

**GDLSK**

GRUNFELD DESIDERIO LEBOWITZ  
SILVERMAN & KLESTADT **LLP**



# International Trade Practice

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## Why GDLSK

GDLSK is the leading international trade and customs law firm in the United States and GDLSK's antidumping (ADD) and countervailing duty (CVD) practice is unrivaled. Clients choose us for our:

- **Focus.** GDLSK has taken its place at the top of the market with an exclusive focus on trade and customs, with all of our 35+ lawyers dedicating their entire practices to customs and trade issues.
- **Experience.** Our founding partners were present at the creation of the United States' modern customs and trade practice in the 1980s; these partners remain active today and have passed on their institutional knowledge to the next generation of GDLSK attorneys. Our team's unique ability to provide expert advice on trade and customs issues was not acquired from merely reading judicial and administrative decisions.
- **Impact.** Since GDLSK was founded in 1985, we have been responsible for multiple seminal decisions impacting U.S. customs and trade law and policy. GDLSK led the opening of the U.S. market to exporters in the Far East. We consistently achieve highly favorable results, both public (before the administrative agencies and the courts) and confidential (which are known only to GDLSK and our clients).
- **Clients.** We counsel large multinational corporations, foreign governments, trade associations, and small family-owned businesses on "bet-the-business" issues that have arisen as a result of congressional legislation and administrative policies intended to protect national security, prevent fraud, and prohibit goods made with forced labor from entering the U.S. (including, for instance, forced labor exclusions, trade remedies, and ADD/CVD evasions). We represent clients before multiple U.S. government agencies for ADD/CVD – the Department of Commerce ("DOC"), U.S. International Trade Commission ("USITC"), and Customs and Border Protection ("CBP") – and federal courts – the Court of International Trade ("CIT") and Court of Appeals for the Federal Circuit ("CAFC").
- **Capacity.** GDLSK resources span the U.S. and the globe. The firm has 35+ U.S.-based lawyers located strategically in New York, Washington, D.C., Milwaukee, Cleveland, and Los Angeles. GDLSK's ADD/CVD practice has more than 10 attorneys that focus almost exclusively on ADD/CVD matters, supported by GDLSK accountants and professional staff located in Hong Kong, Vietnam, India, and Germany. Together with our network of global tax and trade counsel and accounting firms, we provide our clients with expert

advice whenever and wherever our assistance is required. Our capacity and expertise on complex technical, “devil is in the details” issues is unrivaled.

- **Results.** Our results speak for themselves. Our record before the DOC, USITC, CBP, CIT, and CAFC is second to none. Many of our success stories are on the public record, with GDLSK identified as counsel of record in published agency and judicial decisions. Others are known only to GDLSK and our clients. In some cases, success is obvious; in others, the public record may not reveal why the result was a victory.

“Grunfeld Desiderio Lebowitz  
Silverman & Klestadt LLP continued to rack up **critical wins for foreign exporters** in the past year, including a major Chinese tire manufacturer for which it **secured a rare 0% dumping rate**, and successfully defended against fraud allegations by U.S. Customs and Border Protection, earning the firm a spot among Law360’s 2023 International Trade Groups of the Year.”

- Law360



## The GDLSK Trade Group

Present at the birth of the Trade Agreements Act of 1979 and the World Trade Organization in 1994, GDLSK attorneys have handled our clients' most challenging trade matters for decades.

We advise on the full spectrum of import-related trade issues for:

- ◆ Foreign manufacturers and / or exporters
- ◆ Foreign governments
- ◆ U.S. importers
- ◆ Domestic producers importing parts, components, and materials
- ◆ Customhouse brokers and sureties
- ◆ Trade and professional associations

GDLSK does not represent domestic manufacturers requesting relief from imports.

GDLSK is one of the most active law firms in anti-dumping duty and countervailing duty trade cases before the U.S. Department of Commerce and U.S. International Trade Commission, in which we have an unparalleled record of success. We also litigate disputes at the U.S. Court of International Trade, U.S. Court of Appeals for the Federal Circuit, and other forums.

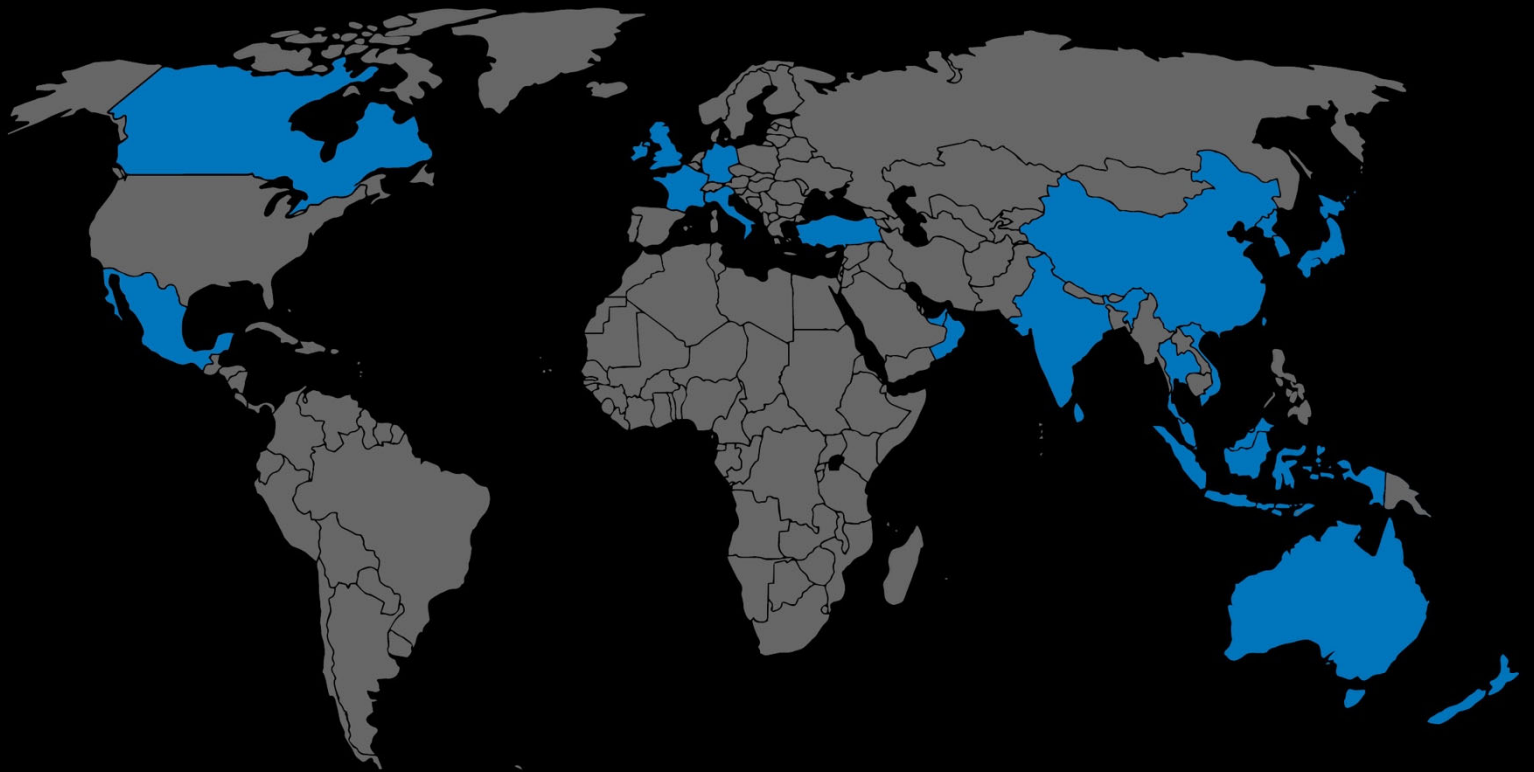
Our outstanding results stem from GDLSK's unique network and history in shaping international trade. We maintain longstanding working relationships with DOC, USITC, and Customs and Border Protection (CBP) personnel. Our lawyers advocate effectively because we understand the perspective of trade regulators and other government officials. The majority of our trade group members have government experience. Before joining GDLSK, our attorneys have litigated trade cases on behalf of the government at the Department of Justice, served as analysts on ADD/CVD cases at the DOC, worked at CBP Headquarters, and clerked at the CIT. GDLSK partners include a past Deputy Assistant Secretary of Commerce in the U.S. and a commissioner in India's Customs Department.

The institutional knowledge that we bring to trade issues plays a role in every one of our engagements and gives us a level of insight that cannot be replicated.

## **GDLSK: PIONEERS IN TRADE**

Our influential role in international trade dates back to the creation of modern trade practice. GDLSK's founding partners were present at the negotiation of the Trade Agreements Act of 1979, the Custom Courts Act of 1980, the Harmonized Tariff Schedule adoption in 1980, and the Uruguay Round Agreement of 1994 that established the World Trade Organization. GDLSK partners also led the opening of the Chinese market and continue our pioneering tradition today in representing exporters and governments from additional countries in the Far East and around the world.

## **GDLSK REPRESENTS TRADE CLIENTS ALL OVER THE WORLD**



CHINA, UNITED KINGDOM, FRANCE, CANADA, GERMANY, ITALY, TURKEY, INDIA, JAPAN, TAIWAN, UAE, KOREA, VIETNAM, THAILAND, SRI LANKA, MALAYSIA, SINGAPORE, OMAN, INDONESIA, AUSTRALIA, MEXICO

## GDLSK Trade Services

GDLSK provides clients with comprehensive legal services in connection with international trade activity, including:

- ◆ Offering confidential business planning advice before problems arise;
- ◆ Representing clients before myriad U.S. governmental agencies responsible for administering import and export laws;
- ◆ Litigating matters before the CIT, CAFC, and other federal courts; and
- ◆ Assisting clients in obtaining legislative solutions to politically sensitive problems.

When ADD/CVD matters arise, GDLSK provides a full suite of solutions. This includes, but is not limited to:

- ◆ Putting on a full defense of an ADD/CVD investigation at USITC on behalf of individual manufacturer/exporters, entire foreign industries, individual importers, and/or coalitions of importers;
- ◆ Representing major foreign producer/exporters selected as “mandatory respondents” by the DOC in AD/CVD proceedings and seeking to obtain the lowest ADD/CVD rate possible;
- ◆ Developing sourcing and pricing solutions for U.S. importers and foreign manufacturers/exporters impacted by ongoing ADD/CVD proceedings;
- ◆ Conducting ADD/CVD audits in anticipation of ADD/CVD cases to assess liability and to recommend methods to reduce or eliminate future liability;
- ◆ Advice and counsel on ADD/CVD scope and circumvention issues and solutions and strategies for limiting or avoiding ADD/CVD liability; and
- ◆ Providing full defense and advice when CBP questions whether imports are subject to ADD/CVD, both in the normal course of business and in more formal EAPA investigations.

GDLSK’s advice depends on our clients’ need and the breadth and depth of our knowledge and experience allows us to provide a practical solution for even the most complex scenario.

### **U.S. International Trade Commission Negative Injury Findings**

GDLSK represents foreign manufacturers, exporters, importers, and U.S. customers at the USITC to defend claims by U.S. producers that a domestic industry is being materially injured or threatened with material injury by dumped or subsidized imports. These cases require that an experienced team of GDLSK attorneys work closely with industry experts, economists, and counsel for other respondents. Our representation includes drafting responses to comprehensive questionnaires, compiling and submitting factual information, preparing briefs, participating at formal hearings, and coordinating with other parties. Our record of success at the USITC is second to none. Our victories span many industries in many countries, including:

- ◆ *Tin Mill Products from Canada, China, and Germany* (GDLSK represented the Chinese industry and U.S. customers)
- ◆ *Freight Rail Coupler Systems from China* (GDLSK represented importers)
- ◆ *Fabricate Structural Steel from China, Mexico, and Canada* (GDLSK represented the Chinese industry and U.S. customers)
- ◆ *R-134a from China* (GDLSK represented the Chinese industry and U.S. customers)
- ◆ *Polytetrafluoroethylene Resin from China* (GDLSK represented the Chinese industry and U.S. customers)
- ◆ *Ball Bearings from Korea* (GDLSK represented foreign manufacturers)
- ◆ *Steel Nails from Sri Lanka, India, Thailand, Oman, Turkey, and Thailand* (GDLSK represented manufacturers in Sri Lanka and India and their U.S. customers)
- ◆ *Mobile Access Equipment from China* (USITC decision was negative material injury, but affirmative threat, saving clients millions of dollars because of later effective date)



## **U.S. Department of Commerce ADD/CVD Findings**

GDLSK represents foreign manufacturers and exporters before the DOC in defending against claims by U.S. producers that imported merchandise is sold at less than fair value (ADD cases) and/or subsidized (CVD cases). DOC cases are extraordinarily complex. Failure to successfully participate could result in the DOC relying on adverse facts available (AFA) to calculate prohibitive ADD/CVD duty rates. In contrast, successful participation could result in *de minimis* ADD/CVD rates and exclusion of a foreign manufacturer from an ADD/CVD Order. Our success stories are the reason why companies “bet their business” on GDLSK.

### ***De Minimis in Investigation***

*Passenger Vehicle and Light Truck  
Tires (PVLТ) from Vietnam  
Steel Nails from Taiwan  
Steel Nails from Sri Lanka*

### ***De Minimis in Annual Review***

*PVLТ from China  
Activated Carbon from China*

### ***<2% in Consecutive Annual Reviews***

*Mechanical Tubing from India*

Success in the majority of cases is not limited to achieving *de minimis* rates. For many clients, success means obtaining the lowest ADD/CVD rate among companies subject to individual investigation. For other clients, success means obtaining ADD/CVD rates which allow the company to remain competitive in the U.S. market and at the same time realize a reasonable profit. We are able to project probable results early in ADD/CVD investigations, and advise clients as to how these investigations impact market conditions. We are honest with our clients as to probable results, so that they can make informed decisions as to their business operations when ADD/CVD Orders are in place.

ADD/CVD cases can be devastating to a foreign industry but with experienced counsel like GDLSK, companies can successfully navigate this difficult road.

**U.S. Department of Commerce  
Scope**

GDLSK provides clients with confidential advice as to whether their products can be drawn into an existing ADD/CVD order through a scope and/or an anticircumvention (AC) proceeding. The following cases are among our recent formal “scope” success stories.

Bathroom furniture	<b>Found outside the scope of</b>	<i>Wooden Bedroom Furniture from China</i>
Mobile utility carts		<i>Hand Trucks from China</i>
Wheel caps		<i>Chassis from China</i>
Light poles		<i>Aluminum Extrusions from China</i>
Collapsible shelters		<i>Aluminum Extrusions from China</i>
Shrimp dumplings		<i>Frozen Warmwater Shrimp from China</i>
Mechanical tubing		<i>Circular Welded Non-Alloy Pipe from Mexico</i>

**U.S. Department of Commerce  
Circumvention**

Rather than file new petitions targeting products from additional countries, domestic interests have at times filed AC petitions with the DOC claiming that third country processing is not sufficient to remove a product from an existing ADD/CVD order. DOC also has self-initiated AC proceedings. GDLSK responds to AC allegations with the same expertise and dedication provided in our traditional ADD/CVD practice. Our recent AC success stories include:

HFC components from China	<b>Found not circumventing</b>	<i>ADD order on HFC blends from China</i>
Pipe from the UAE		<i>ADD order on pipe from India</i>
Solar cells/modules from Malaysia		<i>ADD/CVD order on solar cells/modules from China</i>
Butt weld pipe fittings from Malaysia		<i>Butt weld pipe fittings from China</i>
Quartz surface products from Malaysia		<i>ADD/CVD orders on Chinese products</i>

## **Appellate Reversals of Adverse ADD/CVD Decisions**

The Court of International Trade (CIT) and Court of Appeals for the Federal Circuit (CAFC) are courts of exclusive jurisdiction which are tasked with hearing and resolving all issues arising under the customs and trade laws. GDLSK trade attorneys have extensive litigation experience.

We are responsible for landmark judicial decisions which have industry-wide impact, as well as cases which have resulted in victories solely for our clients based on the unique record we had developed before the agency. We support the DOC/USITC when we win before these agencies.

When we lose, we challenge the agency decision in the CIT/CAFC. Below are recent GDLSK wins reversing adverse DOC decisions.

- ◆ *Wind Towers from Vietnam*: CIT reversed Commerce on two complex substantive issues, and CAFC reversed CIT/Commerce on two other issues, reducing investigation rate from 50% to *de minimis*, resulting in respondent being excluded from ADD order.
- ◆ *Pipe from India*: CIT reduced Annual Review ADD rate from 11.83% to zero (seminal).
- ◆ *Non-Malleable Cast Iron Pipe Fittings from China*: CIT reversed Commerce decisions that products are within scope of ADD/CVD orders.
- ◆ *Solar Panels from China*: CIT reversed Commerce decisions that China's refusal to respond to EBCP questions justified reliance on AFA for this program (seminal).
- ◆ *Nails from Taiwan*: CIT reversed DOC AFA determination, reducing rate from 78.76% to zero.
- ◆ *Nails from China*: CAFC reversed CIT decision that plaintiff had not exhausted administrative remedies, leading to reversal of DOC decision on effective date of scope decision.
- ◆ *Aluminum Extrusions from China*: CIT/CAFC reversed DOC on effective date of anticircumvention decision (seminal).
- ◆ *Nonwoven Ribbons from China*: CAFC reversed DOC/CIT on ADD rate applicable to co-operative separate rate company (seminal).
- ◆ *PVLT from China*: CAFC reversed DOC/CIT on selecting merely one respondent in an Annual Review (seminal).
- ◆ *Nails from Taiwan*: CAFC reversed Commerce/CIT twice as to Commerce's calculation of the denominator in its differential pricing analysis (ongoing; on fourth remand).

## GDLSK Experience

### Non-Market Economies (NME)

*People's Republic of China, Socialist Republic of Vietnam*

§301 Investigations - People's Republic of China	§301 INV.
1-Hydroxyethylidene-1, 1-Diphosphonic Acid / PRC	CVD
1,1,1,2-Tetrafluoroethane (R-134a) / PRC	CVD
§301 Investigations / PRC	§301 INV.
Activated Carbon / PRC	ADD
Activated Carbon (2021) / PRC	EAPA / SCOPE
Alkyl Phosphate Esters / PRC	ADD, CVD
Aluminum Extrusions / PRC, Vietnam	ADD, CVD
Aluminum Foil / PRC	ADD, CVD
Aluminum Foil (Capacitor Foil) / PRC	EAPA / SCOPE
Aluminum Wire and Cable / Vietnam	SCOP / ANTI-CIRC (PRC)
Automotive Replacement Windshields / PRC	ADD
Ball Bearings / PRC	ADD
Biaxial Integral Geogrid Products / PRC	CVD
Bicycles / PRC	ADD
Bicycles / PRC	LANHAM ACT
Butt-Weld Pipe Fittings - Malaysia (2018)	ANTI-CIRC (PRC)
Calcium Hypochlorite / PRC	ADD, CVD
Carbazole Violet Pigment / PRC	ADD
Carbon Steel Butt-Weld Pipe Fittings / PRC	ADD
Carton Closing Steels / PRC	ADD
Cased Pencils / PRC	ADD
Cast Iron Soil Pipe Fittings / PRC	CVD
Ceramic Tile Products / PRC	ADD
Chlorinated Isocyanurates / PRC	CVD
Circular Welded Carbon Quality Steel Pipe / PRC	ADD, CVD
Citric Acid and Certain Citrate Salts / PRC	ADD, CVD
Clothes Pins / PRC §406 – MARKET	§406 – MARKET DISRUPTION
Coated Flat Sheet Paper / PRC	ADD
Cold-Drawn Mechanical Tubing of Alloy and Carbon Steel / PRC	ADD, CVD
Cold-Rolled Steel Flat Products / PRC	ADD, CVD
Cold-Rolled Steel Flat Products / Vietnam	ADD
Collated Steel Stables / PRC	ADD / ANTI-CIRC
Common Alloy Aluminum Sheet / PRC	ADD, CVD
Compact Ductile Iron Waterworks Fittings /	ADD
Copper Pipe and Tube / Vietnam	ADD

CORE / CRS from Japan ANTI-CIRC (PRC)	<i>ANTI-CIRC (PRC)</i>
Corrosion Inhibitors / PRC	<i>ADD, CVD</i>
Corrosion-Resistant Steel Products / PRC	<i>ADD, CVD</i>
Corrosion-Resistant Steel Products / Vietnam	<i>ADD</i>
Cotton Shop Towels / PRC	<i>ADD</i>
Creatine Monohydrate / PRC	<i>ADD</i>
Crystalline Silicon Photovoltaic Cells / PRC	<i>ADD, CVD</i>
Crystalline Silicon Photovoltaic Cells (Whether or Not Assembled Into Modules) / Malaysia	<i>ANTI-CIRC (PRC)</i>
Crystalline Silicon Photovoltaic Cells (Whether or Not Assembled Into Modules) / Thailand	<i>ANTI-CIRC (PRC)</i>
Crystalline Silicon Photovoltaic Cells (Whether or Not Assembled Into Modules) / Vietnam	<i>ANTI-CIRC (PRC)</i>
Crystalline Silicon Photovoltaic Cells (Whether or Not Assembled Into Modules) / PRC	<i>ADD, CVD</i>
Diamond Sawblades / PRC	<i>ADD</i>
Difluoromethane (R-32) / PRC	<i>ADD</i>
Disposable Aluminum Containers	<i>ADD, CVD</i>
Drawn Stainless Steel Sinks / PRC	<i>ADD, CVD</i>
Ductile Iron Waterworks Fittings / PRC	<i>§406 – MARKET DISRUPTION</i>
Electric Oscillating Fans / PRC	<i>ADD</i>
Fabricated Structural Steel / PRC	<i>ADD, CVD</i>
Ferrosilicon / PRC	<i>ADD</i>
Fine Denier Polyester Staple Fiber / PRC	<i>CVD</i>
Flexible Magnets / PRC	<i>CVD</i>
Forged Steel Fittings / PRC	<i>CVD</i>
Freight Rail Couplers / PRC	<i>ADD, CVD</i>
Fresh Garlic / PRC	<i>ADD</i>
Freshwater Crawfish Tailmeat / PRC	<i>ADD</i>
Front Seating Valves / PRC	<i>ADD</i>
Frozen Fish Fillets / Vietnam	<i>ADD</i>
Frozen Warmwater Shrimp / PRC	<i>ADD, CVD</i>
Frozen Warmwater Shrimp / Vietnam	<i>ADD</i>
Galvanized Steel Wire / PRC	<i>ADD</i>
Garlic / PRC	<i>ADD</i>
Garlic (IQF Garlic Cloves) / PRC	<i>EAPA / SCOPE</i>
Glass Containers / PRC	<i>CVD</i>
Glycine / PRC	<i>ADD</i>
Hardwood Plywood Products / PRC	<i>ADD, CVD</i>
Helical Spring Lock Washers / PRC	<i>ADD</i>
High Pressure Steel Cylinders / PRC	<i>ADD, CVD</i>
Honey / PRC	<i>ADD</i>
Hot-Rolled Carbon Steel Coil / PRC	<i>ADD</i>
Hydrofluorocarbon Blends and Components / PRC	<i>ADD</i>

Hydrofluorocarbon Blend R-125	<i>ANTI-CIRC (PRC)</i>
Hydrofluorocarbon Blend R-32 (2020)	<i>ANTI-CIRC (PRC)</i>
Hydrofluorocarbon Blend Unpatented R421-A (2020)	<i>ANTI-CIRC (PRC)</i>
Hydrofluorocarbon (HFC) - Indian Blends (2020) - India	<i>ANTI-CIRC (PRC)</i>
Ironing Boards / PRC	<i>ADD</i>
Lawn and Garden Fence Posts / PRC	<i>ADD</i>
Lined Paper Products / PRC	<i>ADD</i>
Low Speed Personal Transportation Vehicles	<i>ADD, CVD</i>
Magnesia Carbon Bricks / PRC	<i>CVD</i>
Malleable Cast Iron Pipe Fittings / PRC	<i>ADD</i>
Mattresses / PRC, Vietnam	<i>ADD</i>
Mattresses (Compact Cribs) / PRC	<i>EAPA / SCOPE</i>
Mechanical Pipe / PRC	<i>ADD</i>
Mechanical Tubing / PRC	<i>ADD</i>
Mobile Access Equipment / PRC	<i>ADD, CVD</i>
Monosodium Glutamate / PRC	<i>ADD</i>
Multi-Layered Wood Flooring / PRC	<i>ADD, CVD</i>
Narrow Woven Ribbon / PRC	<i>ADD, CVD</i>
Non-Frozen Concentrated Apple Juice / PRC	<i>ADD</i>
Non-Malleable Cast Iron Pipe Fittings / PRC	<i>ADD</i>
Off-Grid Solar Panel (2018) / PRC	<i>EAPA / SCOPE</i>
Off-the-Road Tires / PRC	<i>ADD, CVD</i>
Oil Country Tubular Goods / PRC	<i>CVD</i>
Paper Clips / PRC	<i>ADD</i>
Paper File Folders / PRC, Vietnam	<i>ADD</i>
Paper Plates / PRC, Vietnam	<i>ADD, CVD</i>
Paper Shopping Bags / PRC	<i>ADD, CVD</i>
Passenger Vehicle and Light Truck Tires / PRC	<i>ADD, CVD</i>
Passenger Vehicle and Light Truck Tires / Vietnam	<i>ADD, CVD</i>
Pea Protein / PRC	<i>ADD, CVD</i>
Pentafluoroethane (R-125) / PRC	<i>ADD</i>
Petroleum Wax Candles / PRC	<i>ADD</i>
Photovoltaic Solar Cells / PRC	<i>ADD, CVD</i>
Plastic Decorative Ribbon / PRC	<i>CVD</i>
Polytetrafluoroethylene (PTFE) / PRC	<i>ADD</i>
Polyethylene Retail Carrier Bags / PRC	<i>ADD</i>
Polyethylene Terephthalate (PET) Film, Sheet, and Strip / PRC	<i>ADD</i>
Polyester Staple Fiber / PRC	<i>ADD, CVD</i>
Polyvinyl Alcohol / PRC	<i>ADD</i>
Potassium Permanganate / PRC	<i>ADD</i>
Preserved Mushrooms / PRC	<i>ADD</i>
Prestressed Concrete Steel Rail Tie Wire / PRC	<i>ADD</i>
Quartz Surface Products / PRC	<i>ADD, CVD</i>

Quartz Surface Products (2021 & 2022) / Malaysia	<i>EAPA / SCOPE</i>
(R-125) Pentafluoroethane / PRC	<i>CVD</i>
(R-134a) 1,1,1,2-Tetrafluoroethane / PRC	<i>ADD</i>
Raw Flexible Magnets / PRC	<i>ADD, CVD</i>
Raw Honey / Vietnam	<i>ADD</i>
Saccharin / PRC	<i>ADD</i>
Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe / PRC	<i>CVD</i>
Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe / PRC	<i>EAPA / SCOPE</i>
Seamless Refined Copper Pipe and Tube / PRC, Vietnam	<i>ADD</i>
Sodium Hexametaphosphate / PRC	<i>ADD</i>
Steel Bars / PRC	<i>EAPA / SCOPE</i>
Steel Concrete Reinforcing Bars / PRC	<i>ADD</i>
Steel Grating / PRC	<i>CVD</i>
Steel Kegs / PRC	<i>ADD</i>
Steel Nails / PRC	<i>ADD</i>
Steel Nails / Vietnam	<i>ADD, CVD</i>
Steel Threaded Rod / PRC	<i>ADD</i>
Steel Plate (in Mexico) / PRC	<i>ADD</i>
Steel Racks / PRC	<i>ADD</i>
Steel Threaded Rod / PRC	<i>ADD</i>
Steel Threaded Rod / PRC	<i>EAPA / SCOPE</i>
Steel Trailer Wheels (2021) / PRC	<i>EAPA / SCOPE</i>
Steel Wheels / PRC	<i>ADD</i>
Steel Wire Garment Hangers / Vietnam	<i>CVD</i>
Steel Wire Rod / PRC	<i>ADD, CVD</i>
Steel Wire Rope / PRC	<i>ADD</i>
Tapered Roller Bearings / PRC	<i>ADD</i>
Tin Mill Products / PRC	<i>ADD</i>
Tissue and Crepe Paper Products / PRC	<i>ADD</i>
Tool Chests / PRC	<i>ADD</i>
Tool Chests and Cabinets / PRC	<i>CVD</i>
Truck and Bus Tires / PRC	<i>ADD, CVD</i>
Tungsten Products / PRC	<i>§406 – MARKET DISRUPTION</i>
Utility Scale Wind Towers / PRC	<i>ADD, CVD</i>
Utility Scale Wind Towers / Vietnam	<i>ADD</i>
Vertical Shaft Engines (between 99cc and 225cc, and Parts Thereof) / PRC	<i>ADD, CVD</i>
Vertical Shaft Engines (between 225cc and 999cc, and Parts Thereof) / PRC	<i>ADD, CVD</i>
Welded Steel Pipe - India	<i>ANTI-CIRC (PRC)</i>
Welded Stainless Steel Pressure Pipe / Vietnam	<i>ADD</i>
Wheel Caps, PRC Wooden Bedroom Furniture / PRC	<i>EAPA / SCOPE</i>
Wooden Cabinets and Vanities / PRC	<i>ADD, CVD, ANTI-CIRC / SCOPE</i>
Wooden Furniture / PRC	<i>ADD</i>

Xanthan Gum / PRC	ADD
Zinc Nail Anchors / PRC	SCOPE

### Market Economies (ME)

*Hong Kong, Taiwan, India, Indonesia, Malaysia, Singapore, Thailand, Sri Lanka, Japan, Korea, UK, Germany, Italy, Turkey, Brazil, Canada, Mexico, UAE, Oman, & Various Countries*

§232 Investigation on Aluminum and Steel	§232 INV.
§301 Investigations - European Community	§301 INV.
§301 Semiconductors - Japan	§301 INV.
§337 Investigation on Calculators	§337 INV.
§337 Investigation on Skateboards	§337 INV.
§337 Investigation on Vertical Milling Machines	§337 INV.
§337 Investigation on Woodworking Machines	§337 INV.
Aluminum Extrusions / Malaysia	ADD
Aluminum Extrusions / UAE	ADD
Aluminum Extrusions / Indonesia	ADD, CVD
Antifriction Bearings / Hong Kong, Canada, Japan, Korea	ADD
Antifriction Bearings / Germany, France, Italy, Portugal and UK	ADD
Ball Bearings / UK, Germany, Turkey	ADD
Ball Bearings / Germany and Japan	LANHAM ACT
Boltless Steel Shelving / India	ADD
Calcium Hypochlorite / Japan	ADD
Carbon Butt-weld Steel Pipe Fittings / Taiwan, Thailand	ADD
Carbon Steel Pipe / Turkey	ADD
Carbon Steel Wire Rod / Malaysia, Turkey	ADD
Carbon Steel Wire Rod (in Indonesia) / Turkey	ADD
Carbon Steel Flanges / India	ADD, CVD
Ceramic Tile / India	ADD, CVD
Circular Welded Carbon Quality Steel Pipe / India, Oman	ADD
Circular Welded Carbon Steel Pipes and Tubes / Thailand	ADD
Circular Welded Non-Alloy Steel Pipe / Mexico	ADD
Circular Welded Pipe / UAE	ADD
Clothes Pins §201 ESCAPE	§201 ESCAPE CLAUSE
Cold-Drawn Mechanical Tubing / Italy, India	ADD
Cold-Rolled Carbon Steel Flat Products / Germany	CVD
Cold Rolled Flat Carbon Steel Products / Germany	ADD
Color Televisions / Taiwan, Korea	ADD
Concrete Steel Reinforcing Bars / Singapore	ADD
Concrete Steel Reinforcing Bars / Turkey	ADD, CVD
Concrete Steel Reinforcing Bars (in Singapore) / Turkey	ADD
Cooking Ware	§201 ESCAPE CLAUSE



Corrosion Resistant Flat Rolled Carbon Steel Products / Germany	<i>ADD, CVD</i>
Crystalline Silicon Photovoltaic Cells (Whether or Not Assembled Into Modules) / Malaysia, Thailand, Cambodia	<i>ADD, CVD</i>
Diamond Sawblades / Korea	<i>ADD</i>
Dynamic Random-Access Memory Semiconductors / Japan	<i>ADD</i>
Flowers / Mexico	<i>ADD</i>
Forged Steel Crankshafts / Germany	<i>ADD</i>
Forged Steel Fluid End Blocks / India	<i>ADD, CVD</i>
Forklift Trucks / Japan	<i>ADD</i>
Frozen Concentrated Orange Juice / Brazil	<i>ADD</i>
Frozen Shrimps / India	<i>ADD</i>
Frozen Warmwater Shrimp / India	<i>ADD</i>
Industrial Belts / Italy	<i>ADD</i>
Industrial Belts / Germany	<i>ADD</i>
Industrial Belts Offshore Platform Jackets and Piles / Japan	<i>ADD</i>
Iron Fasteners (in Canada) / Turkey	<i>ADD</i>
Lead and Bismuth Steel / Germany	<i>ADD, CVD</i>
Leather Wearing Apparel	<i>§201 ESCAPE CLAUSE</i>
Leather Wearing Apparel / Mexico	<i>CVD</i>
Light-Walled Rectangular Pipe / Taiwan	<i>ADD</i>
Light-Walled Rectangular Pipe and Tube / Canada	<i>ADD</i>
Light Weight Thermal Paper / Taiwan	<i>ADD</i>
Lined Paper Products / India	<i>ADD</i>
Lumber / Canada	<i>ADD</i>
Manmade Fiber Sweaters / Hong Kong	<i>ADD</i>
Mattresses/ India	<i>ADD</i>
Mattresses/ Mexico	<i>ADD</i>
Non-Egg Dry Pasta / Italy	<i>ADD, CVD</i>
Non-Egg Dry Pasta / Turkey	<i>ADD</i>
Non-Refillable Steel Cylinders / India	<i>ADD, CVD</i>
Offshore Platform Jackets and Piles / Korea	<i>ADD, CVD</i>
Oil Country Tubular Goods / Taiwan	<i>CVD</i>
Oil Country Tubular Goods / Thailand	<i>ADD</i>
Paper File Folders / India	<i>ADD, CVD</i>
Paper Plates / Thailand	<i>ADD, CVD</i>
Passenger Vehicle and Light Truck Tires / Thailand	<i>ADD</i>
Photographic Color Paper / Japan	<i>ADD</i>
Polyester Staple Fiber / Korea	<i>ADD</i>
Polyethylene Terephthalate (PET) Film, Sheet, and Strip / India	<i>ADD</i>
Polyvinyl Alcohol / Japan	<i>ADD</i>
Railroad Freight Car Bearings / Germany	<i>LANHAM ACT</i>
Residential Door Locks / Taiwan	<i>ADD</i>
Small-Diameter Carbon Steel Pipe / Taiwan	<i>ADD</i>

Stainless Steel Bar / India	<i>ADD</i>
Stainless Steel Pipe / Taiwan	<i>ADD</i>
Stainless Steel Butt-Weld Pipe Fittings / Malaysia	<i>ADD</i>
Stainless Steel Sheet and Strip in Coils / Taiwan	<i>ADD</i>
Steel (Flat Rolled, Long and Tine Mill)	<i>§201 ESCAPE CLAUSE</i>
Steel Nails / Taiwan	<i>ADD, CVD</i>
Steel Nails / India	<i>ADD, CVD</i>
Steel Nails / Malaysia	<i>ADD</i>
Steel Nails / Sri Lanka	<i>ADD, CVD</i>
Steel Nails / UAE	<i>ADD</i>
Steel Wire Rod / Germany	<i>ADD</i>
Sugar / Canada	<i>ADD</i>
Tapered Roller Bearings / Germany	<i>ADD</i>
Television Receivers / Japan	<i>ADD</i>
Textiles and Apparel / Various Countries	<i>CVD</i>
Truck and Bus Tires / Thailand	<i>ADD</i>
Welded Stainless Steel Pressure Pipe / Malaysia	<i>ADD</i>
Welded Stainless Steel Pressure Pipe / Thailand	<i>ADD</i>

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