

PUBLIC VERSION

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PUBLIC VERSION

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION OF THE
U.S. DEPARTMENT OF COMMERCE
AND THE
U.S. INTERNATIONAL TRADE COMMISSION**

**ANTIDUMPING AND COUNTERVAILING DUTY PETITION
VOLUME I
GENERAL AND INJURY SECTIONS**

**CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, THE REPUBLIC OF
KOREA, THE RUSSIAN FEDERATION, THE REPUBLIC OF SOUTH AFRICA, SPAIN,
TURKEY, UKRAINE, UNITED ARAB EMIRATES, AND
THE UNITED KINGDOM**

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PETITION VOLUME I: GENERAL ISSUES AND MATERIAL INJURY

These Petitions are filed on behalf of the U.S. industry producing carbon and alloy steel wire rod (“CASWR”). The Petitioners in this case are Gerdau Ameristeel US Inc. (“Gerdau”), Nucor Corporation (“Nucor”), Keystone Consolidated Industries (“Keystone”), and Charter Steel (“Charter”). Petitioners account for the majority of CASWR production in the United States and, therefore, represent the U.S. industry producing CASWR within the meaning of sections 702(c)(4) and 732(c)(4) of the Tariff Act of 1930, as amended (the “Act” or the “statute”). See 19 U.S.C. §§ 1671a(c)(4), 1673a(c)(4).

Petitioners allege that CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom is being, or is likely to be, sold in the United States at less than fair value within the meaning of section 731(1) of the Act. See id. § 1673. Petitioners further allege that the Governments of Turkey and Italy are providing countervailable subsidies with respect to the manufacture, production, and export of CASWR within the meaning of section 701(a)(1) of the Act. See id. § 1671(a). Petitioners also allege that these unfairly traded imports are a cause of material injury to the U.S. industry producing CASWR, and threaten to cause additional material injury to the domestic industry if remedial action is not taken.

Petitioners, therefore, request that antidumping duties be imposed on CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom in an amount equal to the amount by which the normal value exceeds the export price or constructed export price of merchandise. Petitioners also request that countervailing duties be imposed on imports of CASWR from Turkey and Italy in an amount equal to the net countervailable subsidies provided by each country’s respective governments.

These Petitions set forth relevant information reasonably available to Petitioners and are filed in conformity with the requirements of section 351.202 of the U.S. Department of Commerce's ("the Department" or "Commerce") regulations and section 207.11 of the U.S. International Trade Commission's ("the Commission") regulations. See 19 C.F.R. §§ 351.202 and 207.11.

I. COMMON ISSUES

A. Contact Information for the Petitioners (19 C.F.R. § 351.202(b)(1))

Petitioners are companies that produce the domestic like product in the United States. Petitioners are domestic interested parties within the meaning of 19 U.S.C. § 1677(9) and 19 C.F.R. § 351.102(b). Petitioners' contact information is provided in **Exhibit I-1**.

B. Identity of the Industry on Whose Behalf the Petitions Are Filed (19 C.F.R. §§ 207.11(b)(2)(ii) and 351.202(b)(2))

These Petitions are filed on behalf of the U.S. industry that produces CASWR. In addition to the contact information for Petitioners, see **Exhibit I-1**, contact information for additional domestic producers of CASWR is provided at **Exhibit I-2**. Petitioners are aware of the universe of domestic producers both by virtue of direct competition in the domestic market and through participation in the Commission's most recent investigation involving dumped and subsidized CASWR from China. See Carbon and Certain Alloy Steel Wire Rod from China, Inv. Nos. 701-TA-512 and 731-TA-1248, USITC Pub. 4509 (Final) (Jan. 2015) ("CASWR from China"), at III-2. Based on the information reasonably available to Petitioners, **Exhibits I-1** and **I-2** identify all known producers of the domestic like product in the United States.

C. Information Relating to Industry Support for the Petitions (19 C.F.R. § 351.202(b)(3))

The statute requires that the domestic producers or workers who support the petition account for “at least 25 percent of the total production of the domestic like product” and “more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition.” 19 U.S.C. §§ 1671a(c)(4)(A), 1673a(c)(4)(A).

The statutory requirements are satisfied in this case. As shown in **Exhibit I-3**, the U.S. producers of CASWR that are known to be in support of the petition surpass both the 25 and 50 percent thresholds for industry support required by the statute. Petitioners accounted for [67] percent of total U.S. CASWR production in 2016. See Exhibit I-3. Further, [] percent of the U.S. CASWR producers expressing a position on the Petitions support the Petitions. Id. Accordingly, the statutory requirements for standing are met. See 19 U.S.C. §§ 1671a(c)(4)(A), 1673a(c)(4)(A).

D. Related Proceedings (19 C.F.R. § 351.202(b)(4))

Petitioners have not filed for import relief pursuant to section 232 of the Trade Expansion Act of 1962 (19 U.S.C. § 1862), section 301 of the Trade Act of 1974 (19 U.S.C. §§ 2251, 2411), or section 337 of the statute (19 U.S.C. § 1337).

Exhibit I-4 provides a chronology of the prior antidumping and countervailing duty proceedings pursuant to sections 702 and 732 of the statute (19 U.S.C. §§ 1671a, 1673a), prior safeguard proceedings pursuant to sections 201-204 of the Trade Act of 1974, and proceedings under section 312 of the NAFTA Implementation Act with respect to the specific merchandise that is the subject of this petition. Based on petitions filed in 2001 (and subsequent sunset reviews)

and 2014, there are currently antidumping duty orders in place against CASWR from Brazil, China, Indonesia, Mexico, Moldova, and Trinidad & Tobago, and countervailing duty orders in place against CASWR from Brazil and China. See Carbon and Certain Alloy Steel Wire Rod From the People's Republic of China: Antidumping Duty Order, 80 Fed. Reg. 1,015 (Jan. 8, 2015); Carbon and Certain Alloy Steel Wire Rod From the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order, 80 Fed. Reg. 1,018 (Jan. 8, 2015); Carbon and Certain Alloy Steel Wire Rod From Brazil, Indonesia, Mexico, Moldova, and Trinidad and Tobago: Continuation of Antidumping and Countervailing Duty Orders, 79 Fed. Reg. 38,008 (July 3, 2014).

In 2005, the domestic industry filed antidumping duty cases against CASWR from China, Germany, and Turkey. The Commission reached negative preliminary determinations in those investigations, and they were subsequently terminated. See Carbon and Alloy Steel Wire Rod from China, Germany, and China, Inv. Nos. 731-TA-1099-1101, USITC Pub. 3546 (Prelim.) (Jan. 2006); Carbon and Certain Alloy Steel Wire Rod from China, Germany, and Turkey, 71 Fed. Reg. 132 (Jan. 3, 2006).

In 1999, the Commission conducted a safeguard investigation under section 202 of the Trade Act of 1974 to determine whether steel wire rod was being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the industry producing the domestic like product. See Certain Steel Wire Rod, 64 Fed. Reg. 38,692 (July 19, 1999). The Commission was equally divided in its injury determination, which President Clinton considered an affirmative determination.

The President subsequently issued Proclamation 7273 imposing relief in the form of a Tariff Rate Quota ("TRQ") on imports of steel wire rod for a period of three years and one day,

effective March 1, 2000. Imports of subject products in excess of the annual quota amounts were assessed duties in addition to the column-1 general rates of duty in the amounts of 10 percent ad valorem in the first year of relief (in-quota quantity of 1,580,000 short tons); 7.5 percent ad valorem in the second year of relief (in-quota quantity of 1,611,600 short tons); and 5 percent ad valorem in the third year of relief (in-quota quantity of 1,643,832 short tons). See To Facilitate Positive Adjustment to Competition From Imports of Certain Steel Wire Rod, 65 Fed. Reg. 8,619 (Presidential Documents Feb. 18, 2000). With Proclamation 7505 in November 2001, the President modified the TRQ by allocating the in-quota quantity among four supplier country groups: European Community; Commonwealth of Independent States; Trinidad & Tobago; and all other countries. See To Modify the Tariff-Rate Quota Applicable to Imports of Steel Wire Rod, 66 Fed. Reg. 59,353 (Presidential Documents Nov. 28, 2001).

During the period of relief – specifically, in 2001 (Inv. TA-204-6) and 2003 (Inv. TA-204-11) – the Commission reported on industry developments consistent with section 204 of the Trade Act of 1974. See Certain Steel Wire Rod: Monitoring Developments in the Domestic Industry, Inv. No. TA-204-6, USITC Pub. 3451 (Aug. 2001); Certain Steel Wire Rod: Evaluation of the Effectiveness of Import Relief, Inv. No. TA-204-11, USITC Pub. 3629 (Aug. 2003).

Other than the actions identified in **Exhibit I-4**, Petitioners have not filed or initiated proceedings for import relief with respect to the merchandise that is the subject of these Petitions.

E. Description of the Merchandise and Requested Scope of Investigation (19 C.F.R. § 351.202(b)(5))

1. Requested Scope of Investigation

The imported merchandise that Petitioners intend to cover in these investigations is described as follows:¹

The merchandise covered by these investigations are certain hot-rolled products of carbon steel and alloy steel, in coils, of approximately round cross section, less than 19.00 mm in actual solid cross-sectional diameter. Specifically excluded are steel products possessing the above-noted physical characteristics and meeting the Harmonized Tariff Schedule of the United States (HTSUS) definitions for (a) stainless steel; (b) tool steel; (c) high-nickel steel; (d) ball bearing steel; or (e) concrete reinforcing bars and rods. Also excluded are free cutting steel (also known as free machining steel) products (i.e., products that contain by weight one

¹ Note that the scope language of these investigations is the same as the scope of the antidumping and countervailing duty investigations and orders on CASWR from China, but differs from the scope of the orders on CASWR from Brazil, Indonesia, Mexico, Moldova, and Trinidad & Tobago. Compare Carbon and Certain Alloy Steel Wire Rod From the People's Republic of China: Antidumping Duty Order, 80 Fed. Reg. 1,015 (Jan. 8, 2015) with Carbon and Certain Alloy Steel Wire Rod From Brazil, Indonesia, Mexico, Moldova, and Trinidad and Tobago: Continuation of Antidumping and Countervailing Duty Orders, 79 Fed. Reg. 38,008 (July 3, 2014). First, the scope language in the Brazil, Indonesia, Mexico, Moldova, and Trinidad & Tobago investigations listed a lower diameter of 5.0 mm, reflecting the known commercial availability of hot-rolled CASWR products in the United States at the time that those investigations were initiated. In 2016, Commerce published notice of a final decision by the U.S. Court of Appeals for the Federal Circuit affirming Commerce's 2012 anti-circumvention determination that wire rod imports of 4.75mm to 5.00mm in diameter circumvented the antidumping duty order on wire rod from Mexico. See Carbon and Certain Alloy Steel Wire Rod From Mexico: Notice of Court Decision Not in Harmony With Amended Final Determination and Notice of Second Amended Final Determination, 81 Fed. Reg. 46,051 (July 15, 2016). Because technical advances in recent years have meant that CASWR with diameters less than 5 mm is now commercially available in the United States, the scope of the order on CASWR from China and the scope of these Petitions contains no specified lower diameter.

Second, like the scope language in the CASWR from China investigation, the scope of these Petitions does not contain an exclusion for grade 1080 tire cord quality wire rod or grade 1080 tire bead quality wire rod, which the Commission had found were included in its definition of the domestic CASWR like product. Carbon and Certain Alloy Steel Wire Rod from Brazil, et al., Inv. Nos. 701-TA-417 and 731-TA-953, 957-959, 961, and 962, USITC Pub. 4472 (Second Review) (June 2014) ("CASWR from Brazil 2nd Rev."), at 8. During the Commission's investigation of CASWR from China, no respondent challenged the Commission's definition of the domestic like product to be coextensive with the scope of the petition. CASWR from China, USITC Pub. 4509 at I-23.

or more of the following elements: 0.1 percent or more of lead, 0.05 percent or more of bismuth, 0.08 percent or more of sulfur, more than 0.04 percent of phosphorous, more than 0.05 percent of selenium, or more than 0.01 percent of tellurium). All products meeting the physical description of subject merchandise that are not specifically excluded are included in this scope.

The products under investigation are currently classifiable under subheadings 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093; 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035 of the HTSUS. Products entered under subheadings 7213.99.0090 and 7227.90.6090 of the HTSUS also may be included in this scope if they meet the physical description of subject merchandise above. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this proceeding is dispositive.

2. Production Description

The merchandise covered by these investigations is certain hot-rolled products of carbon and alloy steel, in irregularly wound coils, of approximately round cross section, in cross-sectional diameters of less than 19.00 mm.

3. Technical Characteristics, Production Process, and Uses

Although CASWR is generally categorized by quality according to end use, the end use categories most common in the industry are broad and share overlapping metallurgical qualities, chemistries, and physical characteristics. For example, with respect to metallurgical qualities, carbon content affects the ductility, hardness, and tensile strength of the steel, but the addition of certain alloys during the melting stage can impart a range of mechanical characteristics including machinability and work hardenability.

CASWR in the United States is primarily sold to wire drawers who manufacture wire for a wide variety of applications. Industrial quality wire is used in the production of nails, reinforcing wire mesh, and chain link fence. Other wire rod is drawn into wire for upholstery and mechanical

springs, rope, screens, and pre-stressed concrete wire. More demanding applications include automotive wheel bolts and tire reinforcing wire, cold-heading applications, certain welding applications (e.g., gas welding, electric arc welding), and music spring wire. See CASWR from China, USITC Pub. 4509 at I-15-I-17. The characteristics, production process, and uses of CASWR as explained in CASWR from China, USITC Pub. 4509 at I-15-I-22, apply to the CASWR subject to these investigations. The relevant pages of that publication are attached as **Exhibit I-5**.

4. U.S. Tariff Classification

The products subject to the investigation are currently classified in the Harmonized Tariff Schedule of the United States (“HTSUS”): 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035.² The CASWR products subject to these investigations may also enter under the following HTSUS item numbers: 7213.99.0090 and 7227.90.6090. See Exhibit I-6.

HTSUS subheadings are provided for convenience and U.S. Customs and Border Protection purposes only, and they do not define the scope of the Petitions. The written description of the merchandise is dispositive of the scope. The most favored nation rate of duty applicable to CASWR entering the United States under the identified HTSUS subheadings is free.

² HTSUS 7227.90.6030 and 7227.90.6035 (along with two other HTSUS numbers outside the scope of this investigation) replaced HTSUS basket category 7227.90.6085 in January 2014.

F. Names of the Subject Countries and Any Intermediate Country Through Which the Merchandise is Transshipped (19 C.F.R. § 351.202(b)(6))

The CASWR that is the subject of these Petitions is produced in and exported from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom. Petitioners have no knowledge that the subject merchandise is currently being transshipped through any third country to the United States.

G. Producers and Exporters of the Subject Merchandise (19 C.F.R. § 351.202(b)(7)(i)(A))

A list of known producers and exporters of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom is provided in **Exhibit I-7**. In compiling this exhibit, Petitioners relied upon information from Datamyne, PIERIS, and additional research of publicly-available sources. Information reasonably available to Petitioners generally does not allow the identification of the proportion of total exports to the United States accounted for during the most recent 12-month period by the producers listed in this exhibit. Petitioners believe, however, that the companies listed in **Exhibit I-7** account for virtually all exports of the subject merchandise to the United States from the subject countries.

H. Volume and Value of Imports (19 C.F.R. § 351.202(b)(8))

The volume and value of U.S. imports of CASWR from each subject country are presented at **Exhibit I-8** for calendar years 2014, 2015, and 2016.³ The source for these data is the official import statistics published by Commerce.

³ Import information was obtained through the Commission's DataWeb service using a query for customs value and first unit of quantity of imports from the subject countries of the HTSUS numbers identified in Section I.E.4. above.

I. Names and Addresses of U.S. Importers (19 C.F.R. §§ 207.11(b)(2)(iii), 351.202(b)(9))

Based on information reasonably available to Petitioners, a list of known and suspected importers of CASWR from the subject countries is provided in **Exhibit I-9**. Petitioners believe, however, that there may be a number of importers of CASWR from the subject countries that cannot be identified from publicly-available information. Accordingly, Petitioners respectfully request that the Department obtain this information from U.S. Customs and Border Protection, as Petitioners do not have access to that proprietary information.

II. INFORMATION RELATED TO SALES AT LESS THAN FAIR VALUE AND COUNTERVAILABLE SUBSIDIES

Information related to allegations of less-than-fair-value sales from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom is provided in Volumes II to XI of these Petitions. See Petition Volumes II-XI. Information related to the countervailable subsidies provided by the Governments of Turkey and Italy with respect to the manufacture, production, and export of CASWR is provided in Volumes XII and XIII, respectively, of these Petitions. See Petition Volumes XII-XIII.

III. THE DOMESTIC CASWR INDUSTRY HAS BEEN MATERIALLY INJURED BY REASON OF UNFAIRLY TRADED IMPORTS OF CASWR FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY, UKRAINE, UNITED ARAB EMIRATES, AND THE UNITED KINGDOM

A. Introduction

A surge of dumped and subsidized imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom has already caused material injury to the domestic industry – and threatens the domestic industry with even more injury going forward. The volume of subject imports increased from 453,212 tons in 2014

to 708,345 tons in 2016, or by 56.3 percent over the 2014-16 period. Subject imports grew in absolute and relative terms over the period of investigation (“POI”), increasing their market share by [] percentage points, from [7.4] percent to [] percent. See Exhibit I-10.

Subject imports also had significant price effects in the market. Subject imports are interchangeable with the domestic like product, as the Commission has previously recognized. Information reasonably available to Petitioners indicates that the surge in subject import volume and market share was accomplished through systematic underselling. The underselling by subject imports, combined with an oversupply caused by the import surge, contributed to a decline in domestic pricing and profits over the POI.

The low-priced subject imports have had a significant injurious impact on the domestic industry. U.S. producers’ key trade and financial indicators declined over the POI due to surging subject import volumes that undersold the domestic industry and depressed prices. See Exhibit I-11. Moreover, by the end of the POI, having faced surging imports over the past three years, U.S. producers suffered losses in capacity, shipment value, and wages, all of which fell to below 2014 levels. Id.

The increasing volume of low-priced imports that undercut U.S. producer prices resulted in significant financial deterioration of the U.S. industry. The domestic producers’ operating income, gross profits, and net income all plummeted over the POI. See id. For example, U.S. producers saw operating income plunge from [] in 2014 to [] in 2016. Id. The domestic industry’s ratio of operating income to net sales declined from [] percent during 2014 to [] percent in 2016, and the net income to net sales ratio declined from [3.0] percent during 2014 to [] percent in 2016. Id. The causal link between imports and U.S. producers’ financial performance is further corroborated by instances of lost sales and lost

revenues provided by the Petitioners. See Exhibit I-12. Thus, the domestic industry has suffered material injury by reason of the subject imports, as manifested in depressed U.S. prices and deterioration in key trade and financial indicators.

B. The Domestic Like Product Mirrors the Scope of the Petition

The statute defines the 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.” 19 U.S.C. § 1677(10). In identifying the domestic like product, the starting point for the Commission’s analysis is the scope of the case. See, e.g., Certain Aluminum Plate from South Africa, USITC Pub. 3734 (Final) (Nov. 2004), at 7.

The Commission generally considers a number of factors in defining the like product, including physical characteristics and uses, interchangeability, channels of distribution, customer and producer perceptions, common manufacturing facilities, production processes and employees, and, where appropriate, price. See, e.g., Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995). The Commission’s decision regarding the appropriate like product is a case-by-case factual determination in which no single factor is dispositive. See S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979). The Commission looks for clear defining lines between products, but disregards minor variations. See, e.g., Nippon Steel Corp., 19 CIT at 455; 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).

The domestic like product here should mirror the definition of the subject merchandise and also be defined as all CASWR consistent with the domestic like product definition adopted by the Commission in its investigations and reviews involving CASWR from Brazil, China, Indonesia,

Mexico, Moldova, Trinidad & Tobago, and Ukraine. In its most recent investigation on CASWR from China, the Commission

defined a single domestic like product that was coextensive with Commerce's scope based on the absence of clear dividing lines among the various types of steel wire rod. {In the preliminary phase of the investigation, the} Commission found that all types of wire rod share certain basic physical properties, are generally manufactured in the same domestic facilities by the same employees using the same processes, are sold primarily to end users, and are generally produced by all domestic producers. The Commission observed that limited interchangeability in some end uses and price differences were consistent with a wide range of wire rod products. Based on these findings, the Commission found that all wire rod products of the type described in the scope of investigation comprised a single domestic like product.

The record in the final phase of these investigations concerning the domestic like product factors is not materially different from that in the preliminary phase, and there is no argument that the Commission should adopt a definition of the domestic like product different from that in the preliminary determinations. Therefore, for the reasons stated in the preliminary determinations, we find one domestic like product that is coextensive with the scope definition.

CASWR from China, USITC Pub. 4509 at 5-6.

Similarly, in the Commission's original investigations on CASWR from Brazil, China, Indonesia, Mexico, Moldova, Trinidad & Tobago, and Ukraine, the Commission rejected respondents' arguments that tire cord quality rod, certain cold heading quality wire rod, and clean steel precision bar in coils should be defined as separate like products (notwithstanding Commerce's exclusion of certain grade 1080 tire cord wire rod and grade 1080 tire bead wire rod from the scope of the investigation). CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 8. Instead, the Commission concluded that "the wire rod industry is composed of so many different applications, that the only clear dividing line is between wire rod and other steel products." Carbon and Certain Alloy Steel Wire Rod from Brazil, et al., Inv. Nos. 701-TA-417-421 and 731-TA-953-

954, 956-959, and 961-962, USITC Pub. 3546 (Final) (Oct. 2002) (“CASWR from Brazil OI”), at

13. As the Commission explained:

As a general matter, the record demonstrates no clear demarcation between the various types of wire rod products, but rather indicates a continuum of at least 11 major categories of products, ranging from low carbon wire rod such as industrial wire rod used for nails and coat hangers, to medium to high carbon wire rod, such as that used for tire bead and prestressed concrete strand, to the highest-end products, including CHQ, CSPBIC, and tire cord wire rod. In cases such as the present one, where the domestically manufactured merchandise consists of a broad continuum of similar products, the Commission does not consider each item of merchandise to be a separate domestic like product that is only “like” its counterpart in the scope, but considers the continuum itself to constitute the domestic like product.

Id. at 8. There were no material changes in product characteristics in the first and second reviews of those orders to warrant a change in the Commission’s domestic like product definition. See CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 8-9.

The Commission here should continue to define the domestic like product as all CASWR coextensive with the scope of the investigations. All CASWR has similar of physical characteristics and is an “intermediate circular, hot-rolled steel product that is typically sold in irregularly wound coils.” Carbon and Certain Alloy Steel Wire Rod from China, Inv. Nos. 701-TA-512 and 731-TA-1248, USITC Pub. 4458 (Prelim) (Mar. 2014) (“CASWR from China Prelim”), at 6. While wire rods of different grades, end use categories, or sizes are not necessarily interchangeable, “there is an overlap of metallurgical qualities, chemistry, and physical characteristics.” Id. at 7. Further, industrial quality grades of wire rod, which account for the majority of U.S. consumption, are highly substitutable. Id. at 6-7. Thus, “there is no clear demarcation between low-end and high-end wire rod products, but rather a range of at least 11 major types of wire rod products.” Id. at 7.

The majority of CASWR is sold through the same channels of distribution, and all CASWR shares the same basic manufacturing processes using the same hot-rolling mills and other equipment regardless of size or other physical characteristics, and is produced in the same facilities with the same personnel. See id.; CASWR from Brazil OI, USITC Pub. 3546 at 10-11.

Finally, customers and producers perceive all wire rod as comprising a single continuum of products with different types of CASWR that serve different end-use applications, but share overlapping characteristics that create a correlated range of prices. See CASWR from China Prelim, USITC Pub. 4458 at 7; CASWR from Brazil OI, USITC Pub. 3546 at 11-12.

C. The Domestic Industry Consists of All U.S. Producers of CASWR

The domestic industry is defined as “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.” 19 U.S.C. § 1677(4)(A). Based on the domestic like product defined above, the domestic industry consists of all U.S. producers of CASWR. See CASWR from China, USITC Pub. 4509 at 6; CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 9-12. Consistent with the Commission’s previous determinations, the domestic CASWR industry in this investigation consists of the four petitioning companies and the other domestic producers identified in **Exhibit I-2**.⁴

⁴ Domestic producer EVRAZ Rocky Mountain Steel (“EVRAZ Rocky Mountain”), as part of the EVRAZ North America business, is affiliated with Russian subject producer EVRAZ ZSMK through common ownership by EVRAZ Rocky Mountain’s ultimate parent company, EVRAZ plc. [

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D. Subject Imports Surpass the Statutory Negligibility Threshold

Imports of CASWR from Belarus, Korea, Russia, South Africa, Spain, Turkey, Ukraine, UAE, and the United Kingdom surpass the negligibility threshold established by the statute. Under the statute, imports from a subject country corresponding to a domestic like product that 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 are deemed negligible. 19 U.S.C. § 1677(24)(A)(i). An exception is made for subject imports that do not surpass the three percent threshold but, when those beneath the three percent threshold are combined, exceed seven percent of the volume of all such merchandise imported to the United States during the most recent 12 months for which data are available preceding the filing of the petition. 19 U.S.C. § 1677(24)(A)(ii).

U.S. import volumes from the subject countries during the most recent 12-month period for which data are available (February 2016 through January 2017), and their percentage of total imports, are set forth in Table 1 below and **Exhibit I-13**. Imports of CASWR from each of the ten subject countries exceed the negligibility thresholds within the meaning of 19 U.S.C. § 1677(24)(A).

TABLE 1
U.S. Imports of CASWR During March 2016 – February 2017⁵

Country	Share of Total Imports (%)
Korea	4.9
Russia	6.0
Spain	4.4
Turkey	4.5
Ukraine	9.5
Subtotal	29.2
Belarus	2.6
Italy	2.5
South Africa	1.2
United Arab Emirates	1.2
United Kingdom	2.6
Subtotal	10.2
Total Subject	39.4
All Others	60.6
Total Imports	100.00
Source: Exhibit I-13	

1. **Korea, Russia, Spain, Turkey, and Ukraine Antidumping Duty Petitions and Turkey Countervailing Duty Petition**

Imports of CASWR from Korea, Russia, Spain, Turkey, and Ukraine are not negligible within the meaning of 19 U.S.C. § 1677(24)(A)(i) because subject imports from each country surpass three percent of all such merchandise imported into the United States during the period. See **Exhibit I-13**. Specifically, imports from Korea account for 4.9 percent, imports from Russia account for 6.0 percent, imports from Spain account for 4.4 percent, imports from Turkey account for 4.5 percent, and imports from Ukraine account for 9.5 percent of all such merchandise in the most recent 12 months. These countries, therefore, exceed the negligibility threshold.

⁵ SIMA import license data were used for February 2017. All other import data were retrieved from the Commerce and Commission official import statistics.

2. **Belarus, Italy, South Africa, United Arab Emirates, and the United Kingdom Antidumping Duty Petitions**

Imports of CASWR from Belarus, Italy, South Africa, United Arab Emirates, and the United Kingdom, while individually below three percent of total imports, are not negligible because the aggregate volume of subject imports from those five countries is 10.2 percent, meeting the exception under 19 U.S.C. § 1677(24)(A)(ii) by exceeding the seven percent threshold. See Exhibit I-13.

3. **Italy Countervailing Duty Petition**

Subsidized imports of CASWR from Italy that are the subject of the Italy CVD Petition (see Petition Vol. XIII) are not negligible for purposes of the Commission's threat of material injury analysis because "there is a potential" that CASWR imports from Italy will imminently exceed the individual country negligibility threshold. See 19 U.S.C. § 1677(24)(A)(iv). Although imports from Italy accounted for 2.5 percent of all imports in the most recent 12 months (see Exhibit I-13), Commerce's SIMA import license data as of March 21, 2017 demonstrate that subject imports from Italy are increasing rapidly and are on track to imminently exceed the three percent threshold. See Table 2 below; **Exhibit I-13.**

TABLE 2
U.S. Imports of CASWR Aug. 2016 – Mar. 21, 2017 (in short tons)

	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	Total	% of Total
Italy	11,998	-	9,195	11,906	55	11,395	13	3,284	47,846	4.0
Total Imports	173,416	146,187	168,165	119,063	118,985	127,768	166,575	119,021	1,190,213	100.0
Source: Exhibit I-13. SIMA import license data were used for February 2017 and through March 21, 2017. All other import data were retrieved from the Commerce and Commission official import statistics.										

Official import statistics and SIMA data from August 2016, when subject imports from Italy began surging, through March 21, 2017, show that Italian imports totaled 4.0 percent of total wire rod imports during that period, surpassing the three percent negligibility threshold. See Exhibit I-13. The data further show that Italian imports are not negligible on quarterly or annualized bases in 2017. In the first three months of 2017, wire rod imports from Italy accounted for 3.6 percent of total imports.⁶ Id. Annualizing first quarter 2017 volume of Italian imports results in an estimated annual volume of 58,769 tons (see id.), which is 77.2 percent greater than the total volume of 2016 CASWR imports from Italy (see Exhibit I-8). Finally, additional information indicates that [*industry information from confidential source*] Therefore, subsidized subject imports from Italy are not negligible because they will imminently exceed three percent of total CASWR imports.

E. The Commission Should Cumulate Imports from the Subject Countries in Analyzing the Volume and Price Effects of the Unfair Imports

In assessing material injury, the Commission is required to cumulate the volume and price effects of subject imports from all countries with respect to which petitions were filed on the same day, and which compete with each other and the domestic like product in the U.S. market. 19 U.S.C. § 1677(7)(G)(i). The statutory criteria for cumulation are met in this case.

Specifically, petitions against CASWR imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom are being simultaneously filed. Further, none of the statutory exceptions to cumulation applies in this case.

⁶ Italian imports totaled 14,692 tons for January through March 21, 2017. Total imports totaled 413,364 tons for January through March 21, 2017. See Exhibit I-13.

See 19 U.S.C. § 1677(7)(G)(ii). Therefore, as long as there is evidence of a reasonable overlap in competition, cumulation of subject imports for purposes of this investigation is mandatory.

The Commission typically considers four factors in determining whether there is a reasonable overlap in competition between subject imports and the domestic like product: (1) fungibility of the product from various sources, (2) the presence of sales or offers to sell in the same geographic markets, (3) common channels of distribution, and (4) simultaneous market presence.⁷ See, e.g., Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan, USITC Pub. 1845 (Final) (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). No single factor is determinative. See Goss Graphics Sys., Inc., 33 F. Supp. 2d at 1086. Each factor is met in this case.

1. Imports from All Subject Countries Are Fungible

CASWR imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom are generally substitutable with each other and with the domestic like product. CASWR imported into the United States, regardless of source, has similar chemical and physical properties and is sold to the same end users for the same end use applications across the product category continuum. The same is true of the domestic like product.

In its most recent sunset review of CASWR imports from various countries, the Commission determined that the subject imports and the domestic like product were generally

⁷ Only a reasonable overlap of competition is required. 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”); Mukand Ltd. v. United States, 937 F. Supp. 910, 916 (Ct. Int'l Trade 1996); Wieland Werke, AG v. United States, 718 F. Supp. 50, 52 (Ct. Int'l Trade 1989) (“Completely overlapping markets are not required.”).

interchangeable based on data from market participants. See CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 23; CASWR from Brazil OI, USITC Pub. 3546 at 20. Specifically, the Commission found that the majority of U.S. producers, importers, and purchasers reported that subject CASWR imports were always or frequently interchangeable with the domestic like product, and at least frequently or sometimes interchangeable with other CASWR imports. CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 23-24, 25 (“Market participants overwhelmingly find wire rod from different sources to be at least sometimes interchangeable.” (Emphasis added.)). Further, CASWR of the same type is “highly substitutable.” Id. at 43.

2. All Subject Imports Compete in the Same Geographic Markets

Imports from each of the subject countries compete with imports from the other subject countries and with the domestic like product throughout the U.S. market. The Commission determined in the 2001 investigation and the 2014 sunset review of CASWR from multiple countries that the domestic like product was marketed and sold throughout the entire U.S. market, and that subject imports competed with each other and the domestic like product in most or all regions of the United States. See CASWR from Brazil OI, USITC Pub. 3546 at 23; CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 24. In its investigation on CASWR from China, the Commission’s database demonstrated similar nationwide overlapping sales of Chinese subject imports and domestic CASWR. See CASWR from China, USITC Pub. 4509 at II-3. CASWR produced in the United States and imported from each of the countries that is the subject of these Petitions continues to be sold on a nationwide basis.

3. Subject Imports Are Sold Through the Same Channels of Distribution

Commercial shipments of domestically-produced CASWR and subject imports are sold to both distributors and end users, with the majority of shipments going to end users. This is

consistent with the Commission's findings regarding channels of distribution in the recent CASWR investigations and reviews. In 2015, the Commission determined that CASWR from China and the domestic like product were sold in the same channels of distribution, including primarily to end users in the latter half of the period of investigation. See CASWR from China, USITC Pub. 4509 at II-1-II-2. In the multi-country CASWR case, the Commission also found that domestically-produced CASWR and subject imports were distributed through similar channels. See CASWR from Brazil OI, USITC Pub. 3546 at 23; CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 24-25.

4. Subject Imports Are Simultaneously Present in the U.S. Market

Imports of CASWR from each subject country have been simultaneously present in the U.S. market for most of the POI, with virtually all subject imports being present in the United States in each of the past three years. See Exhibit I-8. Domestically-produced CASWR has also been available in the U.S. market throughout the POI. Thus, this factor provides further evidence that subject imports are competing with each other and the domestic like product.

5. Conclusion

Domestically-produced CASWR and CASWR from each of the ten subject countries are generally fungible products, compete in the same geographic markets, are sold through the same channels of distribution, and were simultaneously present in the U.S. market during the past three years. Moreover, the U.S. market for CASWR is highly price-sensitive, with competition occurring between imports and domestic producers for sales on the basis of price. See, e.g., CASWR from Brazil 2nd Rev., USITC Pub. 4472 at 33, 43. Therefore, there is a reasonable overlap of competition among the subject imports and between subject imports and the domestic like product within the meaning of the statute. Accordingly, the Commission should cumulate

imports of CASWR from all ten subject countries in analyzing whether subject imports have caused material injury to the domestic industry in this case.

F. Cumulated Imports from the Subject Countries Are Causing Material Injury to the Domestic CASWR Industry

In determining whether the domestic industry has been injured by reason of the imports under investigation, the statute directs the Commission to consider: (1) the volume of imports of the subject merchandise; (2) the effect of imports of that merchandise on prices in the United States for the domestic like product; and (3) the impact of imports of such merchandise on domestic producers in the context of production operations within the United States. 19 U.S.C. § 1677(7)(B). Information reasonably available to Petitioners indicates unfairly traded imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom have been, and continue to be, a cause of material injury to the domestic industry producing CASWR.

1. The Volume of Imports from the Subject Countries Is Significant and Increasing

In evaluating the volume of imports, the Commission must “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.” 19 U.S.C. § 1677(7)(C)(i). In these investigations, available data show that the volume of subject imports, both in absolute terms and relative to U.S. consumption and production, is significant within the meaning of the relevant statutory provision.

a. **The Volume of Imports Is Significant and Increasing in Absolute Terms**

The volume of subject imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom is significant on an absolute basis. Subject imports totaled 708,345 tons and accounted for 39.6 percent of CASWR imports in 2016. See Exhibit I-10. Subject imports also increased significantly over the POI. The volume of cumulated subject imports increased from 453,212 tons in 2014 to 708,345 tons in 2016, or by 56.3 percent. Id.

b. **Subject Imports Have Increased Significantly as a Share of the U.S. Market**

The volume of subject imports is also significant relative to consumption. As a share of the U.S. market, subject imports increased from [] percent in 2014 to [] percent in 2016. See Exhibit I-10. Subject imports captured an additional [4.9] percentage points in market share between 2014 and 2016. See id. These data establish that the volume of subject imports and the increase in imports were significant both absolutely and on a relative basis.

2. **Unfairly Traded Imports from the Subject Countries Have Had an Injurious Impact on Domestic Producer Prices for CASWR**

The low-priced, dumped and subsidized imports subject to this proceeding have had significant negative price effects on the domestic CASWR industry. Subject imports have significantly undercut U.S. producers' prices, as discussed below. Price underselling by unfairly-traded imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom has significantly depressed the prices at which domestic producers have sold CASWR during the past three years.

a. **Unfairly Traded Imports Undersold Domestically-Produced CASWR by Substantial Margins, Causing the Domestic Industry Lost Sales, Lost Revenue, and Price Depression**

Evidence reasonably available to Petitioners indicates that the surge in subject imports coincided with significant underselling by subject imports, which serves as important evidence that subject imports have had negative price effects. U.S. producers have lost sales and significant revenue due to lower priced offerings from subject imports that undersold U.S. prices. See Exhibits I-11 and I-12. Available data also show significant price declines over the course of the POI as domestic producers competed with the subject imports. See Exhibit I-11. In fact, the average unit values (“AUVs”) of subject imports were [**\$165**] below U.S. producers’ AUVs in 2016. See Exhibits I-8 and I-11.

The underselling and declining subject import prices resulted in the depression of U.S. producer prices across the 2014 to 2016 period. The effects were particularly pronounced by 2016, the last year of the POI. See id. The AUVs of imports from the subject countries fell substantially over the POI, dropping from \$565.73 in 2014 to a low level of \$384.51 in 2016. See Exhibit I-8. Domestic prices fell during the POI as U.S. producers were forced to reduce their prices to compete with low-priced subject imports. These price declines are reflected in the AUVs of domestic producers’ U.S. shipments, which declined from [] per ton in 2014 to [] per ton in 2016. See Exhibit I-11. These substantial price declines occurred as subject imports continued to enter the U.S. market in 2016 in increasing volumes, despite declining demand. See Exhibit I-10. The price depression exerted by the subject imports on domestic producers’ prices has, in turn, led to a deterioration of U.S. producers’ profitability levels. See Exhibit I-11.

b. **Identification of CASWR Products for Which Petitioners Request Collection of Price Data (19 C.F.R. § 201.11(b)(2)(iv))**

Pursuant to the Commission's regulations, 19 C.F.R. § 207.11(b)(2)(iv), Petitioners recommend that the Commission collect pricing data on the following CASWR products:

PRODUCT 1: Industrial quality wire rod, grade C1006, 5.5 mm (7/32 inch) through 12 mm (15/32 inch) in diameter, for hangers, chain link fencing, collated nails and staples, grates, and other formed products (in green condition, e.g., NOT cleaned, coated, etc.).

PRODUCT 2: Industrial quality wire rod, grade C1008 through C1010, 5.5 mm (7/32 inch) through 12 mm (15/32 inch) in diameter, for hangers, chain link fencing, collated nails and staples, grates, and other formed products (in green condition, e.g., NOT cleaned, coated, etc.).

PRODUCT 3: Mesh quality wire rod, grades C1006 through C1015, 5.5 mm (7/32 inch) through 14 mm (9/16 inch) in diameter, for manufacturing of concrete reinforcement products such as wire for A-82 applications (in green condition, e.g. NOT cleaned, coated, etc.).

PRODUCT 4: Grades C1050 through C1070, 5.5 mm (7/32 inch) through 6.5 mm (1/4 inch) in diameter, for spring applications excluding valve spring (in green condition, e.g. NOT cleaned, coated, etc.).

PRODUCT 5: Industrial quality wire, Grades C1060 through 1065, 5.5 mm (7/32 inch) through 17.5 mm (11/16 inch) in diameter, for spring wire rod used in upholstery and mechanical applications, as well as oil-tempered spring applications.

These price descriptors accounted for a significant percentage of sales made in the United States of CASWR during the POI and, accordingly, are the appropriate products for the Commission's analysis and comparison of U.S. producer and import prices.

3. Unfairly Traded Imports Have Had an Injurious Impact on the Domestic CASWR Industry

The domestic CASWR industry has suffered material injury by reason of the subject imports, as demonstrated by sales lost to the unfair imports and depressed U.S. prices. Subject imports have undersold domestically-produced CASWR, resulting in price depression, declining trade indicators, and financial deterioration, as evidenced in domestic producers' inadequate net and operating margins that declined significantly in 2016. These data, as described in more detail below, demonstrate a causal link between the unfairly traded imports and the material injury being suffered by the U.S. industry producing CASWR.

a. The Domestic Industry Has Suffered Declines in Key Trade Factors

Subject imports surged over the period, despite declining demand, between 2014 and 2016 (see **Exhibit I-10**), leading to the domestic industry's (1) declining net sales; (2) declining U.S. prices; (3) deteriorating financial performance; and (4) lost sales and revenues. U.S. producers suffered as unfairly low-priced subject imports continued to enter the United States and capture an increasing market share.

In 2016, as subject imports reached their highest market penetration, numerous domestic industry trade and financial indicators declined. See **Exhibits I-10 and I-11**. U.S. producers' production capacity fell between 2014 and 2016. See **Exhibit I-11**. Further, domestic producers' average U.S. shipments unit value declined by [] percent from 2014 to 2016. *Id.* U.S. producers' capacity utilization stood at [59.9] percent in 2016 as domestic industry sales were displaced by unfairly-traded subject imports. *Id.* The domestic industry has ample capacity to supply CASWR to meet customers' requirements, but has been unable to supply more CASWR to the market due to the high volume of lower-priced dumped and subsidized subject imports.

In addition, deterioration of U.S. producers' business has had a negative effect on domestic industry employment, with a decline in wages paid to production-related workers of [] percent between 2014 and 2016. See id. The growth in volume and unfair pricing of subject imports are directly affecting the livelihood of workers in the United States.

b. **Domestic Producers' Declining Operating Income Demonstrates the Injurious Impact of Substantial Volumes of Low-Priced Imports from the Subject Countries**

The financial performance of the domestic CASWR industry also deteriorated as a result of unfairly traded imports from the subject countries. U.S. producers' net sales value declined from [] in 2014 to [] in 2016, or by [21.7] percent, reflecting the price depression experienced by the domestic industry as a result of subject imports. See Exhibits I-8 and I-11.

The increasing volumes of low-priced imports that undercut U.S. producers' prices resulted in severely worsening profits for the U.S. industry. Id. In 2016, when subject imports reached their highest market penetration, petitioners' operating income plunged from [] to [], or by [85.7] percent. **Exhibits I-10 and I-11.** Domestic producers' gross profit also fell from [] in 2014 to [] in 2016 (a [] percent decline), and net income dropped from [] to [] (a [] percent decline) in that period. **Exhibit I-11.** Further, by 2016, U.S. producers' operating income had weakened to []

[] percent as a ratio of net sales. Id. The financial deterioration of the domestic CASWR industry is directly related to declining sales prices and revenue resulting from increased volumes of unfairly-priced imports.

c. **Petitioners Have Lost Sales and Revenues to Unfair CASWR Imports from the Subject Countries**

The existence of a causal link between rising volumes of low-priced subject imports and U.S. producers' declining profits is corroborated by the anecdotal lost sales and lost revenue information collected and attached as **Exhibit I-12**. This exhibit identifies instances in which Petitioners lost sales to unfairly traded CASWR imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom, as well as transactions in which Petitioners lost revenues due to being forced to lower their prices in response to competing bids from unfairly-traded CASWR imports from the subject countries. Id. This evidence of lost sales and revenues further ties the financial performance of the domestic industry to the injurious price and volume of dumped and subsidized subject imports.

G. Conclusion

All of the indicators of material injury are present in this case. The volume of subject imports was significant both absolutely and relatively over the POI. The subject imports surged from 2014 to 2016, and reached their highest levels of market penetration at the end of the period in 2016. The subject imports systematically undersold the domestic product, causing domestic prices to fall. The domestic industry experienced lost sales and revenue and suffered deteriorating profitability in 2016. The domestic industry's data demonstrate that it suffered material injury by reason of unfairly low-priced imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom.

IV. UNFAIRLY TRADED CASWR IMPORTS FROM BELARUS, BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY, UKRAINE, UNITED ARAB EMIRATES, AND THE UNITED KINGDOM THREATEN THE DOMESTIC INDUSTRY WITH ADDITIONAL MATERIAL INJURY

A. Introduction

In addition to analyzing present material injury, the statute requires the Commission to determine whether the domestic industry is threatened with material injury by reason of the unfair imports. 19 U.S.C. § 1677(7)(F). Here, subject imports also threaten the domestic industry with further material injury. Because its financial performance was adversely affected by the subject imports during the POI, the domestic CASWR industry is also vulnerable to further injury by imports. The rapid and dramatic increase in both the volume of subject imports and their market share demonstrates the ability of the subject imports to enter the U.S. market quickly and in large quantities. The subject imports have also had demonstrable negative price effects, as the rising volume of subject imports forced domestic producers to lower their prices in an attempt to avoid further loss of market share.

Producers of CASWR in the subject countries have both substantial capacity and substantial excess capacity that can be used to significantly increase exports to the United States. Taken together, these factors will make it difficult or impossible for the domestic CASWR industry to generate the level of profit necessary to fund research and development and to make capital investments needed to remain competitive unless trade relief is granted. Indeed, as discussed in section IV.C., the statutory factors that the Commission is required to consider demonstrate that subject imports threaten the domestic industry with further material injury. In the absence of trade relief, subject imports will capture increasing volume and market share, causing additional harm to U.S. producers.

In examining the threat of material injury by subject imports, the Commission is directed to examine a number of factors specified in the statute, including (1) an increase in foreign producers' productive capacity or existing unused capacity; (2) a significant rate of increase of the volume or market penetration of the subject imports; and (3) the likelihood that imports of the subject merchandise are entering at prices that will have a significant depressing or suppressing effect on domestic prices. See 19 U.S.C. § 1677(7)(F)(i). There is ample evidence that imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom also present a massive and imminent threat of further material injury to the domestic industry.

B. The Commission Should Cumulate Subject Imports for Purposes of Its Threat Analysis

The Commission is authorized to cumulate subject imports in assessing threat of material injury if the statutory conditions necessary for cumulation in the material injury analysis are present. See 19 U.S.C. § 1677(7)(H). As discussed in section II.E. above, the statutory factors supporting a cumulative analysis have been met in this case, and the Commission should cumulate the volume and price effects of all subject imports in its threat analysis as well.

C. Subject Imports Threaten the Domestic Industry with Additional Material Injury

1. The Domestic CASWR Industry Is Vulnerable to Material Injury by Reason of Subject Imports

The starting point for the Commission's assessment of threat is the question of whether the domestic industry is vulnerable to material injury by reason of the subject imports. See Seamless Refined Copper and Tube from China and Mexico, USITC Pub. 4193 (Final) (Nov. 2010), at 34; Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China, USITC

Pub. 4190 (Final) (Nov. 2010), at 27-28. To assess vulnerability, the Commission will consider the various indicators of performance for the industry. The Commission gives special weight to the domestic industry's performance at the end of the POI. Seamless Refined Copper and Tube from China and Mexico, USITC Pub. 4193 at 34.

The domestic CASWR industry is extremely vulnerable to further material injury by reason of the subject imports. As explained above, by 2016 when subject imports reached their peak market share, U.S. producers had suffered a [] percent decline in operating income compared to 2014. See **Exhibits I-10 and I-11**; section III.F.3., supra. The domestic industry's net sales values declined over the POI, and workers in the domestic industry lost significant wages. **Exhibit I-11**. The Commission should accordingly determine that the domestic CASWR industry is vulnerable to material injury by reason of the subject imports.

2. **Subject Imports Have Rapidly and Significantly Increased in Volume and Market Share**

The Act provides that "a significant rate of increase of the volume or market penetration of imports of the subject merchandise" shall be considered in determining whether the domestic industry is threatened with material injury from the subject imports. 19 U.S.C. § 1677(7)(F)(i)(III). In this case, there have been dramatic increases in both the volume and market penetration of subject imports over the POI.

As discussed above, the volume of subject imports increased by 56.3 percent during the 2014 to 2016 period, to a peak market share of [15.0] percent in 2016. See **Exhibit I-10**. Subject imports continued to increase between 2015 and 2016 while demand declined. See id. The Commission will consider increases in import volumes in the context of domestic demand. Import volumes that increase faster than demand indicate a threat to the domestic industry. See, e.g.,

Chlorinated Isocyanurates from China and Japan, USITC Pub. 4494 (Final) (Nov. 2014), at 35. Subject import volume was at its peak in 2016, up by 56.3 percent since 2014, while apparent domestic consumption declined over the POI. See Exhibit I-10. This substantial and rapid increase in subject imports in the face of declining demand is clear evidence of threat of material injury.

3. **Subject Producers Have Significant Volumes of New and Unused Capacity That Indicate the Likelihood of Substantial Increase in Imports**

In making a threat determination, the Commission shall consider “any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports.” 19 U.S.C. § 1677(7)(F)(i)(II). The Commission will also consider whether other export markets are available to the subject producers that could absorb excess production. Id. In this case, the availability of capacity for increased exports to the United States from the subject countries threatens the domestic CASWR industry. See Chlorinated Isocyanurates from China and Japan, USITC Pub. 4494 at 36; Polyethylene Retail Carrier Bags from Indonesia, Taiwan, and Vietnam, USITC Pub. 4144 (Final) (April 2010), at 25-26.

The subject countries currently have wire rod production capacity of approximately [] tons. See Table 3 below; **Exhibit I-14**. CASWR producers in the subject countries, however, are currently producing at levels well below their capacity. Table 3 shows the wire rod production capacity of the subject countries in 2016, along with their estimated wired rod production volume and the amount of unused capacity.

TABLE 3
PRODUCTION CAPACITY, PRODUCTION, AND EXCESS CAPACITY, 2016
(in short tons)

Country	Capacity	Production	Excess Capacity
Belarus	[]	[] ⁸	[]
Italy	[]	[]	[]
Korea	[]	[]	[]
Russia	[]	[]	[]
South Africa	[]	[]	[831,813]
Spain	[]	[]	[]
Turkey	[]	[]	[]
Ukraine	[]	[]	[]
UAE	[]	[]	[]
United Kingdom	[]	[]	[]
Total	[]	[]	[]
Source: [<div style="text-align: center;">Source</div> <div style="text-align: center;">]</div>			

As Table 3 shows, each of the subject countries had significant excess capacity in 2016, and cumulatively, the subject producers had huge excess capacity of [] tons – or more than [] the level of U.S. consumption of CASWR in 2016. Total subject imports in 2016 were 708,345 tons, or [] percent of the subject producers' idle capacity. See Exhibit I-14. Further, many subject producers continued to add CASWR production capacity during the POI or have plans to do so in the near future. See Exhibit I-15. Thus, the subject producers have

⁸ []

Source

the ability to increase exports to the United States significantly without encountering any capacity constraints. The rapid increase in subject imports by over 56 percent over the POI demonstrates that the foreign subject producers are able to quickly and injuriously penetrate the U.S. CASWR market.

4. Subject Imports Have Demonstrable Adverse Price Effects That Are Likely to Continue

The statute provides that, in determining whether the domestic industry is threatened with material injury, the Commission should consider “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.” 19 U.S.C. § 1677(7)(F)(i)(IV). Subject imports have had such effects. See supra section III.F.2. In particular, the rise in the volume of low-priced subject imports led to a sharp decline in prices for the domestic product between 2014 and 2016. See Exhibits I-8 and I-11. Given continuing high levels of subject imports, at prices substantially underselling the domestic like product, it is likely that the decline in domestic prices will continue. Thus, this statutory factor shows that the domestic industry is threatened with additional material injury from subject imports.

5. The Subject Producers Are Export-Oriented

CASWR producers in Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom are export-oriented, with the United States being one of their primary export markets. Evidence demonstrates that [*industry information from confidential source*] CASWR producers in the subject countries to send their production to other markets, including the United States. See Exhibit I-15.

6. **The Governments of Turkey and Italy Encourage CASWR Exports Through Countervailable Subsidies**

Turkey and Italy encourage exportation of CASWR through countervailable subsidies. As part of its threat analysis, the Commission must consider “if a countervailable subsidy is involved” and, in particular, “whether the countervailable subsidy is a subsidy described in Article 3 or 6.1” of the WTO Agreement on Subsidies and Countervailing Measures. 19 U.S.C. § 1677(7)(F)(i)(I). Article 3 of the WTO Subsidies Agreement describes subsidies that are prohibited because they are contingent upon export performance or upon the use of domestic over imported goods. Agreement on Subsidies and Countervailing Measures (Apr. 15, 1994), Marrakesh Agreement Establishing the World Trade Organization, Annex 1, 1867 U.N.T.S. 14, at Art. 3. As demonstrated in these Petitions, subject producers in Turkey and Italy have received countervailable subsidies, including numerous export subsidies. Among these subsidies are:

- Export loans, credit, and insurance provided to CASWR producers at preferential rates by government authorities where receipt of the financing is contingent upon exporting;
- Preferential income tax treatment or exemptions, contingent upon exporting, for CASWR producers; and
- Grants provided to CASWR producers and exporters to assist in the defense of trade disputes, development of export markets or to recognized export performance.

See Petition Volumes XII-XIII.

D. **Summary**

The domestic CASWR industry is currently experiencing material injury as a result of unfair imports from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom. As difficult as the current situation may be, if recent trends persist, the domestic industry is threatened with an even worse trade and financial situation

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in the immediate future. The subject producers have demonstrated their ability to rapidly increase exports to the United States of unfairly low-priced CASWR that undersells domestic producers by substantial margins. In light of the recent trends in pricing and volume of unfair imports, producers and exporters in the ten subject countries are likely to continue their assault on the U.S. market absent the restraining and remedial effects of antidumping and countervailing duty orders.

* * *

V. CONCLUSION

The information presented in these Petitions provides evidence reasonably available to Petitioners that imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom are being sold in the United States at less than fair value and that the Governments of Turkey and Italy are providing countervailable subsidies with respect to the manufacture, production, and export of CASWR. These Petitions further provide evidence that the domestic industry producing CASWR has been materially injured, and is threatened with further material injury, by reason of unfairly-traded imports. Accordingly, Petitioners request that the U.S. Department of Commerce and the U.S. International Trade Commission initiate antidumping duty investigations regarding imports of CASWR from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom and countervailing duty investigations regarding imports of CASWR from Turkey and Italy.

Respectfully submitted,



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March 28, 2017

EXHIBIT LIST

Exhibit No.	Description
I-1	Petitioners and Producers of Carbon and Certain Alloy Steel Wire Rod ("CASWR")
I-2	Other U.S. Producers of CASWR
I-3	CASWR Standing Calculation
I-4	Summary of Prior Proceedings Concerning CASWR
I-5	Excerpt from <u>Carbon and Certain Alloy Steel Wire Rod from China</u> , Inv. Nos. 701-TA-512 and 731-TA-1248, USITC Pub. 4509 (Final) (Jan. 2015)
I-6	Harmonized Tariff Schedule of the United States, Chapter 72, Section XV, Headings 7213 and 7227
I-7	Foreign Producers/Exporters of CASWR
I-8	CASWR Import Volume and Value
I-9	U.S. Importers of CASWR
I-10	CASWR Import Volume and Market Share
I-11	U.S. CASWR Industry Trade and Financial Data
I-12	Lost Sales and Lost Revenue
I-13	U.S. Imports of CASWR: March 2016 – February 2017
I-14	[source]
I-15	Information on Foreign Subject Producers and CASWR Industries in the Subject Countries

EXHIBIT I-1

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EXHIBIT I-2

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Oklahoma Steel and Wire

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Website: <http://www.okbrandwire.com/>

Republic Steel

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¹ ArcelorMittal USA LLC ceased production of CASWR in the United States in 2015 when it permanently closed its facility in Georgetown, South Carolina. See Exhibit I-3.

EXHIBIT I-7

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