using the same employees; are not interchangeable with any other printing plates; are sold through similar channels of distribution; are perceived to comprise the same unique product; and are sold within a range of prices.[21]

Respondents' Argument. Respondents do not contest Petitioner's proposed definition of the domestic like product.[22]

B. Analysis and Conclusion

Based on the record, we define a single domestic like product consisting of ALPs, coextensive with the scope in these investigations.

Physical Characteristics and Uses. The record indicates that ALPs covered by the scope of these investigations share the same basic physical characteristics, as all ALPs are produced using lithographic grade aluminum containing at least 90 percent aluminum, and a polymer-based coating capable of capturing an image using either light or heat. They also share the same general application, which is for use in printing presses to reproduce images on suitable receiving materials, such as cloth, paper, or plastic, using fountain solutions and inks. ALPs are commonly used to produce printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.[23]

ALPs are manufactured in different dimensions and thicknesses, but all ALP products fall on a continuum of such specifications. The gauge of an ALP determines not only its specific use

[19] CR/PR at I-9 – I-12, II-1.
[20] Petitioner Postconf. Br. at 3-4, Exhibit 1 at 29-33.
[21] Petitioner Postconf. Br at 5-6, Exhibit 1 at 7-9.
[22] Respondents Postconf. Br. at 5.
[23] CR/PR at I-7 – I-9, II-1.

in printing but also its run time, or time spent used in the printing process, as thicker gauges are valued for their longer run time. ALPs are frequently sold in ISO industry standard thicknesses of 20-gauge (0.184 mm), 30-gauge (0.27 mm), and 40-gauge (0.36 mm), with 30-gauge being the most commonly produced and used in printing applications in the United States.[24]

These physical characteristics and end uses distinguish ALPs from other printing plates using a substrate from other materials, such as plastic or rubber. Petitioner claims that aluminum substrate imparts many important physical characteristics, while other materials lack these qualities and cannot be used on the same printing presses.[25] Petitioner also states that rubber plates, or flexographic plates, are primarily used to print packaging.[26]

Manufacturing Facilities, Production Processes, and Employees. All ALPs are generally produced using the same basic manufacturing process and in the same facilities by the same employees.[27] Specialized machinery uncoils rolls of lithographic grade aluminum that then undergoes a "graining" process meant to roughen the surface area of the aluminum sheet to make it more hydrophilic. Subsequently, the substrate undergoes an "etching " procedure in which the substrate is exposed to caustic chemicals to dissolve small particles from the surface to ensure its smoothness. The substrate is then anodized to create a hydrophilic layer of aluminum oxide using an acidic solution and a high direct current. After the anodization process, an additional hydrophilic treatment is applied to seal any remaining pores in the layer of aluminum oxide. A polymer-based binding material is then applied on top of the substrate's hydrophilic layer of aluminum oxide. And lastly, the substrate is trimmed and cut to the required dimensions and packaged for shipment to the end user.[28] According to Petitioner, all domestically produced ALPs are produced on similar equipment using similar employees and production processes.[29]

Channels of Distribution. All domestically produced ALPs are sold to ***.[30]

Interchangeability. All ALPs are produced from the same substrate material and coated with a polymer-based coating that allows images to be transferred through the use of light or

[24] CR/PR at I-7.
[25] Conf. Tr. at 23 (Tellstone).
[26] Conf. Tr. at 55 (Tellstone).
[27] CR/PR at I-8 – I-9; Petitioner Postconf. Br. Exhibit 1 at 31.
[28] CR/PR at I-10 – I-12.
[29] Conf. Tr. at 23, 49 (Tellstone).
[30] CR/PR at Table II-1.

heat by image setters, and are used in offset printing applications.[31] *** U.S. producers and *** of importers reported that ALPs produced by different producers are ***, with some adjustments needed to the CPT's calibration, color, etching, and any additional features.[32] According to Petitioner, all domestically produced ALPs are interchangeable and are suitable for one dedicated end-use: offset printing applications. Petitioner maintains that printing plates from non-aluminum substrates that are used for other end uses are not interchangeable with ALPs and that there are no substitutes for ALPs.[33]

Producer and Customer Perceptions. According to Petitioner, producers and customers perceive all ALPs to exist on a continuum of products possessing different dimensions and printing properties, and do not view ALPs to be interchangeable with out-of-scope products.[34]

Price. Petitioner contends that ALP prices also exist on a continuum, with thinner gauge product generally selling for lower prices and thicker gauge ALPs commanding higher prices. Petitioner claims that out-of-scope printing plates manufactured with a non-aluminum substrate are sold at different price points.[35]

Conclusion. The record in the preliminary phase of these investigations indicates that all ALPs are produced using lithographic grade aluminum and have a polymer-based coating capable of capturing an image using either light or heat for use in offset printing. In addition, all domestically produced ALPs are produced using the same manufacturing processes, facilities, and employees; interchangeable; sold to ***; and perceived by producers and customers to comprise the same product category. Although ALPs are produced in a range of dimensions, gauges, and prices, the different types of ALPs exist on a continuum. By contrast, the record indicates that more than minor differences separate ALPs from other, out-of-scope types of printing plates, in terms of physical characteristics, end uses, manufacturing processes, and prices, which preclude ALPs and other types of printing plates from being used interchangeably in the same end uses.

Thus, in light of the above and in the absence of any contrary argument, we define a single domestic like product consisting of all ALPs, coextensive with the scope.

[31] CR/PR at I-7 – I-12.
[32] CR/PR at I-8, II-11.
[33] Petitioner Postconf. Br., Exhibit 1 at 8-9.
[34] Petition at Vol. 1 at 16; Petitioner Postconf. Br., Exhibit 1 at 9.
[35] Petitioner Postconf. Br., Exhibit 1 at 9.

IV. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[36] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We consider whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[37] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[38]

The record indicates that one U.S. producer, Fujifilm, qualifies as a related party because it is affiliated with Fujifilm USA, a U.S. importer of subject merchandise from Japan and China,

[36] 19 U.S.C. § 1677(4)(A).

[37] *See Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd mem.*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.,* 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

[38] 19 U.S.C. § 1677(4)(B). The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

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

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

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

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

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015), *aff'd*, 839 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co.*, 790 F. Supp. at 1168.

and Fujifilm China and Fujifilm Japan, foreign producers and exporters of subject merchandise in China and Japan during the POI, respectively, through common control.[39] [40]

A. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that appropriate circumstances do not exist for the Commission to exclude Fujifilm USA from the domestic industry. It argues that the purpose of the related parties provision "is to exclude from the industry headcount domestic producers substantially benefitting from their relationships with foreign exporters."[41] Petitioner argues that the Commission has previously found that an exclusion may not be warranted simply because a large producer has shifted to become a substantial importer of such merchandise during the POI, if the firm's domestic production operations have not significantly benefitted from its relationship with an importer or foreign producer/exporter or from its import activities.[42]

Petitioner argues that excluding Fujifilm would skew the data because, in its view, the producer did not derive a substantial benefit from its related party status or the importation of subject merchandise by its related U.S. importer. To the contrary, Petitioner claims, Fujifilm's financial condition *** between 2020 and 2022 as it reduced domestic production of ALPs and ceased production during the POI.[43] Petitioner contends that the facts in this case are analogous to those in *Large Residential Washers from Korea and Mexico*, where the Commission found that appropriate circumstances did not exist to exclude a U.S. producer from the domestic industry in its investigation even though the producer had ceased domestic

[39] CR/PR at III-2, III-11, Table III-11. *** owns *** percent of Fujifilm, Fujifilm USA, and Fujifilm Japan. Fujifilm Japan owns *** percent of Fujifilm China. *Id*. at III-2 n.3, Table III-2 and ***'s U.S. Importer Questionnaire Response at I-3.

[40] While domestic producer, Kodak, is related to Kodak Japan Limited, a producer of subject merchandise in Japan, Kodak *** import subject merchandise, nor did *** export subject merchandise to the United States during the period of investigation. *See* CR/PR at Tables III-2, VII-8. Consequently, Kodak does not qualify as a related party.

[41] Petitioner Postconf. Br. at 8 *citing USEC, Inc. v. United States*, 132 F. Supp. 2d at 1, 12 (Ct. Int'l Trade 2001); *Changzhou Trina Solar Energy Co. v. U.S. Int'l Trade Comm'n*, 100 F. Supp. 3d 1314, 1329 (Ct. Int'l Trade 2015).

[42] Petitioner Postconf. Br. at 8-9 *citing Certain Tissue Paper from China*, USITC Pub. 3758 (Final) (Mar. 2005) at 11-12; *Canned Pineapple Fruit from Thailand*, USITC Pub. 2798 (Prelim) (July 1994) at 22.

[43] Petitioner Postconf. Br. at 9.

production and become an importer of subject merchandise by the end of the period of investigation.[44]

Respondents' Arguments. Respondents argue that appropriate circumstances exist to exclude Fujifilm from the domestic industry.[45] Respondents note that in *Large Diameter Welded Pipe from China and India*, the Commission determined appropriate circumstances existed to exclude a domestic producer under the related parties provision at least in part because it had not restarted its domestic production facility.[46] Respondents contend that the facts here are similar because Fujifilm's share of domestic ALP production steadily declined over the period and was zero in the first half of 2023.[47]

Respondents also contend that including Fujifilm's data would skew the domestic industry's performance given that Fujifilm's declining trade indicators resulted from the rationalization of its capacity and not subject import competition.[48] Specifically, they argue that Fujifilm Group replaced Fujifilm's domestic production with subject import shipments – closing Fujifilm's facility – in view of declining demand and to rationalize global overcapacity of ALPs and focus on its primary markets in Asia.[49] It also cited the unreliability of competitively priced aluminum sheet after the only producer of the lithographic grade aluminum plate ceased production in the United States in 2017 and antidumping duties and section 232 tariffs became applicable to key manufacturing inputs.[50]

Finally, Respondents argue that Fujifilm's primary interest is in importation, not domestic production, given that the decision to close Fujifilm was made in 2019, before the

[44] Petitioner Postconf. Br. at 9 *citing Certain Large Residential Washers from Korea and Mexico*, USITC Pub. 4378 (Final) (Feb. 2013) at 12 *aff'd*, *LG Elecs., Inc. v. United States*, 26 F. Supp. 3d 1308, 1345-47 (Ct. Int'l Trade 2014).

[45] Respondents Postconf. Br. at 5-6.

[46] Respondents Postconf. Br. at 7 *citing Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final), USITC Pub. No. 4859 (Jan. 2019) at 17.

[47] Respondents Postconf. Br. at 7.

[48] Respondents Postconf. Br. at 9.

[49] Petitioner contends that Fujifilm did not reduce global capacity during the POI, as Respondents claim, but ***. Petitioner Postconf. Br. at 35-37. Additionally, Petitioner disputes that Fujifilm was focused on servicing the Chinese market given that *** and ***. *Id.* at 37.

[50] Respondents Postconf. Br. at 5, 8-9.

petitions in this case were filed, and its ratio of imports to domestic production increased over the POI until domestic production ceased entirely in the first half of 2023.[51]

B. Analysis and Conclusion

Fujifilm accounted for *** percent of U.S. production in 2022 and was the *** domestic producer of ALPs that year.[52] Fujifilm Group *** the petitions.[53] Imports of subject merchandise by Fujifilm's affiliated U.S. importer were *** square meters in 2020, *** square meters in 2021, and *** square meters in 2022; they were *** square meters in interim 2023 compared to *** square meters in interim 2022.[54] The ratio of these imports to Fujifilm's domestic production was *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2022.[55] Fujifilm's domestic production ceased in March 2022.[56] In explaining its reasons for importing, Fujifilm's affiliated importer, Fujifilm USA, stated that ***.[57] ***.[58] Fujifilm's operating income to net sales ratios were *** in 2020 and 2021, but were *** in 2022 and interim 2022.[59]

Fujifilm's ratio of subject imports by its affiliated U.S. importer to its domestic production increased from 2020 to 2022 as its domestic production was increasingly replaced

[51] Respondents Postconf. Br. at 10-11. Fujifilm Group states elsewhere in its brief that domestic production at the Greenwood, South Carolina plant ceased in 2022. *See*, *e.g.*, Respondents Postconf. Br. at 5. Fujifilm also states in its questionnaire responses that the plant closed in 2022. Domestic Producer's Questionnaire Response of Fujifilm at Question II-2a; Foreign Producer's Questionnaire Response of Fujifilm Japan at Questions I-3 & II-2a.

[52] CR/PR at Table III-1. Fujifilm was the *** domestic producer in 2020 and 2021, accounting for *** of U.S. production in 2020 and *** percent in 2021. *Id*.

[53] CR/PR at Table III-1.

[54] CR/PR at Table III-11.

[55] CR/PR at Table III-11. Fujifilm did not have any ***, therefore a ratio of U.S. production to imports from subject sources could not be calculated. *Id*.

[56] CR/PR at Table III-12.

[57] CR/PR at Table III-12. The reasons provided in the questionnaire response of Fujifilm's affiliated importer, Fujifilm North American Corporation, differ somewhat from the reasons provided in Fujifilm Group's post-conference brief. In the latter, Fujifilm Group asserts that "{i}n the face of declining demand and global overcapacity, Fujifilm decided to consolidate its productive resources in Japan and China and serve the U.S. market through those entities." It also cites trade actions resulting in higher input costs for production in the United States and a desire to focus on its primary markets in Asia. Respondents Postconf. Br. at 5, 8-9.

[58] CR/PR at Table III-12.

[59] CR/PR at Table VI-3.

by subject imports, until it ceased production operations in March 2022.[60] Respondents claim that this indicates that Fujifilm's primary interest is in importation.[61]

While we agree that Fujifilm's primary interest appears to lie in importation, as the ratio of subject imports by Fujifilm's affiliated U.S. importer to Fujifilm's domestic production grew substantially over the POI with Fujifilm ceasing U.S. production entirely during the POI, we find that appropriate circumstances do not exist to exclude Fujifilm from the domestic industry under the related parties provision. In considering whether appropriate circumstances exist to warrant exclusion of a given domestic producer, whether its primary interest lies in domestic production or importation is only one factor. Thus, even if a U.S. producer's current primary interest is not in domestic production, that alone is not dispositive in the Commission's related party analysis, for example, when the record shows the related party is not shielded from subject import competition and its exclusion from the industry would mask the effects of subject imports on the industry.[62] As discussed below, the record of these preliminary phase of the investigations indicates that Fujifilm's domestic production was not shielded from

[60] CR/PR at Table III-11.

[61] Respondents Postconf. Br. at 10-11.

[62] CR/PR at Table III-7. *See*, *e.g.*, *Large Residential Washers from Korea and Mexico*, Inv. Nos. 701-TA-488 and 731-TA-1199-1200 (Final) USITC Pub. 4378 (Feb. 2013) at 12-13 ("that {firm's} current interest is not in domestic production is an insufficient basis by itself to warrant exclusion as a related party in these investigations"); *LG Electronics, Inc. v. U.S. Intern. Trade Comm'n*, 26 F. Supp. 3d 1338, 1344-47 (Ct. Int'l Trade 2014) (affirming Commission's decision not to exclude domestic producer, over respondents' objection, when the firm did not appear to benefit from subject imports and exclusion would mask declines in domestic industry during the POI); *see also Certain Tissue Paper from China*, Inv. No. 731-TA-1070B (Final), USITC Pub. 3758 (Mar. 2005) at 11-12 ("{E}xclusion may not be warranted simply because a large producer (that was also a related party) has shifted to become a substantial importer of such merchandise during the period of investigation. A significant factor is whether the firm's domestic production operations significantly benefitted financially from its relationship to subject imports or from its import activities. Such benefits create the sort of data distorting effect that the exercise of discretion to exclude under the related party provision seeks to overcome."). The legislative history of the related party provision in the Trade Agreements Act of 1979 emphasizes that a producer should be excluded when it is shielded from the effects of the subject imports: "where a U.S. producer is related to a foreign exporter and the foreign exporter directs his exports to the United States so as not to compete with his related U.S. producer, this should be a case where the ITC would not consider the related U.S. producer to be a part of the domestic industry." S. Rep. No. 96-249, at 83 (1979) (emphasis added). The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act likewise explains that the purpose of the related party provision is "to reduce any distortion in industry data caused by the inclusion in the domestic industry of a related producer who is being shielded from the effects of the subject imports." SAA at 858.

competition with subject imports during the POI and that its exclusion would skew the domestic industry data.

As Fujifilm's production and shipments declined, subject imports – *** – increased substantially, gaining in market share as Fujifilm's share of the market declined from *** in 2020 to *** in 2022.[63] As Fujifilm's shipments declined, its financial performance declined as well.[64] Further, pricing product data indicate that there was a substantial volume of subject imports similar to *** domestically produced ALPs, supporting that Fujifilm's affiliated U.S. importer was importing product that competed directly with Fujifilm's own production and shipments.[65] Excluding Fujifilm from the domestic industry would mask declines in the domestic industry's market share and deterioration of its output and financial performance as subject import volume and market share increased. This is particularly the case as Fujifilm was ***.[66]

In addition, despite Fujifilm's cited reasons, the lower cost of subject imports from Japan and China appears to have contributed to Fujifilm Group's decision to replace domestic production with subject imports. Fujifilm reported that ***, and Respondents emphasized that access to lower-cost supplies of lithographic grade aluminum plate made production of ALP in China and Japan commercially advantageous.[67] For these reasons, we find that appropriate circumstances do not exist to exclude Fujifilm from the domestic industry under the related parties provision.

For the foregoing reasons, we define the domestic industry to include all U.S. producers of ALPs.

[63] CR/PR at D-5.

[64] CR/PR at Table VI-3.

[65] *See* CR/PR at Tables V-4, V-6.

[66] CR/PR at Table III-7.

[67] Respondents Postconf. Br. at 8; CR/PR at Table III-12. Indeed, the unit values of the domestically produced ALP that Fujifilm transferred to Fujifilm USA during the 2020-2022 period, which ranged from $*** to $*** per square meter, were *** than the unit values of subject imports from China during the same period, which ranged from $*** to $*** per square meter, and subject imports from Japan in 2021 and 2022, which ranged from $*** to $*** per square meter. CR/PR at Table IV-2; Domestic Producer's Questionnaire Response of Fujifilm at Question II-7.

V. Cumulation[68]

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

(1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;

(2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;

(3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

(4) whether the subject imports are simultaneously present in the market.[69]

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for

[68] Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition. *See* 19 U.S.C. §§ 1673b(a), 1677(24)(A)(i).

During September 2022 through August 2023, the 12-month period preceding the filing of the petitions, subject imports from China (for both the antidumping and countervailing duty investigations) accounted for *** percent of total U.S. imports of ALPs, and subject imports from Japan accounted for *** percent of total U.S. imports of ALPs. CR/PR at Table IV-5. As imports from each subject country are clearly above negligible levels, we find that imports from China subject to the antidumping and countervailing duty investigations, and imports from Japan subject to the antidumping duty investigation, are not negligible.

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

determining whether the subject imports compete with each other and with the domestic like product.[70] Only a "reasonable overlap" of competition is required.[71]

A. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that the Commission should cumulate subject imports from China and Japan because the record shows that there is a reasonable overlap of competition between and among subject imports from both countries and the domestic like product.[72] Petitioner claims that subject imports from China and Japan are fungible with one another and the domestic like product. It also contends that ALPs from all three sources were sold through the same channels of distribution, have common geographic markets, and were simultaneously present in the U.S. market over the POI.[73]

Respondents' Arguments. Respondents do not contest cumulation of subject imports from China and Japan.[74]

B. Analysis and Conclusion

The initial statutory requirement is satisfied because the Petitioner filed the antidumping duty petitions with respect to China and Japan and the countervailing duty petition with respect to China on the same day, September 28, 2023.[75] As discussed below, we find that there is a reasonable overlap of competition between subject imports from both of the subject countries and between subject imports from each source and the domestic like product.

Fungibility. *** U.S. producers reported that that subject imports from both subject countries were *** interchangeable with each other as well as with domestically produced ALPs.[76] A majority of U.S. importers reported that subject imports from China and Japan were

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

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

[72] Petitioner Postconf. Br. at 17.

[73] Petitioner Postconf. Br., Exhibit 1 at 11-13.

[74] Respondents Postconf. Br. at 5.

[75] CR/PR at I-1.

[76] CR/PR at Table II-6.

always interchangeable with each other as well as with domestically produced ALPs.[77] In 2022, ALPs from the domestic producers and both subject sources were sold in overlapping thicknesses and plate type (*i.e.*, wet and chemical-free ALPs).[78]

Channels of Distribution. Domestically produced ALPs and imports from each subject source were sold through the same channels of distribution, to ***.[79]

Geographic Overlap. Domestically produced ALPs and imports from both subject countries were available in all geographic markets throughout the United States during the POI.[80] Subject imports from both sources entered through all borders of entry in 2022, with the majority entering the United States through the Eastern border.[81]

Simultaneous Presence in Market. Domestically produced ALPs and subject imports from China and Japan were simultaneously present in the U.S. market throughout the POI.[82]

Conclusion. The record indicates that subject imports from China and Japan are generally fungible with the domestic like product and each other. The record also indicates that imports from each of the subject countries and the domestic like product were generally sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the POI. In light of the foregoing, and in the absence of any contrary argument, we find that there is a reasonable overlap of competition between and among subject imports from China and Japan and the domestic like product. Accordingly, we cumulate subject imports from China and Japan for our analysis of material injury by reason of subject imports.

[77] CR/PR at Table II-7.

[78] CR/PR at Tables IV-6 – IV-7. Respondents noted that they interpreted chemical-free plate to mean their processless plates. *Id*. at IV-8 n.8.

[79] CR/PR at Table II-1. An increasing share of U.S. shipments of the domestic like product and subject imports from Japan and China were sold to end users over the POI. Domestic producers sold primarily to distributors in 2020 and 2021, and primarily to end users in 2022. U.S. shipments of subject imports from China were sold primarily to end users from 2020 to 2022, while U.S. shipments of subject imports from Japan were sold primarily to distributors in 2020, and primary to end users in 2021 and 2022. *Id*.

[80] CR/PR at Table II-2.

[81] CR/PR at Tables IV-8, IV-9.

[82] CR/PR at Tables IV-13, V-4 – V-6 (showing quarterly shipments of domestic ALPs).

VI. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[83] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[84] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[85] In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[86] No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[87]

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[88] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[89] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential

[83] 19 U.S.C. §§ 1671b(a), 1673b(a).

[84] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor … and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[85] 19 U.S.C. § 1677(7)(A).

[86] 19 U.S.C. § 1677(7)(C)(iii).

[87] 19 U.S.C. § 1677(7)(C)(iii).

[88] 19 U.S.C. §§ 1671b(a), 1673b(a).

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

cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[90]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[91] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[92] Nor does

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

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

[92] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have

(Continued…)

the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[93] It is clear that the existence of injury caused by other factors does not compel a negative determination.[94]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports."[95] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [96] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[97]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

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injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to further examine regarding attribution to injury"), *citing Gerald Metals,* 132 F.3d at 722 (the statute "does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.").

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

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

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

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

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

evidence standard.[98] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[99]

B. Conditions of Competition and the Business Cycle

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

1. Demand Conditions

ALPs are used in offset printing processes, mounted into printing presses. U.S. demand for ALPs is driven by demand for U.S.-produced publications such as newspapers, magazines, and retail inserts.[100] Domestic producers and U.S. importers reported mixed U.S. demand trends. *** domestic producer reported U.S. demand fluctuated up, while *** reported it steadily decreased.[101] *** U.S. importer reported U.S. demand fluctuated up, *** reported it fluctuated down, and *** reported it steadily decreased.[102]

Apparent U.S. consumption of ALPs increased from *** square meters in 2020 to *** square meters in 2021 before declining to *** square meters in 2022, a level *** percent lower than in 2020.[103] Apparent U.S. consumption of ALPs was *** percent lower in interim 2023, at *** square meters, than in interim 2022, at *** square meters.[104]

2. Supply Conditions

During the POI, the U.S. market for ALPs was supplied by the domestic industry, cumulated subject imports from China and Japan, and nonsubject sources.[105]

The domestic industry was the largest source of ALP supply to the U.S. market throughout the POI, except in interim 2023 when it became the second largest source.[106] The

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

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

[100] CR/PR at II-6-7.

[101] CR/PR at Table II-4.

[102] CR/PR at Table II-4.

[103] CR/PR at Tables IV-10, C-1.

[104] CR/PR at Tables IV-10, C-1.

[105] CR/PR at Tables IV-10, C-1.

[106] CR/PR at Tables IV-10, C-1.

domestic industry's market share decreased from *** percent in 2020 to *** percent in 2021, and *** percent in 2022, which was *** percentage points lower than the industry's market share in in 2020; its market share was *** percentage points lower in interim 2023, at *** percent, than in interim 2022, at *** percent.[107]

There were three domestic producers at the beginning of the POI, Southern Lithoplate, Inc. ("Southern Litho"), Kodak, and Fujifilm, but only Kodak remained in operation as of interim 2023.[108] Southern Litho discontinued its domestic production of ALPs in May 2021 at its two production facilities to begin production of corrugated cardboard boxes.[109] Southern Litho's customer base was absorbed by Kodak in 2021 and 2022 after entering into a brokerage agreement. Additionally, Kodak took over the servicing of Southern Litho's accounts on August 1, 2021, acquiring Southern Litho's service and parts assets.[110]

In 2022, Fujifilm ceased domestic production of ALPs, closing its ***.[111] Fujifilm Group replaced Fujifilm's domestic production and U.S. shipments with increased subject imports from Fujifilm China and Fujifilm Japan.[112]

Cumulated subject imports were the smallest source of ALPs throughout most of the POI until interim 2023, when they became the largest source. Cumulated subject imports' market share increased by *** percentage points from 2020 to 2022, increasing from *** percent in 2020 to *** in 2021, and *** percent in 2022; their market share was *** percentage points higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[113]

Nonsubject imports were the second largest source of ALPs throughout most of the POI, until interim 2023, when they became the smallest source of ALPs. Nonsubject imports' market share increased by *** percentage points from 2020 to 2022, increasing from *** percent in 2020 to *** in 2021, and *** percent in 2022; their market share was *** percentage points higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[114] Germany and

[107] CR/PR at Tables IV-10, C-1.

[108] CR/PR at III-1.

[109] CR/PR at III-1 n.1. Southern Litho did not respond to the Commission's U.S. producer questionnaire. However, its Chief Executive Officer estimated that Southern Litho produced and sold approximately *** square meters of ALPs in 2020 and *** square meters in 2021. *Id.* at n.2.

[110] CR/PR at III-1 n.1, Table III-3.

[111] CR/PR at III-1 n.1. *See supra* section IV.B providing Fujifilm's cite reasons for ceasing production of ALP in the United States.

[112] CR/PR at Table III-12, Respondents Postconf. Br. at 5, 11.

[113] CR/PR at Tables IV-10, C-1.

[114] CR/PR at Tables IV-10, C-1.

the United Kingdom were the largest country sources, by quantity, of nonsubject imports in 2022.[115]

*** U.S. producer reported it did *** supply constraints during the POI, while *** reported it did experience supply constraints.[116] The majority of importers reported they had experienced supply constraints since the beginning of the POI, with one attributing them to shipping delays during the COVID-19 pandemic.[117]

3. Substitutability and Other Conditions

Based on the current record, we find that there is at least a moderate-to-high degree of substitutability between domestically produced ALPs and cumulated subject imports.[118] As previously discussed, *** U.S. producers reported that subject imports were *** interchangeable with domestically produced ALPs for all comparisons, and a *** of responding U.S. importers reported that subject imports were always interchangeable with domestically produced ALPs.[119] [120] *** responding U.S. producers and the *** of importers reported that ALPs produced by different producers are ***, although ***, ***, and *** reported that some modification of equipment is required when switching suppliers.[121] The majority of responding purchasers indicated they did not know if ALPs produced by different firms were compatible with printing machinery without modification, while the remaining purchasers reported modification was required.[122]

We also find that price is an important factor in purchasing decisions for ALPs. Purchasers responding to the lost sales and lost revenue survey most frequently ranked price as among the two most important factors in purchasing decisions for ALPs.[123] Additionally, *** responding domestic producers and U.S. importers reported that differences other than price were only sometimes or never important for purchasers choosing between purchasing domestically produced ALPs and subject imports.[124]

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[115] CR/PR at II-6.
[116] CR/PR at II-6.
[117] CR/PR at II-6.
[118] CR/PR at II-8.
[119] CR/PR at Tables II-6, II-7.
[120] Factors reported by producers and importers that limited interchangeability include recalibration of printing equipment by end users for ALPs produced by different firms. CR/PR at II-8.
[121] CR/PR at II-11, Table II-10.
[122] CR/PR at II-12, Table II-10.
[123] CR/PR at II-9, Table II-5.
[124] CR/PR at Tables II-8, II-9.

*** U.S. producers and *** responding importers reported that the market was ***.[125] *** reported increased demand for ALPs in the second quarter of each year due to the printing of school yearbooks, and *** reported increased demand for ALPs around the holidays due to increased printing demand.[126]

During the POI, ALPs from the United States, subject sources, and nonsubject sources were sold to distributors and end users, with an increasing amount sold to end users over the period. The domestic like product was sold primarily to distributors in 2020 and 2021, with much smaller, but appreciable quantities sold to end users, but primarily to end users in 2022.[127] Subject imports from China were primarily sold to end users throughout the POI, with much smaller, but appreciable quantities sold to distributors.[128] Subject imports from Japan were mostly sold to distributors in 2020, with much smaller, but appreciable quantities sold to end users, but primarily to end users in 2021 and 2022.[129]

During the POI, U.S. producers primarily sold ALPs using long-term contracts, with lesser but substantial quantities sold through annual contracts.[130] Importers sold subject imports primarily through spot sales and long-term contracts.[131]

During the POI, domestically produced ALPs were sold primarily from inventory with lead times averaging *** days, while lesser but substantial quantities of domestically produced ALPs were produced to order with lead times averaging *** days.[132] *** cumulated subject imports were sold from U.S. inventory with lead times averaging *** days.[133]

Aluminum sheets account for the largest share, *** percent, of total raw material costs.[134] During the POI, the average prices of aluminum increased by *** percent.[135] Lithographic-grade aluminum plate, which is not produced in the United States and must be imported, became subject to an antidumping duty order on imports from China in 2019, and

[125] CR/PR at II-7.
[126] CR/PR at II-7.
[127] CR/PR at Table II-1.
[128] CR/PR at Table II-1.
[129] CR/PR at Table II-1.
[130] CR/PR at Table V-3. Although *** U.S. producers reported annual and long-term contracts with ***, and ***, *** reported renegotiating prices during the POI. *** U.S. producer reported that it did *** prices to raw material costs, whereas *** did ***. Importer *** reported it fixed price and quantity for long-term contracts. CR/PR at V-3-4.
[131] CR/PR at Table V-3.
[132] CR/PR at II-9.
[133] CR/PR at II-9.
[134] CR/PR at VI-12.
[135] CR/PR at V-1.

several additional antidumping duty orders on imports from sixteen countries in 2021.[136] Domestic producers' unit raw material costs increased from $*** per square meter in 2020 to $*** in 2022, but were lower in interim 2023 at $*** per square meter than interim 2022 at $*** per square meter.[137] Raw materials as a share of cost of goods sold ("COGS") increased from *** percent of the in 2020 to *** percent in 2021 and *** percent in 2022, and the ratio was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[138]

Throughout the POI, ALPs imported from China and classified under HTS subheading 3701.30.00 and 3701.99.60 were subject to an additional 25 percent *ad valorem* tariff pursuant to section 301 of the Tariff Act of 1974 ("section 301 tariffs").[139]

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[140]

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[136] Respondents Postconf. Br. at 8; Conf. Tr. at 77 (Herrmann); *Common Alloy Aluminum Sheet from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final), USITC Pub. 4861 (Jan. 2019); *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey*, Inv. Nos. 701-TA-639 and 641-642 and 731-TA-1475-1479, 1481-1483, and 1485-1492 (Final), USTIC Pub. 5182 (April 2021).

Aluminum sheet is subject to additional duties under Section 232 of the Trade Expansion Act of 1962, as amended ("section 232 duties"). On March 29, 2020, Kodak received exclusions on aluminum inputs used in the manufacturing of ALPs that have been extended and remain in effect. *Id*. at I-6 n.12.

[137] CR/PR at Table VI-1.

[138] CR/PR at V-1 and Table VI-1.

[139] CR/PR at I-6. Effective September 24, 2018, ALPs from China under subheadings 3701.30.00 and 3701.99.60 became subject to an additional 10 percent duties under section 301, which was subsequently increased to 25 percent, effective May 10, 2019. *See* 18 U.S.C. § 2411; *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47974 (Sept. 21, 2018); *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019). Effective September 1, 2019, lithographic grade aluminum produced in China and imported under subheadings 7606.11.30, 7606.11.60, 7606.12.30, 7607.11.60, and 7607.11.90, became subject to an additional 15 percent ad valorem duty under section 301; the rate was lowered to 7.5 percent in February 2020. *See Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 43304 (Aug. 20, 2019); *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 45821 (Aug. 30, 2019); *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3741 (Jan. 22, 2020).

[140] 19 U.S.C. § 1677(7)(C)(i).

The volume of cumulated subject imports increased by *** percent from 2020 to 2022, from *** square meters in 2020 to *** square meters in 2021 and *** square meters in 2022.[141] Cumulated subject imports were *** square meters in interim 2023, up *** percent from *** square meters in interim 2022.[142]

Cumulated subject imports as a share of apparent U.S. consumption increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, a level *** percentage points higher than in 2020.[143] Cumulated subject imports as a share of apparent U.S. consumption were *** percentage points higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[144] The ratio of cumulated subject imports to domestic production increased from *** percent in 2020 to *** percent in 2021, and *** percent in 2022; it was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[145]

Based on the record in the preliminary phase of the investigations, we find that the volume of cumulated subject imports and the increase in that volume are significant in absolute terms and relative to consumption and production in the United States.[146] [147]

[141] CR/PR at Tables IV-10, C-1.

[142] CR/PR at Tables IV-10, C-1.

[143] CR/PR at Tables IV-10, C-1.

[144] CR/PR at Tables IV-10, C-1.

[145] CR/PR at Table IV-2.

[146] Given that Southern Litho did not respond to the U.S. producer questionnaire but estimated that it produced *** square meters of ALPs in 2020 and *** square meters in 2021 before ceasing production in 2022, the increase in the volume of cumulated subject imports relative to apparent U.S. consumption and production in the United States is likely understated. CR/PR at III-1 n.2.

[147] We address Respondents' argument concerning the alleged absence of "volume effects" in the impact section below. *See* Respondents Postconf. Br. at 18. The statute does not require the Commission to consider "volume effects" as part of its assessment of the significance of subject import volume. *See OCTAL Inc. v. United States,* 539 F. Supp. 3d 1291, 1299–1300 (Ct. Int'l Trade 2021) (citing 19 U.S.C. § 1677(7)(C)(i)).

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[148]

As addressed in section VI.B.C above, we have found at least a moderate-to-high degree of substitutability between domestically produced ALPs and cumulated subject imports and that price is an important factor in purchasing decisions.

The Commission collected quarterly pricing data from U.S. producers and importers for three pricing products.[149] Two domestic producers and three importers provided usable pricing data, although not all firms reported pricing for all products for all quarters.[150] Pricing data reported by these firms accounted for *** of U.S. producers' U.S. shipments of ALPs, 96.2 percent of importers' U.S shipments of subject merchandise from China, and 99.4 percent of importers' U.S. shipments of subject merchandise from Japan in 2022.[151]

These data show that subject imports oversold the domestic like product in 43 of 62 quarterly comparisons, or 69.4 percent of the time, corresponding to 84.2 percent of reported subject import volume (17.9 million square meters), with overselling margins ranging from 0.9 percent to 236.8 percent and averaging 47.1 percent.[152] Subject imports undersold the domestic like product 19 of 63 quarterly comparisons, or 30.2 percent of the time, corresponding to 15.8 percent of reported subject import sales volume (3.4 million square

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[148] 19 U.S.C. § 1677(7)(C)(ii).

[149] The three pricing products are as follows:

Product 1.-- 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm;

Product 2.-- 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm; and

Product 3.-- 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm. CR/PR at V-4.

[150] CR/PR at V-4.

[151] CR/PR at V-4.

[152] CR/PR at Table V-8.

meters), with underselling margins ranging between 0.1 and 46.9 percent and averaging 16.4 percent.[153]

Petitioner argues that the Commission should not rely on the pricing data submitted by ***[154] to assess the significance of subject import underselling because these data are, in its view, inaccurate. As support, Petitioner claims that ***.[155] Petitioner also contends that ***.[156] Lastly, Petitioner questions how ***.[157] Disputing Petitioner's claims, Respondents assert that Fujifilm Groups' pricing data show that subject imports from China and Japan were priced higher than its domestically produced ALPs because it transferred Fujifilm's lower-volume customers (with higher prices) to its subject sources first, before transferring its higher-volume customers (with lower prices).[158] We intend to further investigate the issues raised by Petitioner in any final phase of the investigations.[159]

We have also considered purchasers' responses to the lost sales/lost revenue survey. Of the five purchasers that responded to the Commission's survey, three reported that they had purchased subject imports instead of the domestic like product, and one of those three reported that subject imports were priced lower than the domestic like product during the POI.[160] This purchaser reported that price was a primary reason for purchasing *** square meters of subject imports instead of the domestic like product, equivalent to *** percent of the total volume of reported purchases imported from subject countries over the POI.[161] Two purchasers indicated that price was not a primary reason for purchasing subject imports rather

[153] CR/PR at Table V-8.

[154] *** is an affiliated U.S. importer of Fujifilm Group. CR at Table III-2.

[155] Petitioner Postconf. Br. at 25-26. Petitioner states that "***." *Id*.

[156] Petitioner Postconf. Br. at 26.

[157] Petitioner Postconf. Br. at 27. Petitioner also raises questions about ***. *Id*.

[158] Respondents Postconf. Br. at Attachment A at 6. Respondents claim that Fujifilm's top ten customers (by volume) were 3.1 percent transitioned to subject sources in 2021, 57.9 percent in 2022, and 96.2 percent in the first half of 2023, whereas other smaller customers were 11.2 percent transitioned in 2021, 81.3 percent in 2022, and 99.7 percent in interim 2023. Respondents note that although Fujifilm stopped production in March 2022, Fujifilm USA continued to make sales of domestically produced ALP from its inventory to customers through the first half of 2023. *Id*. at 5. We note that the Respondents' argument is not borne out by the data for all pricing products. For example, this did not hold true for pricing products 2 and 3 imported from China and pricing product 2 imported from Japan. ***'s U.S. Importer Questionnaire Response at Questions III-2a-b.

[159] We request that the parties in their comments on the draft questionnaires provide suggestions on the appropriate pricing products and methodology for the Commission to collect pricing data for the domestic like product and the subject imports that may provide meaningful price comparisons.

[160] CR/PR at V-13, Table V-12.

[161] CR/PR at V-13, Tables V-10 and V-12.

than the domestic like product, however, citing quality, service, and a switch to processless ALPs as their non-price reasons for purchasing subject imports.[162]

Other evidence on the record indicates that subject import prices were lower than prices for the domestic like product. At the conference, Laura Cole, Vice President of Pricing and Product Management at Kodak, testified that purchasers received price offers from Fujifilm Group and Agfa that were between 10 to 30 percent lower than Kodak's prices, forcing Kodak to forego surcharges to cover increased costs, accept lower prices, or lose customers.[163] Consistent with this testimony, *** submitted by Petitioner indicate that ***.[164] Citing this documentation, Ms. Cole stated in a sworn declaration that low-priced subject import competition caused Kodak to lose sales of *** square meters to ***, equivalent to *** percent of its sales in 2022.[165]

The record evidence concerning subject import underselling is mixed. As stated above, the pricing data show subject import overselling in 69.4 percent of quarterly comparisons involving 84.2 percent of reported subject import sales volume, although Petitioner questions the reliability of these data.[166] On the other hand, hearing testimony and a declaration from Petitioner, consistent with contemporaneous e-mails and other documentation, indicate that low-priced subject import competition put pricing pressure on Kodak and captured sales. Given the at least moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasing decisions, and the questions raised by Kodak concerning the reliability of the pricing data, we cannot find that there was not significant underselling by cumulated subject imports. Based on the foregoing, we cannot find that low-priced subject import competition did not cause at least some portion of the ***

[162] CR/PR at V-15, Table V-12.

[163] Conf. Tr. at 26-27 (Cole) ("{C}ustomers are fielding import offers between 10 to 30 percent lower than our existing prices. Kodak has made the difficult decision not to pursue volumes that are sold at a loss. Because of this pricing pressure, we have lost multiple customer accounts. Once a customer leaves, they are unlikely to return to Kodak unless the lower price can be met. Unfortunately, under current conditions the price delta is just too great. We have other customers that use the low-priced offers from China and Japan to drive down our prices either during contract negotiations, or when we've tried to implement price surcharges to cover our own increased costs.").

[164] *See* Declaration of Laura Cole, appended to Petitioner Postconf. Br. as Exh. 3, Attachments 1-14. The declaration, e-mail correspondence and other contemporaneous documentation indicate that ***. *Id*. at ¶ 8, Attachment 1; *** Purchaser Questionnaire Response at Question 3(c). It also indicates that Kodak's customer, ***. Declaration of Laura Cole, appended to Petitioner Postconf. Br. as Exh. 3, at ¶ 9; Attachment 2. The declaration also indicates that ***. *See id.* at ¶ 11. The declaration and email correspondence also indicate that ***. *Id*. at ¶ 13, Attachment 4. ***. *Id*. at ¶ 15, Attachment 5.

[165] Declaration of Laura Cole, appended to Petitioner Postconf. Br. as Exh. 3, at ¶¶ 7-8, Attachments 1-2. Derived from *id.* and CR/PR at Table VI-3.

[166] CR/PR at Table V-8.

percentage point market share shift from the domestic industry to subject imports from 2020 to 2022.[167]

We have also considered price trends. During the POI, prices for the domestic like product fluctuated but increased for all three pricing products.[168] Between the first and last quarters of the POI, domestic prices increased by *** percent for Product 1, *** percent for Product 2, and *** percent for Product 3.[169] Over the same period, prices for subject imports from Japan fluctuated but decreased overall by *** percent for Product 1 and *** percent for Product 3, and increased overall by *** percent for Product 2.[170]

We have also considered whether cumulated subject imports prevented price increases for domestically produced ALPs which otherwise would have occurred. The domestic industry's COGS-to-net sales ratio increased by *** percentage points from 2020 to 2022, increasing from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, although it was *** percent lower in interim 2023, at *** percent, than in interim 2022, at *** percent.[171] The industry's COGS-to-net sales ratio increased from 2020 to 2022 because its unit COGS increased by $*** per square meter while its unit net sales value increased by only $*** per square meter over the period,[172] reflecting that the industry was unable to fully pass on rising unit costs. Indeed, the record shows that as the domestic industry lost *** percentage points of market share to cumulated subject imports from 2020 to 2021, the industry's unit COGS increased by $*** per square meter, while its unit sales value declined by $*** per square meter, causing the industry's COGS-to-net sales ratio to increase *** percentage points, even as apparent U.S. consumption increased *** percent.[173] In addition, as reviewed above, record evidence indicates that low-priced subject import competition put pricing pressure on Kodak. Given the foregoing, we cannot conclude that cumulated subject imports did not suppress prices for the domestic like product to a significant degree.

[167] CR/PR at Tables IV-10, C-1.

[168] CR/PR at Tables V-3-7.

[169] CR/PR at Table V-7.

[170] CR/PR at Table V-7. There was insufficient pricing data to establish price trends for subject imports from China. *Id*.

[171] CR/PR at Tables VI-1, C-1.

[172] CR/PR at Tables VI-1, C-1. The industry's unit COGS increased from $*** in 2020 to $*** in 2022; unit net sales decreased from $*** in 2020 to $*** in 2022. *Id*.

[173] CR/PR at Tables VI-1, C-1. Between 2021 and 2022, the COGS-to-net sales ratio increased by *** percentage points as unit COGS increased by *** percent while unit net sales value increased by *** percent. However, this was accompanied by a *** percent decline in apparent consumption. *Id*.

Based on the record of the preliminary phase of the investigations, we cannot conclude that the large and increasing volume of cumulated subject imports did not have significant price effects.

E. Impact of the Subject Imports[174]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development ("R&D"), and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[175]

The domestic industry's performance generally declined according to most measures during the POI, as Fujifilm wound down and closed its domestic production facility, the industry lost market share to cumulated subject imports, and apparent U.S. consumption declined irregularly. The domestic industry's practical ALP capacity decreased by *** percent from 2020 to 2022, and was *** percent lower in interim 2023 than in interim 2022.[176] Its production decreased by *** percent from 2020 to 2022 and was *** percent lower in interim 2023 than interim 2022.[177] The industry's capacity utilization increased by *** percentage points from

[174] Commerce initiated its investigations based on estimated dumping margins of 107.62 percent for subject imports from China and estimated dumping margins of 23.46 percent for subject imports from Japan. *Aluminum Lithographic Printing Plates From the People's Republic of China and Japan: Initiation of Less-Than-Fair-Value Investigations*, 88 Fed. Reg. 73316, 73319 (Dep't Commerce Oct. 25, 2023).

[175] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act ("TPEA") of 2015, Pub. L. 114-27.

[176] CR/PR at Tables III-5, C-1. The domestic industry's practical ALP capacity decreased from *** square meters in 2020 to *** square meters in 2021 and *** square meters in 2022. Its capacity was lower in interim 2023, at *** square meters, than in interim 2022, at *** square meters. *Id*.

[177] CR/PR at Tables III-5, C-1. The domestic industry's practical overall production increased from *** square meters in 2020 to *** square meters 2021, before decreasing to *** square meters in 2022. Its production was lower in interim 2023, at *** square meters, than in interim 2022, at *** square meters. *Id*.

2020 to 2022, from *** percent in 2020 to *** percent in 2022, but was *** percentage points lower in interim 2023, at *** percent, than in interim 2022, at *** percent.[178]

The industry's employment-related indicators for the domestic industry generally declined during the POI. The number of production and related workers ("PRWs"), hours worked, wages paid, and productivity declined between 2020 and 2022, irregularly with respect to hours worked and productivity, and were also lower in interim 2023 compared to interim 2022.[179]

The domestic industry's U.S. shipments decreased *** percent from 2020 to 2022, and were *** percent lower in interim 2023 than in interim 2022.[180] The industry's share of apparent U.S. consumption decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, a level *** percentage points lower than in 2020.[181] Its share of apparent U.S. consumption was *** percentage points lower in interim 2023, at *** percent, than in interim 2022, at *** percent.[182]

The domestic industry's end-of-period inventories increased *** percent from 2020 to 2022, but were *** percent lower in interim 2023 than in interim 2022.[183] As a share of total shipments, the domestic industry's end-of-period inventories increased irregularly by ***

[178] CR/PR at Tables III-5, C-1. The domestic industry's capacity utilization increased from *** percent in 2020 to *** percent in 2021, and *** percent in 2022. Its capacity utilization was lower in interim 2023, at *** percent, than in interim 2022, at *** percent. *Id*.

[179] CR/PR at Tables III-13, C-1. The domestic industry's PRWs decreased from *** PRWs in 2020 to *** PRWs in 2021 and *** PRWs in 2022; it was lower in interim 2023, at *** PRWs, than in interim 2022, at *** PRWs. The industry's total hours worked increased initially from *** hours in 2020 to *** hours in 2021 and decreased overall to *** hours in 2022; they were lower in interim 2023, at *** hours, than in interim 2022, at *** hours. Wages paid decreased from $*** in 2020 to $*** in 2021 and $*** in 2022; they were lower in interim 2023, at $***, than in interim 2022, at $***. Productivity increased from *** square meters per hour in 2020 to *** square meters per hour in 2021 and then decreased overall to *** square meters per hour in 2022; it was lower in interim 2023, at *** square meters per hour, than in interim 2022, at *** square meters per hour. *Id*.

[180] CR/PR at Tables III-9, C-1. The industry's U.S. shipments were *** square meters in 2020 to 2021 and decreased to *** square meters in 2022; they were lower in interim 2023, at *** square meters, than in interim 2023, at *** square meters. *Id*.

[181] CR/PR at Tables IV-10, C-1.

[182] CR/PR at Tables IV-10, C-1.

[183] CR/PR at Tables III-10, C-1. The industry's end-of period inventories decreased from *** square meters in 2020 to *** square meters in 2021 and increased overall to *** square meters in 2022; they were lower in interim 2023, at *** square meters, than in interim 2022, at *** square meters. *Id*.

percentage points from 2020 to 2022, but were *** percentage points lower in interim 2023 than in interim 2022.[184]

The industry's net sales revenues decreased by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 than in interim 2022.[185] Its gross profit, operating income, and net income declined during the 2020-2022 period, but were higher in interim 2023 compared to interim 2022.[186] The industry's operating income as a share of net sales deteriorated from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, but improved in interim 2023, at *** percent, compared to interim 2022, at *** percent.[187] Similarly, the industry's net income as a share of net sales deteriorated from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, but improved in interim 2023, at *** percent, compared to interim 2022, at *** percent.[188]

The domestic industry's capital expenditures decreased by *** percent from 2020 to 2022, but were *** percent higher in interim 2023 than in interim 2022.[189] The domestic industry's return on assets declined from *** percent in 2020 to *** percent in 2021 and *** percent in 2022.[190] *** reported negative effects on investments and on growth and development due to cumulated subject imports.[191]

During the POI, there was a significant increase in the volumes of cumulated subject imports with at least moderate-to-high substitutability with the domestic like product. As

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[184] CR/PR at Tables III-10, C-1. The industry's ratio of inventories to total shipments decreased initially from *** percent in 2020 to *** percent in 2021 and increased overall to *** percent in 2022; it was lower in interim 2023, at *** percent, than in interim 2022, at *** percent. *Id*.

[185] CR/PR at Tables VI-1, C-1. The domestic industry's net sales by value decreased from $*** in 2020 to $*** in 2021 and $*** in 2022. Its net sales by value were lower in interim 2023, at $***, than in interim 2022, at $***. *Id*.

[186] CR/PR at Tables VI-1, C-1. The domestic industry's gross profit decreased from $*** in 2020 to $*** in 2021 and $*** in 2022. Its gross profit was higher in interim 2023, at $***, than in interim 2022, at $***. The domestic industry's operating income decreased from $*** in 2020 to $*** in 2021 and *** in 2022. Its operating income was higher in interim 2023, at $***, than in interim 2022, at ***. The domestic industry's net income decreased from $*** in 2020 to $*** in 2021 and $*** in 2022. Its net income was higher in interim 2023, at $***, than in interim 2022, at ***. *Id*. Fujifilm ceased domestic production in 2022 and did not report any sales from domestic production in interim 2023. *Id*. at Tables III-3, VI-3.

[187] CR/PR at Tables VI-1, C-1.

[188] CR/PR at Tables VI-1, C-1.

[189] CR/PR at Tables VI-5, C-1. The domestic industry's capital expenditures decreased from $*** in 2020, $*** in 2021, and increased overall to $*** in 2022; they were higher in interim 2023, at $***, than in interim 2022, at $***. *Id*. The industry did not report any research and development expenses during the POI. *Id*. at VI-16.

[190] CR/PR at Table VI-8.

[191] CR/PR at Tables VI-10-11.

discussed in section IV.D above, we cannot find that low-priced subject import competition did not contribute to the *** percentage point market share shift from the domestic industry to cumulated subject imports during the 2020-2022 period and/or place downward pressure on domestic prices during the POI. Accordingly, we cannot conclude that cumulated subject imports did not have significant effects on prices for the domestic like product. Given these considerations, and in light of the domestic industry's declining production, capacity utilization, employment, U.S. shipments, and financial performance,[192] we cannot conclude based on the record of the preliminary phase of these investigations that cumulated subject imports did not have a significant impact on the domestic industry's performance during the POI.

As discussed in section VI.C above, Respondents argue that the market share shift could have had no adverse effects on the domestic industry because it resulted entirely from Fujifilm's closure, which was unrelated to subject import competition in their view.[193] Kodak, however, disputes Respondents' contention that the closure was intended to address global overcapacity or to enable Fujifilm Group to better serve the Chinese market.[194] The record shows that the AUVs of subject imports from China and Japan were lower than the AUVs of Fujifilm's internal transfers of domestically produced ALPs to Fujifilm USA, which would have provided an economic incentive for Fujifilm Group to replace domestic production with subject imports.[195] Furthermore, Fujifilm China projects that it will have increased its practical production capacity by *** square meters between 2020 and 2023, which would be sufficient to nearly replace the domestic practical production capacity of *** square meters that Fujifilm possessed in 2020.[196] The record also shows that many measures of Kodak's performance declined from 2020 to 2022, including its financial performance.[197] We intend to further investigate the reasons for Fujifilm's closure in any final phase of the investigations.

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[192] The domestic industry's financial performance improved in interim 2023 relative to interim 2022, reportedly as Kodak realized price surcharges. Petitioner Postconf. Br. at 33. However, most other measures of industry performance were weaker in interim 2023 than in interim 2022, including capacity, production, employment, and U.S. shipments, and the industry's capacity utilization, at *** percent, was at the lowest level of the POI. CR/PR at Tables III-5, VI-1.

[193] Respondents Postconf. Br. at 18.

[194] Petitioner Postconf. Br. at 36-37.

[195] CR/PR at Table IV-2; Domestic Producer's Questionnaire Response of Fujifilm at Question II-7.

[196] Foreign Producer's Questionnaire Response of Fujifilm China at Question II-9, CR/PR at III-7, Table III-7.

[197] CR/PR at Tables III-5, VI-1. Respondents also contend that non-price factors, such as quality and service, are the reason that purchasers switched from Kodak to Fujifilm Group, as evidenced in their view by the lost sales and lost revenue survey responses. Respondents Postconf. Br. at 43-45; CR/PR at (Continued…)

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. As discussed above, nonsubject imports were the second largest source of ALPs in the U.S. market during the POI until interim 2023, when they became the smallest source.[198] We recognize that nonsubject imports' market share increased *** percentage points from 2020 to 2022, and that nonsubject import AUVs were lower than subject import AUVs during the POI, with the exception of 2020.[199] However, nonsubject imports cannot explain the *** percentage point shift in market share from the domestic industry to cumulated subject imports during the 2020-2022 period, and the resulting impact on the domestic industry.[200] We therefore find, for purposes of these preliminary determinations, that nonsubject imports cannot explain the domestic industry's declining performance during the POI.

Demand trends also cannot explain the injury that we have attributed to cumulated subject imports. Although apparent U.S. consumption declined irregularly by *** percent from 2020 to 2022, the domestic industry's U.S. shipments decreased by a much greater *** percent over the period as the industry lost market share to cumulated subject imports.[201] Declining demand cannot not fully explain the domestic industry's declining performance, given that cumulated subject imports increased their market share at the direct expense of the domestic industry in the declining market.[202]

VII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of ALPs from China and Japan that are allegedly sold in the United States at less than fair value and imports of ALPs from China that are allegedly subsidized by the government of China.

V-13, Table V-12. As discussed in section IV.D above, we have found at least a moderate-to-high degree of substitutability between subject imports and the domestic like product. Contrary to Respondents' argument, one responding purchaser reported that subject import prices were lower than domestic prices and that price was a primary reason that it purchased *** square meters of subject imports instead of the domestic like product. We intend to further investigate the importance of non-price factors in any final phase of the investigations.

[198] CR/PR at Table IV-10, C-1.

[199] CR/PR at Table IV-10, C-1.

[200] CR/PR at Table IV-10, C-1.

[201] CR/PR at Table IV-10, C-1.

[202] CR/PR at Table IV-10, C-1.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by Eastman Kodak Company ("Eastman Kodak"), Rochester, New York, on September 28, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of aluminum lithographic printing plates ("ALPs")[1] from China and less-than-fair-value ("LTFV") imports of ALPs from China and Japan. Table I-1 presents information relating to the background of these investigations.[2] [3]

Table I-1
ALPs: Information relating to the background and schedule of this proceeding

Effective date	Action
September 28, 2023	Petitions filed with Commerce and the Commission; institution of the Commission investigations (88 FR 68669, October 4, 2023)
October 18, 2023	Commerce's notice of initiation (countervailing duty: 88 FR 73313, October 25, 2023; antidumping duty: 88 FR 73316, October 25, 2023)
October 19, 2023	Commission's conference
November 9, 2023	Commission's vote
November 13, 2023	Commission's determinations
November 20, 2023	Commission's views

Statutory criteria

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

> *shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . .*

[1] See the section entitled "The subject merchandise" in Part I of this report for a complete description of the merchandise subject in this proceeding.

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

[3] A list of witnesses appearing at the conference is presented in appendix B of this report.

may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

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

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

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

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

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

Organization of report

Part I of this report presents information on the subject merchandise, alleged subsidy and dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

ALPs are generally used to produce printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials. The only known current U.S. producer of ALPs is Eastman Kodak Company ("Eastman Kodak"),[6] while leading producers of ALPs outside the United States include *** of China and *** of Japan. The leading U.S. importer of ALPs from China and Japan is ***. Leading importers of ALPs from nonsubject countries (primarily Germany, the Netherlands, and France), include ***. U.S. purchasers of ALPs are publishers or printers; leading purchasers include ***.

Apparent U.S. consumption of ALPs totaled approximately *** square meters ($***) in 2022. Currently, one firm is known to produce ALPs in the United States.[7] U.S. producers' U.S. shipments of ALPs totaled *** square meters ($***) in 2022, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** square meters

[6] Conference transcript, pp. 7-8 (Herrmann).

[7] Fujifilm Manufacturing USA, Inc. ("Fujifilm") and Southern Lithoplate, Inc. ("Southern Litho") have ceased manufacturing in the United States. Fujifilm produced ALPs at its Greenwood, South Carolina facility until 2022, and Southern Litho produced ALPs at its Grand Rapids, Michigan and Youngsville, North Carolina facilities until 2021. Further, Agfa Corporation ("Agfa USA" now known as ECO3), produced ALPs at its Branchburg, New Jersey facility, but ceased production of the subject merchandise in 2018. Petition, pp. 2-3.

($***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** square meters ($***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, tables C-1 and C-2. Except as noted, U.S. industry data are based on questionnaire responses of two firms (***) that accounted for *** U.S. production of ALPs during 2022. U.S. imports are based on questionnaire responses submitted to the Commission.

Previous and related investigations

ALPs have not been the subject of prior antidumping and countervailing duty investigation in the United States.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On October 25, 2023, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on ALPs from China.[8]

Alleged sales at LTFV

On October 25, 2023, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on ALPs from China and Japan.[9] Commerce has initiated antidumping duty investigations based on estimated dumping margins of 107.62 percent for ALPs from China and 23.46 percent for ALPs from Japan.

[8] For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 88 FR 73313, October 25, 2023.

[9] 88 FR 73316, October 25, 2023.

The subject merchandise

Commerce's scope

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

> *The merchandise covered by these investigations is aluminum lithographic printing plates. Aluminum lithographic printing plates consist of a flat substrate containing at least 90 percent aluminum by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the production of newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials through an offset printing process, where an aluminum lithographic printing plate facilitates the transfer of an image onto the printed media.*
>
> *Aluminum lithographic printing plates within the scope of these investigations include all aluminum lithographic printing plates, irrespective of the dimensions or thickness of the underlying aluminum substrate, whether the plate requires processing after an image is applied to the plate, whether the plate is ready to be mounted to a press and used in printing operations immediately after an image is applied to the plate, or whether the plate has been exposed to light or heat to create an image on the plate or remains unexposed and is free of any image.*
>
> *Subject merchandise also includes aluminum lithographic printing plates produced from an aluminum sheet coil that has been coated with a light-sensitive image-recording layer in a subject country and that is subsequently unwound and cut to the final dimensions to produce a finished plate in a third country (including the United States), or exposed to light or heat to create an image on the plate in a third country (including in a foreign trade zone within the United States).*

[10] 88 FR 73313, October 25, 2023.

Excluded from the scope of this investigation are lithographic printing plates manufactured using a substrate produced from a material other than aluminum, such as rubber or plastics.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that merchandise subject to these investigations is imported under statistical reporting numbers 3701.30.0000 and 3701.99.6060 of the Harmonized Tariff Schedule of the United States ("HTS"). The 2023 general rate of duty is free for HTS subheadings 3701.30.00 and 3701.99.60. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Section 232 tariff treatment

The relevant HTS subheadings within the scope of these investigations, 3701.30.00 and 3701.99.60, were not included in the enumeration of aluminum products that are subject to the additional 10-percent ad valorem national-security duties under Section 232 of the Trade Expansion Act of 1962, as amended.[11] However, aluminum, which is subject to the additional duties, is used as an input in ALP production, as discussed below. Petitioner has applied and been granted exclusions[12] on aluminum inputs used in the manufacturing of ALPs imported under HTS statistical reporting numbers 7607.11.9090 and 7607.11.6090 as recently as August 16, 2023 which are currently in effect.[13]

Section 301 tariff treatment

Chinese products subject to these investigations are also subject to additional duties under Section 301 of the Trade act of 1974. Subheadings 3701.30.00 and 3701.99.60 were included among the group of products from China that are subject to and additional duty of 25 percent ad valorem, under HTS subheading 9903.88.03.[14]

[11] 83 FR 11619, March 15, 2018.

[12] These exclusions where first granted to petitioners on March 29, 2020, and have been extended during the period of investigation.

[13] U.S. Department of Commerce, Published Exclusion Requests, accessed October 17, 2023. https://232app.azurewebsites.net/steelalum. Conference transcript, p. 91 (Herrmann).

[14] 84 FR 20459, May 9, 2019.

The product

Description and applications

Aluminum lithographic plats (ALPs)[15] are image carriers that are used in offset printing processes that are made from rolls of lithographic grade aluminum.[16] ALPs are capable of capturing an image that is transferred onto the plate by either light or heat and then reproducing this image onto a receiving material (e.g. cloth, paper, or plastic) using various fountain solutions or inks.[17] ALPs are commonly used to produced printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.

ALPs are frequently sold in ISO industry standard thicknesses of 20-gauge (0.184 mm), 30-gauge (0.27 mm), and 40-gauge (0.36 mm).[18] Majority of ALPs manufactured and used in printing processes within in the United States are of 30-gauge thickness.[19] The gauge of an ALP determines not only its specific use in printing but also is run time, or time spent used in the printing process, as thicker gauges are used for their longer run time. For example, a 20-gauge ALP is more commonly used in newspaper applications because of the need to swap ALPs daily.[20]

Once ALPs are sold to the end user, the plates are put into a device called an image setter or platesetter which imparts the desired image onto the ALP. The platesetter may transfer the image through conventional means or "computer to film" ("CTF") or digital means or "computer-to-plate" ("CTP").[21] In CTF printing, the image is first imparted onto photographic film and then applied to the plates through an exposure process.[22] In CTP printing, the image is created in a desktop publishing application and is then directly applied to the plates.[23] CTP is currently the primary type of plate setter used in the market.[24] There are three different types

[15] ALPs may also be referred to as digital printing plates, offset printing plates, photosensitive printing plates, or thermal printing plates.

[16] Lithographic plates may also be manufactured from plastic or rubber but are excluded from the scope of this investigation.

[17] Petition, p. 7.

[18] Petition, p. 8. Conference transcript, p. 87 (Tellstone). Petitioner's postconference brief, p. 5.

[19] Conference transcript, p. 87 (Tellstone).

[20] Conference transcript, p. 88 (Tellstone).

[21] Petition, p. 8.

[22] Petition, p. 8.

[23] Petition, p. 8. Toptica, "High-Performance Diode Lasers for Computer-To-Plate (CtP) Applications", accessed October 17, 2023. https://www.toptica.com/applications/industrial-manufacturing/computer-to-plate

[24] Conference transcript, p. 26 (Tellstone).

of CTP methods and models that are based on an imagesetter's construction focused mainly around three types of critical parts: an internal drum, external drum, and flat-bed imagesetters.[25] Once the image has been etched onto the ALP, some ALPs (commonly referred to as "wet" or "off-press" plates) are fed through a plate developer which, using chemicals, removes any hydrophobic layers that were not etched into the ALP.[26]

Other ALPs (commonly referred to as "process free," "development on-press," "low-chem," "chemfree," or "chemical-free" plates) do not require this additional processing after the image is applied to be ready to be used in the printing process.[27] Process free plates do not require the additional processing step during the etching process thus saving the customer time and cost. However, process free plates do not last as long as wet plates.[28] Process free plates are also exposed earlier in the production process, meaning that they can be scratched as they are physically handled, and it can be more difficult to see the image once it emerges from the CTP machine.[29] ALPs from different manufacturers are able to be used on any CTP machine which allows for customers to shift their purchasing of plates from one supplier to another.[30] There are some barriers to switching plates faced by the end user such as: recalibration of CTP equipment to "unlock" the ability to use a different manufacturer's plates and swapping out a manufacturer's plate processor.[31]

[25] Platesetters, "3 Types of Computer-to-Plate Methods", accessed October 17, 2023. https://www.platesetters.com/3-types-of-computer-to-plate-methods/.

[26] Offsetprinting, How Are Printing Plates Made?, July 7, 2020. http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html

[27] Petition, p. 9.

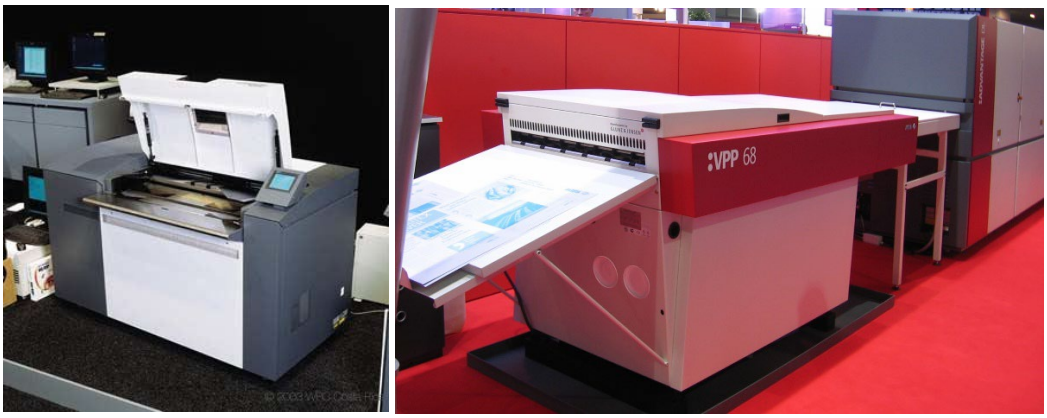
[28] Conference transcript, p. 128 (Crawford).

[29] Conference transcript, p. 128 (Crawford).

[30] Conference transcript, p. 60 (Cole).

[31] Conference transcript, p. 60 (Cole). Conference transcript, p. 189 (Aquino).

Figure I-1
Imagesetter and plate developer



Source: Offsetprinting, How Are Printing Plates Made?, July 7, 2020.
http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html

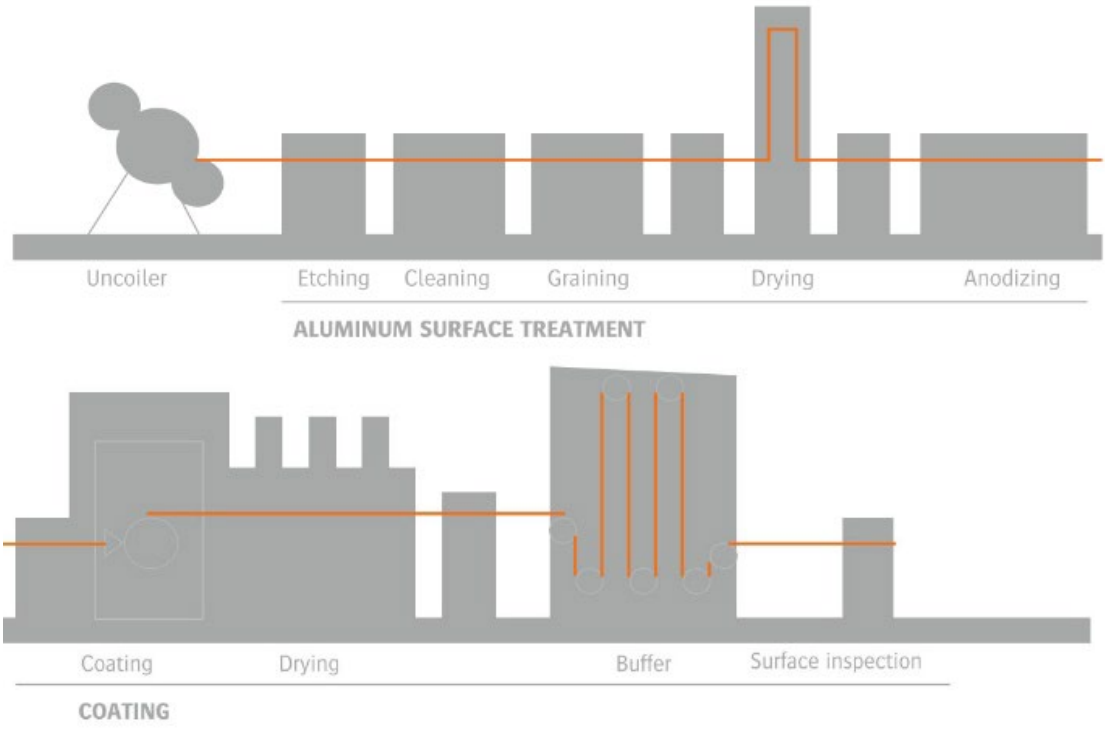
ALPs are ultimately mounted into a printing press and used in a combination of various fountain solutions and inks to reproduce the etched image on a suitable receiving material. Each individual plates carries a specific color record, which means, that multiple plates and inks must be used to generate a colored image. This quality, along with etching, makes the plate non-reusable and thus each plate is recycled and mostly sold as aluminum scrap to recoup some of the initial investment.[32] Each plate can produce hundreds, thousands, or millions of impressions before replacement is required.[33]

Manufacturing processes

Aluminum lithographic plates (ALPs) are manufactured in a process that includes five major steps: (1) uncoiling, (2) graining, (3) anodizing, (4) coating, and (5) finishing. This process is generally continuous from raw material to finished product and can be ran multiple times. While some production processes vary by manufacturer these differences are very minor and production processes between domestic and foreign produced ALPs are very similar.[34]

[32] Conference transcript, p. 88 (Continenza).
[33] Petition, p. 9.
[34] Conference transcript, p. 46 (Tellstone).

Figure I-2
ALPs: Production process



Source: Offsetprinting, How Are Printing Plates Made?, July 7, 2020. http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html

Uncoiling

Specialized machinery uncoils rolls of lithographic grade aluminum[35] to produce an aluminum substrate in an automatic and seamless process that allows production to continue through exhaustion of aluminum rolls. Lithographic grade aluminum sheet is used in manufacturing process to ensure certain mechanical properties that are required for ALPs, such as: high degree of flatness, low degree of surface roughness, tight thickness and width tolerances, corrosion resistance, high thermal and electrical conductivity, and excellent workability.[36]

[35] Also known as litho-stock, lithographic grade aluminum is generally defined as 1XXX series aluminum alloy such as 1050 grade aluminum and 1020 grade aluminum. 1XXX grade aluminum has a minimum of 99 percent aluminum with no other alloying additions.

[36] Petition, p. 11. Ulbrich, 1000 Series Aluminum Alloys, https://www.ulbrich.com/alloys/1000-series-aluminum-alloys/, accessed October 12, 2023.

Graining

The uncoiled aluminum then undergoes a "graining" process meant to roughen the surface area of the aluminum sheet to make it more hydrophilic. Graining is mostly done through an electrochemical process where the substrate is roughened using an acidic solution and a high alternating current but can also be done through strictly mechanical[37] or chemical processes.[38] Computers are used to control the currents, temperatures, and pressures during this process.[39] Immediately after the graining process the substrate undergoes an "etching" procedure in which the substrate is exposed to caustic chemicals to dissolve small particles from the surface of the substrate.[40] This etching process ensures that the substrate will be smooth which improves its printing capabilities.

Anodizing

The third major step in the manufacturing process involves creating a hydrophilic layer of aluminum oxide using an acidic solution and a high direct current. This hydrophilic layer will retain water while repelling oil-based inks which will ensure a proper balance between water and ink during the printing process.[41] This layer also strengthens the plate by reinforcing its structure and improves its scratch resistance which will protect it from chemical and mechanical damage. The anodization process may be repeated multiple times before it is then sealed with an additional hydrophilic treatment to seal any remaining pores in the layer of aluminum oxide.

[37] More mechanical graining techniques include ball graining and sand blasting. These techniques are more often used in noncommercial production of ALPs. For more information on different graining techniques see https://www.polymetaal.nl/beguin/mapg/graining.htm.

[38] Petition, p. 11.

[39] Petition, p. 11.

[40] Petition, p. 11.

[41] Petition, p. 11.

Coating

The substrate is then coated with a polymer-based binding material which is applied on top of the hydrophilic layer of aluminum oxide.[42] This is done in "clean room"[43] conditions to ensure that there are no particles or impurities in the final layer.[44] This polymer layer allows for the ALP to capture an image using light (violet plates) or heat (thermal plates) and transfer the image by maintaining printing and non-printing areas over the course of the ALP's run length.[45] As with anodization, this process can be repeated multiple times to ensure a suitable layer, after which, it is buffed, dried, and prepped for packaging.

Finishing

The substrate undergoes quality control where it is inspected and if found to be substandard removed. The substrate that passes quality control is then cut to fit specified dimensions in a single movement using rotary and scissor knives.[46] The finished plates are then wrapped, packaged, and then shipped to the end user.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes that the Commission should find that the domestic like product mirrors the scope and consists of all ALPs, regardless of size or gauge.[47] Respondent Fujifilm stated that it agrees with the petitioner's definition that there is a single domestic like product coextensive with the scope.[48]

[42] Petition, p. 11.

[43] Cleanrooms are controlled environments that use filtration devices to provide the cleanest area possible devoid of pollutants such as aerosol particles, dust, and airborne microbes.

[44] Petition, p. 11.

[45] Petition, pp. 11-12.

[46] Petition, p. 12.

[47] Petitioner's postconference brief, p. 5, and conference transcript, pp. 29-30 (Herrmann).

[48] Conference transcript, p. 143 (Porter) and Fujifilm's postconference brief, p. 5.

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

U.S. market characteristics

ALPs consist of a flat substrate containing at least 90 percent aluminum, by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the plate's use in offset printing processes to produce materials such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.

*** responding U.S. producers and the majority of importers indicated that the market was subject to distinctive conditions of competition. Specifically, importer *** reported that the printing industry is undergoing a transition where digital printing is reducing the demand for ALPs.

Apparent U.S. consumption of ALPs generally decreased in terms of quantity but generally increased in terms of value from January 2020 to December 2022. Overall, apparent U.S. consumption in 2022 was *** percent lower in terms of quantity than in 2020 but was *** percent higher in terms of value. Apparent U.S. consumption in the first half of 2023 was *** percent lower in terms of quantity and *** percent higher in terms of value compared to the first half of 2022.

Impact of section 301 tariffs and 232 tariffs

U.S. producers and importers were asked to report the impact of section 301 tariffs and 232 tariffs on the U.S. market for ALPs.

U.S. producer *** and half of responding importers reported that section 232 tariffs *** on the U.S. market. U.S. producer *** and the remaining half of responding importers reported that they were ***. U.S. producer *** reported that while aluminum foil and sheet were subject to section 232 tariffs, *** were granted exclusions to section 232 tariffs by the U.S. Department of Commerce. U.S. producer *** reported that it did not know the impact of section 232 tariffs on the U.S. market for ALPs. Importer *** reported that finished ALPs are not subject to section 232 tariffs. Importer *** also reported that it *** in 2022 which means that 232 tariffs are no longer an issue for ***.

U.S. producer *** reported being *** of the impact of section 301 tariffs on the U.S. market for ALPs, while U.S. producer *** reported that section 301 tariffs had an impact on the U.S. market. U.S. importer *** reported that while it did not import ALPs from China, it was aware that ALPs imported under HTSUS code 3701.30.0000 were subject to a 25 percent section 301 tariff. Half of responding importers reported that section 301 tariffs had impacted the U.S. market while the remaining half reported they were unaware of section 301 tariffs on the U.S. market. Importer *** also reported that imports from China were subject to a 25 percent tariff.

Channels of distribution

U.S. producers sold mainly to *** in 2020 and 2021 but sold mainly to *** in 2022 and the interim period of 2023. This shift was driven by U.S. producer ***, which had sold ALPs *** in 2022. U.S. producer *** which sold ALPs *** throughout the period was ***. Importers of ALPs from China sold mainly to end users. Importers of ALPs from Japan sold mainly to end users with the exception of 2020, as shown in table II-1. Shifts in the channels of distribution of ALPs imported from Japan is entirely driven by importer ***.

Table II-1
ALPs: Share of U.S. shipments by source, channel of distribution, and period

* * * * * * *

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

Geographic distribution

U.S. producers and importers reported selling ALPs to all regions of the United States (table II-2). For U.S. producers, 62.0 percent of sales were within 101 and 1,000 miles of their production facility and 38.0 percent were over 1,000 miles. Importers sold 14.0 percent within 100 miles of their U.S. point of shipment, 78.0 percent between 101 and 1,000 miles, and 8.0 percent over 1,000 miles.

Table II-2
ALPs: Count of U.S. producers' and U.S. importers' geographic markets

* * * * * * *

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

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

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding ALPs from U.S. producers and from subject countries.

Table II-3
ALPs: Supply factors that affect the ability to increase shipments to the U.S. market, by country

* * * * * * *

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

Note: Responding U.S. producers accounted for virtually all of U.S. production of ALPs in 2022. Responding foreign producer/exporter firms accounted virtually all of U.S. imports of ALPs from China and Japan during 2022. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part III and IV

Domestic production

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

U.S. producers reported decreased production and production capacity from 2020 to 2022. Production decreased less than production capacity leading to an increase in production capacity utilization over the period. U.S. producers' inventories increased from 2020 to 2022 but remained below *** percent of total shipments in all years. U.S. producers reported selling just under *** of total shipments in markets other than the United States in 2022. *** responding U.S. producers reported that they were unable to produce other products on the same equipment used to produce ALPs.

Subject imports from China

Based on available information, producers of ALPs from China have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of ALPs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity and the ability to shift shipments to or from alternate markets. Factors mitigating responsiveness of supply include limited inventories and the inability to shift production to or from alternate products.

Chinese producers reported increased production capacity and production from 2020 to 2022. Production capacity increased more than production, leading to a decrease in capacity utilization from 2020 to 2022. Chinese producers' inventories increased over the period but remained below *** percent of total shipments in all years. Chinese producers reported selling just over *** of total shipments in their home market and just under *** of total shipments to markets other than the United States in 2022. *** responding Chinese producers reported that they were unable to produce other products on the same equipment used to produce ALPs.

Subject imports from Japan

Based on available information, producers of ALPs from Japan have the ability to respond to changes in demand with small changes in the quantity of shipments of ALPs to the

U.S. market. The main contributing factor to this degree of responsiveness of supply is an ability to shift shipments to or from alternate markets. Factors mitigating the responsiveness of supply include limited availability of unused production capacity, limited inventories, and the inability to shift production to or from alternate products.

Japanese producers reported decreased production capacity and increased production which led to an increase in capacity utilization from 2020 to 2022. Japanese producers' inventories relative to total shipments increased from 2020 to 2022 but remained below *** percent of total shipments in all years. Japanese producers reported selling just under *** of total shipments in their home market and under *** to markets other than the United States in 2022. *** responding Japanese producers reported that they were unable to produce other products on the same equipment used to produce ALPs.

Imports from nonsubject sources

Nonsubject imports accounted for 68.4 percent of total U.S. imports in terms of quantity in 2022. The largest sources of nonsubject imports in 2022 were Germany and the United Kingdom. Combined, these countries accounted for 55.3 percent of nonsubject imports in terms of quantity in 2022.[1]

Supply constraints

U.S. producer *** reported that they had *** supply constraints since January 1, 2020; while U.S. producer *** reported that they had *** supply constraints in the same period. The majority of importers (3 of 4) reported that they had experienced supply constraints since January 1, 2020. One importer, ***, explained that there were shipping delays during COVID-19.

U.S. demand

Based on available information, the overall demand for ALPs is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small cost share of ALPs in the publications they produce. Due to the large capital expenditures that establishing a printing line requires, firms typically do not change

[1] Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed October 12th, 2023. Imports are likely overstated because it may include out-of-scope merchandise and ***. Imports are based on the imports for consumption data series.

production methods until they have recouped their investments, which can take years.[2] This results in a relatively stable demand for ALPs in the short to medium-term but potential fluctuations in demand in the long-term.[3]

End uses and cost share

U.S. demand for ALPs depends on the demand for U.S.-produced publications such as newspapers, magazines, and retail inserts. ALPs account for small share of the cost of these publications. U.S. producer *** reported that ALPs account for less than *** percent of the costs of producing these publications.

Business cycles

*** U.S. producers, and *** responding importers reported that the market was ***. Specifically, U.S. producer *** reported that there is a slight seasonality in the second quarter of each year caused by the increased demand for ALPs to print school yearbooks. Importer *** reported that there is some seasonality due to increased printing demand around the holidays.

Demand trends

U.S. producers' responses regarding U.S. demand for ALPs since January 1, 2020 were mixed (table II-4). U.S. producer *** reported that domestic demand was *** in 2020 due to the COVID-19 pandemic but has *** since 2020. U.S producer *** reported that domestic demand has *** since January 1, 2020. The majority of importers reported that domestic demand for ALPs had fluctuated down or steadily decreased since January 1, 2020. Importer *** reported that the COVID-19 pandemic and shifts in technology had caused demand for ALPs to fluctuate down. *** U.S. producers and *** responding importers reported that foreign demand for ALPs has fluctuated down or steadily decreased since January 1, 2020.

[2] Conference transcript, p. 66 (Continenza).
[3] Conference transcript, p. 67 (Rosenthal).

Table II-4
ALPs: Count of firms' responses regarding overall domestic and foreign demand, by firm type

* * * * * * *

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

Substitute products

*** responding U.S. producers and importers reported that there *** substitutes for ALPs.

Substitutability issues

This section assesses the degree to which U.S.-produced ALPs and ALPs imported from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of ALPs from domestic and imported sources based on those factors. Based on available data, staff believes that there is at least a moderate-to-high degree of substitutability between domestically produced ALPs and ALPs imported from subject sources.[4] Factors contributing to this level of substitutability include similar quality, availability, lead times for ALPs from inventory, little preference for particular country of origin, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors limiting substitutability are that end users must recalibrate printing equipment for plates produced by each individual firm. This reduces a firms willingness to shift purchases from one producing firm to another on a frequent basis.

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

Factors affecting purchasing decisions

Purchasers responding to lost sales lost revenue allegations[5] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for ALPs. The major purchasing factors identified by firms include price and quality.

Most important purchase factors

The most often cited top two factors firms consider in their purchasing decisions for ALPs were price/cost (4 firms) and quality (2 firms) as shown in table II-5.

Table II-5
ALPs: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	1	1	1	4
Quality	0	1	1	2
All other factors	2	1	1	NA

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

Note: Other factors include product performance on current equipment, product arrival condition after shipment, customer service and support after the sale.

Lead times

ALPs are primarily sold from U.S. inventories. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days. Importers reported that *** percent of commercial shipments were from U.S. inventories, with lead times averaging *** days.

Comparison of U.S.-produced and imported ALPs

In order to determine whether U.S.-produced ALPs can generally be used in the same applications as imports from China and Japan; U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-6 to II-7, *** U.S. producers and importers reported that ALPs from the United States, Japan, China, and nonsubject countries are *** interchangeable.

[5] This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

Table II-6
ALPs: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

* * * * * * *

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

Table II-7
ALPs: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

* * * * * * *

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of ALPs from the United States, subject, and nonsubject countries. As seen in tables II-8 to II-9, *** U.S. producers and importers reported that there are *** differences other than price between ALPs from the United States, Japan, China, and nonsubject countries.

Table II-8
ALPs: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

* * * * * * *

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

Table II-9
ALPs: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

* * * * * * *

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

In order to determine whether ALPs from different producers are compatible with all types of machinery without modification to the printing machinery, U.S. producers, importers, and purchasers were asked to report the compatibility of ALPs from different producers. As seen in Table II-10, *** U.S. producers and *** of importers reported that ALPs produced by different producers are ***. However, U.S. producer *** reported that while ALPs produced by different firms could be used on the same equipment, switching between plates produced by different firms would usually require altering the settings of the computer-to-plate (CTP) unit. Both Eastman Kodak and Fujifilm produce CTP units which can process any kind of plate.[6] When switching from ALPs produced by one firm to ALPs produced by another, firms must change the calibration, color, etching, any additional feature of the CTP and run test to ensure that the final printed product is of the required quality.[7] U.S. producer *** reported that the cost is modest and usually comprised of employee time and labor and did not generally require further capital investments. A firm's decision to switch from ALPs produced by one firm to ALPs produced by another, is largely based on the cost savings of switching from one supplier to another relative to the cost of adjusting the CTP.[8] Importer *** reported that with some modification to presses and modification to imaging devices, ALPs from different manufacturing sources are compatible on the same machinery. Importer *** reported that while ALPs from different producers are compatible on the same machinery, technical support to alter the plate exposer, calibration and initial tuning of the tone reproduction, as well as alterations to the pressroom are required to switch to ALPs from different producers.[9] The majority of purchasers (3 of 5) reported that

[6] Conference transcript, p. 71 (Cole).
[7] Conference transcript, p. 53 (Continenza).
[8] Conference transcript, p. 54 (Herrmann).
[9] Respondent*** post conference brief 3, p. 3.

they did not know if ALPs produced by different firms were compatible with printing machinery without modification, while the remaining purchasers (2 of 5) reported that modification to machinery was required. Purchaser *** reported that it had been forced to modify its equipment, specifically the cameras on the bending/punching equipment when Southern Litho was sold, and *** were forced to look for an alternate supplier.

Table II-10
ALPs: Count of U.S. producers', importers' and purchasers' compatibility of presses by different producers

* * * * * * *

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

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

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and Part VI and (except as noted) is based on the questionnaire responses of two firms that accounted for *** U.S. production of ALPs during 2022.[1]

U.S. producers

The Commission issued a U.S. producer questionnaire to three firms based on information contained in the petitions. Two firms (Eastman Kodak and Fujifilm) provided usable data on their operations. Staff believes that these responses represent *** U.S. production of ALPs during 2020-22.[2]

[1] Two other firms ceased U.S. production of ALPs since 2020, leaving Kodak Eastman as the sole remaining U.S. producer of ALPs. Fujifilm Manufacturing USA, Inc. ("Fujifilm"), produced ALPs at its Greenwood, South Carolina facility until first quarter of 2022. Specifically, Fujifilm closed ***. Respondent Fujifilm's postconference brief, attachment A, p. 4.

Southern Lithoplate, Inc. ("Southern Litho") produced ALPs at its Grand Rapids, Michigan and Youngsville, North Carolina facilities until May 2021 and has switched to producing corrugated cardboard boxes. Eastman Kodak entered into a brokerage agreement with Southern Litho and absorbed its customer base in 2021 and 2022, but didn't purchase its equipment. Petition, pp. 2-3, Petitioner's postconference brief, p. 7 and exh. 4, and conference transcript, pp. 8, 9, and 43 (Herrmann and Continenza).

In addition, Agfa Corporation ("Agfa USA" now known as ECO3 after the sale of Agfa's Offset Solutions to Aurelius in April 2023), produced ALPs at its Branchburg, New Jersey facility until 2018. Conference transcript, p. 103 (Larkin); https://www.agfa.com/corporate/news-item/agfa-graphics-intends-to-close-offset-printing-plate-factory-in-branchburg-new-jersey-usa/; https://aurelius-group.com/en/news/aurelius-closes-the-acquisition-of-agfa-offset-solutions/; and https://eco3.com/news/eco3-launched-as-new-name.

[2] The Commission sent a U.S. producer questionnaire to Southern Litho, but the firm did not respond. Edward Casson III, Southern Litho's Chief Executive Officer, estimated that Southern Litho produced and sold approximately *** square meters of ALPs in 2020 and *** square meters in 2021, equivalent to about *** and *** percent of all U.S. ALPs production in 2022, respectively. Petitioner's postconference brief, Exh. 4.

Table III-1 lists U.S. producers of ALPs, their production locations, positions on the petition, and shares of total production in 2022.

Table III-1
ALPs: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2022

Shares in percent

Firm	Position on petition	Production location(s)	Share of production
Eastman Kodak	Petitioner	Columbus, GA	***
Fujifilm	***	Greenwood SC	***
All firms	Various	Various	***

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

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2
ALPs: U.S. producers' ownership, related and/or affiliated firms

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

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

As indicated in table III-2, *** (***) are related to foreign producers of the subject merchandise and one U.S. producer (***) is related to a U.S. importer of the subject merchandise. In addition, as discussed in greater detail below, one U.S. producer (***) directly imports ALPs from China and Japan and *** purchase the subject merchandise from U.S. importers.[3]

[3] Respondent *** clarified that ***. Email from ***, November 1, 2023.

Table III-3 presents events in the U.S. industry since January 1, 2020.

Table III-3
ALPs: Important industry events since 2020

Item	Firm	Event
Partnership	Kodak	Kodak announced a new alliance in which Southern Litho would become a major supplier of Kodak solutions on December 15, 2020.
Acquisition	Kodak	On June 24, 2021, Kodak announced the acquisition of the service and parts assets of Southern Litho Inc. Kodak's service team took over the servicing of Southern Litho's accounts on August 1, 2021.
Plant Closure	Fujifilm	In July of 2021, Fujifilm announced the closure of its manufacturing facility in Greenwood, South Carolina by the end of 2022. The manufacturing facility was responsible for the production of printing plates.

Source: Kodak, "Kodak Reaches Agreement to Form Strategic Alliance with Southern Lithoplate Inc. (SLP)," https://www.kodak.com/en/company/press-release/southern-lithoplate-strategic-alliance/', December 15, 2020. Kodak, "Kodak Strengthens Commitment to Print, Acquiring Southern Lithoplate Inc. (SLP) Service & Parts Assets," https://www.kodak.com/en/company/press-release/kodak-acquires-southern-lithoplate-service-parts-assets/, June 24, 2021. Petapixel, "Fujifilm to Close Four U.S. Photo Equipment Plants and Cut 400 Jobs," https://petapixel.com/2021/07/01/fujifilm-to-close-four-u-s-photo-equipment-plants-and-cut-400-jobs/, July 1, 2021.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of ALPs since 2020. *** indicated in their questionnaires that they had experienced such changes. Table III-4 presents the changes identified by these producers.

Table III-4
ALPs: U.S. producers' reported changes in operations, since January 1, 2020

Item	Firm name and narrative response on changes in operations
Plant closings	***
Prolonged shutdowns	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed and practical capacity and production on the same equipment. *** did not report product shifts or other products produced in the same equipment as ALPs.[4] Installed overall capacity decreased during 2020-22 by *** percent and was *** percent lower in January to June ("interim") 2023 than in interim 2022 as a result of *** ceasing production in the U.S. Likewise, installed overall production declined *** percent during 2020-22 and was *** percent lower in interim 2023 than in interim 2022. Installed overall capacity utilization rates increased during 2020-22 by *** percentage points but were lower by *** percentage points in interim 2023 than in interim 2022. Practical overall capacity, production, and corresponding utilization rates were equal to practical ALPs indicators throughout the period, with capacity decreasing during 2020-22 by *** percent and lower by *** percent in interim 2023 than in interim 2022. Practical production declined *** percent during 2020-22 and was *** percent lower in interim 2023 than in interim 2022. Practical capacity utilization increased during 2020-22 by *** percentage points but was lower by *** percentage points in interim 2023 than in interim 2022.

Table III-5
ALPs: U.S. producers' installed and practical capacity and production, by period

Capacity and production in 1,000 square meters; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical ALPs	Capacity	***	***	***	***	***
Practical ALPs	Production	***	***	***	***	***
Practical ALPs	Utilization	***	***	***	***	***

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

[4] *** noted that reaching the total installed overall capacity, however, would never be possible, as the equipment would continue to require changeover processes for different plates models, and on-going maintenance would be necessary to keep the operation up and running. U.S. producer's questionnaire response, section II-3e.

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints.

Table III-6
ALPs: U.S. producers' reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization with the two U.S. producers presented individually. U.S. producers' capacity decreased by *** percent from 2020 to 2022 and was *** percent lower in interim 2023 than in interim 2022. This decrease was due to ***. *** reported no changes in capacity during the period of data collection. Likewise, production decreased by *** percent from 2020 to 2022 and was *** percent lower in interim 2023 than in interim 2022. U.S. producers' capacity utilization ranged between *** to *** percent during 2020-22 and was lower in interim 2023 than in interim 2022. During 2020-21 *** accounted for approximately half of the U.S. industry's production of ALPs. However, due to *** accounted for *** percent of U.S. production in 2022 and *** accounted for the remainder. In interim 2023, *** accounted for *** percent of U.S. production.

Table III-7
ALPs: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 square meters

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
ALPs: U.S. producers' output, by firm and period

Production

Production in 1,000 square meters

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
ALPs: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

Table III-7 Continued
ALPs: U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

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

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

Note: Staff adjusted capacity reported by *** to equal production in full year 2022 and interim 2022.

Figure III-1
ALPs: U.S. producers' output, by period

* * * * * * *

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

Foreign-trade zone production activities

Eastman Kodak *** had operations as a foreign trade zone ("FTZ"). Eastman Kodak's Columbus, Georgia manufacturing facility is a production FTZ site (FTZ subzone site 0260N02) ***.

*** reported importing aluminum used to manufacture ALPs from ***.

Table III-8 presents U.S. producers' narrative on FTZ operations since January 1, 2020.[5]

[5] Petition, p. 4, conference transcript, p. 21 (Tellstone), and ***'s U.S. producer questionnaire response, section II-6a-II-6c.

Table III-8
ALPs: U.S. producers' narrative on FTZ operations, since January 1, 2020

Item	Firm name and narrative on FTZ operations
Tariff inversion: Parts admitted	***
Tariff inversion: Original HTS numbers	***
Tariff inversion: Original country of origin	***
Tariff inversion: Countries for withdrawals and which dropped	***
Non-Tariff inversion: Parts	***
Non-Tariff inversion: HTS numbers	***
Non-Tariff inversion: Countries of origin	***
Tariff inversion: Parts admitted	***
Tariff inversion: Original HTS numbers	***
Tariff inversion: Original country of origin	***
Tariff inversion: Countries for withdrawals and which dropped	***
Non-Tariff inversion: Parts	***
Non-Tariff inversion: HTS numbers	***
Non-Tariff inversion: Countries of origin	***

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

Alternative products

U.S. producers reported producing *** on the same equipment during 2020-22.

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

Table III-9 presents U.S. producers' total shipments, by destination and period. The quantity of U.S. shipments (inclusive of commercial U.S. shipments and transfers)[6] decreased irregularly during 2020-22 by *** percent (***) square meters, with a slight increase of *** percent from 2020 to 2021, and was lower by *** percent in interim 2023 compared to interim 2022.[7] The value of U.S. shipments decreased by *** percent during 2020-22 and was lower by *** percent in interim 2023 than in interim 2022. U.S. shipments unit values increased during 2020-22 from $*** to $*** per square meter and was higher in interim 2023 than in interim 2022. U.S. shipments accounted for the largest share of total shipments and remained well above *** percent in all periods.

*** was the only U.S. producer to report exports during 2020-22.[8] The quantity of exports declined by *** percent during 2020-22 and was lower by *** percent in interim 2023 than in interim 2022. In contrast, export shipment values increased by *** percent during 2020-22 but was lower by *** percent in interim 2023 than in interim 2022. Export shipments unit values increased from $*** to $*** per square meter during 2020-22 and was higher in interim 2023 than in interim 2022.

Total shipment quantities decreased during 2020-22 by *** percent (***) square meters, with a modest increase of *** percent from 2020 to 2021, and was lower by *** percent in interim 2023 than in interim 2022. The value of U.S. shipments decreased by *** percent during 2020-22 and was lower by *** percent in interim 2023 than in interim 2022. U.S. shipments unit values increased during 2020-22 from $*** to $*** per square meter and was higher in interim 2023 than in interim 2022.

[6] ***. ***'s U.S. producer questionnaire response, section II-12.

[7] ***'s U.S. operations are mostly responsible for the decline, with the firm's overall drop of *** percent in U.S. shipments during 2020-22 and *** reported U.S. shipments in interim 2023.

[8] Principal export markets included ***. ***'s U.S. producer questionnaire response, section II-7.

Table III-9
ALPs: U.S. producers' total shipments, by destination and period

Quantity in 1,000 square meters; value in 1,000 dollars; unit value in dollars per square meters; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

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

U.S. producers' inventories

Table III-10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments.[9] U.S. producers' inventories increased irregularly by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 than in interim 2022. As a ratio to U.S. production, inventories increased by *** percentage points from 2020 to 2022, and were *** percentage point lower in interim 2023 than in interim 2022. As a ratio to U.S. shipments, inventories increased by *** percentage points from 2020 to 2022 and were *** percentage points lower in interim 2023 than in interim 2022. Similar trends existed for inventory ratios to total shipments.

[9] ***. ***'s U.S. producer questionnaire response, section II-7.

Table III-10
ALPs: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 square meters; ratio in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

***'s imports of ALPs are presented in table III-11 and reasons for importing are presented in table III-12. Imports of ALPs from *** rose from *** percent of U.S. production in 2020 to *** percent in 2022 and *** percent in interim 2022. Similarly, ***'s imports from Japan rose from *** percent of U.S. production in 2020, to *** percent in 2022, and *** percent in interim 2022.[10]

Table III-11
ALPs: * U.S. production, U.S. imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 square meters; ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

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

[10] No ratios to U.S. production are shown for 2023 since ***. ***'s U.S. producer questionnaire response, section II-2a.

Table III-12
ALPs: * reasons for importing**

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

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

U.S. employment, wages, and productivity

Table III-13 shows U.S. producers' employment-related data. During 2020-22, the number of production and related workers ("PRWs"), total hours worked, wages paid, hourly wages, and productivity decreased. Total hours worked and productivity both increased in 2021, before decreasing in 2022. In contrast, hours worked per PRW and unit labor costs increased during 2020-22.[11] Except for hourly wages and unit labor costs, which were slightly higher in January-June 2023 compared to January-June 2022, all other labor indicators were lower in interim 2023 compared to interim 2022.

[11] Aggregate decreasing trends, especially for PRWs, hours worked, wages paid, and productivity, are largely driven by ***. *** U.S. producer questionnaire response, sections II-3e and II-11.

Table III-13
ALPs: U.S. producers' employment related information, by period

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (square meters per hour)	***	***	***	***	***
Unit labor costs (dollars per square meter)	***	***	***	***	***

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

Note: Staff estimated hours worked per PRW for *** by multiplying 2080 hours by number of workers in a full year and 1040 hours in interim periods.

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

U.S. importers

The Commission issued importer questionnaires to 29 firms believed to be importers of subject ALPs, as well as to all U.S. producers of ALPs.[1] Usable questionnaire responses were received from five companies,[2] representing the vast majority of U.S. imports from China and Japan in 2022 under HTS subheading 3701.30.00, a "basket" category.[3] Table IV-1 lists all responding U.S. importers of ALPs from China, Japan, and other sources, their locations, and their shares of U.S. imports in 2022.

Table IV-1
ALPs: U.S. importers, their headquarters, and share of imports within each source, 2022

Share in percent

Firm	Headquarters	China	Japan	Subject sources	Nonsubject sources	All import sources
Eastman Kodak	Rochester, NY	***	***	***	***	***
ECO3 USA	Carlstadt, NJ	***	***	***	***	***
Fujifilm USA	Valhalla, NY	***	***	***	***	***
Grafsolve	North Chicago, IL	***	***	***	***	***
Printing Papers	Little Rock, AR	***	***	***	***	***
All firms	Various	***	***	***	***	***

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

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

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of ALPs from China and Japan and all other sources. Tables IV-3 and IV-4 present data for U.S. imports by U.S. producers and/or affiliated firms.

[1] The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data from third-party sources, may have accounted for more than one percent of total imports under HTS subheading 3701.30.00 in 2022.

[2] Four firms (***) certified they did not import ALPs during the period of data collection.

[3] Petitioner stated that merchandise classified under 3701.30.00 represents the overwhelming majority of subject imports. Conference transcript, p. 38 (Herrmann).

Subject imports accounted for *** percent of total imports of ALPs by quantity and *** percent by value in 2022. The quantity of subject imports increased by *** percent or by *** square meters during 2020-22 and was higher by *** percent or by *** square meters in interim 2023 than in interim 2022. The vast majority of the increase in U.S. imports from subject sources was accounted for by ***.[4] The value of subject imports also increased by *** percent during 2020-22 and was higher by *** percent in interim 2023 than in interim 2022. The average unit value of subject imports steadily decreased by *** percent during 2020-22, and was lower during interim 2023 than in interim 2022 by *** percent. The ratio of subject imports to U.S. production increased from *** percent in 2020 to *** percent in 2022 and was higher in interim 2023 than in interim 2022.

Nonsubject imports of ALPs to the United States increased during 2020-22 by *** percent or by *** square meters, but were lower in interim 2023 by *** percent than in interim 2022. During 2020-22, the value of nonsubject imports increased by *** percent and was lower by *** percent in interim 2023 than in interim 2022. *** accounted for the majority of nonsubject imports in all periods.[5] The average unit value for ALPs imports from nonsubject sources increased by *** percent from 2020-22, and was higher by *** percent in interim 2023 than in interim 2022. The ratio of nonsubject imports to U.S. production increased from *** percent in 2020 to *** percent in 2022 and was higher in interim 2023 than in interim 2022.

[4] Of the three firms that reported imports of ALPs from subject sources in 2022 (***), *** accounted for *** percent of those imports by quantity. ***. ***'s U.S. importer's questionnaire response, section II-4. Consequently, respondent Fujifilm asserts that virtually all of Fujifilm USA's increased subject imports of ALPs went to replace the firm's lost U.S. production with the closing of its facility in Greenwood, South Carolina. Noting that it transitioned lower-volume customers first to imports. Conference transcript pp. 137-138 and 175 (Porter).

[5] *** reported importing mostly from Germany and France during 2020-22. ***'s U.S. importer questionnaire response, section II-7a.

Table IV-2
ALPs: U.S. imports by source and period

Quantity in 1,000 square meters; value in 1,000 dollars; unit value in dollars per square meter; share and ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Japan	Unit value	***	***	***	***	***
Subject	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Japan	Share of quantity	***	***	***	***	***
Subject	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	***	***	***	***	***
China	Share of value	***	***	***	***	***
Japan	Share of value	***	***	***	***	***
Subject	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to U.S. production.

Figure IV-1
ALPs: U.S. import quantities and average unit values, by source and period

* * * * * * *

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

Table IV-3
ALPs: U.S. imports by U.S. producers and/or affiliated firms, by source and period

Quantity in 1,000 square meters; ratio to U.S. imports

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Table IV-4
ALPs: U.S. imports by U.S. producers and/or affiliated firms, excluding *, by source and period**

Quantity in 1000 square meters; ratio to U.S. imports

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[6] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[7]

Table IV-5 presents information on imports from the subject countries during the applicable 12-month period for which data were collected. Imports from China and Japan accounted for *** percent and *** percent, respectively, of total imports of ALPs by quantity between September 1, 2022 and, August 31, 2023.

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

[7] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-5
ALPs: U.S. imports in the twelve-month period preceding the filing of the petition, September 1, 2022 through August 31, 2023

Quantity in 1,000 square meters; share of quantity in percent

Source of imports	Quantity	Share of quantity
China	***	***
Japan	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	***	***

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

Cumulation considerations

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

Fungibility

Table IV-6 and figure IV-2 present U.S. producers' and U.S. importers' 2022 U.S. shipments by thickness. Nearly three-quarters of U.S. shipments from U.S. producers, subject sources, and nonsubject sources were of *** ALPs in 2022. U.S. importers' U.S. shipments of *** ALPs accounted for the second largest for all sources, and third *** ALPs during 2022. All other gauges accounted for a small share, between *** percent from all sources in 2022.

Table IV-6
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and thickness, 2022

Quantity in 1,000 square meters

Source	20 gauge	30 gauge	40 gauge	All other products	All thicknesses
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-6 Continued
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and thickness, 2022

Share across in percent

Source	20 gauge	30 gauge	40 gauge	All other products	All thicknesses
U.S. producers	***	***	***	***	100.0
China	***	***	***	***	100.0
Japan	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table IV-6 Continued
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and thickness, 2022

Shares down in percent

Source	20 gauge	30 gauge	40 gauge	All other products	All thicknesses
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

Figure IV-2
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and thickness, 2022

* * * * * * *

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

Table IV-7 and figure IV-3 present U.S. producers' and U.S. importers' U.S. shipments in 2022 by chemical treatment status (wet or chemical free ALPs). Wet ALPs accounted for *** of U.S. producers' U.S. shipments, *** of U.S. importers' U.S. shipments from Japan, and the *** of U.S. importers' U.S. shipments from nonsubject sources. In contrast, all chemical free ALPs accounted for *** of U.S. importers' U.S. shipments from China.[8] U.S. producers', Japan, and nonsubject sources accounted for nearly a *** of all U.S. importers' U.S. shipments of wet ALPs. U.S. producers accounted for approximately ***, China ***, non-subject sources ***, and Japan *** of U.S. importers' U.S. shipments of chemical-free ALPs.

[8] Respondent Fujifilm stated that they interpreted "chemical-free plate" to mean process-free plates and that all of the processless plates being sold currently by the firm are imported from China. Respondent Fujifilm also noted that they don't offer chemical-free plate, only processless and wet plates. Conference transcript, pp. 109-110 and 170-172 (Crawford).

Table IV-7
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2022

Quantity in 1,000 square meters

Source	Wet ALPs	Chemical free ALPs	All chemical treatment statuses
U.S. producers	***	***	***
China	***	***	***
Japan	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table IV-7 Continued
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2022

Share across in percent

Source	Wet ALPs	Chemical free ALPs	All chemical treatment statuses
U.S. producers	***	***	100.0
China	***	***	100.0
Japan	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-7 Continued
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2022

Share down in percent

Source	Wet ALPs	Chemical free ALPs	All chemical treatment statuses
U.S. producers	***	***	***
China	***	***	***
Japan	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

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

Figure IV-3
ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2022

* * * * * * *

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

Geographical markets

Table IV-8 presents data on U.S. imports by source and border of entry in 2022. Imports from all sources entered through all borders of entry in 2022. The vast majority of U.S. imports from subject and nonsubject sources entered through the Eastern borders of entry in 2022.

Table IV-8
ALPs: U.S. imports by source and border of entry, 2022

Quantity in 1,000 square meters

Source	East	North	South	West	All borders
China	4,755	244	7	243	5,250
Japan	10,817	2,946	705	196	14,664
Subject sources	15,573	3,190	711	439	19,913
Nonsubject sources	42,106	640	157	213	43,116
All import sources	57,678	3,831	868	652	63,029

Table continued.

Table IV-8 Continued
ALPs: U.S. imports by source and border of entry, 2022

Share across in percent

Source	East	North	South	West	All borders
China	90.6	4.7	0.1	4.6	100.0
Japan	73.8	20.1	4.8	1.3	100.0
Subject sources	78.2	16.0	3.6	2.2	100.0
Nonsubject sources	97.7	1.5	0.4	0.5	100.0
All import sources	91.5	6.1	1.4	1.0	100.0

Table continued.

Table IV-8 Continued
ALPs: U.S. imports by source and border of entry, 2022

Share down in percent

Source	East	North	South	West	All borders
China	8.2	6.4	0.8	37.3	8.3
Japan	18.8	76.9	81.2	30.0	23.3
Subject sources	27.0	83.3	81.9	67.3	31.6
Nonsubject sources	73.0	16.7	18.1	32.7	68.4
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed October 12th, 2023.

Note: Imports are likely overstated as it may include out-of-scope merchandise and ***. Imports are based on the imports for consumption data series.

Presence in the market

Table IV-9 and figures IV-4 and IV-5 present data on U.S. imports by source and month from January 2020 to August 2023. Imports from both aggregate subject sources and nonsubject sources were present in every month from January 2020 to August 2023. Imports from China, Japan, and nonsubject sources were present in 44 of 44 months in this period.

Table IV-9
ALPs: Quantity of U.S. imports, by source and month

Quantity in 1,000 square meters

Year	Month	China	Japan	Subject sources	Nonsubject sources	All import sources
2020	January	11	514	525	5,173	5,698
2020	February	15	986	1,001	6,027	7,028
2020	March	0	1,431	1,431	5,497	6,928
2020	April	1	177	178	5,283	5,461
2020	May	1	287	288	4,287	4,575
2020	June	3	272	275	3,484	3,760
2020	July	5	658	664	3,564	4,227
2020	August	11	395	406	3,728	4,134
2020	September	13	148	161	3,002	3,163
2020	October	14	187	201	9,598	9,800
2020	November	6	76	82	3,769	3,851
2020	December	1	179	181	4,438	4,618
2021	January	0	90	90	4,735	4,825
2021	February	0	52	52	4,433	4,485
2021	March	1	311	312	5,379	5,691
2021	April	24	1,343	1,367	4,218	5,585
2021	May	3	478	481	3,790	4,272
2021	June	6	289	295	4,473	4,769
2021	July	56	337	393	5,231	5,624
2021	August	9	800	809	4,409	5,218
2021	September	81	520	601	4,136	4,737
2021	October	199	540	740	4,286	5,026
2021	November	180	388	568	4,183	4,751
2021	December	139	926	1,065	3,764	4,829

Table continued.

Table IV-9 Continued
ALPs: Quantity of U.S. imports, by source and month

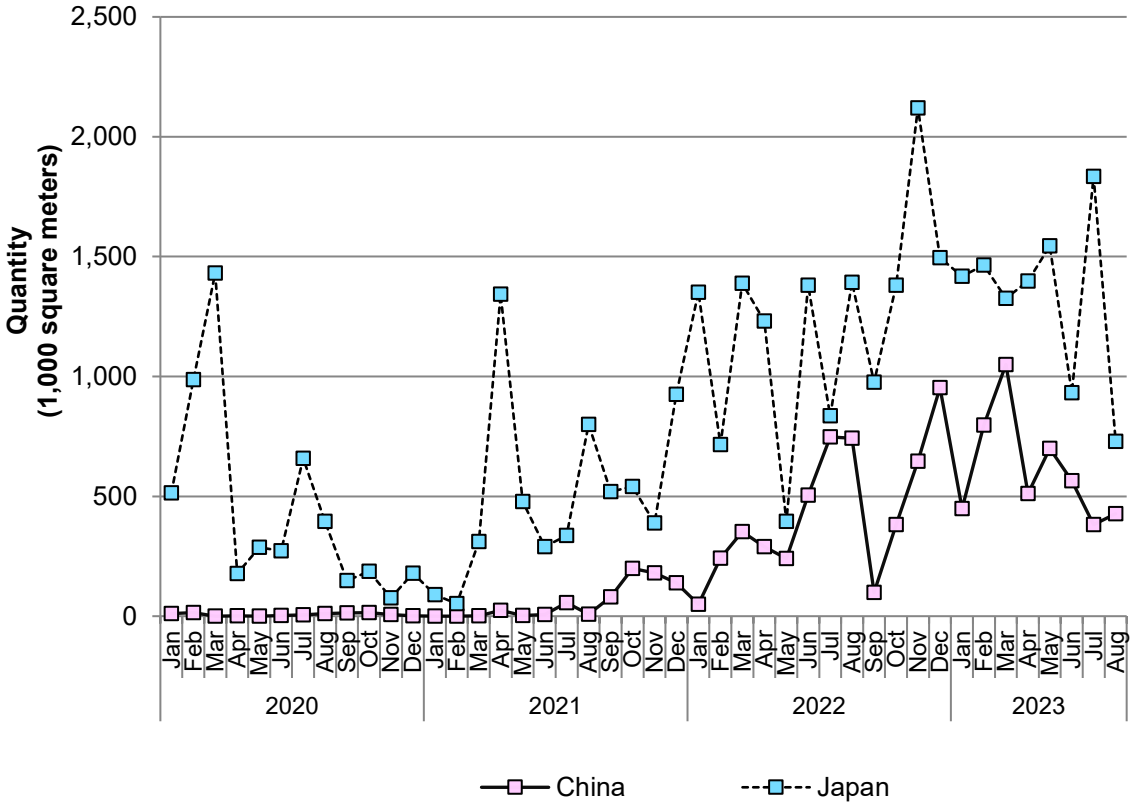
Quantity in 1,000 square meters

Year	Month	China	Japan	Subject sources	Nonsubject sources	All import sources
2022	January	50	1,352	1,401	3,747	5,148
2022	February	242	716	958	3,083	4,040
2022	March	353	1,389	1,742	6,188	7,929
2022	April	290	1,231	1,521	3,869	5,389
2022	May	240	396	636	3,065	3,701
2022	June	504	1,381	1,885	2,992	4,877
2022	July	748	836	1,584	3,416	5,000
2022	August	742	1,392	2,134	2,538	4,673
2022	September	99	976	1,076	3,964	5,040
2022	October	382	1,381	1,763	4,079	5,842
2022	November	646	2,120	2,765	3,663	6,428
2022	December	954	1,496	2,449	2,512	4,961
2023	January	449	1,418	1,867	3,090	4,957
2023	February	797	1,464	2,262	2,685	4,947
2023	March	1,050	1,326	2,376	2,430	4,805
2023	April	511	1,397	1,908	2,802	4,710
2023	May	700	1,544	2,245	2,105	4,349
2023	June	565	932	1,497	2,371	3,868
2023	July	382	1,835	2,217	2,182	4,399
2023	August	428	729	1,157	2,109	3,265

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed October 12th, 2023.

Note: Zeroes are suppressed values which were rounded down to show data 1,000 square meters. Note: Imports are likely overstated as it may include out-of-scope merchandise and ***. Imports are based on the imports for consumption data series.

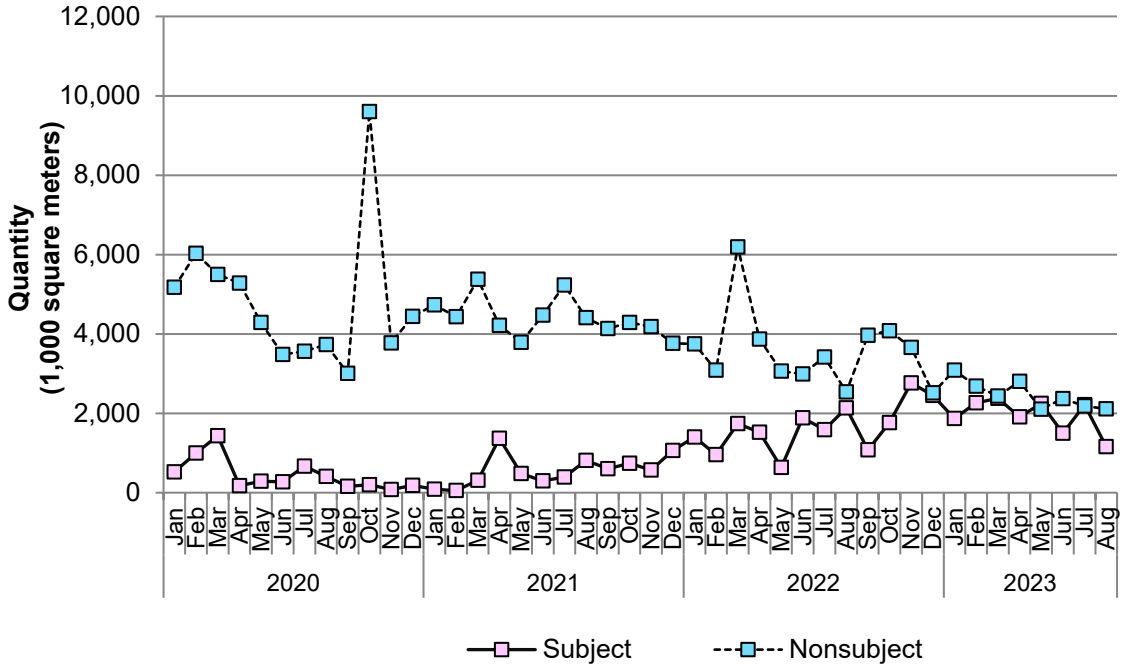
Figure IV-4
ALPs: U.S. imports from individual subject sources, by source and month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed October 12th, 2023.

Note: Imports are likely overstated as it may include out-of-scope merchandise and ***. Imports are based on the imports for consumption data series.

Figure IV-5
ALPs: U.S. imports from aggregated subject and nonsubject sources, by source and month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed October 12th, 2023.

Note: Imports are likely overstated as it may include out-of-scope merchandise and ***. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table IV-10 and figure IV-6 present data on apparent U.S. consumption and U.S. market shares by quantity for ALPs. Apparent U.S. consumption, by quantity, decreased by *** percent from 2020 to 2022, and was *** percent lower in interim 2023 than in interim 2022. The share of quantity held by U.S. producers decreased by *** percentage points from 2020 to 2022 and was *** percentage points lower in interim 2023 than in interim 2022.

The share of quantity held by subject imports increased by *** percentage points from 2020 to 2022 and was *** percentage points higher in interim 2023 than in interim 2022.[9] The share of quantity held by nonsubject imports increased by *** percentage points from 2020 to 2022 and was *** percentage points higher in interim 2023 than in interim 2022.

Table IV-10
ALPs: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 square meters; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

[9] This is partially due to ***.

Figure IV-6
ALPs: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

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

Value

Table IV-11 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by value for ALPs. Apparent consumption by value increased by *** percent from 2020 to 2022 and was *** percent higher in interim 2023 than in interim 2022. The share of value held by U.S. producers decreased by *** percentage points from 2020 to 2022 and was *** percentage points lower in interim 2023 than in interim 2022. The share of value held by subject imports increased by *** percentage points from 2020 to 2022 and was *** percentage points higher in interim 2023 than in interim 2022. The share of value held by nonsubject imports increased by *** percentage points from 2020 to 2022 but was *** percentage points lower in interim 2023 than in interim 2022.

Table IV-11
ALPs: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

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

Figure IV-7
ALPs: Apparent U.S. consumption based on value, by source and period

* * * * * * *

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

U.S. producers and importers were asked whether the decline in print media and the associated increase in digital media had an impact on the firm's operations. Table IV-12 presents the firms' narrative responses.

Table IV-12
ALPs: U.S. producers' and importers' responses to impact of the decline in print media

Firm	Narrative response on impact of decline in print media
Eastman Kodak	***
ECO3 USA	***
Fujifilm USA	***
Grafsolve	***
Printing Papers	***

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

Part V: Pricing data

Factors affecting prices

Raw material costs

The principal raw material used in the production of ALPs is aluminum. The published prices for aluminum increased by *** percent over the period. (figure V-1). Aluminum prices spiked in the first quarter of 2022 in part due to the Russian invasion of Ukraine and Russian producer Rusal shutting down production in the Nikolaev alumina refinery which produced roughly 2.5 million tons annually.[1] The European energy crisis in the first quarter of 2022 suppressed aluminum production in Europe, while world-wide increased energy costs added to the cost of aluminum production elsewhere. Energy costs contributed to the spike in the price of aluminum.[2] Aluminum prices began to decrease from their highest points from January 2020 to September 2023, starting in the second quarter of 2022 and generally decreased throughout the remainder of the period but remained above initial prices.

Figure V-1
ALPs: Raw materials prices of Aluminum P1020A in the United States, by month, January 2020 through September 2023

* * * * * * *

Source: ***.

[1] MetalMiner, https://agmetalminer.com/2022/12/29/aluminum-prices-and-global-market-a-2022-review/, retrieved October 12, 2023.
[2] Ibid.

Table V-1
ALPs: Prices of Aluminum P1020A in the United States, by month

* * * * * * *

Source: ***.

Transportation costs to the U.S. market

Transportation costs for ALPs shipped from subject countries to the United States averaged 14.2 percent for China and 6.4 percent for Japan during 2022. These estimates were derived from official import data and represent the transportation and other charges on imports.[3]

U.S. inland transportation costs

*** responding U.S. producers and importers reported that they ***. U.S. producers reported that their U.S. inland transportation costs ranged from *** to *** percent while responding importers reported costs ranging from *** to *** percent.

[3] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting number 3701.30.000.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists (table V-2).

Table V-2
ALPs: Count of U.S. producers' and importers' reported price setting methods

* * * * * * *

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

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

U.S. producers reported selling the vast majority of ALPs under long-term and annual contracts. Importers reported selling the vast majority of ALPs in the spot market and under long-term contracts (table V-3).

Table V-3
ALPs: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022

* * * * * * *

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

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

*** U.S. producers reported renegotiating prices during annual and long-term contracts. U.S. producer *** reported that it *** in annual and long-term contracts and *** prices to raw material costs. U.S. producer *** and importer *** reported that it *** in annual and long-term contracts and ***. Importer *** reported that it fixed both price and quantity for long-term contracts.

Sales terms and discounts

U.S. producer *** reported that it typically quotes prices on *** and offers ***. U.S. producer *** reported that it typically quotes prices on *** and offers ***. Importers typically quote prices on a delivered basis. Importers offer quantity and total volume discounts.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following ALPs products shipped to unrelated U.S. customers during January 2020-June 2023.

Product 1.-- 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Product 2.-- 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Product 3.-- 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Two U.S. producers and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[4] Pricing data reported by these firms accounted for virtually all of U.S. producers' U.S. shipments of ALPs and 96.2 percent of U.S. shipments of subject imports from China and 99.4 percent from Japan in 2022.[5] [6]

Price data for products 1-3 are presented in tables V-4 to V-6 and figures V-2 to V-4.

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

[5] Pricing coverage is based on U.S. shipments reported in questionnaires.

[6] Respondents attribute pricing volatility and differences between U.S.-produced and imported pricing products to high volume purchases being sold at a lower price and the transition of customers from U.S.-produced product to imported products. Conference transcript, p. 156 (Larkin).

Table V-4
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

* * * * * * *

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

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Figure V-2
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table V-5
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

* * * * * * *

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

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Figure V-3
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Table V-6
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

* * * * * * *

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

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Figure V-4
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Price trends

In general, domestic prices increased during January 2020 to June 2023 while imported price trends were mixed. There are insufficient data to determine price trends from ALPs imported from China over the whole period of investigation. Prices decreased for pricing products 1 and 3 imported from Japan while increasing for product 2. Pricing product 2 represents *** percent of subject import pricing data by quantity over the period. Pricing product 2 imported from Japan represents *** percent of subject import pricing data by quantity. Table V-7 summarizes the price trends, by country and by product.[7]

Table V-7
ALPs: Summary of price data, by product and source, January 2020-June 2023

* * * * * * *

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

Note: Percent change column is percentage change from the first quarter 2020 to the second quarter in 2023.

[7] From the first quarter of 2022 to the second quarter of 2023, the prices for pricing products 1 and imported from China increased by *** percent and *** percent respectively, while prices for pricing product 2 decreased by *** percent.

Price comparisons

As shown in tables V-8 and V-9, prices for product imported from subject countries were below those for U.S.-produced product in 19 of 62 instances (3.36 million square meters); margins of underselling ranged from 0.1 to 46.9 percent. In the remaining 43 instances (17.91 million square meters), prices for product from subject countries were between 0.9 and 236.8 percent above prices for the domestic product. The majority of instances of underselling are from product imported from China (11 of 19 instances), while the majority of instances of overselling are from product imported from Japan (31 of 43 instances).

Table V-8
ALPs: Instances of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 square meters; margins in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	2	***	***	***	***
Product 2	Underselling	7	***	***	***	***
Product 3	Underselling	10	***	***	***	***
Total, all products	Underselling	19	3,369	16.4	0.1	46.9
Product 1	Overselling	18	***	***	***	***
Product 2	Overselling	16	***	***	***	***
Product 3	Overselling	9	***	***	***	***
Total, all products	Overselling	43	17,919	(47.1)	(0.9)	(236.8)

Source: Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-9
ALPs: Instances of underselling and overselling and the range and average of margins, by source

Quantity in 1,000 square meters; margins in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	11	***	***	***	***
Japan	Underselling	8	***	***	***	***
Total, all subject sources	Underselling	19	3,369	16.4	0.1	46.9
China	Overselling	12	***	***	***	***
Japan	Overselling	31	***	***	***	***
Total, all subject sources	Overselling	43	17,919	(47.1)	(0.9)	(236.8)

Source: Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

The Commission requested that U.S. producers of ALPs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of ALPs from subject countries since January 1, 2020. Of the two responding U.S. producers, one *** reported that they had to reduce prices and submitted lost sales and lost revenue allegations. U.S. producer *** identified 13 firms with which it lost sales or revenue (six consisting of lost sales allegations and seven consisting of lost revenue allegations).

Staff contacted 13 purchasers and received responses from five purchasers. Responding purchasers reported purchasing 307,152 square meters of ALPs during January 2020-June 2023 (table V-10).

During 2022, responding purchasers purchased 81.1 percent from U.S. producers, 8.4 percent from China, and 10.4 percent from Japan. Purchasers were asked about changes in their purchasing patterns from different sources since 2020. Of the responding purchasers, three reported that purchases from domestic producers fluctuated down or decreased and two reported no change.[8] Explanations for decreasing purchases of domestic product included decreased demand due to reduced printing and using processless plates that had better images to proof and setup. Purchaser responses on changes in purchasing patterns of ALPs from subject countries were mixed (table V-11).

Of the five responding purchasers, one reported that, since 2020, it had purchased imported ALPs from China and two reported that they purchased ALPs from Japan, instead of U.S.-produced product. The purchaser that reported purchasing ALPs from China also reported that prices of subject imports from China were lower than U.S.-produced product, and this purchaser reported that price was a primary reason for the decision to purchase imported product. This one purchaser estimated the quantity of ALPs purchased from China instead of domestic product was 14,157 square meters (tables V-12 and V-13). Purchaser *** identified quality and service as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the five responding purchasers, all reported they did not know if U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries.

[8] All five responding purchasers indicated that they knew the source of all the ALPs they purchased.

Table V-10
ALPs: Purchasers' reported purchases and imports, by firm and source

* * * * * * *

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

Table V-11
ALPs: Count of changes in purchase patterns from U.S. subject, and nonsubject countries

* * * * * * *

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

Table V-12
ALPs: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 square meters

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--3; No--2	Yes--1; No--2	Yes--1; No--2	***	

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

Table V-13
ALPs: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Count in number of firms reporting; quantity in 1,000 square meters

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	***	***	***	***
Japan	***	***	***	***
Any subject source	3	1	1	***

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Purchaser *** reported that it had begun to purchase processless plates from Fujifilm-China that are manufactured in China in order to minimize its environmental impact and Fujifilm plates work best with its printing plants. Purchaser *** reported that it was happily using Southern Litho plates until Eastman Kodak bought them but after the purchase plate quality became sporadic. Purchaser *** also reported that it used an ECRM computer to run plates and when Eastman Kodak acquired the company it stopped offering parts and service causing the purchaser to switch to Fuji.

Part VI: Financial experience of U.S. producers

Background[1]

Two U.S. producers, Eastman Kodak and Fujifilm, provided usable financial results on their ALP operations. The ALPs industry experienced some changes over the period examined.[2] [3] [4] *** reported financial data on a calendar year and on the basis of GAAP.[5]

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2022.[6]

[1] The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] Southern Lithoplate ceased its ALP operations in 2021, and did not provide a response to the U.S. producers' questionnaire. The firm's data are not included in the aggregated financial data or any narrative responses.

[3] Eastman Kodak acquired the service and parts assets of Southern Lithoplate in 2020, and took over the servicing of Southern Lithoplate's accounts beginning August 1, 2021. (Eastman Kodak did not acquire any of Southern Lithoplate's physical assets). https://www.kodak.com/en/company/press-release/kodak-acquires-southern-lithoplate-service-parts-assets/. ***. Petitioner's postconference brief, p. 11

[4] Fujifilm stopped producing ALPs and closed its Greenwood, South Carolina facility in 2022. Fujifilm indicated that the closure was "a result of a strategic consolidation of Fujifilm's global operations. Faced with declining demand in the printing and photo industry, Fujifilm determined to close its U.S. operations which served the smallest of the three global markets." Conference transcript, p. 123 (Beaty).

[5] ***.

[6] ***.

Figure VI-1
ALPs: U.S. producers' share of net sales quantity in 2022, by firm

* * * * * * *

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

Operations on ALPs

Table VI-1 presents aggregated data on U.S. producers' operations in relation to ALPs, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data. Appendix F presents U.S. producers' financial data excluding ***.

Table VI-1
ALPs: U.S. producers' results of operations, by item and period

Quantity in 1,000 square meters; value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Less by-product revenue	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expenses/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Less by-product revenue	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued
ALPs: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per square meter; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Less by-product revenue	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS before by-product offset. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VI-2
ALPs: Changes in AUVs between comparison periods

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▼***	▲***	▲***
COGS: Raw materials	▲***	▲***	▲***	▼***
COGS: Direct labor	▲***	▼***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Less by-product revenue	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table VI-2 Continued
ALPs: Changes in AUVs between comparison periods

Changes in dollars per square meter

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▼***	▲***	▲***
COGS: Raw materials	▲***	▲***	▲***	▼***
COGS: Direct labor	▲***	▼***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Less by-product revenue	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▲***
SG&A expense	▲***	▼***	▲***	▲***
Operating income or (loss)	▼***	▼***	▼***	▲***
Net income or (loss)	▼***	▼***	▼***	▲***

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

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “---”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table VI-3
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 square meters

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per square meter

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Fujifilm	***	***	***	***	***
Eastman Kodak	***	***	***	***	***
All firms	***	***	***	***	***

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

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

Net sales

Total revenue consists of commercial sales and transfers to related firms accounting for *** percent of total revenue, respectively, in 2022. Transfers to related firms are included in the financial data, but not shown separately in this section of the report.[7] As shown in table VI-1, total net sales quantity slightly increased from 2020 to 2021 before substantially decreasing from 2021 to 2022. Despite the increase in quantity in 2021, net sales value declined continuously from 2020 to 2022. Total sales quantity and values decreased overall by *** percent, respectively, from 2020 to 2022, and were lower in interim 2023 compared with interim 2022. The decline in sales volumes and revenues in 2022 and interim 2023 is ***. As shown in table VI-3, *** reported an increase in its sales quantity and value from 2020 to 2022, while *** reported a decrease.[8] In interim 2023, *** reported lower sales quantity and value compared with interim 2022. On an average per

[7] ***. *** U.S. producers' questionnaire response, section II-12, and email from ***, October 18, 2023.

[8] ***. Emails from ***, October 17, and November 2, 2023.

square meter basis, sales values slightly decreased from $*** in 2020 to $*** in 2021, then increased to $*** in 2022 and were higher in interim 2023 at $*** compared with interim 2022 at $*** (***). Per square meter sales values varied in directional trends between the two U.S. producers, *** reported an increase from 2020 to 2022, while *** reported a decrease during that same time period.[9]

Cost of goods sold and gross profit or loss

Raw material costs, direct labor and other factory costs accounted for *** percent of total COGS, respectively, in 2022.

Raw material costs, the *** component of COGS, increased by *** percent from 2020 to 2021 then decreased by *** percent from 2021 to 2022. Raw material costs decreased overall by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 compared with interim 2022. On an average per square meter basis, raw material costs increased from $*** in 2020 to $*** in 2021 and $*** in 2022 (***), and were lower in interim 2023 at $*** compared with $*** in interim 2022.[10] As shown in table VI-3, *** U.S. producers reported an increase in per-unit raw material costs from 2020 to 2022, and *** reported lower values in interim 2023 compared with interim 2022. As a ratio to net sales, raw material costs increased from *** percent in 2020 to *** percent in 2022, and were lower in interim 2023 at *** percent compared with interim 2022 at *** percent.

Table VI-4 presents details on specific raw material inputs as a share of total raw material costs in 2022. Aluminum sheets account for the largest share of raw material cost (*** percent), and the remaining *** percent represents other material inputs such as chemicals and packaging.[11]

[9] Eastman Kodak has implemented various pricing actions in response to increased labor, material, and distribution costs primarily within its Traditional Printing segment. In order to mitigate the impact of higher aluminum, energy and packaging costs, the segment implemented surcharges on purchases of plates largely beginning in the latter part of the second quarter of 2021 that continue to be periodically reviewed and adjusted for accordingly. Eastman Kodak's 2022 Form 10-K, p.34 (as filed).

[10] Email from ***, October 17, 2023.

[11] *** reported raw material inputs purchased from related firms. The firm purchases ***. Purchases were reported in a manner consist with the company's accounting books and records. U.S. producers' questionnaire responses sections III-6, III-7a, and III-7b.

Table VI-4
ALPs: U.S. producers' raw material costs in 2022

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Aluminum sheet	***	***
Other material inputs	***	***
All raw materials	***	***

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

Direct labor costs, the *** component of COGS in most years, decreased overall by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 compared with interim 2022. On an average per square meter basis, direct labor costs decreased from $*** in 2020 to $*** in 2021, then increased to $*** in 2022 and were higher in interim 2023 at $*** compared with $*** in interim 2022. As shown in table VI-3, ***'s direct labor costs decreased, while those of *** increased substantially from 2020 to 2022 (***). In interim 2023, ***'s unit values were higher than interim 2022. As a ratio to net sales, direct labor costs decreased from *** percent in 2020 to *** percent in 2022, and were lower in interim 2023 at *** percent compared to interim 2022 at *** percent.

Other factory costs, *** component of COGS in most years, decreased overall by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 compared with interim 2022. On an average per square meter basis, other factory costs increased from $*** in 2020 to $*** in 2022, and were lower in interim 2023 at $*** compared with $*** in interim 2022. As shown in table VI-3, *** U.S. producers reported an increase in per-unit other factory costs from 2020 to 2022, with the increase in 2022 ***. In interim 2023, *** per square meter values were higher compared to interim 2022. As a ratio to net sales, other factory costs increased from *** percent in 2020 to *** percent in 2022, and were lower in interim 2023 at *** percent compared to *** percent in interim 2022.

*** U.S. producers reported aluminum scrap as a by-product. By-product revenue ranged between *** percent of total COGS, and increased overall from 2020 to 2022. In interim 2023, by-product revenue was lower compared to interim 2022.

Total COGS net of by-products revenue increased by *** percent from 2020 to 2021, then decreased by *** percent in 2022, and decreased overall by *** percent from 2020 to 2022. In interim 2023, total COGS were *** percent lower compared with interim 2022. On an average per square meter basis, total COGS increased from $*** in 2020 to $*** in 2022, and was lower in interim 2023 at $*** compared with interim 2022 at $***. As a

ratio to net sales, total COGS increased from *** percent in 2020 to *** percent in 2022 and was lower in interim 2023 at *** percent compared with interim 2022 in *** percent.

As shown in table VI-1, gross profit declined from $*** in 2020 to $*** in 2021 and $*** in 2022, and was higher in interim 2023 at $*** compared with $*** in interim 2022. As a ratio to net sales, gross profit decreased from *** percent in 2020 to *** percent in 2022, and was higher at *** percent in interim 2023 compared to *** percent in interim 2022. As shown in table VI-3, results between the two U.S. producers varied widely, *** reported an overall increase in gross profit from 2020 to 2022, and reported a higher gross profit in interim 2023 compared with interim 2022, while ***'s gross profit declined in 2021 and further declined into a loss in 2022.[12]

SG&A expenses and operating income or loss

U.S. producers' SG&A expenses decreased by *** percent from 2020 to 2021, then increased by *** percent in 2022 and were *** percent lower in interim 2023 compared with interim 2022. As shown in table VI-3, the two U.S. producers varied in values and directional trends. ***'s SG&A expenses continuously increased from 2020 to 2022, and were slightly higher in interim 2023 compared with interim 2022. ***'s SG&A expenses continuously decreased from 2020 to 2022.[13] The corresponding SG&A expense ratio (total SG&A expenses divided by total sales value) increased from *** percent in 2020 to *** percent in 2022 and was *** percentage points higher in interim 2023 at *** percent compared to interim 2022 at *** percent.

U.S. producers operating income decreased from $*** in 2020 to $*** in 2021, and further declined into an *** of $*** in 2022. Operating income was higher in interim 2023 at $*** compared to *** in interim 2022. As a ratio to net sales, operating income decreased from ***

[12] As previously mentioned in footnote 6, ***.
[13] ***. Emails from ***, October 18 and October 19, 2023.

percent in 2020 to a *** percent in 2022, and was higher in interim 2023 at *** percent compared to a *** percent in interim 2022. As shown in table VI-3, ***'s operating income declined from 2020 to 2021 then increased in 2022, but was still lower than what it was in 2020. In interim 2023, *** reported a *** operating income compared to a *** operating income in interim 2022. ***'s operating income, similar to its gross profits, declined in 2021 and further declined into a *** in 2022.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. Interest expense, other expenses, and other income were combined and only the net amount is shown. Interest expenses *** reported only by *** increased overall from 2020 to 2022, and were lower in interim 2023 compared with interim 2022.[14] Other expenses, the majority of which were reported by *** increased overall from 2020 to 2022 and were lower in interim 2023 compared with interim 2022. Other income was not reported in 2020 and increased from 2021 to 2022. In 2022, other income offset interest expense and other expenses and increased net income.[15]

Net income decreased from $*** in 2020 to $*** in 2021, then further declined to $*** in 2022, and was higher in interim 2023 at $*** compared with a *** in interim 2022. As a ratio to net sales, net income decreased from *** percent in 2020 to *** percent in 2022, and was higher in interim 2023 at *** percent compared to a *** percent in interim 2022. As shown in table VI-3, ***'s net income declined from a *** in 2020 to a *** in 2021 and 2022, and was higher in interim 2023 compared with interim 2022

[14] Email from ***, October 18, 2023.

[15] *** U.S. producers' questionnaire responses sections III-10a and III-10b, and email from ***, October 20, 2023.

(***). ***'s net income *** declined from 2020 to 2022 *** remained *** during the full year periods.[16]

Capital expenditures and R&D expenses

Table VI-5 presents capital expenditures, by firm. Table VI-6 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. Neither firm reported R&D expenses. Total capital expenditures (***) decreased overall from 2020 to 2022 and were higher in interim 2023 compared with interim 2022.

Table VI-5
ALPs: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-6
ALPs: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Eastman Kodak	***
Fujifilm	***

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

[16] A variance analysis is not shown due to ***.

Assets and return on assets

Table VI-7 presents data on the U.S. producers' total assets while table VI-8 presents their operating ROA.[17] Table VI-9 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets increased from 2020 to 2022, and return on assets decreased from *** in 2020 to *** percent in 2022.

Table VI-7
ALPs: U.S. producers' total assets, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022
Eastman Kodak	***	***	***
Fujifilm	***	***	***
All firms	***	***	***

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

Note: Total assets is reported net of accumulated depreciation.

Table VI-8
ALPs: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2020	2021	2022
Eastman Kodak	***	***	***
Fujifilm	***	***	***
All firms	***	***	***

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

Note: ROAs are based on the ratio of operating income or (loss) to total assets.

Table VI-9
ALPs: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Eastman Kodak	***
Fujifilm	***

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

[17] The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Capital and investment

The Commission requested U.S. producers of ALPs to describe any actual or potential negative effects of imports of ALPs from China and Japan on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-10 presents the number of firms reporting an impact in each category and table VI-11 provides the U.S. producers' narrative responses.

Table VI-10
ALPs: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

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

Note: ***

Table VI-11
ALPs: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020, by firm and effect

Item	Firm name and narrative on impact of imports
Return on specific investments negatively impacted	***
Other negative effects on investments	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to eight firms believed to produce and/or export ALPs from China.[3] Usable responses to the Commission's questionnaire were received from two firms: ECO3 (Wuxi) Printing Plate Co. Ltd. ("ECO3") and Fujifilm Printing Plate (China) Co., Ltd. ("Fujifilm China").[4] These firms' exports to the United States accounted for *** of U.S. imports of ALPs from China in 2022. According to estimates requested of the responding producers in China, the production of ALPs in China reported in questionnaires accounts for approximately *** percent of overall production of ALPs in China.[5] Tables VII-1 and VII-2 present information on the ALPs operations of the responding producers and exporters in China.

Table VII-1
ALPs: Summary data for producers in China, 2022

Quantity in 1,000 square meters; shares in percent

Firm	Production (1,000 square meters)	Share of reported production (percent)	Exports to the United States (1,000 square meters)	Share of reported exports to the United States (percent)	Total shipments (1,000 square meters)	Share of firm's total shipments exported to the United States (percent)
ECO3	***	***	***	***	***	***
Fujifilm China	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

[3] These firms were identified through a review of information submitted in the petition and presented in third-party sources.

[4] One foreign producer, *** also reported limited resales of ALPs produced by another entity ***. ***. Email from ***, October 13, 2023.

[5] Foreign producers' questionnaire response, section II-7a.

Table VII-2
ALPs: Summary data for resellers in China, 2022

Firm	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)
Fujifilm China	***	***
All firms	***	***

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

Changes in operations

Producers in China were asked to report any change in the character of their operations or organization relating to the production of ALPs since 2020. One of the producers indicated in its questionnaire that it had experienced such changes. Table VII-3 presents the changes identified by this producer.

Table VII-3
ALPs: Reported changes in operations in China since January 1, 2020, by firm

Item	Firm name and accompanying narrative response
Plant closings	***

Item	Firm name and accompanying narrative response
Expansions	***

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

Operations on ALPs

Table VII-4 presents data on installed capacity, practical overall capacity, and practical ALPs capacity and production on the same equipment for the responding producers in China.

Table VII-4
ALPs: Producers in China installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 square meters; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical ALPs	Capacity	***	***	***	***	***
Practical ALPs	Production	***	***	***	***	***
Practical ALPs	Utilization	***	***	***	***	***

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

Table VII-5 presents reported capacity constraints for producers in China since January 1, 2020.

Table VII-5
ALPs: Foreign producers in China reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Existing labor force	***
Fuel or energy	***
Other constraints	***

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

Table VII-6 presents information on the ALPs operations of the responding producers and exporters in China. From 2020 to 2022, practical capacity to produce ALPs increased by *** percent and was higher in interim 2023 by *** percent compared to interim 2022.[6] Projected capacity was also expected to increase for 2023 by *** percent. Production levels increased by *** percent during 2020-22, were higher in interim 2023 than in interim 2022 by *** percent. Production is also projected to increase during 2022-23 by *** percent and by *** percent in 2023-24. Capacity utilization ratios ranged between *** percent and *** percent during the period, including projections through 2024.

Home market shipments accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in interim 2022, and *** percent in interim 2023, but are expected to rise in 2023 and then decline in 2024. Exports to the United States accounted for a relatively small share of total shipments, accounting for *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in interim 2022, and *** percent in interim 2023.

Exports to the United States are projected to account for *** percent of total shipments by 2024. Other export destination markets, which accounted for *** percent of total shipments in 2022, include ***. Inventories ratios to total shipments fluctuated throughout the period examined in these investigations, accounting for between *** percent and *** percent of total shipments.

[6] The increase in capacity is driven by *** whose practical ALPs capacity increased by *** percent during 2020-22 and projected capacity is expected to rise by *** percent between 2022 and 2023. The firm stated that *** has operated at capacity utilization rates above *** percent and given customer demands cannot operate at 100 percent of practical capacity for sustained periods. In addition, the firm's ALP demand for markets outside the United States (including home market and third country exports) are ***, the firm added. *** postconference briefs, Attachment A, pp. 1-2.

Table VII-6
ALPs: Data on industry in China, by period

Quantity in 1,000 square meters; ratio and share in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

Table continued.

Table VII-6 Continued
ALPs: Data on industry in China, by period

Shares and ratios in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	***	***	***	***	***	***
Total exports to the United States by producers	***	***	***	***	***	***	***
Total exports to the United States by resellers	***	***	***	***	***	***	***
Adjusted total shipments exported to the United States	***	***	***	***	***	***	***

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

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

Alternative products

The responding firms in China did not produce any other products on the same equipment and machinery used to produce ALPs.

Exports

According to GTA, the leading export markets for photographic plates and flat film (including ALPs) from China are South Korea, India, and Belgium. During 2022, South Korea was the top export market for photographic plates and flat film from China, accounting for 13.2 percent, followed by India and Belgium, each accounting for 8.9 percent.

Table VII-7
Photographic plates and flat film (of material other than paper, paperboard or textiles) nesoi, with any side exceeding 255 mm, sensitized, unexposed: Exports from China, by destination market and period

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	1,630	5,081	22,790
South Korea	Value	85,145	113,585	117,563
India	Value	33,574	47,942	79,172
Belgium	Value	41,126	63,084	78,905
Netherlands	Value	6,527	17,431	44,190
Turkey	Value	32,154	42,821	38,665
Taiwan	Value	23,367	28,489	33,011
Vietnam	Value	22,866	28,650	31,989
Russia	Value	17,423	32,447	30,155
All other destination markets	Value	229,479	342,842	414,893
All destination markets	Value	493,291	722,372	891,333
United States	Share of value	0.3	0.7	2.6
South Korea	Share of value	17.3	15.7	13.2
India	Share of value	6.8	6.6	8.9
Belgium	Share of value	8.3	8.7	8.9
Netherlands	Share of value	1.3	2.4	5.0
Turkey	Share of value	6.5	5.9	4.3
Taiwan	Share of value	4.7	3.9	3.7
Vietnam	Share of value	4.6	4.0	3.6
Russia	Share of value	3.5	4.5	3.4
All other destination markets	Share of value	46.5	47.5	46.5
All destination markets	Share of value	100.0	100.0	100.0

Source: Official export statistics under HS subheading 3701.30, as reported by China Customs in the Global Trade Atlas Suite database, accessed October 11, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in Japan

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export ALPs from Japan.[7] Usable responses to the Commission's questionnaire were received from two firms: Fujifilm Corporation ("Fujifilm Japan") and Kodak Japan Limited.[8] These firms' exports to the United States accounted for *** of U.S. imports of ALPs from Japan in 2022. According to estimates requested of the responding producers in Japan, the production of ALPs in Japan reported in questionnaires accounts for *** production of ALPs in Japan.[9] Table VII-8 presents information on the ALPs operations of the responding producers and exporters in Japan.

Table VII-8
ALPs: Summary data for producers in Japan, 2022

Quantity in 1,000 square meters; share in percent

Firm	Production (1,000 square meters)	Share of reported production (percent)	Exports to the United States (1,000 square meters)	Share of reported exports to the United States (percent)	Total shipments (1,000 square meters)	Share of firm's total shipments exported to the United States (percent)
Fujifilm Japan	***	***	***	***	***	***
Kodak Japan	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

Producers in Japan were asked to report any change in the character of their operations or organization relating to the production of ALPs since 2020. One producer indicated in its questionnaire that it had experienced such changes. Table VII-9 presents the changes identified by these producers.

[7] These firms were identified through a review of information submitted in the petition and presented in third-party sources.

[8] Certified responses were received from *** that these firms were not producers or exporters of the subject merchandise at any time since January 1, 2020.

[9] Foreign producers' questionnaire response, section II-7a.

Table VII-9
ALPs: Reported changes in operations in Japan since January 1, 2020, by firm

Item	Firm name and accompanying narrative response
Plant closings	***
Production curtailments	***

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

Operations on ALPs

Table VII-10 presents information on the ALPs operations of the responding producers and exporters in Japan.

Table VII-10
ALPs: Japan producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 square meters; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical ALPs	Capacity	***	***	***	***	***
Practical ALPs	Production	***	***	***	***	***
Practical ALPs	Utilization	***	***	***	***	***

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

Table VII-11 presents Japan producers' reported capacity constraints since January 1, 2020.

Table VII-11
ALPs: Foreign producers in Japan reported capacity constraints since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table VII-12 presents information on the ALPs operations of the responding producers and exporters in Japan. From 2020 to 2022, practical capacity to produce ALPs decreased by *** percent and was lower in interim 2023 by *** percent compared to interim 2022. Projected capacity was also expected to decrease for 2023 by *** percent. Production levels increased by *** percent during 2020-22, but were lower in interim 2023 than in interim 2022 by *** percent. Production is also projected to decrease during 2022-23 by *** percent and before increasing by *** percent in 2023-24. Capacity utilization ratios, including projections through 2024, range between *** percent and *** percent during the period.

Home market shipments accounted for the largest, albeit declining, share of total shipments *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in interim 2022, and *** percent in interim 2023 and are expected to remain stable through 2024. Exports to the United States accounted for a relatively small share of total shipments, accounting for *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in interim 2022, and *** percent in interim 2023. Exports to the United States are projected to account for *** percent of total shipments by 2024. Other export destination markets, which accounted for *** percent of total shipments in 2022, include ***. Inventories ratios to total shipments slightly increased throughout the period examined in these investigations, accounting for between *** percent and *** percent of total shipments.

Table VII-12
ALPs: Data on industry in Japan, by period

Quantity in 1,000 square meters

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-12 Continued
ALPs: Data on industry in Japan, by period

Shares and ratios in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	***	***	***	***	***	***

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

Alternative products

The responding firms in Japan did not produce any other products on the same equipment and machinery used to produce ALPs.

Exports

According to GTA, the leading export markets for photographic plates and flat film (including ALPs) from Japan are the United States, China, and India. During 2022, the United States was the top export market for photographic plates and flat film from Japan, accounting for 25.3 percent, followed by China, accounting for 9.8 percent.

Table VII-13
Photographic plates and flat film (of material other than paper, paperboard or textiles) nesoi, with any side exceeding 255 mm, sensitized, unexposed: Exports from Japan, by destination market and period

Quantity in 1,000 square meters; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	608	5,964	14,083
China	Quantity	6,585	5,451	5,468
India	Quantity	4,797	6,085	5,352
Netherlands	Quantity	3,021	3,198	3,525
Malaysia	Quantity	1,275	3,545	3,153
Singapore	Quantity	1,649	3,100	2,904
Mexico	Quantity	1,335	2,466	2,365
Vietnam	Quantity	1,249	2,012	2,364
Brazil	Quantity	1,360	1,841	2,302
All other destination markets	Quantity	13,424	15,134	14,121
All destination markets	Quantity	35,304	48,797	55,637
United States	Value	20,716	45,165	77,703
China	Value	82,400	101,739	95,642
India	Value	21,578	25,819	23,256
Netherlands	Value	23,797	23,285	22,380
Malaysia	Value	6,911	16,521	14,993
Singapore	Value	7,710	14,133	13,157
Mexico	Value	6,302	11,426	11,285
Vietnam	Value	8,790	12,306	14,261
Brazil	Value	5,778	6,927	10,325
All other destination markets	Value	206,924	238,751	185,774
All destination markets	Value	390,904	496,072	468,775

Table continued.

Table VII-13 Continued
Photographic plates and flat film (of material other than paper, paperboard or textiles) nesoi, with any side exceeding 255 mm, sensitized, unexposed: Exports from Japan, by destination market and period

Unit values in dollars per square meter; shares in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	34.05	7.57	5.52
China	Unit value	12.51	18.66	17.49
India	Unit value	4.50	4.24	4.35
Netherlands	Unit value	7.88	7.28	6.35
Malaysia	Unit value	5.42	4.66	4.76
Singapore	Unit value	4.68	4.56	4.53
Mexico	Unit value	4.72	4.63	4.77
Vietnam	Unit value	7.04	6.12	6.03
Brazil	Unit value	4.25	3.76	4.49
All other destination markets	Unit value	15.42	15.78	13.16
All destination markets	Unit value	11.07	10.17	8.43
United States	Share of quantity	1.7	12.2	25.3
China	Share of quantity	18.7	11.2	9.8
India	Share of quantity	13.6	12.5	9.6
Netherlands	Share of quantity	8.6	6.6	6.3
Malaysia	Share of quantity	3.6	7.3	5.7
Singapore	Share of quantity	4.7	6.4	5.2
Mexico	Share of quantity	3.8	5.1	4.3
Vietnam	Share of quantity	3.5	4.1	4.2
Brazil	Share of quantity	3.9	3.8	4.1
All other destination markets	Share of quantity	38.0	31.0	25.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 3701.30 as reported by Japan Ministry of Finance in the Global Trade Atlas Suite database, accessed October 11, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

Subject countries combined

Table VII-14 presents summary data on ALPs operations of the reporting subject producers in the subject countries.

Table VII-14
ALPs: Data on the industry in aggregated subject countries, by period

Quantity in 1,000 square meters

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

Table continued.

Table VII-14 Continued
ALPs: Data on the industry in aggregated subject countries, by period

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	***	***	***	***	***	***
Total exports to the United States by producers	***	***	***	***	***	***	***
Total exports to the United States by resellers	***	***	***	***	***	***	***
Adjusted total shipments exported to the United States	***	***	***	***	***	***	***

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

U.S. inventories of imported merchandise

Table VII-15 presents data on U.S. importers' reported inventories of ALPs.

Table VII-15
ALPs: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 square meters; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Japan	***	***	***	***	***
Ratio to imports	Japan	***	***	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***	***	***
Ratio to total shipments of imports	Japan	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of ALPs from China and Japan after June 30, 2023. Their reported data of the four responding firms is presented in table VII-16.[10]

Table VII-16
ALPs: U.S. importers' arranged imports, by source and period

Quantity in 1,000 square meters

Source	Jul-Sep 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions[11]

In May 2023, Taiwan initiated an anti-dumping investigation on Chinese imports of offset printing plates, this investigation is still ongoing. In April 2021, South Korea imposed antidumping duties between 3.6 percent and 7.61 percent on presensitized aluminum plate with double-layered coating for offset printing applications from China. In May 2019, India imposed antidumping duties on digital offset printing plates from China, Japan, South Korea, and Vietnam with a rate of $0.13 per sqm to $0.77 per sqm. In May 2021, Brazil extended antidumping duties on presensitized offset aluminum printing plates from China, Hong Kong, European Union, and United States with an applied rate of $2.35 per kilogram.

Foreign producers were asked about the impact of other countries' trade actions on their export shipments of ALPs during 2020-23. The reported data of the three responding firms is presented in table VII-17.

[10] ***. U.S. importer questionnaire responses, section II-3a.

[11] Unless otherwise noted, information in this section was obtained using the World Trade Organization's database of anti-dumping investigations. For more information see https://trade-remedies.wto.org/en/antidumping/investigations.

Table VII-17
ALPs: Foreign producers' narratives regarding the impact of trade actions withing specific countries, by firm

Impact of	Firm name	Narrative on impact of trade action
India trade action	***	***
India trade action	***	***
South Korea trade action	***	***

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

Information on nonsubject countries

Table VII-18 presents global export data for aluminum lithographic printing plates and some out-of-scope products by source in descending order of value for 2022. China is the largest global exporter representing 28.6 percent of global export value for 2022. The next four leading exporters in 2022, by value, were Germany, Japan, and Belgium. When paired with China, these four countries represent 74.9 percent of global export value in 2022.

Table VII-18
Photographic plates and flat film (of material other than paper, paperboard or textiles) nesoi, with any side exceeding 255 mm, sensitized, unexposed: Global exports by exporter and period

Value in 1,000 dollars; share in percent

Exporting country	Measure	2020	2021	2022
United States	Value	289,085	329,481	287,834
China	Value	493,291	722,372	891,333
Japan	Value	390,904	496,072	468,775
Subject exporters	Value	884,195	1,218,445	1,360,108
Germany	Value	569,517	662,599	598,669
Belgium	Value	351,686	345,636	373,613
Netherlands	Value	167,020	182,365	214,213
Spain	Value	27,550	40,353	32,030
South Korea	Value	31,064	39,506	41,290
United Kingdom	Value	22,295	27,434	27,832
Taiwan	Value	17,374	22,692	28,215
Brazil	Value	15,199	20,255	24,956
Hong Kong	Value	5,928	14,449	5,910
All other exporters	Value	131,242	100,167	117,035
All reporting exporters	Value	2,512,155	3,003,382	3,111,707
United States	Share of value	11.5	11.0	9.3
China	Share of value	19.6	24.1	28.6
Japan	Share of value	15.6	16.5	15.1
Subject exporters	Share of value	35.2	40.6	43.7
Germany	Share of value	22.7	22.1	19.2
Belgium	Share of value	14.0	11.5	12.0
Netherlands	Share of value	6.6	6.1	6.9
Spain	Share of value	1.1	1.3	1.0
South Korea	Share of value	1.2	1.3	1.3
United Kingdom	Share of value	0.9	0.9	0.9
Taiwan	Share of value	0.7	0.8	0.9
Brazil	Share of value	0.6	0.7	0.8
Hong Kong	Share of value	0.2	0.5	0.2
All other exporters	Share of value	5.2	3.3	3.8
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 3701.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 11, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
88 FR 68669, October 4, 2023	*Aluminum Lithographic Printing Plates From China and Japan; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-10-04/pdf/2023-21930.pdf
88 FR 73313, October 25, 2023	*Aluminum Lithographic Printing Plates From the People's Republic of China: Initiation of Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2023-10-25/pdf/2023-23531.pdf
88 FR 73316, October 25, 2023	*Aluminum Lithographic Printing Plates From the People's Republic of China and Japan: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-10-25/pdf/2023-23530.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission's preliminary conference:

Subject: Aluminum Lithographic Printing Plates from China and Japan

Inv. Nos.: 701-TA-694 and 731-TA-1641-1642 (Preliminary)

Date and Time: October 19, 2023 - 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**John M. Herrmann**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**Daniel L. Porter**, Curtis, Mallet-Prevost, Colt & Mosle LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Kelley Drye & Warren LLP
Washington, DC
on behalf of

Eastman Kodak Company

James V. Continenza, Executive Chairman and Chief Executive Officer, Eastman Kodak Company

Laura Cole, Vice President, Pricing and Product Management, Eastman Kodak Company

Jodi Tellstone, Finance Director, Print, Eastman Kodak Company

Paul Smith, Global Director, International Trade and Compliance, Eastman Kodak Company

Brad Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Jacob Jones, Trade Analyst, Georgetown Economic Services, LLC

John M. Herrmann)
Paul C. Rosenthal)
) – OF COUNSEL
Joshua R. Morey)
Elizabeth C. Johnson)

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders:

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

FUJIFILM North America Corporation ("FUJIFILM-USA")
FUJIFILM Corporation ("FUJIFILM-Japan")
FUJIFILM Printing Plate (China) Co ("FUJFILM-China")
(collectively "FUJIFILM")

Toyoyuki ("Tommy") Katagiri, President,
FUJIFILM North America Corp., Graphic Communication Division

Dan Larkin, Vice President of Operations,
FUJIFILM North America Corp., Graphic Communication Division

Jim Crawford, Director, Consumable Sales,
FUJIFILM North America Corporation, Graphic Communications Division

Anthony Aquino, National Sales Director
FUJIFILM North America Corporation, Graphic Communication Division

Kevin Bird, Finance Director, FUJIFILM North America Corp.

Sarah M. Karlgaard, General Counsel & Secretary
FUJIFILM Holdings America Corporation

Patricia Brannick, Counsel, FUJIFILM North America Corp.

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Andrew Szamosszegi, Principal, Capital Trade Inc.

Travis Pope, Manager, Capital Trade Inc.

Daniel L. Porter)
James P. Durling) – OF COUNSEL
James C. Beaty)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Paul C. Rosenthal**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**James P. Durling**, Curtis, Mallet-Prevost, Colt & Mosle LLP)

-End-

APPENDIX C

SUMMARY DATA

All U.S. producers

Table C-1
ALPs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	▲***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	▲***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Practical capacity quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Production quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▼***	▲***	▼***

Table continued.

Table C-1 Continued
ALPs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. producers':--Continued									
Production workers	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s)	***	***	***	***	***	▼***	▲***	▼***	▼***
Wages paid ($1,000)	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▼***	▼***	▼***	▲***
Productivity (square meters per hour)	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▼***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▼***	▲***	▼***	▼***
Gross profit or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit COGS	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
COGS/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Capital expenditures	***	***	***	***	***	▼***	▼***	▲***	▲***
Research and development expenses	***	***	***	***	***	***	***	***	***
Net assets	***	***	***	***	***	▲***	▼***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Period changes suppressed due to near zero denominator.
fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Related party exclusion

Table C-2
ALPs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1):									
Included producer	***	***	***	***	***	▲***	▲***	▲***	▼***
Excluded producer	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producer	***	***	***	***	***	▲***	▲***	▲***	▼***
Excluded producer	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	▲***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	***	▲***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C-2 Continued
ALPs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
Included U.S. producers':									
Practical capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Inventories/total shipments (fn1)	***	***	***	***	***	▼***	▼***	▲***	▼***
Production workers	***	***	***	***	***	▲***	▲***	▼***	***
Hours worked (1,000s)	***	***	***	***	***	▲***	▲***	▲***	▼***
Wages paid ($1,000)	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▼***	▼***	▼***	▲***
Productivity (square meters per hour)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▲***	▲***	▲***	▼***
Gross profit or (loss) (fn3)	***	***	***	***	***	▲***	▼***	▲***	▲***
SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit COGS	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit operating income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn3)	***	***	***	***	***	▼***	▼***	▼***	▲***
COGS/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Capital expenditures	***	***	***	***	***	▲***	▼***	▲***	▲***
Research and development expenses	***	***	***	***	***	***	***	***	***
Net assets	***	***	***	***	***	▲***	▼***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in appendix D and F of this report.

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Period changes suppressed due to near zero denominator.
fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

U.S. PRODUCERS' TRADE DATA EXCLUDING ***

Table D-1
ALPs: U.S. producers' capacity, production, and capacity utilization excluding one U.S. producer *, by period**

Capacity and production in 1,000 square meters; utilization in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity utilization	***	***	***	***	***

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

Figure D-1
ALPs: U.S. producers' capacity, production, and capacity utilization excluding one U.S. producer *, by period**

* * * * * * *

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

Table D-2
ALPs: U.S. producers' total shipments excluding one U.S. producer *, by destination and period**

Quantity in 1,000 square meters; value in 1,000 dollars; unit values in dollars per square meter; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

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

Table D-3
ALPs: U.S. producers' inventories and their ratio to select items excluding one U.S. producer *, by period**

Quantity in 1,000 square meters; ratios in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

Table D-4
ALPs: U.S. producers' employment related information excluding one U.S. producer *, by item and period**

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (square meter per hour)	***	***	***	***	***
Unit labor costs (dollars per square meter)	***	***	***	***	***

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

Table D-5
ALPs: Apparent U.S. consumption and market shares based on quantity data excluding one U.S. producer *, by source and period**

Quantity in 1,000 square meters; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Included U.S. producer	Quantity	***	***	***	***	***
Excluded U.S. producer	Quantity	***	***	***	***	***
All U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
Included U.S. producer	Share	***	***	***	***	***
Excluded U.S. producer	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Data for import sources are based on U.S. shipments of imports from the specified country.

Table D-6
ALPs: Apparent U.S. consumption and market shares based on value data excluding one U.S. producer *, by source and period**

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Included U.S. producer	Value	***	***	***	***	***
Excluded U.S. producer	Value	***	***	***	***	***
All U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
Included U.S. producer	Share	***	***	***	***	***
Excluded U.S. producer	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Data for import sources are based on U.S. shipments of imports from the specified country.

APPENDIX E

PRICE DATA EXCLUDING U.S. PRODUCER ***

In comparing pricing data with U.S. producers' pricing data with the exception of ***, prices for product imported from China and Japan were lower than prices for U.S.-produced product in *** instances with margins of underselling ranging from 0.2 percent to 43.2 percent. Of the total instances of underselling, *** of these instances were by imports from China and *** by imports from Japan. In the remaining *** instances margins of overselling ranged from *** percent to *** percent. Of the total instances of overselling, *** of these instances were by imports from Japan and *** of these instances were by imports from China.

Table E-1
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling) excluding U.S. producer *, by source and quarter**

Quantity in square meters; prices in dollars per square meter; margins in percent

* * * * * * *

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

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm..

Figure E-1
ALPs: Weighted-average prices and quantities of domestic and imported product 1 excluding U.S. producer *, by quarter**

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table E-2
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling) excluding U.S. producer *, by source and quarter**

Quantity in square meters; prices in dollars per square meter; margins in percent

* * * * * * *

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

Note: Product 2: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Figure E-2
APLs: Weighted-average prices and quantities of domestic and imported product 2 excluding U.S. producer *, by quarter**

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table E-3
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling) excluding U.S. producer *, by source and quarter**

Quantity in square meters; prices in dollars per square meter; margins in percent

* * * * * * *

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

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Figure E-3
ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product , and margins of underselling/(overselling) excluding U.S. producer *, by source and quarter**

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Table E-4
ALPs: Summary of price data excluding U.S. producer *, by product and source, January 2020 through June 2023**

Prices in dollars per square meter; quantity in 1,000 square meters; change in percent

* * * * * * *

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

Table E-5
ALPs: Instances of underselling/overselling and the range and average of margins excluding U.S. producer *, by product**

Quantity in 1,000 square meters; margins in percent

Products	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	2	***	***	***	***
Product 2	Underselling	7	***	***	***	***
Product 3	Underselling	11	***	***	***	***
All products	Underselling	20	3,724	16.9	0.2	43.2
Product 1	Overselling	18	***	***	***	***
Product 2	Overselling	16	***	***	***	***
Product 3	Overselling	8	***	***	***	***
All products	Overselling	42	17,564	(52.2)	(0.8)	(267.7)

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

Table E-6

ALPs: Instances of underselling/overselling and the range and average of margins excluding U.S. producer *, by source**

Quantity in 1,000 square meters; margins in percent

Products	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	11	***	***	***	***
Japan	Underselling	9	***	***	***	***
All subject sources	Underselling	20	3,724	16.9	0.2	43.2
China	Overselling	12	***	***	***	***
Japan	Overselling	30	***	***	***	***
All subject sources	Overselling	42	17,564	(52.2)	(0.8)	(267.7)

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

APPENDIX F

U.S. PRODUCERS' FINANCIAL DATA EXCLUDING ***

Table F-1
ALPs: Results of operations of U.S. producers excluding one U.S. producer *, by item and period**

Quantity in 1,000 square meters; value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Less by-product revenue	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expenses/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Less by-product revenue	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table F-1 Continued
ALPs: Results of operations of U.S. producers excluding one U.S. producer *, by item and period**

Shares in percent; unit values in dollars per square meter; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Less by-product revenue	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS before by-product offset. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table F-2
ALPs: Changes in average unit values between comparison periods excluding one U.S. producer ***

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▲***	▲***	▲***
COGS: Raw materials	▲***	▲***	▲***	▼***
COGS: Direct labor	▼***	▼***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▲***
COGS: Less by-product revenue	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table F-2 Continued
ALPs: Changes in average unit values between comparison periods excluding one U.S. producer ***

Changes in dollars per square meter

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▲***	▲***	▲***
COGS: Raw materials	▲***	▲***	▲***	▼***
COGS: Direct labor	▼***	▼***	▲***	▲***
COGS: Less by-product revenue	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▲***	▼***	▲***	▲***
SG&A expense	▲***	▼***	▲***	▲***
Operating income or (loss)	▼***	▼***	▲***	▲***
Net income or (loss)	▼***	▼***	▼***	▲***

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

Note: Shares and unit values shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table F-3
ALPs: Capital expenditures, net assets and operating return on assets of U.S. producers excluding one U.S. producer *, by item and period**

Value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capital expenditures	Value	***	***	***	***	***
Total assets	Value	***	***	***	***	***
Return on assets	Ratio	***	***	***	***	***

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

Note: Total assets is reported net of accumulated depreciation. Return on asset is based on the ratio of operating income to total assets.