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September 12, 2014

VIA ELECTRONIC FILING

The Honorable Penny Pritzker
Secretary of Commerce
Enforcement and Compliance
Central Records Unit, Rm. 1870
U.S. Department of Commerce
14th St. & Constitution Ave., N.W.
Washington, D.C. 20230

Case No. C-570-017
Investigation
Total Pages: 34
E&C/Office VII

PUBLIC DOCUMENT

Re: *Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China—Petitioner's Critical Circumstances Allegation*

Dear Secretary Pritzker:

On behalf of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC (the "USW"), and pursuant to 19 U.S.C. § 1671b(e) and section 351.206 of the Department of Commerce's regulations, we hereby allege that critical circumstances exist with respect to imports of certain passenger vehicle and light truck ("PVLТ") tires from the People's Republic of China and submit factual information providing a reasonable basis to believe or suspect that such critical circumstances exist.¹

¹ This submission contains new factual information within the meaning of 19 C.F.R. § 351.102(b)(21)(ii), *i.e.*, factual information in support of an allegation. *See* 19 C.F.R. § 351.301(b).

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I. Introduction

Pursuant to 19 U.S.C. § 1671b(e), if the petitioner timely alleges critical circumstances, the Department will consider “whether there is a reasonable basis to believe or suspect” that (1) the countervailable subsidies that have been alleged are inconsistent with the Agreement on Subsidies and Countervailing Measures (“SCM Agreement”) and (2) “there have been massive imports of the subject merchandise over a relatively short period.”² This provision is designed, in part, “to deter efforts to circumvent, or preempt, the application of antidumping or countervailing duties by entering large quantities of imports that are being sold at less than fair value or subsidized prior to a preliminary determination by the Commerce Department.”³ The Department may make a preliminary critical circumstances determination any time after the initiation of an investigation; the agency need not wait until the issuance of a preliminary determination of subsidies.⁴

As reviewed below, in the subject proceeding the criteria to demonstrate that there is reason to believe or suspect that critical circumstances exist are met. Accordingly, we request that the Department issue a preliminary affirmative determination of critical circumstances at the earliest practical time, but no later than the preliminary determination, which is currently scheduled for November 21, 2014.⁵

² 19 U.S.C. § 1671b(e)(1).

³ S. Rep. No. 100-71, at 93 (1987).

⁴ *Id.* at 92 (noting the Department’s practice of typically delaying a preliminary critical circumstances determination until the preliminary determination of subsidies or sales at less than fair value and stating that “{t}he Committee believes that findings of critical circumstances should be made promptly as soon as the Commerce Department determines that the statutory criteria are met”).

⁵ *See* 19 C.F.R. § 351.206(c)(2)(i).

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II. Exports of Subject Merchandise Have Benefited from Countervailable Subsidies that Are Prohibited by the SCM Agreement.

To determine whether there is a reason to believe or suspect that the alleged countervailable subsidies are inconsistent with the SCM Agreement within the meaning of 19 U.S.C. § 1671b(e)(1)(A), the Department will examine whether any of the subsidy programs at issue are contingent on export performance or on the use of domestic goods over imported goods.⁶ If such programs have been alleged, the first prong of 19 U.S.C. § 1671b(e)(1) is satisfied.⁷

Here, the USW alleged, and the Department initiated on, a large number of countervailable subsidy programs that are either dependent upon export performance or on the use of domestic goods over imports.⁸ In addition, the Department has found many of these programs to be countervailable in previous countervailing duty proceedings.⁹ Alleged countervailable subsidies dependent on export performance include: (1) discounted loans for export-oriented enterprises, (2) export buyer's credits and export seller's credits from state-owned banks, (3) export credit insurance subsidies, (4) export credit guarantees, (5) export interest subsidy funds for enterprises located in Guangdong and Zhejiang provinces, and (6)

⁶ See, e.g., *Drill Pipe from the People's Republic of China: Notice of Preliminary Affirmative Determination of Critical Circumstances*, 75 Fed. Reg. 49,891, 49,892 (Dep't Commerce Aug. 16, 2010)

⁷ See, e.g., *Countervailing Duty Investigation of Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, From the People's Republic of China: Preliminary Determination of Critical Circumstances*, 77 Fed. Reg. 5487, 5488 (Dep't Commerce Feb. 3, 2012) (finding a reason to believe to suspect that there were subsidy allegations inconsistent with the SCM Agreement based on the information contained in the petition and on prior investigations finding some of the alleged programs to constitute export or import substitution subsidies).

⁸ See Petitions for the Imposition of Antidumping Duties and Countervailing Duties on Behalf of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC (June 3, 2014) at III-22 – III-25 (“Petition”); Enforcement and Compliance, Office of AD/CVD Enforcement, “Countervailing Duty Investigation Initiation Checklist,” July 14, 2014, at 8-47 (“Checklist”).

⁹ Petition at III-22 – III-25.

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funds for “outward expansion” of industries in Guangdong province.¹⁰ Alleged countervailable subsidies dependent on the use of domestic goods over imported goods include: (1) income tax credits on purchases of domestically-produced equipment by foreign-invested enterprises, (2) income tax credits for domestically-owned companies purchasing Chinese-made equipment, (3) value-added tax refunds for foreign-invested enterprises on purchases of Chinese-made equipment, and (4) value-added tax refunds for domestic firms on purchases of Chinese-made equipment.¹¹ Accordingly, there is sufficient evidence to provide a reason to believe or suspect that alleged countervailable subsidies are inconsistent with the SCM Agreement.

III. There Have Been Massive Imports of the Subject Merchandise Over a Relatively Short Period of Time.

Under the Department’s regulations, the agency will examine the volume and value of imports, seasonal trends, and the share of domestic consumption held by imports to determine whether there is a reasonable basis to believe or suspect that there have been massive imports within the meaning of 19 U.S.C. § 1673b(e)(1)(B).¹² The Department typically considers imports to be “massive” if they have increased by at least fifteen percent in the “relatively short period” examined.¹³ Normally, the “relatively short period” consists of the period starting on the

¹⁰ Checklist at 8-47.

¹¹ *Id.*

¹² 19 C.F.R. § 351.206(h)(1).

¹³ *Id.* § 351.206(h)(2).

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date the petition is filed and ending at least three months later.¹⁴ This “comparison period” is “compared to a corresponding period prior to the filing of the petition (i.e., the base period).”¹⁵

In the subject proceeding, import data demonstrate that imports of Chinese PVLT tires have been massive in the comparison period (June through August of 2014) compared to the base period (March through May of 2014). To determine whether imports of PVLT tires have been massive, the USW examined import data from two sources. First, the USW reviewed U.S. Census Bureau data obtained from the USITC’s DataWeb. As of the date of this filing, U.S. Census Bureau data are only available through July 2014. Thus, to compare the base period and the comparison period, the USW compared the average monthly total for the March through May period with the average monthly total for the June through July period. As the table below shows, these data indicate that Chinese imports of PVLT tires have increased 23 percent by value and 26 percent by volume.

¹⁴ *Id.* § 351.206(h)(2)(i); see *1,1,1,2-Tetrafluoroethane From the People's Republic of China: Antidumping Duty Investigation, Preliminary Determination of Sales at Less Than Fair Value, Affirmative Preliminary Determination of Critical Circumstances, in Part, and Postponement of Final Determination*, 79 Fed. Reg. 30,817 (Dep’t Commerce May 29, 2014), and accompanying Preliminary Determination Memorandum at 6.

¹⁵ *1,1,1,2-Tetrafluoroethane From the People's Republic of China: Antidumping Duty Investigation, Preliminary Determination of Sales at Less Than Fair Value, Affirmative Preliminary Determination of Critical Circumstances, in Part, and Postponement of Final Determination*, 79 Fed. Reg. 30,817 (Dep’t Commerce May 29, 2014), and accompanying Preliminary Determination Memorandum at 6. Moreover, it is the Department’s practice to treat the month in which the petition is filed as part of the comparison period if the petition is filed in the first half of the month. See *Monosodium Glutamate From the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, and Postponement of Final Determination*, 79 Fed. Reg. 26,408 (Dep’t Commerce May 8, 2014), and accompanying Preliminary Determination Memorandum at 4.

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U.S. Imports of PVLT Tires from China in 2014¹⁶

	Monthly Average March – May	Monthly Average June – July	Percent Change
Value (\$1,000)	188,815	233,130.5	23.47%
Quantity (1,000 units)	4,823	6,102	26.50%

Second, the USW has examined data obtained from the Automated Manifest System (“AMS”) for imports of PVLT tires from March 1, 2014, through August 31, 2014. These data show that, between the base period and the comparison period, imports from China increased by almost 20 percent by volume.

U.S. Imports of PVLT Tires from China in 2014¹⁷
(in Kilograms)

March	April	May	March – May Total	June	July	August	June – Aug. Total
78,757,996	89,182,727	92,469,899	260,410,622	94,757,441	108,545,084	108,380,057	311,682,582
Percent Change (March – May v. June – Aug.)							19.69%

As demonstrated by the U.S. Census Bureau and AMS statistics, imports from China of PVLT tires have been massive since the filing of the petition.

¹⁶ USITC Trade DataWeb, U.S. Imports for Consumption, for HTS 4011.10.10.10, 4011.10.10.20, 4011.10.10.40, 4011.10.10.50, 4011.10.10.60, 4011.10.10.70, 4011.10.50.00, 4011.20.10.05, and 4011.20.50.10. The full dataset is contained in **Exhibit 1**.

¹⁷ Data obtained from the Automated Manifest System are contained in the database accompanying this submission. As the data collected by AMS does not include HTS categories, subject merchandise was identified based on the commodity description provided. Included in **Exhibit 2** are the search parameters used for identifying subject merchandise. The USW also notes that we have removed from the AMS data in the accompanying database entries for Carlisle (Meizhou) Rubber Products Co., Ltd., as Carlisle does not appear to produce in-scope merchandise. See Memorandum to Gary Taverman From Edward C. Yang, “Antidumping Duty Investigation of Certain Passenger Vehicle and Light Truck Tires from the People’s Republic of China: Respondent Selection,” Aug. 27, 2014, at 4, excerpt included in **Exhibit 3**. In addition to excluding entries where Carlisle is listed as the foreign shipper, the USW has also excluded entries where the information in the “container contents” field indicates that the shipment contained Carlisle tires. Finally, the USW has removed entries where the “container contents” field indicated that the entry was not PVLT tires.

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Import data also demonstrate that Chinese imports have a growing market share. The table below shows the monthly average U.S. imports from China and from all other countries in March through May versus June through July.

All U.S. Imports of PVLT Tires in 2014¹⁸

		Monthly Average March – May	Monthly Average June – July	Percent Change
China	Value (\$1,000)	188,815	233,130.5	23.47%
	Quantity (1,000 units)	4,823	6,102	26.50%
All Others	Value (\$1,000)	656,417	640,982	-2.35%
	Quantity (1,000 units)	10,239	10,217	-2.13%

As Chinese imports increased by more than 20 percent by volume and by value while imports from all other countries decreased, these data indicate that the market share of Chinese imports has likely increased. Finally, included as **Exhibit 5** is U.S. Census Bureau data for Chinese imports for the March through May and June through August periods for 2011, 2012, and 2013. As there has not been a consistent large increase in imports in the past during the June to August period, these data show that the increase seen after the filing of the petition cannot be attributed to seasonality. Accordingly, the U.S. Census Bureau data and the AMS data provide a reasonable basis to believe or suspect that Chinese imports have been massive over a relatively short period of time.

¹⁸ USITC Trade DataWeb, U.S. Imports for Consumption, for HTS 4011.10.10.10, 4011.10.10.20, 4011.10.10.40, 4011.10.10.50, 4011.10.10.60, 4011.10.10.70, 4011.10.50.00, 4011.20.10.05, and 4011.20.50.10. The full dataset is contained in **Exhibit 4**.

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IV. Conclusion

As demonstrated above, there is a reasonable basis to believe or suspect that critical circumstances exist. As such, the USW requests that the Department make a preliminary affirmative determination of critical circumstances. Thank you for your attention to this matter. Please contact the undersigned if you should have any questions.

Respectfully submitted,

/s/ Elizabeth J. Drake

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COUNSEL CERTIFICATION

I, Elizabeth J. Drake, with the Law Offices of Stewart and Stewart, counsel to the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC ("USW"), certify that I have read the attached submission of Petitioner's Critical Circumstances Allegation filed on September 12, 2014 pursuant to the countervailing duty investigation of certain passenger vehicle and light truck tires from the People's Republic of China (C-570-017). In my capacity as counsel of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

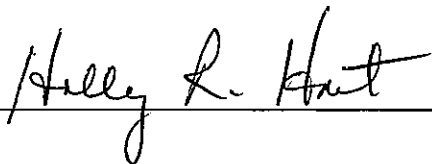
Signature: 

Date: 9/12/14

UNION CERTIFICATION

I, Holly Hart, Assistant to the President and Legislative Director, currently employed by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC ("USW"), certify that I prepared or otherwise supervised the preparation of the attached submission of Petitioner's Critical Circumstances Allegation filed on September 12, 2014 pursuant to the countervailing duty investigation of certain passenger vehicle and light truck tires from the People's Republic of China (C-570-017). I certify that the public information and any business proprietary information of the USW contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: _____



Date: _____

9.12.14

CERTIFICATE OF SERVICE

*Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China
C-570-017 (Investigation)*

I hereby certify that on September 12, 2014, copies of the foregoing public document were served on the following parties via the manner indicated:

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Via First-Class Mail

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/s/ Elizabeth J. Drake
Elizabeth J. Drake

Exhibit 1

**PVLT: Customs Value by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2014

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL
	In 1,000 Dollars						
Customs Value where quantities are collected in number							
4011101040	42,105	34,753	39,389	41,925	49,984	51,104	59,948
4011101050	33,072	27,024	34,879	38,665	40,128	45,231	48,340
4011201005	36,049	28,461	34,178	39,134	31,654	37,822	37,278
4011101030	28,635	21,472	25,939	27,672	28,345	32,428	33,436
4011101070	20,797	15,039	19,160	20,262	19,354	21,865	29,306
4011101060	12,053	9,233	11,293	12,544	14,186	17,221	18,144
4011101020	9,611	6,476	7,432	7,252	7,756	9,246	10,717
4011105000	3,654	2,738	2,886	3,542	3,688	4,566	4,289
4011101010	1,266	1,014	788	1,078	1,760	2,042	1,699
4011205010	341	288	412	668	492	565	1,014
Subtotal number	187,583	146,497	176,356	192,743	197,346	222,091	244,170
Total	187,583	146,497	176,356	192,743	197,346	222,091	244,170

**PVLT: First Unit of Quantity by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2014

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL
	In 1,000 Units of Quantity						
First Unit of Quantity where quantities are collected in number							
4011101040	1,129	918	1,054	1,161	1,401	1,424	1,657
4011101050	802	674	867	1,000	1,041	1,172	1,240
4011201005	576	461	546	639	512	597	592
4011101030	908	669	851	900	947	1,102	1,121
4011101070	441	271	341	366	348	403	537
4011101060	284	217	264	305	343	420	447
4011101020	364	247	285	284	306	373	423
4011105000	184	148	139	173	217	328	182
4011101010	57	44	35	49	70	79	75
4011205010	6	5	7	14	8	12	19
Subtotal number	4,750	3,655	4,388	4,891	5,191	5,910	6,293

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

Exhibit 2

Search Parameters Used to Identify PVL Tires in AMS Database

The Commodity Description that

Contains:

"TIRE "
 "TIRES "
 " TYRES "
 " TYRE "

But not:

"SOLID RUBBER"	"AIRCRAFT"	"FARM"
"TIRE GAUGE"	"INDUSTRIAL"	"INDUSTRIAL"
"TIRE MAKING"	"TIRE INFLAT"	"STEEL WHEEL"
"TIRE COVER"	"TIRE PUMP"	"PULL TOY"
"CLOCK"	"TIRE INSERT"	"TIRE REPAIR"
"VALVE"	"CYCLE"	"TOY LARGE"
"EASTER"	"ATV"	"TOY SMALL"
"STYRENE"	"TIRE RAFT"	"CART TIRE"
"TIRE RING"	"WHEEL COVER"	"CUSHION TIRE"
"BUTADIENE"	"SEEDER TIRE"	"TIRE VLV"
"SHOE"	"SNOW CHAIN"	"TOYS"
"TIRE MOUNT"	"BRASS COATED"	"EARTHMOVER"
"TIRE SPREAD"	"OFF-ROAD"	"CONDOM"
"BOOTS"	"SOLID TIRE"	"STEEL TYRE"
"LEATHER"	"TRAILER"	"TIRE ASSY"
"COTTON"	"TIRE BRUSH"	"TIRE MOLD"
"TIRE TOOL"	"TIRE CORD"	"USED "
"FUTON"	"FIRE CONTROL"	"GO KART"
"TIRE CHANGER"	"STRAWBEERIE"	"SPORTING GOOD"
"TIRE CHAIN"	" ENTIRE "	"TIRE MANUFACTUR"
"RUBBER MAT"	"latex"	"TIRE ROD"
"VALVS"	"TOOL-TIRE"	"CHEMICAL PREPARATION"
"HAMMER"	"SPARE TIRE AIR"	"Butadiene rubber (br)"
"FURNITURE"	"BUS"	"SCRAP TIRE"
"BRASS COATED STEEL	"BIKE"	"TIRE PATCH"
CORD"	"HSE W/TIRE"	"AGR MCH"
"USED TIRE"	"PRESSURE GAUGE"	"MACHINE"
"USED TYRE"	"TIRE VICTORIAN CART"	" LAMTIRE"
"RETREAD"	"BROMOBUTYL"	"TIRE LIFT"
" CORD "	"SOLID TYRE"	"TIRE MOULD"
" MAT"	"GOLF CAR"	"TIRE FUJT"
"FABRIC"	"TREAD GAUGE"	"TIRE CARRIER"
"WHEELBARROW"	"ALLOY WHEEL"	"TIRE RACK"
"GARDEN"	"TOY CAR"	"TIRE GUGE"
"LAWN"	"HORTICULTUR"	"MOBILE HOME"
	"AGRICULTUR"	"TYRE CHANGER"

"TIRE THUMPER"	"DECORATIVE LAMP"
"TYRE COVER"	"SPONGE TIRE"
"TIRE TUBE SUSPENSION"	"VISON BRUSH"
"FAT TIRE NEON SIGN"	"PLASTIC BRUSHES"
"JAZZYSELECT"	"ALLOY SLEEVE"
"SERVICE CART"	"FACIAL TISSUE"
"TYRE INFLATOR"	"TRACTOR"
"SQUEEGEE"	"HANDICRAFT"
"AG TRAC"	"BOAT COVER"
"METAL PLANTER"	"REEL CART"
"KRONGC LED SIGN"	"Spark-igntn rcprctng"
"GUAGES"	"INJECTION MOLD"
"RAFT INFLATOR"	
"IMPLEMENT TIRE"	
"MUFFLER PIPE"	
"AG USE"	
"DRAWER DESK"	
"OTR TYRE"	
"GRANITE COUNTER"	
"OTR TIRE"	
"MOP PARTS"	
"FISHING RODS"	
"BATTERY STRAP"	
"BEADED NECKLACE"	
"SUN LOTION"	
"TIRE EXCHANGER"	
"TYRE CHANGER"	
"TIRE GUAGE"	
"WINCH"	
"SHARPENING STONE"	
"MOLD FOR TIRE"	
"PLYWOOD"	
"PATIO FURNIT"	
"HORN PEDALS"	
"WHEELS WHEELS HI-SPEC WHEEL"	
"PLUMBING"	
"ARTS AND CRAFTS"	
"STEM TIRE VAL"	
"GAZEBO"	
"CURTAIN"	
"SKYHOOK"	
"BEACH SANDALS"	
"CART 16X4X8"	
"COMFORTER"	
"HARDWARE STEEL"	
"JACK AIR PUMP"	
"VACUUM CLEANER"	

Exhibit 3




UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

A-570-016
Investigation
E&C/Office VII: EH
~~Proprietary Document~~
PUBLIC VERSION

DATE: August 27, 2014

MEMORANDUM TO: Gary Taverman
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

FROM: Edward C. Yang 
Director, Office VII
Antidumping and Countervailing Duty Operations

RE: Antidumping Duty Investigation of Certain Passenger Vehicle and
Light Truck Tires from the People's Republic of China:
Respondent Selection

Summary

On July 14, 2014, the Department of Commerce (the Department) initiated an antidumping duty (AD) investigation to determine whether certain passenger vehicle and light truck tires (certain passenger tires) from the People's Republic of China (PRC) were sold to the United States at less than fair value during the period of investigation (POI), October 1, 2013 through March 31, 2014.¹ Due to the large number of producers and exporters named in the Petition,² we recommend limiting the number of respondents selected for this investigation to the two largest companies determined by the quantity of sales of certain passenger tires to the United States during the POI, as reported in the quantity and value (Q&V) questionnaire responses.

Background

On June 3, 2014, the Department received an AD Petition concerning imports of certain passenger tires from the PRC, filed in proper form by Petitioner.³ On July 21, 2014, the Department published in the *Federal Register* a notice of initiation for the AD investigation.⁴ In the *Initiation Notice*, the Department noted that it intended to issue Q&V questionnaires to each potential respondent named in the Petition and base respondent selection on the responses to the Q&V questionnaire.⁵

¹ See *Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China: Initiation of Antidumping Duty Investigation*, 79 FR 42292 (July 21, 2014) (*Initiation Notice*).

² See "Petition for the Imposition of Antidumping Duties on Imports of Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China," (June 3, 2014) (Petition).

³ Collectively, United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL- CIO, CLC.

⁴ See *Initiation Notice*.

⁵ *Id.*, 79 FR at 72296.



On July 16, 2014, the Department issued Q&V questionnaires to the 61 companies that the Petitioner identified as potential producers/exporters of certain passenger tires from the PRC.⁶ These questionnaires requested that the companies report the Q&V of their POI sales of certain passenger tires to the United States for the purpose of respondent selection. In addition, the Department posted the Q&V questionnaire on its website and, in the *Initiation Notice*, invited parties that did not receive a Q&V questionnaire from the Department to file a response to the Q&V questionnaire by the applicable deadline if they wished to be included in the pool of companies from which the Department will select mandatory respondents.

We received timely responses to the Q&V questionnaire from 100 companies. We identified a number of Q&V questionnaire responses that contained filing deficiencies and gave these companies an opportunity to correct the filing deficiencies.⁷ In addition, certain companies to which the Department issued Q&V questionnaires did not respond to the questionnaire. We intend to address the treatment of the non-responsive companies in the preliminary determination of this investigation.

On August 19, 2014, Petitioner submitted respondent selection comments urging the Department to select four mandatory respondents.⁸ Petitioner also requested that the Department decline to select Carlisle (Meizhou) Rubber Products Co., Ltd. (Carlisle) as a mandatory respondent as it does not seem in fact to be a producer of in-scope merchandise.

Respondent Selection

Issue 1: Limiting Examination to a Reasonable Number of Companies

Applicable Statutory Provision

Section 777A(c)(1) of the Tariff Act of 1930, as amended (the Act), directs the Department to calculate individual dumping margins for each known exporter and producer of the subject merchandise.⁹ However, when faced with a large number of exporters or producers, if it is not practicable to examine all companies, section 777A(c)(2) of the Act grants the Department discretion to limit its examination to a reasonable number of companies.

Analysis

In determining whether to limit the number of respondents to examine individually, the Department first considers whether, due to the large number of producers or exporters involved in an investigation, determining an individual weighted-average dumping margin for each respondent is practicable.¹⁰ As part of that determination, the Department considers its resources including its current and anticipated workload, and deadlines coinciding with the investigation in question.

⁶ See Letter to Interested Parties, “Quantity and Value Questionnaire,” July 16, 2014.

⁷ See, e.g., Letter to Carlisle (Meizhou) Rubber Products Co., Ltd., “Passenger Vehicle and Light Truck Tires from the People’s Republic of China Clarification on Certifications,” August 5, 2014.

⁸ See Letter from Petitioner, “Certain Passenger Vehicle and Light Truck Tires from the People’s Republic of China—Petitioner’s Comments on Respondent Selection,” August 19, 2014.

⁹ Regarding respondent selection in general, see also 19 CFR 351.204(c).

¹⁰ See section 777A(c)(2) of the Act.

As noted above, 61 companies were named in the Petition and 100 companies filed Q&V questionnaires. We find that 100 companies is a large number of potential respondents and that it is “not practicable to make individual weighted-average dumping margin determinations” for each company.¹¹ Reviewing all 100 companies would require significant resources because it would require the Department to analyze each company’s corporate structure, accounting and selling practices, and production information. After carefully considering the complexities expected to arise in this investigation, our available resources, including current and anticipated workload, and deadlines coinciding with this investigation, we find that it would not be practicable to calculate individual dumping margins for all potential respondents. Office VII, Antidumping Duty/Countervailing Duty Operations, the office to which this investigation is assigned, is conducting numerous concurrent AD and countervailing duty proceedings that place a constraint on the number of analysts that can be assigned to this investigation.¹² These proceedings will consume a substantial amount of Office VII’s resources. Further, other offices within Enforcement and Compliance do not have additional resources to assist Office VII with its workload.

Recommendation

For the reasons discussed above, we recommend limiting individual examination to a reasonable number of producers/exporters, pursuant to section 777A(c)(2) of the Act.

Agree

Disagree

Issue 2: Selection of Respondents

Applicable Statutory Provision

Where it is not practicable to individually examine all known producers/exporters of subject merchandise (*i.e.*, passenger tires), sections 777A(c)(2)(A) and (B) of the Act permit the Department to limit its examination using either of the following methodologies: (1) a sample of exporters, producers, or types of products that is statistically valid based on the information available at the time of selection; or (2) exporters and producers accounting for the largest volume of the subject merchandise that can reasonably be examined. The Act does not express a preference for either methodology.¹³ In addition, the Statement of Administrative Action accompanying the Uruguay Round Agreements Act (the SAA) interprets this provision to mean that the authority to select respondents, whether by using a “statistically valid” sample, or by examining respondents accounting for the largest volume of subject merchandise, rests exclusively with the Department.¹⁴

¹¹ *Id.*

¹² In addition to the instant investigation, Office VII is currently conducting nine investigations, fourteen administrative reviews, four sunset reviews, three new shipper reviews, two scope inquiries, and one changed circumstances review. Examples of proceedings include, but are not limited to, sugar from Mexico, monosodium glutamate from the PRC, Uranium from France, and Polyethylene Terephthalate (PET) Film from India and Taiwan.

¹³ See section 777A(c)(2)(A)-(B) of the Act.

¹⁴ See SAA, H.R. Doc. No. 103-316, vol. I at 872 (1994).

Analysis

In selecting respondents for individual examination in this AD investigation, we believe it is appropriate to choose the largest producers/exporters, pursuant to section 777A(c)(2)(B) of the Act. We identified the largest producers/exporters based on the volume of subject merchandise sales to the United States during the POI reported in response to the Q&V questionnaire.¹⁵ In limiting the selection to the largest respondents, we believe that an individual examination of the companies accounting for the largest volume of subject merchandise balances the Department's resource constraints while capturing the largest amount of sales of subject merchandise from the PRC during the POI.

In reviewing the Q&V questionnaire responses, we find that we have the resources to individually examine two respondents. Additionally, we note that Carlisle, as a precautionary measure, reported its sales of trailer tires, which it believes fall outside the scope of this investigation. Petitioner noted in a supplemental questionnaire response to the Petition, that "such tires bear an "ST" prefix or suffix. These tires, if they meet the speed and load ratings, and have the physical characteristics, of special tires for trailers in highway service, are not intended to be covered by the petitions."¹⁶ In its scope comments, Carlisle listed numerous features that differentiate its trailer tires from passenger tires, including the ST prefix or suffix and the higher load ratings mentioned by Petitioner (they have 40 percent higher load ratings than passenger tires) that demonstrate Carlisle's trailer tires do not fall within the scope of the investigation.¹⁷ Lastly, in the respondent selection comments, Petitioner requested that the Department not select Carlisle because of Carlisle's statement that its sales are outside the scope. While we are not making a determination on the scope of any particular product that may be produced and exported by Carlisle at this time, we conclude that Carlisle's reported shipments of trailer tires should not be considered for purposes of respondent selection. Accordingly, because Carlisle does not appear to be a producer of in-scope merchandise and because Carlisle also reports having no shipments of other products during the POI, we are not selecting them as a mandatory respondent in this instant investigation.

The following two companies, listed alphabetically, reported the largest quantity of sales of subject merchandise to the United States during the POI: GITI Tire Global Trading Pte. Ltd., and its affiliates Giti Tire (USA) Ltd., Giti Tire (Anhui) Company Ltd., Giti Tire (Fujian) Company Ltd., and Giti Tire (Hualin) Company Ltd. (collectively, GITI), and Shandong Yongsheng Rubber Group Co., Ltd. (Yongsheng). This selection represents the exporters or producers accounting for the largest volume of sales of the merchandise under consideration to the United States that can be reasonably examined.

¹⁵ See Attachment.

¹⁶ See Letter from Petitioner, "Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China-Petitioner's Response to the Department's June 6, 2014 Supplemental Questions regarding General Issues," June 10, 2014 (Petition Supplemental), at 4-5.

¹⁷ See Letter from Carlisle, "Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China-Comments on Scope," August 11, 2014.

Exhibit 4

**PVLT: Customs Value by Customs Value
for ALL Countries**

U.S. Imports for Consumption

Monthly data for 2014

Country	JAN	FEB	MAR	APR	MAY	JUN	JUL
<i>In 1,000 Dollars</i>							
Customs Value where quantities are collected in number							
China	187,583	146,497	176,356	192,743	197,346	222,091	244,170
Canada	115,532	119,423	129,338	117,906	124,328	119,148	112,151
Korea	102,516	89,431	106,191	91,529	99,351	89,386	96,632
Japan	49,907	61,022	64,807	73,505	61,274	77,852	82,175
Mexico	46,271	50,784	64,299	52,970	54,233	52,546	48,975
Indonesia	46,043	33,327	39,070	40,047	38,359	40,544	42,665
Thailand	52,574	39,173	61,239	46,947	39,387	44,710	38,453
Germany	11,481	21,728	31,070	37,859	36,054	30,920	35,727
Chile	31,043	30,284	35,574	34,826	31,861	32,351	34,582
Taiwan	18,131	18,278	18,778	23,206	23,272	30,031	20,630
France	10,730	12,744	15,526	17,294	12,623	13,120	14,804
Philippines	4,716	7,076	10,910	11,805	7,626	8,394	13,440
Brazil	11,546	12,551	20,455	15,826	15,628	18,733	12,812
Czech Republic	7,737	9,631	11,291	14,938	16,747	12,925	12,155
United Kingdom	4,108	4,348	7,698	8,485	6,575	9,129	9,444
Italy	3,178	3,919	4,092	6,214	5,577	4,733	9,251
Romania	9,833	7,131	7,328	15,762	13,546	10,483	8,467
Russia	4,020	1,794	3,101	7,216	9,856	8,791	6,731
Costa Rica	3,332	3,699	7,225	5,211	5,932	6,440	6,731
Slovak Republic	3,908	7,009	8,504	9,061	7,094	7,662	5,715
Portugal	2,602	3,526	6,657	11,073	7,985	9,237	5,654
Vietnam	3,896	3,299	6,536	3,688	5,452	5,760	5,068
Malaysia	2,851	2,408	3,160	3,481	4,052	2,582	3,627
Hungary	2,258	1,112	2,267	1,857	2,653	2,365	2,952
Poland	2,045	1,725	3,096	2,223	2,308	1,602	1,891
Finland	1,071	1,268	2,085	559	2,249	1,428	1,663
Argentina	155	136	671	504	547	576	1,092
Spain	291	915	724	470	1,046	1,951	972
Turkey	590	1,085	1,212	937	680	863	833
Hong Kong	0	37	46	0	344	68	358
India	121	88	108	94	110	152	127
United Arab Em	0	0	23	0	0	0	125

Peru	0	1	4	171	51	192	115
South Africa	640	182	492	323	502	231	92
Netherlands	226	402	305	348	360	270	75
Panama	0	0	23	0	0	0	45
Jamaica	0	0	0	0	0	36	35
Bahamas	0	0	0	0	0	0	31
Australia	0	3	36	6	0	1	21
Slovenia	0	76	3	0	0	41	19
Luxembourg	23	18	126	101	15	40	15
Sweden	0	0	6	0	0	0	9
Sri Lanka	0	0	0	2	1	1	1
Venezuela	0	0	0	0	15	43	0
Belize	0	0	0	1	0	0	0
Paraguay	0	0	0	0	0	138	0
Israel	0	0	1	0	0	20	0
Saudi Arabia	52	0	0	0	0	0	0
Ireland	31	0	0	0	0	0	0
Kuwait	0	0	0	0	0	0	0
Serbia	0	64	0	0	116	107	0
Ukraine	88	0	24	41	46	0	0
Ecuador	0	0	0	0	0	0	0
Belgium	25	0	0	0	5	0	0
Georgia	0	0	67	0	0	0	0
Norway	0	8	0	0	0	0	0
Singapore	19	0	0	27	0	0	0
Austria	140	2	294	154	260	0	0
Subtotal number	741,317	696,201	850,821	849,410	835,466	867,694	880,531
Total	741,317	696,201	850,821	849,410	835,466	867,694	880,531

**PVLT: First Unit of Quantity by Customs Value
for ALL Countries**

U.S. Imports for Consumption

Monthly data for 2014

Country	JAN	FEB	MAR	APR	MAY	JUN	JUL
<i>In 1,000 Units of Quantity</i>							
First Unit of Quantity where quantities are collected in number							
China	4,750	3,655	4,388	4,891	5,191	5,910	6,293
Canada	1,641	1,712	1,836	1,657	1,740	1,677	1,577
Korea	1,586	1,362	1,645	1,447	1,584	1,433	1,552
Japan	599	728	762	903	792	982	1,087
Mexico	793	857	1,094	878	935	918	852
Indonesia	1,059	777	956	971	925	972	1,052
Thailand	1,113	826	1,305	996	883	1,051	861
Germany	114	219	284	367	367	295	370
Chile	538	493	575	576	537	556	603
Taiwan	519	528	515	626	604	792	529
France	121	145	169	200	167	165	183
Philippines	77	109	158	175	113	122	207
Brazil	138	150	230	171	179	208	163
Czech Republic	63	93	101	133	145	104	96
United Kingdom	42	43	86	92	66	94	98
Italy	28	34	39	65	66	58	110
Romania	118	92	91	191	170	132	97
Russia	53	24	41	102	123	119	88
Costa Rica	71	79	142	104	114	137	120
Slovak Republic	65	108	135	131	109	126	97
Portugal	30	44	69	122	92	102	57
Vietnam	86	61	133	72	103	112	106
Malaysia	58	51	66	70	81	54	71
Hungary	21	10	16	14	20	22	25
Poland	34	29	51	39	37	28	30
Finland	12	15	24	6	24	15	16
Argentina	3	3	11	7	11	11	22
Spain	3	9	7	5	11	23	13
Turkey	2	4	5	4	3	4	4
Hong Kong	0	1	0	0	7	2	8
India	2	2	1	2	3	2	2
United Arab Em	0	0	1	0	0	0	3

Peru	0	0	0	2	1	3	2
South Africa	10	6	7	3	4	2	1
Netherlands	2	4	3	3	2	4	1
Panama	0	0	1	0	0	0	1
Jamaica	0	0	0	0	0	1	1
Bahamas	0	0	0	0	0	0	1
Australia	0	0	1	0	0	0	0
Slovenia	0	1	0	0	0	1	0
Luxembourg	0	0	0	0	0	0	0
Sweden	0	0	0	0	0	0	0
Sri Lanka	0	0	0	0	0	0	0
Venezuela	0	0	0	0	0	1	0
Belize	0	0	0	0	0	0	0
Paraguay	0	0	0	0	0	3	0
Israel	0	0	0	0	0	0	0
Saudi Arabia	1	0	0	0	0	0	0
Ireland	1	0	0	0	0	0	0
Kuwait	0	0	0	0	0	0	0
Serbia	0	0	0	0	1	1	0
Ukraine	3	0	0	1	1	0	0
Ecuador	0	0	0	0	0	0	0
Belgium	0	0	0	0	0	0	0
Georgia	0	0	0	0	0	0	0
Norway	0	0	0	0	0	0	0
Singapore	1	0	0	0	0	0	0
Austria	1	0	1	1	1	0	0
Subtotal number	13,754	12,271	14,949	15,028	15,211	16,239	16,399

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

Exhibit 5

U.S. Imports from China for March – May and June – August for 2011, 2012, and 2013

		March	April	May	March – May Total	June	July	August	June – August Total	Percent Change
2011	Value (\$1,000)	72,574	90,783	87,888	251,245	89,700	81,586	86,922	258,208	2.77%
	Volume (1,000 units)	1,908	2,366	2,296	6,570	2,307	2,078	2,303	6,688	1.80%
2012	Value (\$1,000)	88,432	91,771	105,749	285,952	100,651	86,339	62,043	249,033	-12.91%
	Volume (1,000 units)	2,214	2,360	2,836	7,410	2,676	2,419	1,724	6,819	-7.98%
2013	Value (\$1,000)	137,870	179,053	187,009	503,932	196,423	196,415	193,326	586,164	16.32%
	Volume (1,000 units)	3,184	4,227	4,509	11,920	4,828	4,891	4,878	14,597	22.46%

**PVLT: Customs Value by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2011

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Dollars</i>												
Customs Value where quantities are collected in number												
4011101040	19,305	17,059	17,773	21,526	19,898	21,814	19,060	23,349	16,964	22,406	21,572	23,389
4011101050	10,134	9,656	10,118	12,552	11,382	12,080	12,929	14,838	12,037	14,598	11,390	14,266
4011201005	18,479	15,295	14,033	15,578	15,025	14,308	15,443	14,375	10,942	12,813	11,752	13,920
4011101030	12,826	10,986	14,607	19,097	18,954	17,759	14,459	16,059	13,314	13,483	12,059	12,672
4011101070	9,499	4,525	4,160	8,162	9,388	9,830	6,926	6,248	3,372	9,156	9,941	7,596
4011101020	6,187	5,262	5,957	8,156	6,385	5,925	4,604	4,036	3,729	4,181	4,267	4,871
4011101060	3,215	2,524	2,626	2,695	2,628	4,073	4,044	4,786	2,734	3,197	3,154	3,317
4011105000	822	977	1,101	1,239	2,388	2,350	1,991	1,953	1,887	1,569	1,912	1,340
4011205010	452	440	897	332	388	356	971	651	248	337	681	862
4011101010	939	1,088	1,301	1,446	1,452	1,205	1,158	627	919	734	742	737
Subtotal number	81,858	67,812	72,574	90,783	87,888	89,700	81,586	86,922	66,145	82,475	77,471	82,969
Total	81,858	67,812	72,574	90,783	87,888	89,700	81,586	86,922	66,145	82,475	77,471	82,969

**PVLT: First Unit of Quantity by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2011

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Units of Quantity</i>												
First Unit of Quantity where quantities are collected in number												
4011101040	550	446	473	546	497	532	479	566	409	529	511	519
4011101050	261	247	256	315	271	283	305	334	262	326	239	292
4011201005	330	260	225	249	235	233	250	247	173	195	171	191
4011101030	430	351	468	581	541	509	416	475	377	376	326	339
4011101070	201	104	80	173	213	203	151	143	75	186	198	155
4011101020	253	205	228	311	222	205	160	149	137	144	142	158
4011101060	89	65	70	70	73	102	98	124	60	73	69	71
4011105000	33	40	42	58	186	189	155	228	176	122	136	62
4011205010	9	10	16	6	5	4	17	10	4	4	6	14
4011101010	42	42	50	58	53	47	47	27	33	28	27	25
Subtotal number	2,197	1,770	1,908	2,366	2,296	2,307	2,078	2,303	1,706	1,982	1,826	1,828

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

**PVLT: Customs Value by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2012

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Dollars</i>												
Customs Value where quantities are collected in number												
4011101040	21,976	16,409	22,880	24,854	28,138	28,943	23,909	17,161	33,245	52,338	45,031	36,311
4011101030	14,284	10,002	13,071	13,440	14,686	14,380	14,980	9,554	21,537	32,556	24,831	27,016
4011101050	16,447	12,892	17,710	18,412	19,745	19,305	15,552	11,065	16,003	28,238	25,605	21,421
4011201005	14,709	12,091	13,715	13,531	14,736	13,628	12,317	10,418	15,428	27,247	21,272	20,759
4011101070	9,202	6,486	9,464	9,171	13,643	11,803	7,519	3,945	3,851	14,515	13,999	17,667
4011101020	5,119	2,272	4,967	4,588	5,040	4,265	4,111	3,036	7,286	9,586	7,933	8,377
4011101060	4,569	4,020	4,373	4,628	5,567	4,403	2,858	2,264	3,212	6,069	7,131	5,720
4011105000	1,171	1,193	1,095	2,208	3,262	2,954	3,683	3,501	3,003	3,395	2,365	3,245
4011205010	728	395	285	261	263	438	874	577	109	1,175	1,546	1,720
4011101010	702	481	872	678	669	532	534	521	772	1,346	1,660	1,265
Subtotal number	88,908	66,241	88,432	91,771	105,749	100,651	86,339	62,043	104,446	176,466	151,372	143,501
Total	88,908	66,241	88,432	91,771	105,749	100,651	86,339	62,043	104,446	176,466	151,372	143,501

**PVLT: First Unit of Quantity by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2012

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Units of Quantity</i>												
First Unit of Quantity where quantities are collected in number												
4011101040	526	398	574	639	742	727	628	436	783	1,229	1,083	881
4011101030	401	302	416	425	492	470	502	291	589	927	707	775
4011101050	338	282	390	413	477	440	380	248	321	606	558	505
4011201005	206	169	198	206	215	211	184	152	223	399	317	306
4011101070	192	141	231	237	340	286	195	81	65	264	238	300
4011101020	169	84	190	170	192	163	147	114	243	320	278	292
4011101060	102	89	113	123	138	114	79	62	66	132	154	129
4011105000	55	54	52	113	205	233	266	307	235	204	130	155
4011205010	13	6	5	4	4	6	13	8	2	17	23	25
4011101010	32	24	43	30	32	27	23	24	29	55	50	56
Subtotal number	2,032	1,548	2,214	2,360	2,836	2,676	2,419	1,724	2,555	4,154	3,538	3,424

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

**PVLT: Customs Value by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2013

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Dollars</i>												
Customs Value where quantities are collected in number:												
4011101040	43,984	35,119	35,633	50,638	54,197	56,105	48,922	49,421	42,311	45,146	40,313	42,295
4011201005	25,486	18,458	19,782	24,679	23,999	25,965	30,816	32,856	29,503	36,147	32,206	31,184
4011101050	24,815	22,905	26,114	30,429	32,725	35,490	35,281	34,243	32,056	31,686	32,512	30,547
4011101030	31,417	22,705	24,190	33,172	30,460	33,434	35,430	34,713	30,755	30,382	25,444	28,002
4011101070	20,083	14,498	14,490	18,686	21,046	19,030	19,421	15,823	15,232	13,494	12,706	14,565
4011101060	7,359	5,965	6,332	8,349	9,933	10,658	11,378	10,309	10,231	10,046	8,959	9,676
4011101020	9,553	6,903	7,817	7,947	8,441	10,092	9,213	9,322	7,884	7,968	7,852	8,730
4011105000	3,046	2,018	1,722	2,916	3,324	3,605	3,748	4,640	3,442	3,796	2,890	3,505
4011101010	1,639	895	1,004	1,109	1,656	1,705	1,376	1,513	1,306	1,293	1,204	987
4011205010	1,967	1,478	786	1,127	1,228	338	832	486	587	392	337	314
Subtotal number	169,348	130,944	137,870	179,053	187,009	196,423	196,415	193,326	173,307	180,350	164,422	169,804
Total	169,348	130,944	137,870	179,053	187,009	196,423	196,415	193,326	173,307	180,350	164,422	169,804

**PVLT: First Unit of Quantity by Customs Value
for China**

U.S. Imports for Consumption

Monthly data for 2013

HTS Number	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<i>In 1,000 Units of Quantity</i>												
First Unit of Quantity where quantities are collected in number:												
4011101040	1,075	877	843	1,230	1,365	1,419	1,252	1,298	1,138	1,210	1,050	1,086
4011201005	374	263	282	363	359	389	479	508	470	590	540	495
4011101050	557	513	571	698	756	825	819	818	772	764	763	722
4011101030	902	676	687	959	907	1,017	1,109	1,069	974	976	817	887
4011101070	341	253	245	305	344	324	351	277	261	224	205	241
4011101060	165	130	141	186	218	240	267	230	231	231	203	216
4011101020	337	238	274	286	303	360	335	340	295	306	295	330
4011105000	152	89	87	140	172	178	209	269	177	222	150	169
4011101010	68	36	43	45	68	70	59	61	56	54	55	42
4011205010	26	20	11	15	17	5	10	8	7	6	5	5
Subtotal number	3,996	3,095	3,184	4,227	4,509	4,828	4,891	4,878	4,381	4,584	4,082	4,193

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.