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

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

CERTAIN TOOL CHESTS AND CABINETS FROM
THE PEOPLE'S REPUBLIC OF CHINA AND
THE SOCIALIST REPUBLIC OF VIETNAM

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PETITION FOR THE IMPOSITION OF ANTIDUMPING DUTIES AGAINST THE PEOPLE’S REPUBLIC OF CHINA AND THE SOCIALIST REPUBLIC OF VIETNAM AND COUNTERVAILING DUTIES AGAINST THE PEOPLE’S REPUBLIC OF CHINA ON CERTAIN TOOL CHESTS AND CABINETS

On behalf of the domestic industry producing certain tool chests and tool cabinets (“Tool Chests”), Waterloo Industries Inc. (“Waterloo” or “Petitioner”) files these petitions before the U.S. Department of Commerce (the “Department”) and the U.S. International Trade Commission (“ITC” or “Commission”) pursuant to sections 702(c)(4) and 732(c)(4) of the Tariff Act of 1930, as amended (the “Act” or the “statute”). See 19 U.S.C. §§ 1671a(c)(4), 1673a(c)(4). Waterloo is the larger of the only two known domestic producers of Tool Chests. Tool Chests, which are more fully described below in section I.E., typically have bodies made of carbon, alloy, and/or stainless steel and may include drawers, trim, or other components made of other metal or non-metal materials.

Waterloo alleges that Tool Chests from the People’s Republic of China (“China”) and the Socialist Republic of Vietnam (“Vietnam”) are being, or are likely to be, sold in the United States at less than fair value within the meaning of section 731(1) of the Act. See 19 U.S.C. § 1673. Waterloo further alleges that central and sub-central authorities of the Government of China are providing countervailable subsidies with respect to the manufacture, production and export of Tool Chests within the meaning of section 701(a)(1) of the Act. See id. § 1671(a)(1). Further, this Petition demonstrates that these unfairly traded imports are causing material injury to the U.S. domestic industry producing Tool Chests within the meaning of section 731(2) of the Act (see id. § 1673(2)) and threaten to cause further material injury if remedial action is not taken.

Waterloo, therefore, requests that antidumping duties be imposed on imported Tool Chests from China and Vietnam in an amount equal to that by which the factors of production-
based normal value of the subject merchandise exceeds its corresponding export price or constructed export price. Waterloo also requests that countervailing duties be imposed on imports of Tool Chests from China in an amount equal to the net countervailable subsidies.

This Petition sets forth relevant information reasonably available to the Petitioner in support of these allegations and is filed in conformity with the requirements of section 351.202 of the Department’s regulations and section 207.11 of the Commission’s regulations. See 19 C.F.R. §§ 351.202 and 207.11.

I. GENERAL INFORMATION

A. Petitioner

Waterloo is the largest U.S. producer of Tool Chests and is an “interested party” within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b). Waterloo manufactures Tool Chests at its production facility in Sedalia, Missouri. The contact information for Waterloo is:

Waterloo Industries Inc.
1500 Waterloo Drive
Sedalia, MO 65301
Phone: (660) 826-0960
Fax: (660) 827-0698
Contact: Bill Nictakis
Email: Bnictakis@waterlooindustries.com
Website: http://www.waterlooindustries.com/

B. Other Domestic Producers

Waterloo is aware of only one other domestic producer of subject Tool Chests – Metal Box International (“MBI”). The contact information for MBI is:
C. Information Related to Industry Support

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

The statutory requirements for standing are satisfied here. As shown in Exhibit GEN-1, the U.S. producers of Tool Chests who are known to support the petition surpass both the 25 percent and 50 percent thresholds for industry support required by the statute. Waterloo accounted for [ ] percent of total U.S. Tool Chests production in 2016. See id. Further, Waterloo and MBI, both of which have indicated support for the Petition, accounted for 100 percent of U.S. Tool Chests produced in 2016. See Exhibits GEN-1 and GEN-2 (Dec., para. 2). Accordingly, the statutory requirements for standing are met. 19 U.S.C. §§ 1671a(c)(4)(A), 1673a(c)(4)(A).

D. Related Proceedings

The domestic industry producing Tool Chests has not previously sought import relief with respect to the merchandise subject to this Petition pursuant to section 232 of the Trade Expansion Act of 1962 (19 U.S.C. § 1862), section 201 of the Trade Act of 1974 (19 U.S.C. §

E. Description of Subject Merchandise and Requested Scope of Investigation

1. Product Description

The product covered by these investigations is certain metal tool chests and tool cabinets, typically made of steel, with two or more drawers per unit. The subject merchandise includes tool top chests, intermediate chests, cabinets, side cabinets, mobile work benches, work stations, and metal storage units with two or more drawers. Descriptions of these products, along with pictures of representative types of tool chests and tool cabinets, are provided at Exhibit GEN-3. Not covered by the scope of these investigations are (1) tool boxes, chests and cabinets with bodies made entirely of plastic, carbon fiber, wood, or other non-metallic substances; (2) portable tool boxes;¹ and (3) industrial grade tool chests and cabinets.²

2. Physical Characteristics and Uses

The subject Tool Chests are chests or cabinets with at least two drawers that are designed for the storage of tools and equipment. They have bodies that are generally produced from carbon, alloy, or stainless steel, but which can also be produced from other metals. The thickness of the steel used in the bodies and drawers of the subject merchandise typically ranges

¹ Portable tool boxes, which are excluded from the scope of this petition, are metal tool boxes with handles on the top and of a small size that makes them suitable for transporting them by hand when filled with tools. Portable metal tool boxes have each of the following characteristics: (1) fewer than three drawers; (2) a handle on the top that allows the tool box to be carried by hand; (3) a width that is 21 inches or less; and depth (front to back) not exceeding 10 inches.

² Industrial grade metal tool chests and cabinets are those having each of the following physical characteristics: (1) a width of more than 60 inches or (2) having each of the following characteristics: (a) a body made of steel that is 0.055” or more in thickness; (b) all drawers over 21” deep; (c) all drawer slides rated for 200 lbs. or more; and (4) not prepackaged for retail sale.
from .018 inches to .055 inches, but most commonly falls within a range of .033 inches to .044 inches thick.

Drawers are an essential component of all Tool Chests. Drawers are also typically made of steel, but can be made from other metals. Each individual unit of subject merchandise (i.e., top chest, intermediate chest, tool cabinet, side cabinet, work station, and tool storage unit) has two or more drawers for storage of tools and equipment, although subject merchandise may also have doors, top lids or shelves in addition to drawers. Drawers are typically assembled with the finished metal tool chest and cabinet bodies with ball bearing sliders or other hardware for easy opening and closing. The drawers are designed to hold tools and other equipment and have different depths, weight ratings and compartment layouts depending on their design.

Tool Chests are typically painted or epoxy- or powder-coated, but they may also be otherwise coated or made of uncoated metal (e.g., stainless steel) or galvanized steel. Coatings serve as protection against corrosion and are also important for aesthetic appearance. The subject merchandise may also incorporate other non-metallic materials such as rubber, plastic, carbon fibers, or wood in the drawers, trim, worktops, or accessories.

Tool Chests are produced in widths (side to side) exceeding 21 inches but not exceeding 60 inches, and have a depth (front to back) exceeding 10 inches but not exceeding 24 inches. Units with a width of 21 inches or less and/or a depth of 10 inches or less are typically portable tool boxes and are excluded from the scope. Units with a width exceeding 60 inches or a drawer depth exceeding 24 inches are typically industrial grade tool chests that are excluded from the scope.
Tool Chests include top chests, intermediate chests, tool cabinets and side cabinets, work stations, metal storage units, work stations, and mobile work benches. Each of these types of Tool Chests meet the physical description above.

Top chests are tool chests, primarily made of steel but possibly made of other metal, that are designed to sit on top of a tool cabinet or intermediate chest. Top chests have two or more drawers for tool storage space, but they will often also open from the top allowing users to store tools in the body of the chests. Top chests may have side handles to assist the purchaser in lifting the chest out of its packaging, but their size and weight make them unsuitable for use as a portable tool box.

Intermediate chests, also usually made of steel, are designed to sit between a tool cabinet and a top chest. For this reason, they typically will not open from the top. Like other subject merchandise, intermediate chests have two or more drawers for tool and equipment storage. They typically do not have handles. As with top chests, the size and weight of intermediate chests make them unsuitable for use as portable tool boxes.

Tool cabinets are tool storage units, primarily with steel bodies, that are larger than top chests or intermediate chests. They are made to stand on the floor and act as the base for the top and intermediate chests. As with all other subject merchandise, tool cabinets have multiple drawers, although they may also have storage space incorporated with doors and shelving. Tool cabinets also typically have casters, which may be assembled with the unit before or after the product is purchased. Casters allow the cabinet to be pushed on the floor, but they may also be locked in place. Tool cabinets may also have side handles to assist with rolling the cabinets. Work stations and mobile work benches otherwise fit the description of tool cabinets but also have a work surface on top. The work surface may be made of rubber, plastic, metal, or wood.
Side cabinets are tool storage units with two or more drawers that are designed to be attached to the side of a tool cabinet or work station to expand the storage space of the main tool cabinet. Tool Chests may also come with various accessories and hardware such as power strips and locks.

Although top chests and intermediate chests may be packaged or sold separately from tool cabinets, they are designed to be sold and used with tool cabinets. For this reason, they may come with hardware that allows them to be attached to the tool cabinet. Top chests, intermediate chests, tool cabinets, and side cabinets may be assembled and used together to form a tool storage unit. The most common combination units are a tool cabinet and chest that are 26 inches and 41 inches in width. For example, a 26-inch in combo might include a 22-inch chest that is designed for use with a 26-inch cabinet.

Once assembled, Tool Chests are packaged for retail sale. In some instances, the tool chests and cabinets may be sold with tool sets included. Packages may include instructions for assembling chest and cabinet combos and/or attaching side handles and casters.

3. **Production Process**

The production process typically begins with the slitting of coils of cold rolled, flat-rolled carbon steel, and/or stainless steel into widths suitable for forming the panels and drawers of Tool Chests. The thickness of the coiled steel varies depending on the design and level of durability required for the individual chest or cabinet as well as the individual piece (i.e., drawer or chest and cabinet unit) that will be produced. The thicknesses may range from .018 inches to

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3 The process may also begin with flat sheets that have already been cut from coils, but most modern production facilities cut their own sheets from coils.
.055 inches but most commonly falls within a range of .033 inches to .044 inches thick. The coils are slit into various widths depending on the part that will be produced from the slit steel.

The slit steel moves through various processes in order to produce the component parts of the cabinets and chests (body panels, drawers, dividers, etc.). First, the steel is fed into a series of presses and punch machines where it is cut to size, punched and bent into various shapes necessary to create the components. Second, the various component pieces are welded together to form the drawers, bodies, lids, and other components of the chests and cabinets.

The individual parts are then pre-washed before being coated with paint, typically by one of two processes – either electro-coating (or “e-coating”) or powder coating. E-coating involves electrically charging the metal parts and placing them in a bath of paint that holds the opposite charge. The parts are moved through the paint for a short period during which time the paint adheres to the part. The part is then sprayed with a clear coat and is cured in an oven.

Powder coating also involves electrically charging the parts and the coating with opposite charges, but the coating is a dry powder that is sprayed on.

Once the components are painted, the parts are assembled by hand into finished tool chests and cabinets. Ball bearing slides, casters, drawer pulls, name plates, and rubber mats and other hardware and accessories are incorporated into the product at the assembly stage or are packaged together with the Tool Chests.

4. U.S. Tariff Classification

Tool Chests are classified in Harmonized Tariff Schedule of the United States (“HTSUS”) statistical subheading 9403.20.0030, but may also enter through HTSUS
9403.20.0026 and 7326.90.3500. See Exhibit GEN-4. These statistical subheadings each cover a large variety of different types of metal furniture, containers, and parts of metal furniture, making it impossible to rely on official import data to determine the volume and value of imports. See Exhibit GEN-5.

Due to the relatively small number of purchasers and producers of Tool Chests in the United States, Petitioner has reasonable knowledge of the size of the U.S. Tool Chests market and the level of subject imports. See Exhibit GEN-2 (Dec., para. 3). The official import data in HTSUS 9403.20.0030 show imports into this basket category that are far in excess of the level of the imported subject product that petitioner knows to be in the U.S. market. See Exhibits GEN-6 and GEN-7.

5. **Requested Scope of Investigation**

The following language describes the scope of the imported merchandise that Petitioner intends to cover in this investigation:

The scope of this petition covers certain metal tool chests and tool cabinets with drawers ("tool chests and cabinets") from the People's Republic of China and the Socialist Republic of Vietnam. The scope covers all metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

(1) a body made of carbon, alloy, or stainless steel and/or other metals;

(2) two or more drawers for storage in each individual unit;

(3) a width (side to side) exceeding 21 inches but not exceeding 60 inches;

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4 This tariff classification appears to cover portable steel tool boxes, but it is believed that some subject tool top chests and intermediate chests produced from steel may have been entered under this classification.
(4) a drawer depth (front to back) exceeding 10 inches but not exceeding 24 inches; and

(5) prepackaged for retail sale.

Prepackaged for retail sale means the units are packaged in a cardboard box or other container suitable for retail display and sale. Subject tool chests and cabinets are covered whether imported in assembled or unassembled form. Subject merchandise includes tool chests and cabinets produced in China or Vietnam but assembled, prepackaged for sale, or subject to other minor processing in a third country prior to importation into the United States. Similarly, it would include tool chests and cabinets produced in China or Vietnam that are later found to be assembled, prepackaged for sale, or subject to other minor processing after importation into the United States.

Subject tool chests and cabinets may also have doors and shelves in addition to drawers, may have handles (typically mounted on the sides), and may have a work surface on the top. Subject tool chests and cabinets may be uncoated (e.g., stainless steel), painted, powder coated, galvanized, or otherwise coated for corrosion protection or aesthetic appearance.

Subject tool chests and cabinets may be shipped, packaged or sold as individual units or in sets. When sold in sets, they typically include a cabinet with one or more chests that stack on top of the cabinet. Tool cabinets act as a base tool storage unit and typically have rollers, casters, or wheels to permit them to be moved more easily when loaded with tools. Work stations are tool cabinets with a work surface on the top that may be made of rubber, plastic, metal, or wood.

Top chests are designed to be used with a tool cabinet to form a tool storage unit. The top chests may be mounted on top of the base tool cabinet or onto an intermediate chest. They are often sold as a set with tool cabinets or intermediate chests, but may also be sold separately. They may be sold with mounting hardware (e.g., bolts) and instructions for assembling them onto the base tool cabinet or onto an intermediate tool chest which rests on the base tool cabinet. Smaller top chests typically have handles on the sides, for purposes of lifting the chest out of the package onto the cabinet, while the larger top chests typically lack handles. Intermediate tool chests are designed to fit on top of the floor standing tool cabinet and to be used underneath the top tool chest. Although they may be imported, sold or used separately from the
tool cabinet, intermediate chests are designed to be used in conjunction with tool cabinets. The intermediate chests typically do not contain handles. The intermediate and top chests have the capability of being bolted together.

Side cabinets are designed to be bolted or otherwise attached to the side of the base storage cabinet to expand the storage capacity of the base tool cabinet.

Subject tool chests and cabinets also may be shipped, packaged or sold with a tool set included, and when this occurs the tools are part of the subject merchandise.

Excluded from the scope of the investigation are tool boxes, chests and cabinets with bodies made of plastic, carbon fiber, wood, or other non-metallic substances. Also excluded from the scope of the investigation are portable tool boxes. Portable tool boxes have each of the following characteristics: (1) fewer than three drawers; (2) a handle on the top that allows the tool box to be carried by hand; and (3) a width that is 21 inches or less; and depth (front to back) not exceeding 10 inches.

Also excluded from the scope of the investigation are industrial grade steel tool chests and cabinets. The excluded industrial grade steel tool chests and cabinets are those:

(1) having a body that is over 60 inches wide; or

(2) having each of the following physical characteristics:

(a) a body made of steel that is 0.055” or more in thickness;

(b) all drawers over 21” deep;

(c) all drawer slides rated for 200 lbs. or more; and

(d) not prepackaged for retail sale.

Also excluded from the scope of the investigation are work benches with fewer than two drawers. Excluded work benches have a solid top working surface, have fewer than two drawers, are supported by legs and have no solid front, side, or back panels enclosing the body of the unit.
Also excluded from the scope of the investigation are metal filing cabinets that are configured to hold hanging file folders and are properly entered into United States through Harmonized Tariff Schedule of the United States ("HTSUS") category 9403.10.0020.

Subject tool chests and cabinets enter the United States through HTSUS 9403.20.0030, but may also enter through HTSUS 9403.20.0026 and 7326.90.3500. While HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of this investigation is dispositive.

F. Names of the Subject Countries and Any Intermediate Country Through Which the Merchandise is Transshipped

The Tool Chests that are the subject of this petition are produced in and exported from the People’s Republic of China and the Socialist Republic of Vietnam. Petitioner has no knowledge that the subject merchandise is currently being transshipped through any third country to the United States.

G. Producers and Exporters of the Subject Merchandise

Lists of known and suspected producers and exporters of Tool Chests from China and Vietnam are provided in Exhibit GEN-8 and Exhibit GEN-9, respectively. The Chinese producers that Petitioner believes to be the largest producers are identified in Exhibit GEN-2 (I Dec., para. 5). The Vietnamese producer that Petitioner believes to be the largest producer of subject merchandise is identified in Exhibit GEN-2 (I Dec., para. 6). Petitioner has supplied all information reasonably available. To the extent specific contact information is not available, Petitioner so indicated.

H. Volume and Value of Imports

The estimated volume and value of U.S. imports of Tool Chests from China and Vietnam are presented in Exhibit GEN-7 for calendar years 2014, 2015, and 2016. As described in section I.E.4 above, imports of Tool Chests enter the United States in large basket HTSUS
statistical subcategories for metal furniture, making it impossible to rely on official import statistics to determine the volume and value of subject imports. See Exhibits GEN-4, GEN-5, and GEN-6. There are no other public sources for these data.

Due to the relatively small number of purchasers and producers of Tool Chests in the United States, Petitioner has a reasonable knowledge of the size of the domestic Tool Chests market and the level of subject imports. See Exhibit GEN-2 ([ ] Dec., paras. 2-22). [ ] the volume and value of imports reported in this Petition [ ]

Source of information

See Exhibit GEN-2 ([ ] Dec., paras. 2-3). Comprehensive import data will be collected by the Commission in the course of its investigation.

I. Names and Addresses of U.S. Importers

Based on information reasonably available to Petitioner, lists of known and suspected importers of Tool Chests from China and Vietnam are provided in Exhibit GEN-10 as required by the Department. 19 C.F.R. § 351.202(b)(9). Petitioner has supplied all information reasonably available. To the extent specific contact information is not available, Petitioner has stated such.

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

Information related to allegations of less-than-fair-value sales of the subject merchandise from China and Vietnam is provided in Volume II and III of this Petition. See Petition Volumes II-III. Information related to allegations of countervailable subsidies on the subject merchandise from China is provided in Volume IV of this Petition. See Petition Volume IV.
III. THE DOMESTIC TOOL CHESTS INDUSTRY HAS BEEN MATERIALLY INJURED BY REASON OF UNFAIRLY TRADED IMPORTS FROM CHINA AND VIETNAM

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

The statute defines a “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.” 19 U.S.C. § 1677(10). The domestic like product in this investigation is Tool Chests, co-extensive with the scope definition. An examination of the Commission’s traditional six-factor test demonstrates that Tool Chests comprise a continuum of a single product with no clear dividing lines.

All Tool Chests are used primarily for tool and equipment storage by consumers in homes and garages. All subject merchandise, including top chests, intermediate chests, tool cabinets and side cabinets, work stations and metal storage units, have similar physical characteristics. All subject merchandise is made from flat-rolled steel, typically cold-rolled and/or stainless steel coils using the production process described above in section I.E.3. The subject merchandise has two or two or more drawers for storage in each individual unit. It also has a width (side to side) exceeding 21 inches but not exceeding 60 inches, as well as a drawer depth (front to back) exceeding 10 inches but not exceeding 24 inches.

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5 In reaching a like product determination, the Commission considers a number of factors, including physical characteristics and uses, interchangeability, channels of distribution, customer and producer perceptions, common manufacturing facilities, production processes and employees, and, where appropriate, price. See, e.g., Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995).

These dimensions distinguish Tool Chests from portable metal tool boxes, which are smaller than subject Tool Chests in order to allow portable tool box to be carried comfortably from place to place when loaded with tools. They also distinguish them from the industrial tool storage units, which are made from heavy-duty steel for use in physically demanding industrial environments. Unlike the subject Tool Chests, industrial grade tool chests are not prepackaged for retail sale.

All Tool Chests are sold through similar channels of distribution. They are prepackaged for sale to consumers and are sold through “big box” home improvement stores, club stores, hardware stores and other retail outlets, as well as through online retailers. Consumers purchase the prepackaged product with the characteristics that match their tool storage needs.

With respect to production processes, equipment and employees, all Tool Chests are produced using the same basic manufacturing process, as described in section I.E.3. above, as well as on the same equipment and by the same employees. Other types of tool storage (portable and industrial) not within the scope and domestic like product definition are not made on the same equipment, do not use the same production processes, and are not made by the same employees.

Producers of subject Tool Chests, their customers and end-users perceive all Tool Chests to be the same product, due to their size, tool storage capacities, and retail packaging. They do not perceive other non-steel, portable, or industrial grade tool chests and cabinets to be the same as the subject products. Further, these other types of non-subject products are sold through different channels of distribution and are priced much differently based on their different physical characteristics.
With respect to price, all Tool Chests are sold within a reasonable range of similar prices based on a continuum of sizes (depths, widths, number of levels and drawers) and options for physical characteristics such as finish type (paint, powder coating, etc.), color, and capacity.

Accordingly, the domestic like product in these investigations should be defined as Tool Chests, co-extensive with the scope definition.

**B. The Domestic Industry Consists of All U.S. Producers of Tool Chests**

Section 771(4)(A) of the statute defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.” 19 U.S.C. § 1677(4)(A). Based on the domestic like product definition, the domestic industry consists of all U.S. producers of Tool Chests. In this case, to Petitioner’s best knowledge, Waterloo and MBI are the only U.S. producers of the subject Tool Chests. See supra, sections I.A.-B.7

**C. Imports of Tool Chests from China Are Not Negligible**

Imports from China and Vietnam surpass the negligibility threshold established by the statute. Under the statute, imports from a subject country corresponding to a domestic like product that account for less than three percent of all such merchandise imported into the United States are not considered significant.

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7 [ ]
States during the most recent 12 months for which data are available preceding the filing of the petition are deemed negligible. 19 U.S.C. § 1677(24)(A)(i). Here, the volume of imports from China and Vietnam during the most recent 12-month period (April 2016 through March 2017) respectively exceeded the three percent negligibility threshold as required by the statute. See Exhibits GEN-2 ([ ] Dec., para. 23) and GEN-7.

As discussed above in sections I.E.4. and I.H., because Tool Chests are being imported under various basket HTSUS statistical subcategories, [

] See Exhibit GEN-2 ([ ] Dec., para. 3). [ ] the volume of imports from China in the most recent 12-month period was [ ] units, accounting for [ ] percent of total imports. See id. at para. 23; Exhibit GEN-11. [ ] volume of U.S. imports from Vietnam in the most recent 12 month period was [1,600] units, accounting for [ ] percent of total imports. Id. [ ]

] Id. Thus, imports from China and Vietnam each accounted for more than three percent of subject imports during the most recent twelve-month period. Accordingly, imports of Tool Chests from China and Vietnam are not negligible within the meaning of 19 U.S.C. § 1677(24)(A)(i).

D. The Commission Should Cumulate Imports from China and Vietnam in Analyzing the Volume and Price Effects of the Unfair Imports

In assessing material injury, the Commission is required to cumulate the volume and price effects of subject imports from all countries with respect to which petitions were filed on the same day, and which compete with each other and the domestic like product in the U.S. market. 19 U.S.C. § 1677(7)(G)(i). The statutory criteria for cumulation are met in this case.
The antidumping petitions against imports of Tool Chests from China and Vietnam, and the countervailing duty petition against subsidized subject imports from China, are being simultaneously filed. Additionally, none of the statutory exceptions to cumulation applies. See 19 U.S.C. § 1677(7)(G)(ii). Accordingly, as long as there is evidence of a reasonable overlap in competition between the subject imports and the domestic like product, cumulation of subject imports for purposes of this investigation is mandatory.

An examination of the factors considered by the Commission in determining whether there is a reasonable overlap in competition between subject imports and the domestic like product indicates that each factor is met in this case. Both domestically-produced and imported Tool Chests, whether imported from China or Vietnam, are fungible products that are produced to standard sizes, storage capacities, and finishes and compete directly with one another. Imports from each country and the domestic product are also sold through the same channels of distribution, primarily through “big box” retailers and direct to consumers via e-commerce. See Exhibit GEN-2 (Declaration, paras. 3-18). In addition, imports from both China and Vietnam as well as the domestic like product are sold on a nationwide basis and, thus, in the same geographic markets. Imports from China and Vietnam and U.S.-produced merchandise have been simultaneously present in the U.S. market in each of the past three years. See Exhibit

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8 To determine whether subject imports compete with one another and the domestic like product, the Commission generally considers the: (1) fungibility of the product from various sources, (2) the presence of sales or offers to sell in the same geographic markets, (3) common channels of distribution, and (4) simultaneous market presence. See, e.g., Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan, USITC Pub. 1845 (Final) (May 1986), aff’d, Fundacao Tupy, S.A. v. United States, 678 F. Supp. 898 (Ct. Int’l Trade), aff’d, 859 F.2d 915 (Fed. Cir. 1988). No single factor is determinative. See Goss Graphic Sys., Inc. v. United States, 33 F. Supp. 2d 1082, 1086 (Ct. Int’l Trade 1998). Additionally, only a reasonable overlap of competition is required. Goss Graphics Sys., Inc., 33 F. Supp. 2d at 1086 (“cumulation does not require two products to be highly fungible”); Mukand Ltd. v. United States, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); Wieland Werke, AG v. United States, 718 F. Supp. 50, 52 (Ct. Int’l Trade 1989) (“Completely overlapping markets are not required.”).
Accordingly, there is a reasonable overlap of competition among the subject imports and between subject imports and the domestic like product within the meaning of the statute. The Commission should cumulate imports of Tool Chests from China and Vietnam in its material injury (and threat of material injury) assessment.

E. Imports from China and Vietnam Are Causing Material Injury to the Domestic Tool Chests Industry

In determining whether the domestic industry has been injured by reason of the imports under investigation, the statute directs the Commission to consider: (1) the volume of imports of the subject merchandise; (2) the effect of imports of that merchandise on prices in the United States for the domestic like product; and (3) the impact of imports of such merchandise on domestic producers in the context of production operations within the United States. 19 U.S.C. § 1677(7)(B). Information reasonably available to Petitioner indicates unfairly traded imports from China and Vietnam have been, and continue to be, a cause of material injury to the domestic industry producing Tool Chests.

1. The Volume of Imports from China and Vietnam Was Significant and Increasing in Recent Years

In evaluating the volume of imports, the Commission must “consider whether the volume of imports of the merchandise, or any increase in that volume either in absolute terms or relative to production or consumption in the United States, is significant.” 19 U.S.C. § 1677(7)(C)(i). In these investigations, available data show that the volume of subject imports, both in absolute terms and relative to U.S. consumption and production, is significant within the meaning of the relevant statutory provision.
a. **The Volume of Imports Is Significant and Increasing in Absolute Terms**

The volume and value of subject imports from China and Vietnam is significant on an absolute basis. Subject imports totaled [ ] percent of imports in 2016. See Exhibit GEN-7. Subject imports also increased significantly over the POI. The volume of cumulated subject imports rose from [ ] in 2014 to [ ] in 2016, or by [ ] percent. In that same period, subject import values also increased from [ ] percent. Id.

| $339 million |

b. **Subject Imports Are Also a Significant and Increasing Share of the U.S. Market**

The volume of subject imports is also significant relative to consumption. As a share of the U.S. market, subject imports accounted for [ ] See Exhibit GEN-7. Subject imports also increased significantly on a relative basis, rising from [ ] percent of the U.S. market in 2014 to [ ] percent of the market in 2016 on a volume basis, and from [ ] percent of the market in 2014 to [ ] percent of the market in 2016 on a value basis. Id. Thus, on a volume basis, subject imports captured an additional [ ] percentage points in market share between 2014 and 2016, as U.S. producers lost [ ] percentage points of market share. See id. Subject imports’ market share gain was at the direct expense of U.S. producers. These data establish that the volume of subject imports and the increase in those imports were significant both absolutely and on a relative basis.
2. **The Dumped Subject Imports Have Had Significant Negative Price Effects on the U.S. Tool Chests Industry**

The low-priced, dumped and subsidized imports subject to this proceeding have had significant negative price effects on the U.S. Tool Chests industry. Subject imports have increased their share of the U.S. market by significantly undercutting U.S. producer price levels. Price underselling by unfairly-traded imports of Tool Chests from China and Vietnam has also depressed the prices at which domestic producers have sold Tool Chests during the past three years.

a. **Subject Imports Have Undercut and Depressed U.S. Prices**

Evidence reasonably available to Petitioners indicates that the surge in subject imports was driven by significant underselling by subject imports, important evidence that subject imports have had negative price effects. U.S. producers have lost sales and significant revenue due to lower-priced offerings from subject imports that undersold U.S. prices. **See Exhibit GEN-2 ([Dec., paras. 8-23, 25] and GEN-12).** Customers reported to Waterloo that the prices of subject imports were [ ] below U.S. producers’ prices in 2016. **See Exhibit GEN-2 ([Dec., paras. 12-18].** Moreover, [ ]

The underselling and declining subject import prices resulted in the depression of U.S. producer prices across the 2014 to 2016 period. **See Exhibit GEN-2 ([Dec., paras. 25-}
26) and GEN-12. Domestic prices fell during the POI as U.S. producers were forced to reduce their prices to compete with low-priced subject imports. See Exhibit GEN-2 ([Dec., paras. 25-26]. These price declines occurred as subject imports continued to enter the U.S. market in 2016 in increasing volumes. See Exhibit GEN-7. The price depression exerted by the subject imports on domestic producers’ prices has, in turn, led to a deterioration of U.S. producers’ profitability levels. See Exhibit GEN-13.

b. Identification of CASWR Products for Which Petitioner Requests Collection of Price Data

Pursuant to the Commission’s regulations, 19 C.F.R. § 207.11(b)(2)(iv), Petitioner recommends that the Commission collect pricing data on the following Tool Chests products:

**PRODUCT 1**: 26-27 inch wide top chest sold in combination with a 26-27 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 9 to 10 total drawers (across both units) with ball bearing drawer slides, a minimum chest depth (front to back) of 15 inches, a minimum cabinet depth of 18 inches and a combined unit weight (not shipping weight) of 150 to 180 lbs.

**PRODUCT 2**: 40-46 inch wide top chest sold in combination with a 40-46 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 16 to 21 drawers (across both units) with ball bearing slides, a chest depth of and cabinet depth of 16 to 19 inches; and combined unit weight (not shipping weight) of less than 420 lbs.

**PRODUCT 3**: 52-54 inch wide top chest sold in combination with a 52-54 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 15 to 18 drawers (across both units) with ball bearing slides, a chest depth of and cabinet depth of 16 to 21 inches; and combined unit weight (not shipping weight) of less than 420 lbs.

**PRODUCT 4**: 45 to 56 inch wide workstation or mobile workbench, with a body of cold-rolled carbon steel, having 8 to 11 drawers or doors with ball bearing slides, a top work surface, a unit depth of 17-24 inches, and a unit weight (not shipping weight) of less than 175 lbs. This category specifically excludes work stations or mobile workbenches in which the body is made of
stainless steel but includes tool chests and cabinets in which the drawers or door fronts are made of stainless steel.

These price descriptors represent models that account for a significant volume of U.S. sales of subject imports and the domestic like product. Accordingly, they are appropriate product-types for the Commission’s analysis and comparison of U.S. producer and importer prices.

3. **Unfair Imports Have Had an Injurious Impact on the Domestic Industry Producing Tool Chests**

The domestic industry has suffered material injury by reason of the subject imports, as manifested in market share lost to the unfair imports, depressed U.S. prices, and resulting deterioration in key trade and financial variables.

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

Subject imports surged over the period between 2014 and 2016, leading to the domestic industry’s (1) declining production and shipments; (2) declining net sales; (3) deteriorating financial performance; and (4) lost sales and revenues. See Exhibit GEN-13. U.S. producers suffered as unfairly low-priced subject imports continued to enter the United States and capture an increasing market share. Compare Exhibit GEN-7 with Exhibit GEN-13.

In 2016, as subject imports reached their highest market share of [ ] percent, numerous domestic industry trade and financial indicators declined to [ ] percent between 2014 and 2016, while shipments fell by [ ] percent. See Exhibit GEN-13. U.S. producers’ capacity utilization stood at [30] percent in 2016, as domestic industry sales were displaced by unfairly-traded subject imports. Id. The domestic industry has capacity sitting idle that could supply the U.S. market, but it has been unable to sell more Tool Chests to
U.S. customers due to the increasing volumes of lower-priced dumped and subsidized subject imports.

b. **The U.S. Industry’s Declining Sales and Operating Income Demonstrate the Injurious Impact of Substantial Volumes of Low-Priced Imports from the Subject Countries**

The financial performance of the domestic Tool Chests industry also deteriorated as a result of unfairly traded imports from the subject countries. U.S. producers’ net sales declined from [ ] in 2014 to [ ] in 2016, or by [ ] percent, as U.S. producers lost sales and saw prices deteriorate due to increased volumes of subject imports. See Exhibit GEN-13.

The increasing volumes of low-priced imports that undercut U.S. producers’ prices resulted in [ ] worsening profits for the U.S. industry. Id. In 2016, when subject imports reached their highest market penetration, domestic producers’ operating income declined from [ ] to [ ] in 2016, or by [ ] percent. See Exhibits GEN-7 and GEN-13. Domestic producers’ net income also dropped from [ ] to [ ], or by [ ] percent. Id. Further, by 2016, U.S. producers’ ratio of operating income to net sales had weakened to [ ] percent, down from [5.6] percent in 2014. Id. The financial deterioration of the domestic Tool Chests industry is directly related to declining sales prices and revenue resulting from increased volumes of unfairly-priced imports.

c. **Petitioner Has Lost Sales and Revenues to Unfairly-Traded Tool Chests Imports from the Subject Countries**

The existence of a causal link between rising volumes of low-priced subject imports and U.S. producers’ declining profits is corroborated by the anecdotal lost sales and lost revenue information collected and attached as Exhibit GEN-12. This exhibit identifies instances in which Petitioner lost sales to unfairly traded Tool Chests imports from China and Vietnam, as...
well as transactions in which Petitioner lost revenues due to being forced to lower its prices in response to competing bids from unfairly-traded Tool Chests imports from the subject countries. Id. This evidence of lost sales and revenues further ties the financial performance of the domestic industry to the injurious price and volume of dumped and subsidized subject imports.

* * *

All of the indicators of material injury are present in this case. The volume of subject imports was significant and increasing both absolutely and relatively over the POI. The subject imports significantly undersold the domestic product, causing domestic prices to fall and domestic sales volumes to drop. The domestic industry experienced declines in key trade variables and suffered deteriorating profitability in 2016, an adverse impact of the unfairly-traded imports. These factors indicate that the U.S. industry has suffered material injury by reason of unfairly-traded imports from China and Vietnam.

IV. THE DOMESTIC INDUSTRY IS THREATENED WITH FURTHER MATERIAL INJURY BY REASON OF UNFAIR IMPORTS OF TOOL CHESTS FROM CHINA AND VIETNAM

In addition to analyzing present material injury, the Commission may assess whether the domestic industry is threatened with material injury by reason of the unfair imports. 19 U.S.C. § 1677(7)(F). In making this determination, the Commission is directed to examine a number of factors specified in the statute, including an increase in foreign producers’ productive capacity or existing unused capacity; a significant rate of increase of the volume or market penetration of the subject imports; and the likelihood that imports of the subject merchandise are entering at prices that will have a significant depressing or suppressing effect on domestic prices. 19 U.S.C. § 1677(7)(F)(i). In assessing threat of material injury, the Commission should exercise its discretion to cumulate subject imports because the statutory criteria are met. See section II.D.
As indicated below, there is evidence that imports of Tool Chests from China and Vietnam present a massive and imminent threat of further material injury to the domestic industry producing Tool Chests.

- There are at least 50 subject foreign producers of Tool Chests in China and Vietnam. See Exhibits GEN-8 and GEN-9. There is foreign producer information from a confidential source about the largest Chinese producers of Tool Chests and the largest Vietnamese producer of Tool Chests. See Exhibit GEN-2 ([Dec., paras. 5-6].

- The foreign subject producers maintain a significant export business with respect to the subject merchandise, with the United States being one of their primary export markets. See Exhibits GEN-2 ([Dec., paras. 10-18], GEN-14 and GEN-15. In addition, subject producers maintain substantial production capacity to produce Tool Chests that would allow them to ship increasing volumes of subject merchandise to the United States. See Exhibits GEN-14 and GEN-15.

- Chinese subject producers are also encouraged by the Government of China to export Tool Chests through the provision of subsidies such as export loans and credit from Chinese state-owned banks and grants contingent upon export performance. See Petition Vol. IV.

- There has been a rapid rate of increase in subject import volume and market share during the period. From a volume of [ ] units and a market share of [ ] percent in 2014, the subject imports increased in volume to [ ] units and to a market share of [ ] percent in 2016. See supra section III.E.1.; Exhibits GEN-2 ([Dec., paras. 20-21) and Exhibit GEN-7.

- It is likely that subject imports will enter the United States at pricing levels that will undercut and depress U.S. prices in the imminent future, as they have during the past three years. See supra section III.E.2.; Exhibit GEN-12. In the face of recent aggressive pricing by the subject imports and the injurious impact on the domestic Tool Chests industry’s profitability, the threat of continued depressing effects of subject imports on domestic prices is real and imminent. See supra section III.E.3.; Exhibit GEN-2 ([Dec., para. 26).
V. CONCLUSION

The information presented in this Petition provides evidence reasonably available to the Petitioner that imports of Tool Chests from China and Vietnam are being sold in the United States at less than fair value and that the Government of China is providing countervailable subsidies with respect to the manufacture, production, and export of Tool Chests. This Petition further provides evidence that the domestic industry producing Tool Chests has been materially injured, and is threatened with material injury, by reason of these unfairly-traded imports. Accordingly, antidumping and countervailing duty investigations should be initiated against imports of Tool Chests from China, an antidumping duty investigation should be initiated against imports of Tool Chests from Vietnam, and duties should be imposed to offset these unfair trade practices.

Respectfully submitted,

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