



American Wire Producers Association

PO Box 151387
Alexandria, VA 22315

August 21, 2018

**SECTION 301 (CHINA)
DOCKET NO. USTR-2018-0026**

PUBLIC SUBMISSION

VIA ELECTRONIC SUBMISSION ([HTTP://WWW.REGULATIONS.GOV](http://www.regulations.gov))

Ambassador Robert E. Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 Seventeenth Street, NW
Washington, DC 20508

Attention: Arthur Tsao, Assistant General Counsel, USTR
Justin Hoffmann, Director of Industrial Goods, USTR
Office of the United States Trade Representative

Re: *Comments on Proposed Modification of Action pursuant to Section 301
Determination regarding China's Acts, Policies, and Practices related to
Technology Transfer, Intellectual Property, and Innovation
(Docket Number USTR-2018-0026)*

Dear Ambassador Lighthizer:

On behalf of the American Wire Producers Association (“AWPA”), we submit the following comments in response to the notice of the United States Trade Representative (“USTR”) regarding the proposed modification of action in connection with its Section 301 finding that “acts, policies and practices of the Government of China related to technology transfer, intellectual property, and innovation . . . are unreasonable or discriminatory and burden or restrict U.S. commerce.”¹

¹ *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 33,608 (July 17, 2018) (hereinafter “Notice”). See also *Extension of Public Comments Period Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation* (Continued)

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Further to the USTR's Section 301 determination regarding China² and previous actions and proposed actions to implement the USTR's determination,³ the USTR has proposed an additional duty of 25 percent *ad valorem*⁴ on imports of specific products from China, which are listed in the *Annex* to the *Notice*. These products are identified by their eight-digit subheadings in the *Harmonized Tariff Schedule of the United States* ("HTSUS").⁵ The AWP respectfully urges the USTR to:

- (a) include the carbon, stainless, and other alloy steel wire products listed in the *Annex* in the final list of imports from China which will be subject to any additional duty;⁶ and

(Continued)

Innovation, 83 Fed. Reg. 38,760 (August 7, 2018) (hereinafter "*Extension Notice*"). These comments are timely submitted. *Id.* at 38,761.

² See Office of the United States Trade Representative, *Findings of the Investigation into China's Acts, Policies, and Practices related to Technology Transfer, Intellectual Property, and Innovation under Section 301 of the Trade Act of 1974* (March 22, 2018).

³ See *Notice of Action and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 28,710 (June 20, 2018); *Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 14,906 (April 6, 2018).

⁴ See *Extension Notice* at 38,760–38,761.

⁵ See *Notice* at *Annex*.

⁶ See Attachment 1. We note that imports from China of both wire rod and wire of carbon, stainless, and alloy steel are already covered by the President's Proclamation imposing a 25-percent tariff on imports pursuant to Section 232 of the *Trade Expansion Act of 1962*, as amended, but that products made from steel wire (i.e., steel wire products) are not. See, e.g., *Proclamation 9705 of March 8, 2018: Adjusting Imports of Steel Into the United States*, 83 Fed. Reg. 112,625 (March 15, 2018) at *Annex: To Modify Chapter 99 of the Harmonized Tariff Schedule of the United States*.

(b) take action in the form of a 25-percent duty on these steel wire products.

The AWWA represents 40 independent producers of carbon, stainless, and other steel wire products as well as five integrated wire rod mills that also manufacture such downstream steel wire products. On their behalf and on behalf of their workers and communities in 35 states, the AWWA submits that the proposed duties on steel wire products will be both practicable and effective in obtaining the elimination of China's acts, policies, and practices which unfairly and unjustifiably burden and restrict U.S. commerce.

First, the USTR has noted in numerous reports to the United States Congress that China's illegal trade practices have encouraged the exportation of finished products, such as steel wire products, while discouraging the exportation of semi-finished products and raw materials.⁷ Specifically, the USTR has reported that China's manipulation of border taxes:

. . . encourage{s} the export of certain finished products over other finished products within a particular sector. For example, . . . China has targeted value-added steel products, particularly wire products and steel pipe and tube products, many of which ended up in the U.S. market.⁸

⁷ See, e.g., *United States Trade Representative, 2017 Report to Congress On China's WTO Compliance* (January 2018) at 46 (hereinafter "*USTR's 2017 Report*"); *United States Trade Representative, 2016 Report to Congress On China's WTO Compliance* (January 2017) at 58; *United States Trade Representative, 2015 Report to Congress On China's WTO Compliance* (December 2015) at 56.

⁸ *USTR's 2017 Report* at 46.

At the same time, China's border tax regime:

. . . discourages the export of the relevant primary and intermediate products . . ., resulting in increased domestic supply and lower domestic prices.⁹

The result has been a surge of imports of steel wire products of all types from China,¹⁰ capturing more and more of the U.S. wire products market through the export targeting measures of the Chinese Government.

Second, China's extensive programs of government-supplied subsidies have also promoted the market penetration by imports of value-added Chinese products, such as steel wire products. In its most recent report on China's compliance with its obligations under the World Trade Organization ("WTO"), the USTR again found—as it has in previous reports—that “China continues to provide substantial subsidies to its domestic industries, which have caused injury to U.S. industries.”¹¹ Chinese government bodies at every level—central, provincial, municipal, and local—provide a broad range of subsidies that distort national and international markets and promote the building of excess capacity in the steel sector, including steel wire products. These subsidy programs have adversely impacted the American wire products industry, as demonstrated by the countervailing duty orders imposed by

⁹ *Id.*

¹⁰ *See* Attachment 2.

¹¹ *USTR's 2017 Report* at 6 and 51–56. Indeed, the Administration has identified China's extensive programs of industrial subsidies as among the unfair trade practices which distort trade patterns and undermine U.S. industries. *See* Attachment 3.

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the U.S. Department of Commerce (“Commerce”) on a number of steel wire products from China. For example, Commerce found countervailing duty margins ranging from 9.42 percent to 45.85 percent on prestressed concrete steel wire strand, a countervailing duty margin of 62.46 percent on steel wire grating, and countervailing duty margins ranging from 7.85 percent to 264.09 percent on wire shelving for kitchen appliances.¹²

Third, without additional tariffs of 25 percent on imports of steel wire products from China, U.S. manufacturers of steel wire products are facing an untenable cost-price squeeze. Chinese wire rod has been effectively eliminated from the U.S. market as a result of:

- (a) China’s own policies to discourage the export of inputs like wire rod;
- (b) Triple-digit antidumping and countervailing duties on steel wire rod from China;¹³ and
- (c) The overlay of Section 232 tariffs.¹⁴

These circumstances have encouraged the Chinese Government and its steel industry to accelerate the shift to downstream steel wire products which are currently not covered by either

¹² See USTR’s 2017 Report at 55–56.

¹³ *Carbon and Certain Alloy Steel Wire Rod From the People’s Republic of China: Antidumping Duty Order*, 80 Fed. Reg. 1,015 (January 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 (January 8, 2015).

¹⁴ *Proclamation 9705 of March 8, 2018: Adjusting Imports of Steel Into the United States*, 83 Fed. Reg. 112,625 (March 15, 2018) at *Annex: To Modify Chapter 99 of the Harmonized Tariff Schedule of the United States*.

Section 301 or Section 232 duties.¹⁵ In addition, the Section 232 tariff of 25 percent *ad valorem* severely restricts the availability of wire rod from other global sources. Consequently, both the price and availability of steel wire rod in the U.S. market are adversely affected, increasing the costs of U.S. producers of steel wire products as they attempt to compete with the flood of imported steel wire products from China. Only the imposition of comparable tariffs of 25 percent on these steel wire products can restore a level playing field for American wire products manufacturers.

Fourth, the proposed imposition of duties on steel wire products are practicable in terms of ease of enforcement and effective in terms of the value of imports from China. Because China is already a significant—and often the largest—source of imports of various types of steel wire products, U.S. Customs and Border Protection (“CBP”) is familiar with these products, their import trends, and their Chinese suppliers. Any attempt to evade Section 301 duties would be apparent and, thus, readily detectable. In addition, Section 301 duties on steel wire products would affect approximately two billion dollars (\$2,000,000,000) worth of Chinese exports,¹⁶ thus representing a significant inducement for the Chinese Government to rescind its unreasonable and discriminatory acts, policies, and practices which have imposed a burden on and restricted U.S. commerce.

¹⁵ See Attachment 2.

¹⁶ See Attachment 4.

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Finally, additional duties on steel wire products from China are unlikely to “cause disproportionate economic harm to U.S. interests, including small- or medium-size businesses and consumers”¹⁷ because there is more than sufficient capacity in the United States to meet domestic demand. The U.S. wire products industry has numerous plants throughout the country to serve customers with products in the quantities and qualities required. Consequently, additional duties on these steel wire products from China would NOT cause “disproportionate economic harm to U.S. interests.”¹⁸ The AWPAs also notes that many of its members who supply steel wire products are themselves small- and medium-size businesses which are important sources of employment and income in their communities. Further, U.S. wire products manufacturers support numerous other American companies in their supply chains for inputs and services, including the domestic steel wire rod mills as well as manufacturers of machinery, packaging materials, and other input materials.

In conclusion, the AWPAs respectfully urges the USTR to recommend to the President that:

- (a) All steel wire products be included in the final list of imports from China which are subject to additional duties, and
- (b) The additional duties be in the amount of 25 percent *ad valorem*.

¹⁷ See Notice at 33,609. Indeed, additional duties on imports of wire products are unlikely to cause any economic harm to U.S. interests. Such duties would only benefit the United States, as shown above.

¹⁸ See *id.*

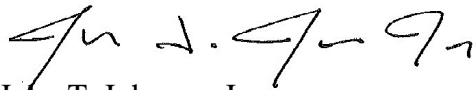
AMBASSADOR ROBERT E. LIGHTHIZER
UNITED STATES TRADE REPRESENTATIVE
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE
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We are grateful for the USTR's consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Johnson, Jr.", written in a cursive style.

John T. Johnson, Jr.
AWPA President
President, MID-SOUTH WIRE

Attachments

ATTACHMENT 1

SECTION 301 INVESTIGATION OF CHINA

LIST OF CARBON, STAINLESS, AND STEEL WIRE PRODUCTS

THE CARBON, STAINLESS, AND ALLOY STEEL WIRE PRODUCTS
WHICH ARE THE FOCUS OF THESE COMMENTS ARE HIGHLIGHTED
ON THE ATTACHED EXCERPT FROM THE ANNEX TO THE *REQUEST FOR COMMENTS
CONCERNING PROPOSED MODIFICATION OF ACTION PURSUANT TO SECTION 301:
CHINA'S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION*
(83 FED. REG. 33,608 (JULY 17, 2018))

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION

COMMENTS ON PROPOSED MODIFICATION OF ACTION PURSUANT TO SECTION 301:
CHINA'S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0026)

AUGUST 21, 2018

ANNEX—Continued

Note: All products that are classified in the 8-digit subheadings of the Harmonized Tariff Schedule of the United States (HTSUS) that are listed in this Annex are covered by the proposed supplemental action. The product descriptions that are contained in this Annex are provided for informational purposes only, and are not intended to delimit in any way the scope of the proposed action. Any questions regarding the scope of particular HTSUS subheadings should be referred to U.S. Customs and Border Protection. In the product descriptions, the abbreviation “nesoi” means “not elsewhere specified or included”.

HTSUS subheading	Product description
7216.61.00	Iron/nonalloy steel, angles, shapes & sections nesoi, not further worked than cold-formed or cold-finished, from flat-rolled products.
7216.69.00	Iron/nonalloy steel, angles, shapes & sections nesoi, not further worked than cold-formed or cold-finished, not from flat-rolled products.
7216.91.00	Iron/nonalloy steel, angle, shapes & sections nesoi, cold-formed/cold-finished from flat-rolled prod. & furth wkd th/ cold-formed/cold-finish.
7301.20.10	Iron or nonalloy steel, angles, shapes and sections, welded.
7301.20.50	Alloy steel, angles, shapes and sections of alloy steel, welded.
7302.30.00	Iron or steel, switch blades, crossing frogs, point rods and other crossing pieces, for jointing or fixing rails.
7303.00.00	Cast iron, tubes, pipes and hollow profiles.
7307.11.00	Cast nonmalleable iron, fittings for tubes or pipes.
7307.19.30	Cast ductile iron or steel, fittings for tubes or pipes.
7307.19.90	Cast iron or steel, fittings for tubes or pipes, nesoi.
7307.21.10	Stainless steel, flanges for tubes/pipes, forged, not machined, not tooled and not otherwise processed after forging.
7307.21.50	Stainless steel, not cast, flanges for tubes/pipes, not forged or forged and machined, tooled and otherwise processed after forging.
7307.22.10	Stainless steel, not cast, threaded sleeves (couplings) for tubes/pipes.
7307.22.50	Stainless steel, not cast, threaded elbow and bends for tubes/pipes.
7307.23.00	Stainless steel, not cast, butt welding fittings for tubes/pipes.
7307.29.00	Stainless steel, not cast, fittings for tubes/pipes, nesoi.
7307.91.10	Iron or nonalloy steel, flanges for tubes/pipes, forged, not machined, not tooled and not otherwise processed after forging.
7307.91.30	Alloy steel (o/than stainless), not cast, flanges for tubes/pipes, forged, not machined/tooled and not otherwise processed after forging.
7307.91.50	Iron or steel (o/than stainless), not cast, flanges for tubes/pipes, not forged or forged and machined, tooled & processed after forging.
7307.92.30	Iron or steel (o/than stainless), not cast, threaded sleeves (couplings) for tubes/pipes.
7307.92.90	Iron or steel (o/than stainless), not cast, threaded elbow and bends for tubes/pipes.
7307.93.30	Iron or nonalloy steel, not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360 mm.
7307.93.60	Alloy steel (o/than stainless), not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360 mm.
7307.93.90	Iron or alloy steel (o/than stainless), not cast, butt welding fittings for tubes/pipes, w/inside diam. 360 mm or more.
7307.99.10	Iron or nonalloy steel, fittings for tubes/pipes, nesoi, forged, not machined, not tooled and not otherwise processed after forging.
7307.99.30	Alloy steel (o/than stainless), fittings for tubes/pipes, nesoi, forged, not machined/tooled and not otherwise processed after forging.
7307.99.50	Iron/steel (o/than stainless), n/cast, fittings for tubes/pipes, nesoi, not forged or forged and machined, tooled & processed after forging.
7308.30.10	Stainless steel, doors, windows and their frames, and thresholds for doors.
7308.30.50	Iron or steel (o/than stainless), doors, windows and their frames, and thresholds for doors.
7308.40.00	Iron or steel, props and similar equipment for scaffolding, shuttering or pit-propping.
7309.00.00	Iron/steel, reservoirs, tanks, vats, siml. contain., for any material (o/than compress./liq.gas), w/capacity o/300 l, n/ fit. w/mech/thermal.
7310.10.00	Iron/steel, tanks, casks, drums, cans, boxes & siml. cont. for any material (o/than compress./liq.gas), w/cap. of 50+ l but n/o 300 l.
7310.21.00	Iron/steel, cans for any material (o/compressed/liq. gas), closed by soldering or crimping, w/cap. less than 50 l.
7310.29.00	Iron/steel, cans for any material (o/compressed/liq. gas), n/closed by soldering or crimping, w/cap. less than 50 l.
7311.00.00	Iron/steel, containers for compressed or liquefied gas.
7312.10.05	Stainless steel, stranded wire, not elect. insulated, fitted with fittings or made up into articles.
7312.10.10	Stainless steel, stranded wire, not elect. insulated, not fitted with fittings or made up into articles.
7312.10.20	Iron or steel (o/than stainless), stranded wire, not elect. insul., fitted with fittings or made up into articles.
7312.10.30	Iron or steel (o/than stainless), stranded wire, not elect. insul., not fitted with fittings or made up into articles.
7312.10.50	Stainless steel, ropes, cables and cordage (o/than stranded wire), not elect. insul., fitted with fittings or made up into articles.
7312.10.60	Stainless steel, ropes, cables and cordage (o/than stranded wire), not elect. insul., not fitted with fittings or made up into articles.
7312.10.70	Iron/steel (o/stainless), ropes, cables & cordage (o/than stranded wire), n/elect. insul., fitted with fittings or made up into articles.
7312.10.80	Iron/steel (o/stainless), ropes, cables & cordage, of brass plated wire (o/than stranded wire), n/elect. insul., w/o fittings or arts.
7312.10.90	Iron/steel (o/stainless), ropes, cables & cordage, o/th of brass plate wire (o/than stranded wire), n/elect. insul., w/ o fittings etc.
7312.90.00	Iron/steel (o/stainless), plaited bands, slings and the like, not electrically insulated.
7313.00.00	Iron/steel, barbed wire; iron/steel, twisted hoop or single flat wire and loosely twisted double wire, of a kind used for fencing.

ANNEX—Continued

Note: All products that are classified in the 8-digit subheadings of the Harmonized Tariff Schedule of the United States (HTSUS) that are listed in this Annex are covered by the proposed supplemental action. The product descriptions that are contained in this Annex are provided for informational purposes only, and are not intended to delimit in any way the scope of the proposed action. Any questions regarding the scope of particular HTSUS subheadings should be referred to U.S. Customs and Border Protection. In the product descriptions, the abbreviation “nesoi” means “not elsewhere specified or included”.

HTSUS subheading	Product description
7314.12.10	Stainless steel, woven cloth endless bands for machinery, w/meshes not finer than 12 wires to the lineal cm in warp or filling.
7314.12.20	Stainless steel, woven cloth endless bands for machinery, w/meshes finer than 12 but n/finer than 36 wires to the lineal cm warp or filling.
7314.12.30	Stainless steel, Fourdrinier wires for papermaking machines w/94 or more wires to the lineal cm in warp or filling.
7314.12.60	Stainless steel, Fourdrinier wires for papermaking machines w/36 to 93 wires to the lineal cm in warp or filling.
7314.12.90	Stainless steel, woven cloth endless bands for machinery, nesoi, w/meshes finer than 36 wires to the lineal cm in warp or filling.
7314.14.10	Stainless steel, woven cloth (o/than endless bands for machinery), w/meshes not finer than 12 wires to the lineal cm in warp or filling.
7314.14.20	Stainless steel, woven cloth (o/than endless bands for machinery), w/meshes finer 12 but n/finer 36 wires to the lineal cm warp/filling.
7314.14.30	Stainless steel, Fourdrinier wires (o/than endless bands) for papermaking machines, w/meshes 94 or more wire to lineal cm warp/filling.
7314.14.60	Stainless steel, Fourdrinier wires (o/than endless bands) for papermaking machines, w/meshes 36 to 93 wires to the lineal cm warp/filling.
7314.14.90	Stainless steel woven cloth (other than endless band for machinery), nesoi, w/meshes finer than 36 wires to the lineal cm in warp or filling.
7314.19.01	Iron or steel (o/than stainless), woven cloth.
7314.20.00	Iron/steel, grill, netting & fencing, of wire w/maximum x-sect. dimension 3 mm or more, welded at intersection, w/ mesh size 100 cm2 or more.
7314.31.10	Iron/steel, fencing, of wire, welded at the intersection, plated or coated with zinc, whether or not covered w/plastic material.
7314.31.50	Iron/steel, grill and netting, of wire, welded at the intersection, plated or coated with zinc, nesoi.
7314.39.00	Iron/steel, grill, netting and fencing, of wire, welded at the intersection, not plated or coated with zinc.
7314.41.00	Iron/steel, grill, netting and fencing, of wire, not welded at the intersection, plated or coated with zinc.
7314.42.00	Iron/steel, grill, netting and fencing, of wire, not welded at the intersection, coated with plastics.
7314.49.30	Iron/steel, grill, netting and fencing, of wire, not welded at the intersection, not cut to shape.
7314.49.60	Iron/steel, grill, netting and fencing, of wire, not welded at the intersection, cut to shape.
7314.50.00	Iron or steel, expanded metal.
7315.11.00	Iron or steel, roller chain.
7315.12.00	Iron or steel, articulated link chain (other than roller chain).
7315.19.00	Iron or steel, parts of articulated link chain.
7315.20.10	Iron or steel, skid chain, not over 8 mm in diameter.
7315.20.50	Iron or steel, skid chain, over 8 mm in diameter.
7315.81.00	Iron or steel, stud link chain.
7315.82.10	Alloy steel, welded link chain, not over 10 mm in diameter.
7315.82.30	Alloy steel, welded link chain, over 10 mm in diameter.
7315.82.50	Iron or nonalloy steel, welded link chain, not over 10 mm in diameter.
7315.82.70	Iron or nonalloy steel, welded link chain, over 10 mm in diameter.
7315.89.10	Iron or steel, chain nesoi, with links of essentially round cross section, not over 8 mm in diameter.
7315.89.30	Iron or steel, chain nesoi, with links of essentially round cross sections, over 8 mm in diameter.
7315.89.50	Iron or steel, chain nesoi.
7315.90.00	Iron or steel, parts of chain (other than articulated link chain).
7316.00.00	Iron or steel, anchors, grapnels and parts thereof.
7317.00.20	Iron or steel, nails, tacks, corrugated nails, staples & similar arts., not threaded, suitable for use in powder-actuated hand tools.
7317.00.30	Iron or steel, nails, tacks, corrugated nails, staples & similar arts., threaded, suitable for use in powder-actuated hand tools.
7317.00.55	Iron or steel, nails, tacks, corrugated nails, staples & similar arts., of one piece construction, made of round wire, nesoi.
7317.00.65	Iron or steel, nails, tacks, corrugated nails, staples & similar arts., of one piece construction, not made of round wire, nesoi.
7317.00.75	Iron or steel, nails, tacks, corrugated nails, staples & similar arts., of two or more pieces, nesoi.
7318.11.00	Iron or steel, coach screws.
7318.12.00	Iron or steel, wood screws (o/than coach screws).
7318.13.00	Iron or steel, screw hooks and screw rings.
7318.14.10	Iron or steel, self-tapping screws, w/shanks or threads less than 6 mm in diameter.
7318.14.50	Iron or steel, self-tapping screws, w/shanks or threads 6 mm or more in diameter.
7318.15.20	Iron or steel, bolts and bolts & their nuts or washers, imported in the same shipment.
7318.15.40	Iron or steel, machine screws (o/than cap screws), 9.5 mm or more in length and 3.2 mm in diameter.
7318.15.50	Iron or steel, threaded studs.
7318.15.60	Iron or steel, screws and bolts, nesoi, having shanks or threads less than 6 mm in diameter.
7318.15.80	Iron or steel, screws and bolts, nesoi, having shanks or threads 6 mm or more in diameter.
7318.19.00	Iron or steel, threaded articles similar to screws, bolts, nuts, coach screws & screw hooks, nesoi.
7318.21.00	Iron or steel, spring washers and other lock washers.
7318.22.00	Iron or steel, washers (o/than spring washers and other lock washers).

ANNEX—Continued

Note: All products that are classified in the 8-digit subheadings of the Harmonized Tariff Schedule of the United States (HTSUS) that are listed in this Annex are covered by the proposed supplemental action. The product descriptions that are contained in this Annex are provided for informational purposes only, and are not intended to delimit in any way the scope of the proposed action. Any questions regarding the scope of particular HTSUS subheadings should be referred to U.S. Customs and Border Protection. In the product descriptions, the abbreviation “nesoi” means “not elsewhere specified or included”.

HTSUS subheading	Product description
7318.23.00	Iron or steel, rivets.
7318.24.00	Iron or steel, cotters and cotter pins.
7318.29.00	Iron or steel, nonthreaded articles similar to rivets, cotters, cotter pins, washers and spring washers.
7320.10.30	Iron or steel, leaf springs & leaves therefore, to be used in motor vehicles having a G.V.W. not exceeding 4 metric tons.
7320.10.60	Iron or steel, leaf springs & leaves therefore, suitable for motor vehicle suspension (o/than for motor vehicles w/a G.V.W. o/4 metric tons).
7320.10.90	Iron or steel, leaf springs & leaves therefore, not suitable for motor vehicle suspension.
7320.90.10	Iron or steel, hairsprings.
7320.90.50	Iron or steel, springs (o/than leaf springs, helical springs or hairsprings).
7321.11.10	Iron or steel, portable non-electric domestic cooking appliances and plate warmers, for gas fuel or for both gas and other fuels.
7321.11.30	Iron or steel, nonportable non-electric domestic stoves or ranges, for gas fuel or for both gas and other fuels.
7321.11.60	Iron or steel, nonportable non-electric domestic cook. appl. (o/th stoves or ranges) & plate warmers, for gas fuel or both gas & other fuels.
7321.90.10	Iron/steel, cooking chambers for nonportable non-electric domestic stoves or ranges, for gas or for gas and other fuels.
7321.90.20	Iron/steel, top surface panels w/or w/o burners/controls for nonportable non-elect. domest. stoves or ranges, for gas or gas & other fuels.
7321.90.40	Iron/steel, door assembly w/more than one of inner panel, out. panel, window, insul., for non-elect. stoves or ranges, for gas or gas & other.
7321.90.50	Iron/steel, parts of nonportable non-electric domestic stoves or ranges, nesoi, for gas fuel or for both gas and other fuels.
7321.90.60	Iron/steel, parts, of nonelectric domestic cooking and warming appliances, nesoi.
7322.11.00	Cast iron, non-electrically heated radiators and parts thereof, for central heating.
7322.19.00	Iron (o/than cast) or steel, non-electrically heated radiators and parts thereof, for central heating.
7322.90.00	Iron or steel, non-electrically heated air heaters and hot air distributors w/motor driven fan or blower and parts thereof.
7323.10.00	Iron or steel wool; iron or steel pot scourers and scouring or polishing pads, gloves and the like.
7323.99.90	Iron (o/th cast)/steel (o/th tinplate or stainless), table, kitchen (o/th cooking.) or o/household arts & part, n/coated/plated w/prec. metal.
7324.10.00	Stainless steel, sinks and wash basins.
7324.21.10	Cast iron, baths (whether or not enameled), coated or plated with precious metal.
7324.21.50	Cast iron, baths (whether or not enameled), not coated or plated with precious metal.
7324.90.00	Iron or steel, sanitary ware (o/than baths or stainless steel sinks and wash basins) and parts thereof.
7325.10.00	Nonmalleable cast iron, articles, nesoi.
7325.91.00	Iron or steel, cast grinding balls and similar articles for mills.
7325.99.10	Cast iron (o/than nonmalleable cast iron), articles nesoi.
7325.99.50	Steel, cast articles nesoi.
7326.11.00	Iron or steel, forged or stamped grinding balls and similar articles for mills.
7326.19.00	Iron or steel, articles forged or stamped but n/further worked, nesoi.
7326.20.00	Iron or steel, articles of wire, nesoi.
7326.90.10	Tinplate, articles nesoi.
7326.90.25	Iron or steel, cable or inner wire for caliper and cantilever brakes and casing therefore, whether or not cut to length.
7326.90.35	Iron or steel, containers of a kind normally carried on the person, in the pocket or in the handbag, nesoi.
7326.90.45	Iron or steel, horse and mule shoes.
7326.90.60	Iron or steel, articles nesoi, coated or plated with precious metal.
7326.90.86	Iron or steel, articles, nesoi.
7401.00.00	Copper mattes; cement copper (precipitated copper).
7402.00.00	Unrefined copper; copper anodes for electrolytic refining.
7403.11.00	Refined copper cathodes and sections of cathodes.
7403.12.00	Refined copper, wire bars.
7403.13.00	Refined copper, billets.
7403.19.00	Refined copper, unwrought articles nesoi.
7403.21.00	Copper-zinc base alloys (brass), unwrought nesoi.
7403.22.00	Copper-tin base alloys (bronze), unwrought nesoi.
7403.29.01	Copper alloys (o/than copper-zinc, copper-tin alloys), unwrought nesoi.
7404.00.30	Copper spent anodes; copper waste & scrap containing less than 94% by weight of copper.
7404.00.60	Copper, waste and scrap containing 94% or more by weight of copper.
7405.00.10	Copper master alloys, containing 5% or more but n/more than 15% by weight of phosphorus.
7405.00.60	Copper master alloys, not containing 5% or more but n/more than 15% by weight of phosphorus.
7406.10.00	Copper, powders of non-lamellar structure.
7406.20.00	Copper, powders of lamellar structure; copper flakes.
7407.10.15	Refined copper, hollow profiles.
7407.10.30	Refined copper, profiles (o/than hollow profiles).
7407.10.50	Refined copper, bars and rods.

ATTACHMENT 2

U.S. IMPORTS OF STEEL WIRE PRODUCTS FROM CHINA CALENDAR YEARS 2001–2017

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION

**COMMENTS ON PROPOSED MODIFICATION OF ACTION PURSUANT TO SECTION 301:
CHINA’S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0026)**

AUGUST 21, 2018

U.S. IMPORTS OF STEEL WIRE PRODUCTS FROM CHINA CALENDAR YEARS 2001–2017

QUANTITIES IN NET TONS FOR ALL PRODUCTS EXCEPT GARMENT HANGERS
QUANTITIES OF GARMENT HANGERS IN UNITS

PRODUCT CATEGORIES									
YEAR	WIRE ROPE	WIRE STRAND*	WIRE SPRINGS	WOVEN WIRE FABRIC	WIRE GRILL, NETTING AND FENCING	NAILS AND STAPLES*	INDUSTRIAL FASTENERS	CHAINS AND PARTS	STEEL WIRE GARMENT HANGERS*
2001	10,482	2,169	11,716	4,517	47,601	123,645	174,180	37,062	0
2002	14,189	3,345	16,632	6,709	65,939	182,027	244,721	42,652	294,062,708
2003	19,124	22,642	18,039	8,010	70,191	265,603	259,976	47,940	487,748,019
2004	21,619	80,832	22,218	11,387	94,153	393,581	353,982	64,036	773,683,893
2005	26,472	105,763	36,338	6,504	59,214	558,387	443,882	73,959	1,044,700,856
2006	32,198	233,090	36,817	72,929	68,980	700,923	568,825	81,847	1,777,679,847
2007	34,717	229,442	32,073	81,421	68,750	636,882	542,377	89,421	2,697,369,183
2008	40,156	255,651	24,899	86,008	63,904	362,286	511,217	90,762	2,069,184,583
2009	30,580	69,303	10,733	56,709	47,866	212,630	298,025	66,413	733,870,626
2010	44,131	79,156	22,766	205,816	59,142	251,509	365,099	84,541	220,000,704
2011	43,957	86,578	21,704	218,462	61,705	247,811	398,184	99,569	588,917,073
2012	37,989	71,827	29,166	232,219	76,245	268,593	429,774	96,995	941,677,567
2013	34,661	51,312	30,164	239,784	66,211	244,435	418,470	86,808	1,119,899,939
2014	43,917	48,208	38,664	249,037	69,601	268,083	492,742	100,413	637,425,571
2015	40,068	50,019	41,374	234,475	82,853	307,670	498,470	102,713	92,906,075
2016	36,606	70,482	41,645	204,675	95,151	322,436	494,392	92,956	330,316,937
2017	35,649	72,664	45,040	294,014	108,539	312,678	593,673	106,560	335,433,320

* *Antidumping ("AD") and/or countervailing duty ("CVD") petitions filed against imports from China, resulting in AD and/or CVD orders.*

Source: U.S. Department of Commerce and U.S. International Trade Commission (2001—2017), Trade DataWeb; AIS Import Report 3 (2001—2017).

ATTACHMENT 3

WHITE HOUSE FACT SHEET
“PRESIDENT DONALD J. TRUMP IS CONFRONTING
CHINA’S UNFAIR TRADE POLICIES”
(MAY 29, 2018)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION
COMMENTS ON PROPOSED MODIFICATION OF ACTION PURSUANT TO SECTION 301:
CHINA’S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0026)

AUGUST 21, 2018



FACT SHEETS

President Donald J. Trump is Confronting China's Unfair Trade Policies

ECONOMY & JOBS

Issued on: May 29, 2018



“

From now on, we expect trading relationships to be fair and to be reciprocal.

President Donald J. Trump

YEARS OF UNFAIR TRADE PRACTICES: China has consistently taken advantage of the American economy with practices that undermine fair and reciprocal trade.

- For many years, China has pursued industrial policies and unfair trade practices—including dumping, discriminatory non-tariff barriers, forced technology transfer, over capacity, and industrial subsidies—that champion Chinese firms and make it impossible for many United States firms to compete on a level playing field.
- China's industrial policies, such as its “Made in China 2025” plan, harm companies in the United States and around the world.
- China imposes much higher tariffs on United States exports than the United States imposes on China.
 - China's average tariff rate is nearly three times higher than the average United States rate.
 - Certain products are even more imbalanced, for instance the United States charges a 2.5 percent tariff on Chinese cars, while China currently maintains a 25 percent tariff on cars from the United States.
- China has banned imports of United States agricultural products such as poultry, cutting off America's ranchers and farmers from a major market for their goods.
- China has dumped and unfairly subsidized a range of goods for the United States market, undermining America's domestic industry.
 - In 2018 alone, the Trump Administration has found dumping or unfair subsidies on 13 different products, including steel wheels, cold-drawn mechanical tubing, tool chests and cabinets, forged steel fittings, aluminum foil, rubber bands, cast iron soil pipe and fittings, and large diameter welded pipe.

- In January 2018, the Trump Administration found that China's overproduction of steel and aluminum, and the resulting impact on global markets, is a circumstance that threatens to impair America's national security.
- The United States has run a trade in goods deficit with China for years, including a \$375 billion deficit in 2017 alone.

UNDERMINING AMERICAN INNOVATION AND JOBS: China has aggressively sought to obtain technology from American companies and undermine American innovation and creativity.

- The cost of China's intellectual property theft costs United States innovators billions of dollars a year, and China accounts for 87 percent of counterfeit goods seized coming into the United States.
- United States Trade Representative's (USTR) Section 301 investigation identified four of China's aggressive technology policies that put 44 million American technology jobs at risk:
 - Forced technology transfer;
 - Requiring licensing at less than economic value;
 - Chinese state-directed acquisition of sensitive United States technology for strategic purposes; and
 - Outright cyber theft.
- China uses foreign ownership restrictions, administrative review, and licensing processes to force or pressure technology transfers from American companies.
 - China requires foreign companies that access their New Energy Vehicles market to transfer core technologies and disclose development and manufacturing technology.
 - China imposes contractual restrictions on the licensing of intellectual property and technology by foreign firms into China, but does not put the same restrictions on contracts between two Chinese enterprises.
- China directs and facilitates investments in and acquisitions of United States companies to generate large-scale technology transfer.
- China conducts and supports cyber intrusions into United States computer networks to gain access to valuable business information so Chinese companies can copy products.

STANDING UP TO CHINA'S UNFAIR TRADE PRACTICES: President Trump has taken long overdue action to finally address the source of the problem, China's unfair trade practices that hurt America's workers and our innovative industries.

- In January 2018, the President announced his decision to provide safeguard relief to United States manufacturers injured by surging imports of washing machines and solar products.
 - This was the first use of Section 201 of the Trade Act of 1974 to impose tariffs in 16 years.
 - These actions responded to injurious trade practices by China and other countries, including attempts to avoid legally imposed antidumping and countervailing duties.

- Following the decision, Whirlpool announced 200 new jobs in Ohio.
- USTR and the Department of Commerce are working together to defend the right of the United States to continue treating China as a non-market economy in antidumping investigations until China makes the reforms it agreed to when it joined the World Trade Organization (WTO).
- President Trump's Administration has successfully litigated WTO disputes targeting unfair trade practices and upholding our right to enforce United States trade laws.
- In February 2018, USTR won a WTO compliance challenge against China's unfair antidumping and countervailing duties on United States poultry exports and China announced the termination of those duties.

PROTECTING AMERICAN INNOVATION AND CREATIVITY: President Trump has worked to defend America's intellectual property and proprietary technology from theft and other threats.

- In August 2017, the Administration initiated a Section 301 investigation into China's practices related to forced technology transfer, unfair licensing, and intellectual property policies.
- After USTR completed its Section 301 report in March 2018, the President directed the agencies to explore numerous actions to protect domestic technology and intellectual property.
- Under President Trump's leadership:
 - The United States will impose a 25 percent tariff on \$50 billion of goods imported from China containing industrially significant technology, including those related to the "Made in China 2025" program. The final list of covered imports will be announced by June 15, 2018.
 - USTR will continue WTO dispute settlement against China originally initiated in March to address China's discriminatory technology licensing requirements.
 - The United States will implement specific investment restrictions and enhanced export controls for Chinese persons and entities related to the acquisition of industrially significant technology. The list of restrictions and controls will be announced by June 30, 2018.

ATTACHMENT 4

QUANTITY AND VALUE
OF ANNUAL U.S. IMPORTS FROM CHINA
OF
STEEL WIRE PRODUCTS
(2015—2017)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

AMERICAN WIRE PRODUCERS ASSOCIATION

COMMENTS ON PROPOSED MODIFICATION OF ACTION PURSUANT TO SECTION 301:
CHINA'S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER,
INTELLECTUAL PROPERTY, AND INNOVATION
(DOCKET NUMBER USTR-2018-0026)

AUGUST 21, 2018

QUANTITY AND VALUE
OF ANNUAL U.S. IMPORTS FROM CHINA
OF
STEEL WIRE PRODUCTS
(2015—2017)

(ALL QUANTITY FIGURES ARE IN METRIC TONS.)

PRODUCT	2015		2016		2017	
	QUANTITY	VALUE	QUANTITY	VALUE	QUANTITY	VALUE
ROPE & STRAND	87,520	\$181,162,077	104,000	\$197,600,692	103,790	\$203,687,913
BARBED WIRE	3,035	\$2,841,274	3,636	\$2,857,928	3,391	\$3,098,088
CLOTH, GRILL, NETTING & FENCING	108,799	\$184,679,890	107,944	\$167,980,678	115,620	\$196,488,818
CHAIN	93,263	\$205,562,679	84,371	\$179,002,553	96,844	\$205,676,785
NAILS & STAPLES	232,887	\$243,130,877	243,386	\$227,101,522	230,752	\$242,123,489
SCREWS, BOLTS & NUTS	412,593	\$826,412,793	398,768	\$739,266,042	412,270	\$820,881,545
SPRINGS	33,211	\$44,445,268	35,487	\$44,088,988	39,384	\$50,420,720
OTHER WIRE PRODUCTS	N/A	\$214,329,534	N/A	\$237,011,868	N/A	\$213,066,741
TOTALS	971,308	\$1,902,564,392	977,592	\$1,794,910,271	1,002,051	\$1,935,444,099

Source: U.S. International Trade Commission, DataWeb (2015–2017).

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Quantity in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017	
	Quantity	Value	Quantity	Value	Quantity	Value

ROPE & STRAND

73121005	680	\$5,251,768	606	\$5,261,390	571	\$4,704,678
73121010	591	\$3,242,529	854	\$4,707,213	1,021	\$4,647,289
73121020	1,527	\$8,109,446	2,090	\$9,620,928	1,758	\$10,407,861
73121030	44,934	\$78,725,369	63,555	\$100,748,609	64,319	\$106,640,918
73121050	181	\$1,096,569	602	\$1,479,748	606	\$1,734,350
73121060	1,633	\$5,271,023	2,035	\$5,931,948	2,312	\$6,965,032
73121070	2,207	\$10,754,982	2,206	\$10,178,183	2,464	\$10,453,162
73121080	29	\$61,597	315	\$527,206	277	\$433,359
73121090	34,528	\$64,384,075	30,263	\$54,777,794	29,144	\$52,772,220
73129000	1,210	\$4,264,719	1,474	\$4,367,673	1,318	\$4,929,044
SUBTOTAL	87,520	\$181,162,077	104,000	\$197,600,692	103,790	\$203,687,913

ROPE & STRAND**BARBED WIRE**

73130000	3,035	\$2,841,274	3,636	\$2,857,928	3,391	\$3,098,088
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CLOTH, GRILL, NETTING & FENCING

73141210	175	\$654,174	236	\$776,647	149	\$635,151
73141220	64	\$548,282	70	\$435,127	109	\$357,834
73141230	128	\$587,725	10	\$135,916	11	\$142,227
73141260	0	\$8,812	1	\$5,918	0	\$2,409
73141290	45	\$222,580	33	\$290,663	127	\$339,358
73141410	2,081	\$12,876,273	2,012	\$11,334,624	3,171	\$15,613,299
73141420	1,836	\$7,013,849	1,940	\$5,195,593	2,171	\$6,546,910
73141430	12	\$96,034	7	\$62,429	5	\$41,353
73141460	69	\$470,693	40	\$358,052	54	\$491,004
73141490	2,535	\$16,874,423	1,437	\$9,291,621	2,564	\$15,331,076
73141901	15,029	\$19,306,031	8,147	\$12,855,045	7,842	\$11,325,463
73142000	3,307	\$6,120,054	3,345	\$5,749,202	4,327	\$9,861,745
73143110	37,386	\$44,382,472	35,493	\$40,953,977	37,038	\$45,405,710
73143150	11,789	\$14,870,999	13,834	\$15,648,443	16,014	\$19,090,049
73143900	4,813	\$10,351,807	5,248	\$9,450,007	5,288	\$10,967,018
73144100	17,129	\$21,393,273	17,956	\$20,910,650	18,500	\$22,135,445
73144200	4,011	\$7,070,134	6,892	\$9,886,501	8,730	\$15,205,515
73144930	4,029	\$8,326,079	4,267	\$7,537,030	3,732	\$7,645,158
73144960	3,494	\$9,595,550	5,188	\$11,698,547	4,271	\$9,931,057
73145000	867	\$3,910,646	1,788	\$5,404,686	1,517	\$5,421,037
SUBTOTAL	108,799	\$184,679,890	107,944	\$167,980,678	115,620	\$196,488,818

CLOTH, GRILL, NETTING & FENCING

Source: U.S. International Trade Commission, DataWeb (2015–2017).

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Quantity in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017	
	Quantity	Value	Quantity	Value	Quantity	Value

CHAIN

73151100	20,062	\$63,051,980	17,610	\$54,623,581	19,131	\$59,685,468
73151200	9,908	\$26,066,012	7,527	\$19,584,084	6,697	\$18,458,136
73151900	3,638	\$10,890,567	4,360	\$12,117,301	5,941	\$17,510,419
73152010	9,821	\$16,425,627	10,179	\$16,901,580	12,588	\$19,456,340
73152050	1,394	\$3,077,826	1,112	\$2,261,826	3,503	\$6,272,370
73158100	4,177	\$5,567,254	2,965	\$3,186,989	2,640	\$3,383,526
73158210	4,302	\$8,127,727	4,583	\$7,403,934	5,645	\$9,212,788
73158230	4,046	\$6,694,369	4,080	\$6,011,324	4,204	\$5,842,810
73158250	22,932	\$33,324,006	21,210	\$28,038,185	24,407	\$33,614,646
73158270	4,841	\$7,319,818	3,059	\$4,336,908	3,722	\$5,226,419
73158910	2,130	\$4,911,888	2,065	\$5,091,153	1,825	\$4,808,028
73158930	1,289	\$4,986,431	1,128	\$4,604,438	1,012	\$6,269,729
73158950	807	\$3,646,424	902	\$3,802,773	1,003	\$4,026,283
73159000	3,916	\$11,472,750	3,591	\$11,038,477	4,526	\$11,909,823
SUBTOTAL	93,263	\$205,562,679	84,371	\$179,002,553	96,844	\$205,676,785

CHAIN**NAILS & STAPLES**

73170020	2,358	\$9,170,588	3,474	\$10,786,003	4,779	\$12,695,120
73170030	380	\$1,114,250	215	\$687,245	348	\$1,035,948
73170055	213,349	\$207,229,984	219,645	\$188,489,271	208,506	\$203,855,946
73170065	4,566	\$8,376,548	4,258	\$7,870,649	4,148	\$7,619,138
73170075	12,234	\$17,239,507	15,794	\$19,268,354	12,971	\$16,917,337
SUBTOTAL	232,887	\$243,130,877	243,386	\$227,101,522	230,752	\$242,123,489

NAILS & STAPLES

Source: U.S. International Trade Commission, DataWeb (2015–2017).

AMERICAN WIRE PRODUCERS ASSOCIATION

Annual Imports from China

Quantity in Metric Tons, Value in US Dollars

WIRE PRODUCTS	2015		2016		2017	
	Quantity	Value	Quantity	Value	Quantity	Value

SCREWS, BOLTS & NUTS

73181100	13,183	\$15,681,420	11,122	\$11,992,212	11,504	\$14,414,728
73181200	3,966	\$8,243,640	4,097	\$8,647,293	4,418	\$9,642,661
73181300	4,409	\$12,232,675	3,649	\$11,265,964	3,894	\$12,040,715
73181410	67,816	\$128,595,758	79,036	\$135,694,498	67,270	\$127,869,129
73181450	4,319	\$11,796,817	4,239	\$10,789,320	5,149	\$13,533,954
73181520	177,814	\$293,034,847	165,706	\$251,886,643	166,120	\$276,991,051
73181540	12,229	\$20,756,118	11,326	\$21,193,046	11,700	\$23,648,535
73181550	41,391	\$82,646,269	31,264	\$57,356,933	46,016	\$80,448,754
73181560	3,346	\$15,537,300	3,483	\$16,889,848	3,411	\$16,085,580
73181580	8,283	\$27,430,159	7,321	\$25,415,710	9,194	\$32,163,479
73181900	6,886	\$29,531,560	5,901	\$25,600,334	8,041	\$32,590,505
73182100	3,776	\$10,390,809	3,981	\$10,113,305	3,842	\$10,552,001
73182200	49,625	\$89,826,315	52,904	\$79,055,894	56,503	\$90,443,369
73182300	2,662	\$11,317,738	2,531	\$10,119,938	2,173	\$11,586,843
73182400	1,419	\$7,057,692	1,509	\$6,919,987	1,916	\$8,822,327
73182900	11,469	\$62,333,676	10,699	\$56,325,117	11,119	\$60,047,914
SUBTOTAL	412,593	\$826,412,793	398,768	\$739,266,042	412,270	\$820,881,545

SCREWS, BOLTS & NUTS**SPRINGS**

73201030	732	\$1,217,917	989	\$1,552,414	1,070	\$1,724,539
73201060	11,417	\$11,824,581	9,313	\$9,976,836	13,586	\$14,726,377
73201090	13,794	\$15,431,555	18,711	\$18,206,569	17,682	\$17,517,521
73209010	113	\$872,797	47	\$323,077	37	\$225,748
73209050	7,155	\$15,098,418	6,427	\$14,030,092	7,009	\$16,226,535
SUBTOTAL	33,211	\$44,445,268	35,487	\$44,088,988	39,384	\$50,420,720

SPRINGS**ARTICLES OF STEEL WIRE, NOT ELSEWHERE SPECIFIED**

73262000	N/A	\$214,329,534	N/A	\$237,011,868	N/A	\$213,066,741
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**TOTAL
ALL WIRE
PRODUCTS**

2015		2016		2017	
Quantity	Value	Quantity	Value	Quantity	Value
971,308	\$1,902,564,392	977,592	\$1,794,910,271	1,002,051	\$1,935,444,099

Source: U.S. International Trade Commission, DataWeb (2015–2017).