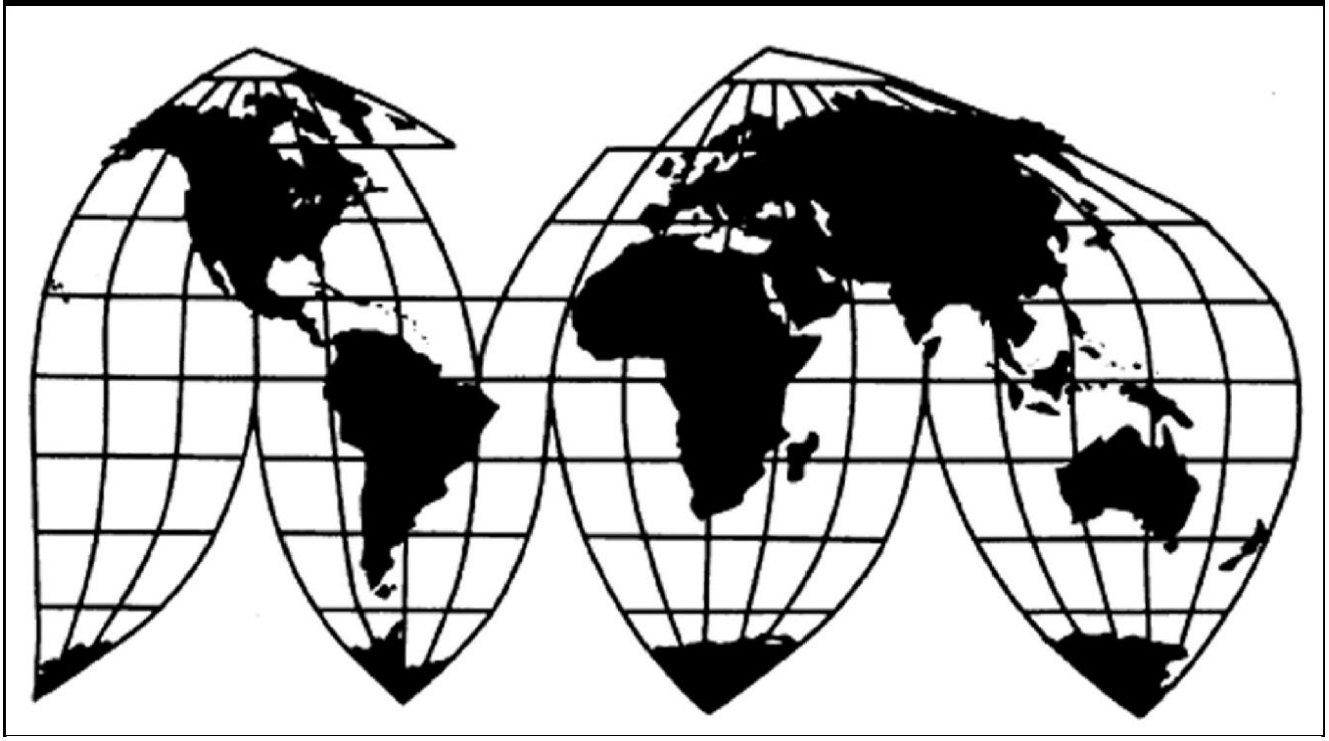
Aluminum Lithographic Printing Plates from China and Japan

Investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Final)

Publication 5559 **November 2024**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

Amy A. Karpel, Chair
David S. Johanson
Rhonda K. Schmidtlein
Jason E. Kearns

Catherine DeFilippo

Director of Operations

Staff assigned

Celia Feldpausch, Investigator
Brennan Taylor, Industry Analyst
James Horne, Economist
Jennifer Brinckhaus, Accountant
Lita Davis-Harris, Statistician
Christopher W. Robinson, Attorney
Nathanael Comly, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Aluminum Lithographic Printing Plates from China and Japan

Investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Final)

Publication 5559

November 2024

CONTENTS

Page

CONTENTS

Page

CONTENTS

Page

CONTENTS

Page

CONTENTS

Page

Appendixes

Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (***) in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-694 and 731-TA-1641-1642 (Final)

Aluminum Lithographic Printing Plates from China and Japan

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is materially injured by reason of imports of aluminum lithographic printing plates ("ALPs") from China and Japan, provided for in subheading 3701.30.00 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV"), and subsidized by the government of China.[2] [3] [4]

BACKGROUND

The Commission instituted these investigations effective September 28, 2023, following receipt of petitions filed with the Commission and Commerce by Eastman Kodak Company, Rochester, New York. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of ALPs from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports of ALPs from China and Japan were sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission,

[1] The record is defined in § 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

[2] 89 FR 79256, 89 FR 79250, and 89 FR 79248 (September 27, 2024).

[3] Commissioner David S. Johanson dissenting.

[4] The Commission also finds that imports subject to Commerce's affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping and countervailing duty orders on ALPs from China.

Washington, DC, and by publishing the notice in the *Federal Register* on May 14, 2024 (89 FR 41993).[5] The Commission conducted its hearing on September 17, 2024. All persons who requested the opportunity were permitted to participate.

[5] A revision to the final phase schedule was published in the *Federal Register* on August 13, 2024 (89 FR 65933).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of aluminum lithographic printing plates ("ALPs" or "plates") from China and Japan found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value and subsidized by the government of China.[1] We also find that critical circumstances do not exist with respect to imports of ALPs from China that are subject to Commerce's final affirmative critical circumstances determinations.

I. Background

Eastman Kodak Company ("Kodak" or "Petitioner"), a domestic producer of ALPs, filed the petitions in these investigations on September 28, 2023. Kodak submitted prehearing and posthearing briefs and final comments, and representatives of Kodak appeared at the hearing accompanied by counsel.

Several respondent entities participated in these investigations. FUJIFILM North America Corporation ("FNAC"), an importer of subject merchandise, FUJIFILM Corporation ("Fujifilm Japan"), a producer and exporter of subject merchandise in Japan, and FUJIFILM Printing Plate (China) Co. ("Fujifilm China"), a producer and exporter of subject merchandise in China (collectively, "Fujifilm" or "Respondents"), submitted prehearing and posthearing briefs and final comments. Representatives of Fujifilm, along with representatives of the following purchasers of ALPs—Quad Graphics, Inc., T Enterprises Inc., dba 1Vision, Varsity Yearbook, Teton Media Works Inc., and Bedwick & Jones Printing Inc.— appeared at the hearing accompanied by counsel. In addition, ECO3 Graphics USA Corp, a U.S. importer of ALPs from China and nonsubject sources, and ECO3 (Wuxi) Printing Plate Co., Ltd., a producer of ALPs in China (collectively, "ECO3"), submitted a prehearing brief.

U.S. industry data are based on the questionnaire responses two firms, Fujifilm Manufacturing USA Inc. ("Fujifilm Manufacturing USA" or "Greenwood") and Kodak, that accounted for nearly all known U.S. production of ALPs during the January 2021 to March 2024

[1] Commissioner David S. Johanson determines that an industry in the United States is not materially injured or threatened with material injury by reason of subject imports of ALPs from China and Japan. He joins with and adopts sections I-V.C. *See Dissenting Views of Commissioner David S. Johanson.*

period of investigation ("POI").[2] U.S. import data are based on the questionnaire responses of five firms that accounted for the vast majority of U.S. imports of subject merchandise from China and Japan and the vast majority of nonsubject imports in 2023.[3] Foreign industry data and related information are based on the questionnaire responses of two producers/exporters of ALPs in China, accounting for approximately *** percent of ALPs production in China and *** U.S. imports of ALPs from China in 2023, and two producers/exporters of ALPs in Japan, accounting for *** production of ALPs in Japan and *** U.S. imports of ALPs from Japan in 2023.[4]

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the "domestic like product" and the "industry."[5] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), 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."[6] In turn, the Tariff Act defines "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."[7]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[8]

---

[2] Confidential Staff Report, INV-WW-127 (Oct. 9, 2024) ("CR") at 3.1 and n.1; *Aluminum Lithographic Printing Plates from China and Japan,* Inv. Nos. 701-TA-694 and 731-TA-1641-1642 (Final), USITC Pub. 5559 (Nov. 2024) ("PR") at 3.1 and n.1; Hearing Tr. at 29-30 (Herrmann).

[3] CR/PR at 4.1. Because ALPs are imported under HTS subheading 3701.30.00, a basket category that includes out-of-scope merchandise, import data are based on questionnaire responses.

[4] CR/PR at 7.3.

[5] 19 U.S.C. § 1677(4)(A).

[6] 19 U.S.C. § 1677(4)(A).

[7] 19 U.S.C. § 1677(10).

[8] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

Therefore, Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is "necessarily the starting point of the Commission's like product analysis."[9] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[10] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[11] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[12] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[13]

B. Product Description

Commerce defined the scope of the imported merchandise under investigation as follows:

---

[9] *Cleo Inc. v. United States,* 501 F.3d 1291, 1298 (Fed. Cir. 2007); see also *Hitachi Metals, Ltd. v. United States,* Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

[10] *Cleo*, 501 F.3d at 1298 n.1 ("Commerce's {scope} finding does not control the Commission's {like product} determination."); *Hosiden Corp. v. Advanced Display Mfrs.,* 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission's determination defining six like products in investigations where Commerce found five classes or kinds).

[11] *See*, *e.g.*, *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

[12] *See*, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

[13] *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also* S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in "such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

The merchandise covered by these investigations is aluminum lithographic printing plates. Aluminum lithographic printing plates consist of a flat substrate containing at least 90 percent Aluminum by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the production of newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials through an offset printing process, where an aluminum lithographic printing plate facilitates the transfer of an image onto the printed media.

Aluminum lithographic printing plates within the scope of these investigations include all aluminum lithographic printing plates, irrespective of the dimensions or thickness of the underlying aluminum substrate, whether the plate requires processing after an image is applied to the plate, whether the plate is ready to be mounted to a press and used in printing operations immediately after an image is applied to the plate, or whether the plate has been exposed to light or heat to create an image on the plate or remains unexposed and is free of any image.

Subject merchandise also includes aluminum lithographic printing plates produced from an aluminum sheet coil that has been coated with a light-sensitive image-recording layer in a subject country and that is subsequently unwound and cut to the final dimensions to produce a finished plate in a third country (including the United States), or exposed to light or heat to create an image on the plate in a third country (including in a foreign trade zone within the United States).

> Excluded from the scope of these investigations are lithographic printing plates manufactured using a substrate produced from a material other than aluminum, such as rubber or plastics.[14] [15]

ALPs are image carriers that are used in offset printing processes. They are commonly used to produce printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.[16] ALPs are put into a device called a platesetter or image setter which imparts the desired image onto the ALP. The platesetter may transfer the image by two different methods, computer-to-film ("CTF") or computer-to-plate ("CTP"). In CTF printing, the image is first imparted onto photographic film and then applied to the plates through an exposure process. In CTP printing, the image is directly applied to the plates. Once the image is etched onto the ALP, wet plates (plates which require chemical treatment after etching) are then fed through a plate developer, whereas process free plates do not require any additional processing step. ALPs are then mounted in printing presses and used with fountain solutions and inks to reproduce the image on a suitable receiving material (*e.g.*, cloth, paper, or plastic). Each ALP carries a specific color record, and thus, multiple plates and inks must be used to generate a colored image.[17]

ALPs are manufactured using lithographic aluminum plate, a flat substrate containing at least 90 percent aluminum by weight. The aluminum substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the substrate. An image-recording, oleophilic layer that is sensitive to light is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer of the ALP.[18]

C. Arguments of the Parties

Kodak argues that the Commission should define a single domestic like product, coextensive with the scope, as it did in the preliminary phase.[19] In Kodak's view, the

---

[14] *Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 89 Fed. Reg. 79256 (Sept. 27, 2024); *Aluminum Lithographic Printing Plates From Japan: Final Affirmative Determination of Sales at Less-Than-Fair-Value*, 89 Fed. Reg. 79250 (Sept. 27, 2024).

[15] The scope is unchanged from the preliminary phase of these investigations. *Aluminum Lithographic Printing Plates from China and Japan*, Inv. Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary), USITC Pub. 5475 (Nov. 2023) ("*Preliminary Determinations*") at 6-7.

[16] CR/PR at 1.8.

[17] CR/PR at 1.9—1.10.

[18] CR/PR at 1.10—1.13, 2.1.

[19] Kodak Prehearing Br. at 4-6.

Commission's traditional domestic like product factors continue to support a single domestic like product definition coextensive with the scope, given that all ALPs have similar physical characteristics and end uses; share the same production processes and manufacturing facilities using the same employees; are not interchangeable with any other printing plates; are sold through similar channels of distribution; are perceived by producers and customers to comprise the same unique product; and are sold within a range of prices.[20] Respondents do not contest Petitioner's proposed definition of the domestic like product.[21]

D. Analysis and Conclusion

In its preliminary determinations, the Commission defined a single domestic like product consisting of all ALPs, coextensive with Commerce's scope.[22] The record indicated that all ALPs are produced using lithographic grade aluminum and have a polymer-based coating capable of capturing an image using either light or heat for use in offset printing. The Commission found that all domestically produced ALPs are produced using the same manufacturing processes, facilities, and employees; are interchangeable; are sold through the same channels of distribution; and are perceived by producers and customers to comprise the same product category. It found that ALPs are produced in a range of dimensions and gauges, corresponding to a range of prices, and thus exist on a continuum. Further, the Commission found that ALPs generally differed from other, out-of-scope types of printing plates, in terms of physical characteristics, end uses, manufacturing processes, and prices, which would preclude ALPs and other types of printing plates from being used interchangeably in the same end uses.[23]

The record of the final phase of these investigations does not contain any new information or argument concerning the characteristics and uses of ALPs suggesting that the Commission should revisit the domestic like product definition from the preliminary determinations.[24] No party contests Kodak's argument that the Commission should adopt the same definition in the final phase of the investigations. Accordingly, we again define a single domestic like product consisting of ALPs, coextensive with the scope.

[20] Kodak Prehearing Br. at 5-6.
[21] Fujifilm Prehearing Br. at 58 n.103; CR/PR at 1.13.
[22] *Preliminary Determinations,* USITC Pub. 5475 at 10 (Nov. 2023) at 10.
[23] *Preliminary Determinations,* USITC Pub. 5475 at 10 (Nov. 2023) at 8-10.
[24] *See* CR/PR at 1.10 — 1.13.

III. Domestic Industry

The domestic industry is defined as the domestic "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."[25] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

A. Related Parties

In these investigations, we must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[26] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[27]

One U.S. producer, Fujifilm Manufacturing USA, qualifies as a related party because it is affiliated with FNAC, a U.S. importer of subject merchandise from Japan and China, and Fujifilm

[25] 19 U.S.C. § 1677(4)(A).

[26] *See Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem*., 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

[27] The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see *also Torrington Co. v. United States*, 790 F. Supp. at 1168.

China and Fujifilm Japan, foreign producers and exporters of subject merchandise in China and Japan, through common control.[28] [29]

1. Arguments of the Parties

Petitioner's Arguments. Kodak argues that the Commission should include in the domestic industry all producers accounting for production of the domestic like product during the POI, and that appropriate circumstances do not exist to exclude Fujifilm Manufacturing USA.[30] Kodak argues that Fujifilm Manufacturing USA's trade and financial indicators deteriorated as the volume of subject imports increased and therefore its exclusion would mask declines in the domestic industry's condition.[31]

Respondents' Arguments. Fujifilm argues that appropriate circumstances exist to exclude Fujifilm Manufacturing USA from the domestic industry.[32] Fujifilm contends that the related parties provision provides the Commission with broad discretion to exclude related parties that might distort the Commission's analysis. According to Fujifilm, its closure of the Greenwood facility created the kind of distortion the related parties provision seeks to prevent because Fujifilm Manufacturing USA's declining trade and other indicators resulted from its own decision made prior to the POI to rationalize global capacity in the face of declining global demand for ALPs, not subject import competition.[33] Fujifilm also argues that the five factors the Commission has traditionally considered to determine whether appropriate circumstances exist to exclude a related party do not support Fujifilm Manufacturing USA's exclusion.[34]

2. Analysis

Fujifilm Manufacturing USA accounted for *** percent of U.S. production in 2021 and *** percent in 2022, but *** production thereafter, having ceased domestic production in

[28] CR/PR at Tables 3.3 & 3.11. *** owns *** percent of Fujifilm Manufacturing USA, FNAC, and Fujifilm Japan. Fujifilm Japan owns *** percent of Fujifilm China. *Id.* at 3.3 n.3.

[29] While Kodak is related to Kodak Japan Limited, a producer of subject merchandise in Japan, it ***, nor did *** export subject merchandise to the United States during the period of investigation. *See* CR/PR 4.2 n.4, Tables 3.2 and 7.1. Therefore, Kodak does not qualify as a related party.

[30] Kodak Prehearing Br. at 6, 8.

[31] Kodak Prehearing Br. at 9-10.

[32] Respondents Prehearing Br. at 3, 12, 23-26, 28-35.

[33] Fujifilm Prehearing Br. at 28.

[34] Fujifilm Prehearing Br. at 29-35.

March 2022.[35] It *** the petitions.[36] Although Fujifilm Manufacturing USA did not import subject merchandise during the POI, imports of subject merchandise by its affiliated U.S. importer, FNAC, were *** square meters in 2021, *** square meters in 2022, and *** square meters in 2023; they were *** square meters in January-March 2024 ("interim 2024) compared to *** square meters in January-March 2023 ("interim 2023").[37] The ratio of these imports to Fujifilm Manufacturing USA's domestic production was *** percent in 2021 and *** percent in 2022.[38] In explaining its reasons for importing, Fujifilm stated that it increased imports to replace the supply from its Greenwood facility that it closed as part of corporate strategy to reallocate production globally in light of macroeconomic conditions, including declining demand, greater overall demand in Asian markets, and proximity to raw materials.[39] Fujifilm Manufacturing USA's operating income margin was *** in 2021 but *** in 2022.[40]

Fujifilm Manufacturing USA's ratio of subject imports by its affiliated U.S. importer to its domestic production increased dramatically from 2021 to 2022 as its domestic production was increasingly replaced by subject imports until it ceased production in March 2022.[41] Fujifilm claims that this change in sourcing from domestic supply to subject imports indicates that its primary interest is in importation.[42]

As Fujifilm Manufacturing USA was a U.S. producer and did not itself import subject merchandise during the POI, its primary interest was in domestic production, until it ceased such production in March 2022. When a U.S. producer is related to a U.S. importer or exporter of subject merchandise, the Commission examines whether the domestic producer's affiliation acts to shield it from subject import competition and its inclusion or exclusion in the industry would mask the effects of subject imports on the industry.[43] As discussed below, the record

[35] CR/PR at Tables 3.4, 3.7.
[36] CR/PR at Table 3.11.
[37] CR/PR at Table 3.11.
[38] CR/PR at Table 3.11.
[39] CR/PR at Table 3.12; Fujifilm Prehearing Br. at 14-22.
[40] CR/PR at Table 6.3.
[41] CR/PR at Tables 3.4 and 3.11.
[42] Fujifilm Prehearing Br. at 33.
[43] *See*, *e.g.*, *LG Electronics, Inc. v. U.S. Intern. Trade Comm'n*, 26 F. Supp. 3d 1338, 1344-47 (Ct. Int'l Trade 2014) (affirming Commission's decision not to exclude domestic producer, over respondents' objection, when the firm did not appear to benefit from subject imports and exclusion would mask declines in domestic industry during the POI); *see also Certain Tissue Paper from China*, Inv. No. 731-TA-1070B (Final), USITC Pub. 3758 (Mar. 2005) at 11-12 ("{E}xclusion may not be warranted simply because a large producer (that was also a related party) has shifted to become a substantial importer of such
(Continued...)

indicates that Fujifilm Manufacturing USA's domestic production was not shielded from competition with subject imports during the POI and that its exclusion would skew the domestic industry data.

As Fujifilm Manufacturing USA's production and shipments declined, the volume of cumulated subject imports – *** – increased substantially, gaining in market share as Fujifilm Manufacturing USA's share of the apparent U.S. consumption declined from *** in 2021 to *** in 2022.[44] As Fujifilm Manufacturing USA's shipments declined, its financial performance declined as well.[45] Further, the record indicates that FNAC's imports of subject merchandise were of the same products that were domestically produced by Fujifilm Manufacturing USA, indicating that these subject imports competed directly with Fujifilm's own domestically produced ALPs.[46] Excluding Fujifilm Manufacturing USA from the domestic industry would mask declines in the domestic industry's market share, output, and financial performance during the POI as subject import volume and market share increased, particularly given that Fujifilm Manufacturing USA was ***.[47]

Fujifilm argues that its decision to offshore production was made before the POI.[48] Even if that were the case, the Commission has previously declined to exclude from the domestic industry a related domestic producer that made a decision prior to the Commission's POI to offshore production of the merchandise at issue to a subject country when it has found that

---

merchandise during the period of investigation. A significant factor is whether the firm's domestic production operations significantly benefitted financially from its relationship to subject imports or from its import activities. Such benefits create the sort of data distorting effect that the exercise of discretion to exclude under the related party provision seeks to overcome."). The legislative history of the related party provision in the Trade Agreements Act of 1979 emphasizes that a producer should be excluded when it is shielded from the effects of the subject imports: "where a U.S. producer is related to a foreign exporter and the foreign exporter directs his exports to the United States so as not to compete with his related U.S. producer, this should be a case where the ITC would not consider the related U.S. producer to be a part of the domestic industry." S. Rep. No. 96-249, at 83 (1979) (emphasis added). The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act likewise explains that the purpose of the related party provision is "to reduce any distortion in industry data caused by the inclusion in the domestic industry of a related producer who is being shielded from the effects of the subject imports." SAA at 858.

[44] CR/PR at Table C-2.

[45] CR/PR at Table 6.3.

[46] *See, e.g.,* FNAC's U.S. Importer Questionnaire at III-2 and Attach. A, EDIS Doc. 826696 (July 15, 2024) (showing overlap among ***); Fujifilm Prehearing Br. at 66 ("Fujifilm's subject imports did no more than replace Greenwood's shipments during the period").

[47] CR/PR at Table 3.7.

[48] Fujifilm Prehearing Br. at 30; Fujifilm Posthearing Br. at Attach. A, p. 27.

excluding that producer from the domestic industry would mask declines in the domestic industry's performance.[49] Simply put, where a domestic producer replaces domestic production with imports, excluding that producer from the domestic industry would skew the data in terms of the domestic industry's performance.

For these reasons, we find that appropriate circumstances do not exist to exclude Fujifilm Manufacturing USA from the domestic industry pursuant to the related parties provision. In sum, consistent with our definition of the domestic like product, we define the domestic industry to include all U.S. producers of ALPs.

IV. Cumulation[50]

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject

[49] *See*, e.g., *Certain Large Residential Washers from Korea and Mexico* ("*Washers*") Inv. No. 701-TA-488 and 731-TA-1199-1200 (Final), USITC Pub. 4378 (Feb. 2013) at 12-13. Fujifilm argues that this case is distinguished from *Washers* in that the effect of the decision to shift to imports "manifested itself quickly at the beginning of the POI" whereas in *Washers,* Electrolux "did not cease U.S. production until the last full year of the POI." Fujifilm Prehearing Br. at 33. We disagree that the impact of a decision to close a facility manifesting itself earlier versus later in the POI necessarily counsels for a different outcome on whether to exclude a domestic producer from the domestic industry. Rather, as discussed above, regardless of whether the effect of Fujifilm's decision to close Fujifilm Manufacturing USA occurred before or during the POI, we find based on the record of this investigation that excluding the domestic producer would clearly mask injury to the domestic industry. The Commission's decision to not exclude the related party in *Washers* was upheld at the U.S. Court of International Trade. Kodak Posthearing Br. at 16-18. *See LG Elecs. v. U.S. Int'l Trade Comm'n*, 26 F. Supp. 3d 1338 (Ct. Int'l Trade 2014).

[50] Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B).

During the 12-month period preceding the filing of the petitions (September 2022 through August 2023), imports of ALPs from China subject to both the antidumping and countervailing duty investigations accounted for *** percent of total imports, and imports of ALPs from Japan subject to the antidumping duty investigation accounted for *** percent of total imports. CR/PR at Table 4.6. As subject imports from China and Japan exceed the negligibility threshold, we find that imports of ALPs from China subject to the antidumping and countervailing duty investigations and imports of ALPs from Japan subject to the antidumping duty investigation are not negligible.

imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

(1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;

(2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;

(3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

(4) whether the subject imports are simultaneously present in the market.[51]

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[52] Only a "reasonable overlap" of competition is required.[53]

A. Arguments of the Parties

Petitioner's Arguments. Kodak argues that the Commission should cumulate subject imports from China and Japan because the record shows that there is a reasonable overlap of competition between and among subject imports from both countries and the domestic like product.[54] Kodak claims that subject imports from China and Japan are fungible with one another and domestically produced ALPs.[55] It also contends that ALPs from all three sources

[51] *See Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), aff'd, 859 F.2d 915 (Fed. Cir. 1988).

[52] *See*, *e.g.*, *Wieland Werke, AG v. United State*s, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

[53] The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that "the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition." H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; *see Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) ("cumulation does not require two products to be highly fungible"); *Wieland Werke, AG*, 718 F. Supp. at 52 ("Completely overlapping markets are not required.").

[54] Kodak Prehearing Br. at 12-13.

[55] Kodak Prehearing Br. at 13-14.

were sold through the same channels of distribution in overlapping geographic markets, and were simultaneously present in the U.S. market over the POI.[56]

Respondents' Arguments. No respondent party contests the cumulation of subject imports from China and Japan.[57]

B. Analysis and Conclusion

The initial statutory requirement is satisfied because Kodak filed the antidumping and countervailing duty petitions with respect to both subject countries on the same day, September 28, 2023.[58] As discussed below, we find that there is a reasonable overlap of competition between subject imports from both of the subject countries and between subject imports from each source and the domestic like product.

Fungibility. The record indicates that domestically produced ALPs and imports of ALPs from China and Japan are generally fungible.[59] ***, all U.S. importers, and a majority purchasers reported that subject imports from both subject countries were always or frequently interchangeable with each other as well as with domestically produced ALPs.[60] In addition, when asked to compare subject imports with the domestic like product with respect to 16 purchasing factors, a majority of purchasers reported that U.S.-produced ALPs were comparable to ALPs from each subject country for all 16 factors.[61] The record also indicates that ALPs from domestic and both subject sources were generally sold in overlapping thicknesses and plate types.[62]

---

[56] Kodak Prehearing Br. at 14-15.

[57] Fujifilm Prehearing Br. at 58 n.103.

[58] None of the statutory exceptions to cumulation applies.

[59] *See* CR/PR at 2.10-11.

[60] CR/PR at Tables 2.13, 2.14, and 2.15. Eleven of 15 responding purchasers reported that ALPs from China were *** interchangeable with the domestic like product; 11 of 16 purchasers reported that ALPs from Japan were *** interchangeable with the domestic like product; and 8 of 10 purchasers reported that ALPs from China were *** interchangeable with ALPs from Japan. *Id.* at Table 2.15.

[61] CR/PR at Table 2.12.

[62] CR/PR at Tables 4.11, 4.12 and E.1 — E.4. The vast majority of U.S. importers' shipments of plates from Japan were *** during the POI, while the vast majority of U.S. importers' shipments of plates from China were ***. U.S. producers' U.S. shipments were both process-free and wet. There were *** reported shipments of chemical-free plates from domestic or Japanese sources, and chemical-free plates accounted for only a small share of subject imports from China. *See Id.* at Tables E.1 – E.3. While Kodak does not produce violet plates domestically, Fujifilm reports that violet plates accounted for *** shares of its subject imports from China and Japan. Hearing Tr. at 244-245 (Porter); Fujifilm Posthearing Br. at Exh. 2.

Channels of Distribution. Domestically produced ALPs and imports from each subject source were sold through the same channels of distribution, to distributors and end users.[63]

Geographic Overlap. Domestically produced ALPs and imports from both subject countries were sold in all geographic markets throughout the United States during the POI.[64] Subject imports from both sources entered through all borders of entry in 2023, with the majority entering the United States through the Eastern border.[65]

Simultaneous Presence in Market. Domestically produced ALPs and subject imports from Japan and China were simultaneously present in the U.S. market throughout the POI.[66]

Conclusion. The record indicates that subject imports from China and Japan are generally fungible with the domestic like product and each other. The record also indicates that imports from each of the subject countries and the domestic like product were generally sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the POI. Based on the reasonable overlap of competition between and among subject imports from China and Japan and the domestic like product, we cumulate subject imports from China and Japan for our analysis of material injury by reason of subject imports.

V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of imports of ALPs from China and Japan found by Commerce to be sold in the United States at less than fair value and subsidized by the government of China.

[63] CR/PR at Table 2.3. Domestic producers sold primarily to distributors in 2021, and primarily to end users in 2022 and 2023. U.S. shipments of subject imports from China and Japan were sold primarily to end users from 2021 to 2023 and the share sold to end users increased during that time for each subject source. *Id*.

[64] CR/PR at Table 2.4.

[65] CR/PR at Table 4.13.

[66] CR/PR at Tables 4.14 (showing that subject imports from Japan were present in 39 of 39 months during POI; subject imports from China were present in 37 of 39 months) and 5.4 – 5.6 (showing quarterly shipments of domestic ALPs).

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[67] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[68] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[69] In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[70] No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[71]

Although the statute requires the Commission to determine whether the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[72] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[73] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports

[67] 19 U.S.C. §§ 1671d(b), 1673d(b).

[68] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor ... and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[69] 19 U.S.C. § 1677(7)(A).

[70] 19 U.S.C. § 1677(7)(C)(iii).

[71] 19 U.S.C. § 1677(7)(C)(iii).

[72] 19 U.S.C. §§ 1671d(b), 1673d(b).

[73] *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) ("{T}he statute does not 'compel the commissioners' to employ {a particular methodology}."), *aff'g,* 944 F. Supp. 943, 951 (Ct. Int'l Trade 1996).

are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[74]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[75] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[76] Nor does

[74] The Federal Circuit, in addressing the causation standard of the statute, observed that "{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement." *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that "this court requires evidence in the record 'to show that the harm occurred "by reason of" the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.'" *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass'n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

[75] SAA at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-than-fair-value imports."); H.R. Rep. 96-317 at 47 (1979) ("in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;" those factors include "the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry"); *accord Mittal Steel*, 542 F.3d at 877.

[76] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have
(Continued...)

the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[77] It is clear that the existence of injury caused by other factors does not compel a negative determination.[78]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports."[79] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [80] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[81]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to further examine regarding attribution to injury"), *citing Gerald Metals,* 132 F.3d at 722 (the statute "does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.").

[77] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

[78] *See Nippon Steel Corp*., 345 F.3d at 1381 ("an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the 'dumping' need not be the sole or principal cause of injury.").

[79] *Mittal Steel*, 542 F.3d at 876 &78; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.") *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

[80] *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant "other factor" may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

[81] *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 ("*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was 'by reason' of subject imports.").

evidence standard.[82] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[83]

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

1. Demand Considerations

ALPs are used in offset printing processes and mounted into printing presses. Accordingly, U.S. demand for ALPs is driven by demand for U.S.-produced publications such as newspapers, magazines, and retail inserts.[84] *** responding U.S. producers, all U.S. importers, and 16 of 18 purchasers reported that demand for ALPs either *** since January 1, 2021.[85] The *** indicated that the market was subject to business cycles.[86] The record indicates that sales of ALPs in the U.S. market experience slight fluctuations due to seasonality, with upticks in demand in response to yearbook printing in the spring and increased demand for printed products around holidays.[87]

Apparent U.S. consumption of ALPs declined from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023, a level *** percent lower than in 2021; it was *** percent lower in interim 2024, at *** square meters, than in interim 2023, at *** square meters.[88]

2. Supply Considerations

The domestic industry was the largest source of ALP supply to the U.S. market in 2021 and 2022 but, after the closure of Fujifilm Manufacturing USA in March 2022, became the smallest source of supply in 2023 and interim 2024.[89] The domestic industry's share of

---

[82] We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

[83] *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp*., 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 ("The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.").

[84] CR/PR at 2.9–2.10.

[85] CR/PR at Table 2.6.

[86] CR/PR at 2.9–2.10.

[87] CR/PR at 2.9–2.10.

[88] CR/PR at Tables 4.15, C.1.

[89] CR/PR at Tables 4.15, C.1.

apparent U.S. consumption decreased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023, a decrease of *** percentage points; its share of apparent U.S. consumption was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent).[90]

One U.S. producer, Southern Lithoplate Inc. ("SLP") ceased ALP production in May 2021.[91] Subsequently, Fujifilm Manufacturing USA ceased its domestic production operations in March 2022 as Fujifilm transitioned to supplying the U.S. market with subject imports from Fujifilm China and Fujifilm Japan.[92] Hence, Kodak is the sole remaining domestic producer as of 2023. Reflecting this change, the domestic industry's practical capacity decreased from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023, an overall decrease of *** percent.[93] The domestic industry maintained excess production capacity throughout the POI, as its practical capacity utilization rate was *** percent in 2021, *** percent in 2022, and *** in 2023; it was *** in interim 2024 compared to *** in interim 2023.[94]

Cumulated subject imports were the smallest source of supply to the U.S. market in 2021 and 2022 before becoming the largest source of supply in 2023 and interim 2024. Cumulated subject imports' share of apparent U.S. consumption increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023, an increase of *** percentage points; their share of apparent U.S. consumption was *** percentage points higher in interim 2024 (*** percent) than in interim 2023 (*** percent).[95] FNAC accounted for the large majority (***

[90] CR/PR at Tables 4.15, C.1. Using FNAC's commercial U.S. shipments rather than Fujifilm Manufacturing USA's transfers to calculate apparent U.S. consumption, domestic producers' market share decreased by *** percentage points from 2021 to 2023, declining from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent). *Id.* at Table F.1.

[91] CR/PR at 3.1 n.1. Prior to its closure, SLP entered into a brokerage agreement with Kodak whereby Kodak absorbed SLP's customer base, with SLP remaining in operation but soliciting proposals from its customers to purchase plates from Kodak. Subsequently, SLP independently determined to end ALPs production and begin production of corrugated cardboard boxes. SLP did not submit a questionnaire response but estimated that it produced *** square meters of ALPs in 2021, equivalent to about *** percent of domestic ALP production in 2021. *Id.* at 3.2 n.2; Kodak Prehearing Br. at Exh. 5.

[92] CR/PR at 3.1 n.1 and Table 3.12; Hearing at 10 (Porter).

[93] CR/PR at Tables 3.5, C.1. It was *** square meters in interim 2023 and *** in interim 2024. *Id*.

[94] CR/PR at Table 3.5.

[95] CR/PR at Tables 4.15, C.1.

percent in 2023) of subject imports, and ECO3 was the second-largest importer of subject imports (accounting for *** percent of subject imports in 2023).[96]

Nonsubject imports were the second-largest source of supply throughout the POI. Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2021 to *** percent in 2022 and 2023, an increase of *** percentage points; their share was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent).[97] The largest sources of nonsubject imports include Germany, home to the ALP production facilities of large global suppliers ECO3 and Kodak, and the Netherlands, home to one of Fujifilm's production facilities until *** 2023, when it closed.[98]

U.S. producer *** and the majority of responding purchasers reported that they did not experience supply constraints during the POI. On the other hand, a majority of responding U.S. importers reported they had experienced supply constraints during the POI, with two attributing them to the COVID-19 pandemic.[99]

3. Substitutability and Other Conditions

We find that there is a at least moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports. As discussed in section IV.B, ***, all responding U.S. importers, and a majority of responding purchasers reported that subject imports were *** interchangeable with domestically produced ALPs.[100] When asked to compare subject imports with the domestic like product with respect to 16 purchasing factors, a majority of responding purchasers reported that U.S.-produced ALPs were comparable to subject imports for all 16 factors.[101] Nearly all responding purchasers reported that the quality of U.S.-produced ALPs and subject imports always or usually met minimum quality standards.[102] In addition, *** and a majority of importers reported that differences other than price between domestically produced ALPs and subject imports are sometimes or never significant.[103] On the other hand, a majority of responding purchasers reported that such non-price differences are

[96] CR/PR at Table 4.1.
[97] CR/PR at Tables 4.15, C.1.
[98] CR/PR at 1.3, 7.17; Hearing Tr. at 121 (Cole), 163 (Durling); Kodak Posthearing Br. at 11.
[99] CR/PR at 2.8–2.9.
[100] CR/PR at Tables 2.13, 2.14, and 2.15.
[101] CR/PR at Table 2.12.
[102] CR/PR at Table 2.10.
[103] CR/PR at Tables 2.16, 2.17.

always or frequently significant.[104] Three of 25 purchasers reported always or usually making purchasing decisions based on the country of origin, but a larger share (10 of 24) reported always or usually making purchasing decision based on the manufacturer.[105]

One factor limiting substitutability is that end users must recalibrate printing equipment when switching plate suppliers.[106] Purchasers indicated that operational downtime adds to the cost of switching suppliers.[107] On the other hand, a Kodak company official testified that CTPs are easily recalibrated to image plates produced by other suppliers, and stated that its plates are certified to run on CTPs sold by Fujifilm and ECO3, just as Fujifilm and ECO3 plates are certified to run on Kodak's CTPs.[108] The record also indicates that customers can more easily switch between plate suppliers once their equipment has been calibrated for a particular supplier or plate, and that many purchasers sourced from multiple suppliers during the POI.[109] Kodak reportedly charges a one-time fee of *** to $10,000 per machine to recalibrate its CTPs for image plates produced by other suppliers and the process takes a technician around *** to complete.[110] ***, the majority of importers, and 8 of 23 purchasers reported that ALPs from different suppliers are compatible with all types of machinery with some modification.[111]

We also find that price is an important factor in purchasing decisions, among other important factors. Responding purchasers most frequently ranked price (20 firms) as among

---

[104] CR/PR at Table 2.18. In providing context on purchaser responses, Kodak testified that Fujifilm announced a price increase to its customers following Commerce's preliminary affirmative antidumping determinations in late April 2024 (see Hearing Tr. at 63 (Cole)) calling the price increase a "duty in the Eastman Kodak case." Kodak also provided ***. *See* Kodak Posthearing Br. at Exh. 5, paras. 15, 18.a and Attachs. 3 & 5.a.

[105] CR/PR at Table 2.7.

[106] CR/PR at 2.11.

[107] CR/PR at 2.21.

[108] Hearing Tr. at 23-24 (Cole).

[109] Hearing Tr. at 24, 77, 97-98 (Cole) ("many customers have multiple plates either from the same vendor, or from multiple vendors set up on their CTP devices"). *See* Purchaser Questionnaire Responses at II-6. For example, *** purchased substantial quantities from ECO3, Fujifilm, and Kodak in 2023. *** Purchasers' Questionnaire Response at Attach. to II-1.

[110] CR/PR at 2.21; Hearing Tr. at 24 (Cole), 173 (Kluetz); Kodak Prehearing Br. at Exh. 1, p. 11.

[111] CR/PR at 2.20-21. Fujifilm argues that the staff report overemphasizes substitutability within a supplier (*i.e.,* Fujifilm Greenwood's plates versus Fujifilm plates imported from China and Japan) while neglecting factors that limit substitutability between suppliers (*i.e.,* Fujifilm versus Kodak). *See* Fujifilm Prehearing Br. at 46; Hearing Tr. at 217-219 (Porter). As discussed above, however, the record indicates that the cost and time required for purchasers to switch between suppliers, through the recalibration of their equipment, is not significant and is consistent with the at least moderate-to-high degree of substitutability between subject imports and the domestic like product that we have found.

their top three purchasing factors, followed by quality (17 firms) and availability (13 firms), although quality was the most frequently cited first-most important factor (14 firms), followed by availability (6 firms), and price (3 firms).[112] The majority of responding purchasers (18 of 23) reported that price was a very important purchasing factor, and no purchasers reported that price was not an important purchasing factor, although a greater number of responding purchasers cited other purchasing factors, such as product consistency and reliability of supply, as very important.[113] A majority of responding purchasers (14 of 21) reported that they only sometimes or never purchase the lowest-priced product.[114]

During the POI, domestically produced ALPs were sold primarily from inventory with lead times averaging *** days, while lesser but substantial quantities of domestically produced ALPs were produced to order with lead times averaging *** days.[115] *** cumulated subject imports were sold from U.S. inventory with lead times averaging *** days.[116]

Long-term contracts (of more than one year) are an important feature of the U.S. ALPs market, although spot sales accounted for *** of U.S. shipments of subject imports. In 2023, *** percent of U.S. producers' U.S. shipments were made pursuant to long-term contracts, *** percent were made pursuant to annual contracts, and *** percent were spot sales. That same year, *** percent of U.S. shipments of subject imports were made pursuant to long-term contracts, *** percent were made pursuant to annual contracts, and *** percent were spot sales.[117]

Although long-term contracts moderate the ability of purchasers to rapidly switch suppliers,[118] the record indicates that such contracts do not preclude purchasers from doing so or from seeking more advantageous pricing. As noted above, Kodak and a majority of importers reported that price may be renegotiated during the terms of such contracts.[119] In

[112] CR/PR at Table 2.8.
[113] CR/PR at Table 2.9.
[114] CR/PR at 2.12.
[115] CR/PR at 2.13.
[116] CR/PR at 2.13.
[117] CR/PR at Table 5.3. ***. A majority of importers reported that their long-term contracts fix price and quantity but that prices are renegotiated during the contract period. Importers also reported that they indexed prices to raw materials in long-term contracts. *** reported that it used the London Metal Exchange ("LME") to index prices to raw materials. In 2023, *** percent of *** U.S. shipments used the LME to index prices to raw materials, *** from *** percent in 2021 and *** percent in 2022. *Id.* at 5.3 and n.4.
[118] *See* Hearing Tr. at 21 (Tellstone), 35 (Herrmann), 148-149 (Kluetz).
[119] CR/PR at 5.3; Hearing Tr. at 65 (Cole).

addition, some contracts contain minimum purchase requirements, and thus purchasers are able to reduce the volume of their purchases in order to increase purchases from other suppliers.[120]

ALPs are typically sold in connection with other products and services, such as equipment, chemicals, and technical support.[121] The record indicates that the costs of the products and services linked to ALPs substantially add to the prices at which ALPs are sold.[122] In addition, the prices of equipment and services from a particular ALP supplier are commonly linked to the purchases of ALPs from the supplier.[123] All responding purchasers reported that the prices they would need to pay for additional equipment or services from an ALP supplier would increase if they chose to purchase ALPs from a different supplier.[124]

Volume discounts are common in the U.S. market.[125] Both Kodak and Fujifilm offer annual total volume discounts where the discounts to the customers are applied after the term of sale on an annual basis.[126] As a result, prices may vary considerably between large and small volume customers. For instance, Fujifilm reports that the price difference between its largest and smallest customer is *** percent.[127] Kodak has approximately *** U.S. customers while Fujifilm has approximately *** U.S. customers, with a greater proportion of sales to smaller customers than Kodak.[128]

Aluminum sheet accounted for the largest share (approximately *** to *** percent) of the domestic industry's total raw material costs during the POI.[129] Published prices for aluminum increased irregularly by *** percent from January 2021 to March 2024, spiking in the

[120] *See* Kodak Prehearing Br. at 60 and Exh. 1, para. 26; Hearing Tr. at 25, 64-65 (Cole).

[121] CR/PR at 2.21. The majority of purchasers (18 of 23) reported that ALPs are purchased in tandem with other products or services. *Id.*

[122] *See* Hearing Tr. at 295 (Anderson), 296 (Durling), 299-300 (Porter, Anderson).

[123] A majority of purchasers (15 of 23) reported that the prices of additional equipment or services were linked to the purchases of additional ALPs. CR/PR at 2.21-22.

[124] CR/PR at 2.22.

[125] *See, e.g.,* CR/PR at 5.4; Hearing Tr. at 257 (Hudgens) ("***"); Fujifilm Posthearing Br. at 3; Kodak Prehearing Br. at 45.

[126] CR/PR at 5.4; Kodak Prehearing Br. at 45; FNAC's U.S. Importer Questionnaire at III-5.

[127] Hearing Tr. at 290 (Porter). *See also* Hearing Tr. at 258 (Jones), 289 (Anderson), 291-292 (Porter, Szamosszegi); Kodak Posthearing Br. at Exh. 1, p. 64.

[128] Hearing Tr. at 211 (Durling) ("Kodak doesn't sell directly to small volume customers"), 231 (Anderson) ("Fujifilm does not sell to distributors, for the most part. They are the distributor to thousands of very small customers who have very different SKUs and very different specifications"), 289 (Anderson) ("***"); *compare* CR/PR at Tables I.1 – I.3 *with* FNAC's U.S. Importer Questionnaire at III-2a, III-2b.

[129] CR/PR at 6.12.

first quarter of 2022, in part due to Russia's invasion of Ukraine, then declining after the second quarter of 2022 throughout the remainder of the period to a level that remained above that in January 2021.[130] Domestic producers' unit raw material costs increased from $*** per square meter in 2021 to $*** per square meter in 2022 and then decreased to $*** per square meter in 2023; they were lower in interim 2024, at $*** per square meter, than interim 2023, at $*** per square meter.[131] Raw materials as a share of their cost of goods sold ("COGS") increased from *** percent of the 2021 to *** percent in 2022 before declining to *** percent in 2023; the ratio was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[132]

Lithographic grade aluminum sheet is not currently produced in the United States and must therefore be imported from the only four countries where the product is currently manufactured: China, Germany, Japan, and the United Kingdom.[133] In the United States, lithographic grade aluminum sheet imported from China became subject to an antidumping duty order in 2019, and several additional antidumping duty orders on imports from sixteen countries in 2021.[134]

Throughout the POI, ALPs imported from China and classified under HTS subheading 3701.30.00 and 3701.99.60 were subject to an additional 25 percent *ad valorem* tariff pursuant to section 301 of the Tariff Act of 1974 ("section 301 tariffs").[135]

---

[130] CR/PR at 5.1, Table 5.1.

[131] CR/PR at Table 6.1.

[132] CR/PR at Table 6.1.

[133] Kodak Prehearing Br. at 16-17.

[134] *See* Kodak Prehearing Br. at 16-21; *Common Alloy Aluminum Sheet from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final), USITC Pub. 4861 (Jan. 2019); *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey*, Inv. Nos. 701-TA-639 and 641-642 and 731-TA-1475-1479, 1481-1483, and 1485-1492 (Final), USTIC Pub. 5182 (April 2021). The record indicates that the only known U.S. producer of lithographic grade aluminum sheet ceased production of the product in 2018. Fujifilm Prehearing Br. at Exh. 3.

Aluminum sheet is subject to additional duties under Section 232 of the Trade Expansion Act of 1962, as amended ("section 232 duties"). On March 29, 2020, Kodak received exclusions on aluminum inputs used in the manufacturing of ALPs that have been extended and remain in effect. CR/PR at I.7 n.13. Aluminum sheet imported from China is also subject to additional section 301 duties. Exemptions to the section 301 duties for imports under HTS statistical reporting numbers 7607.11.9090 and 7607.11.6090, which are inputs for ALPs, were removed on September 12, 2024. *Id*. at I.8.

[135] CR/PR at 1.8. Effective September 24, 2018, ALPs from China under HTS subheadings 3701.30.00 and 3701.99.60 became subject to an additional 10 percent duties under section 301, which was subsequently increased to 25 percent effective May 10, 2019. *See* 18 U.S.C. § 2411; *Notice of*

(Continued...)

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall 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."[136]

The volume of cumulated subject imports increased by *** percent from 2021 to 2023, increasing from *** square meters in 2021 to *** square meters in 2022 before declining to *** square meters in 2023. The volume of cumulated subject imports was *** percent lower in interim 2024 (*** square meters) than in interim 2023 (*** square meters).[137]

As a share of apparent U.S. consumption, cumulated subject imports increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023, an overall increase of *** percentage points; their share of apparent U.S. consumption was *** percentage points higher in interim 2024 (*** percent) than in interim 2023 (*** percent).[138] The ratio of cumulated subject imports to domestic production increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[139]

Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed. Reg. 47974 (Sept. 21, 2018); *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019).

[136] 19 U.S.C. § 1677(7)(C)(i).

[137] CR/PR at Tables 4.2, 4.3. U.S. shipments of cumulated subject imports increased by *** percent from 2021 to 2023, increasing from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023; they were *** percent higher in interim 2024 (*** square meters) than in interim 2023 (*** square meters). *Id*. at Tables 4.15, C.1.

[138] CR/PR at Tables 4.15, C.1.

[139] CR/PR at Table 4.2.

Based on the foregoing, we find that the volume of cumulated subject imports, and the increase in that volume, are significant in absolute terms and relative to consumption and production in the United States.[140] [141]

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[142]

As discussed in section V.B.3 above, we find that there is at least a moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, and that price is an important factor in purchasing decisions, among other important factors.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of three pricing products shipped to unrelated U.S. customers during the POI.[143] One domestic

---

[140] Given that SLP did not respond to the U.S. producers' questionnaire but estimated that it produced and sold *** square meters in 2021 (equivalent to *** percent of reported U.S. production and *** percent of apparent U.S. consumption in 2021) before ceasing production in 2021, the market share of the domestic industry in 2021 is likely slightly understated (and the market share of subject imports consequently overstated), and therefore the increase in the volume of cumulated subject imports relative to apparent U.S. consumption and production in the United States from 2021 to 2023 is likely slightly understated. CR/PR at 3.2 n.2; Kodak Prehearing Br. at 22 and Exh. 5.

[141] We address Respondents' argument concerning the alleged absence of "volume effects" in the impact section below. *See* Fujifilm Prehearing Br. at 56-75. We note that the statute does not require the Commission to consider "volume effects" as part of its assessment of the significance of subject import volume. *See OCTAL Inc. v. United States,* 539 F. Supp. 3d 1291, 1299–1300 (Ct. Int'l Trade 2021) (citing 19 U.S.C. § 1677(7)(C)(i)).

[142] 19 U.S.C. § 1677(7)(C)(ii).

[143] The three pricing products are as follows:

Product 1.-- 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm;

Product 2.-- 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm; and

(Continued...)

producer and three importers provided usable pricing data, although not all firms reported pricing for all products for all quarters.[144] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of ALPs, *** percent of importers' U.S. shipments of subject merchandise from China, and *** percent of importers' U.S. shipments of subject merchandise from Japan in 2023.[145]

These data show that subject imports undersold the domestic like product in *** of *** quarterly comparisons, or *** percent of the time, corresponding to *** percent of reported subject import sales volume (*** square meters), with underselling margins ranging from *** to *** percent and averaging *** percent.[146] Subject imports oversold the domestic like product in *** of *** quarterly comparisons, or *** percent of the time, corresponding to *** percent of reported subject import volume (*** square meters), with overselling margins ranging from *** percent to *** percent and averaging *** percent.[147]

For purposes of our underselling analysis, we have examined several sources of information, including the pricing data, above, as well as pricing data limited to Kodak's and Fujifilm's ten largest customers, the pricing data of ECO3, lost sales information, and other record evidence. We have afforded little weight to the quarterly price comparisons, described above. As detailed below, the record indicates that there were errors in the pricing data reported by FNAC, whose sales accounted for the vast majority of reported subject import sales volume, that have the effect of inflating FNAC's reported prices relative to Kodak's reported prices. In addition, the prevalence of substantial discounts for large volume customers coupled with the disproportionate share of sales made to small customers by FNAC compared to Kodak impairs an apples-to-apples comparison in the pricing data as reflected in the quarterly price comparisons described above.

Product 3.-- 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm. CR/PR at 5.4.

[144] CR/PR at 5.5 and n.9. FNAC's sales of Fujifilm Manufacturing USA's domestically produced ALPs are also included in the pricing data. *Id.* at H.3.

[145] CR/PR at 5.5 and n.9.

[146] CR/PR at Table H.4.

[147] CR/PR at Table H.4. These data are not materially different if FNAC's sales of U.S.-produced ALPs are excluded from the pricing data. When excluding FNAC's sales of U.S.-produced ALPs, subject imports undersold the domestic product in *** of *** quarterly comparisons (*** percent of the time), with *** square meters of subject imports (*** percent of subject import volume) in the quarters with underselling. The average margin of underselling was *** percent and the average margin of overselling was *** percent. *Id.* at Table 5.10.

As to the pricing data reported by Fujifilm, it appears to include some transportation and services costs, as well as costs for goods that are not ALPs, which would have the effect of inflating Fujifilm's reported prices. As discussed in section V.B.3 above, the cost of products and services linked to sales of ALPs add to the sales prices charged for the ALPs. For this reason, the questionnaires instructed domestic producers and importers to report net values for the pricing products, "*i.e.,* gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods."[148] After the hearing, the Commission requested that Fujifilm confirm that it "correctly adjusted for customer-specific volume discounts and accounted for all rebates and discounts" in its pricing data and did not "include things such as indirect services." The Commission also requested any documentation that could help verify the accuracy of Fujifilm's pricing data.[149] Fujifilm stated that its pricing data "***" and that it ***.[150]

The documentation that Fujifilm submitted to verify the accuracy of its pricing data, however, indicates that FNAC did not properly net out all transportation and linked goods (*e.g.,* chemicals) and services costs for associated products (*e.g.,* CTPs and processors). Although Fujifilm removed transportation, goods, and services revenue for transactions in which these items were separately charged, it did not remove transportation or linked goods and services costs for transactions that had them "baked-in" to the invoiced amounts.[151] In contrast, the record indicates that Kodak did properly net out transportation and any linked goods and services costs when reporting its pricing data.[152] Accordingly, the pricing data as reported by Fujifilm contains errors related to not completely netting out the cost of linked goods and services, as well as transportation costs, as instructed, with the resulting effect of inflating FNAC's prices as reported in the pricing data by the value of these non-charged costs.

In addition, as discussed in section V.B.3 above, the record indicates that volume discounts are prevalent in the U.S. market, with larger-volume customers paying less for ALPs

[148] *E.g.,* U.S. Importer Questionnaire at III-2.

[149] Fujifilm Answers to Staff Post-Hearing Questions, EDIS Doc. 834308 (Sept. 24, 2024) at 1.

[150] Fujifilm Answers to Staff Post-Hearing Questions, EDIS Doc. 834308 (Sept. 24, 2024) at 1; FNAC's Revised U.S. Importer Questionnaire (Sept. 26, 2024).

[151] *See* Fujifilm Answers to Staff Post-Hearing Questions, EDIS Doc. 834308 (Sept. 24, 2024) at 4; Fujifilm Posthearing Br. at Attach. A, pp. 19-20 and Exh. 15. When asked about the ***." Hearing Tr. at 319-320 (***).

[152] Kodak underwent verification by Commission staff wherein the accuracy of its pricing data and the absence of freight costs in the pricing data were confirmed. *See* Hearing Tr. at 326 (Rosenthal); Kodak U.S. Producer Questionnaire at IV-2c; Verification Report – Eastman Kodak Company, EDIS Doc. 833346 (Sept. 26, 2024) at 6, 11-12.

on a unit basis than smaller-volume customers.[153] The parties also agree that differences in customer size can result in distortions to the pricing data.[154] Kodak supplies approximately *** customers, while FNAC supplies over *** customers.[155] Kodak's top ten customers accounted for *** percent of its overall pricing data, while FNAC's top ten customers accounted for *** percent of its overall pricing data, indicating that FNAC's pricing data include a greater proportion of sales to smaller customers.[156] Because smaller customers do not benefit from the volume discounts provided to large customers, the greater proportion of sales to smaller customers in FNAC's pricing data would tend to make a comparison of FNAC's overall average sales prices relative to those reported by Kodak not an apples-to-apples comparison in the context of the conditions of competition in these investigations.[157] For these reasons, we have afforded less weight to the pricing data as reflected in the quarterly price comparisons as described above.

We next examine the pricing data reported by Kodak and FNAC for sales to their ten largest customers by purchase volume. Narrowing the customer universe to this subset of Kodak's and FNAC's purchasers mitigates distortions caused by the differing sizes of each supplier's customer base, given that their top ten customers are comparable in terms of reported purchase volumes in 2023.[158] Although the pricing data for the top ten customers do not contain data from importers of subject merchandise other than FNAC, FNAC's pricing data account for the vast majority, *** percent, of the volume of reported subject imports in the overall pricing data, and FNAC also accounted for the vast majority of sales of cumulated

[153] CR/PR at 5.4; Hearing Tr. at 257 (Hudgens); Kodak Prehearing Br. at 45; Fujifilm Posthearing Br. at 3. We previously observed that the difference in pricing between Fujifilm's largest and smallest customer is more than ***. Hearing Tr. at 290 (Porter).

[154] Hearing Tr. at 260 (Herrmann) ("***"); 294 (Anderson) ("***.").

[155] Hearing Tr. at 289 (Anderson); Fujifilm's Posthearing Br. at Attach. A, p. 1.

[156] *Calculated from* Tables I.1 — I.3 and FNAC's U.S. Importer Questionnaire at III-2a, III-2b. As discussed in section V.B.3 above, hearing testimony by Kodak and Fujifilm officials also confirmed that Fujifilm's customers include a greater proportion of smaller purchasers.

[157] As previously noted, the overall pricing data (*i.e.,* pricing data based on the quarterly price comparison described above and not limited to the top ten customers) account for *** sales of subject imports and the domestic like product. CR/PR at 5.5.

[158] Kodak and FNAC provided the percentages of their 2023 sales made to their top ten largest customers during the POI. Multiplying these shares by Kodak's and FNAC's total U.S. shipments in 2023 derives their approximate sales volume to those customers in 2023 and shows that their respective top ten customer bases are comparable in size, although FNAC's sales to its top ten customers accounted for a smaller share of its U.S. shipments in 2023 compared to Kodak. *Derived from* Kodak's U.S. Producer Questionnaire at II-7, IV-25 and FNAC's U.S. Importer Questionnaire at II-5a, II-26a, II-7a, III-26.

subject imports in the market during the POI.[159] Even though these data appear to be similarly inflated as FNAC's overall pricing data in that they were not properly adjusted to remove transportation costs as well as costs associated with additional services, as discussed above, these data show that Fujifilm's subject imports predominantly undersold Kodak's domestically produced ALPs throughout the POI.[160]

The pricing data reported by Kodak and Fujifilm for sales to their top ten customers show that FNAC's subject imports undersold the domestic like product in *** of *** quarterly comparisons, or *** percent of the time, corresponding to *** percent of reported subject import volume (*** square meters), with underselling margins ranging from *** percent to *** percent and averaging *** percent.[161] These subject imports oversold the domestic like product in *** of *** quarterly comparisons, or *** percent of the time, corresponding to *** percent of reported subject import sales volume (*** square meters), with overselling margins ranging between *** percent and *** percent and averaging *** percent.[162] Additionally, the frequency of underselling and the volume of subject imports in the quarters with underselling increased over the POI, from *** quarters and *** square meters (*** percent of the volume) in 2021, to *** quarters (*** percent) and *** square meters (*** percent of the volume) in

[159] *Calculated from* FNAC's U.S. Importer Questionnaire at III-2a and III-2b and CR/PR at Tables 5.4 — 5.6; *see* Fujifilm Prehearing Br. at Exh. 13. We also observe that ECO3's pricing data show that it undersold the domestic like product in *** percent of quarterly comparisons (***) but corresponding to *** percent of its reported sales volume. *Calculated from* CR/PR at Tables 5.3-5.6 and ECO3's U.S. Importer Questionnaire at III-2a. Pricing data for FNAC's sales of U.S.-produced product was not requested at a customer-specific level but, as with the overall pricing comparisons, including that data would not likely have materially changed the comparisons.

[160] Fujifilm argues that there is very little overlap between the top ten customers of Kodak and Fujifilm. Fujifilm Posthearing Br. at Attach. A, p.13. However, in a market containing thousands of purchasers where there are no dominant purchasers, we find it notable that there are still *** customers who are on both Kodak's and Fujifilm's list of top ten largest customers, indicating that there is direct competition between Kodak and Fujifilm even in this subset of purchasers. Moreover, the top ten customer pricing data allow for a comparison of Kodak's and Fujifilm's prices to purchasers of similar sizes, thus removing distortions caused by volume discounts in the overall pricing data.

[161] CR/PR at Table I.4. These pricing data account for a substantial portion of sales of ALPs in the U.S. market. They account for *** percent of Kodak's total pricing data, *** percent of Fujifilm's total pricing data, and *** percent of subject imports in the total pricing data. *Calculated from* CR/PR at Tables 5.4 – 5.6 and I.1 – I.3; *see* CR/PR at 5.5.

[162] CR/PR at Table I.4.

2022, and *** quarters (*** percent) and *** square meters (*** percent) of the volume) in 2023.[163] [164]

We have also considered evidence in the record regarding lost sales. Nineteen of 25 responding purchasers reported that they had purchased subject imports instead of domestically produced ALPs during the POI. Of these, five purchasers reported that subject imports were priced lower than the domestic like product, and two purchasers reported that they had purchased *** square meters of subject imports instead of domestically produced ALPs primarily because of their lower price.[165]

In addition, two of the largest purchasers, *** and ***, increased their purchases of subject imports by *** percent and *** percent, respectively, from 2021 to 2023, at least in part at the expense of their purchases of the domestically produced ALPs.[166] Although they did not indicate that they purchased subject imports instead of domestically produced ALPs based on price,[167] both purchasers emphasized the importance of price in their questionnaire responses and the comparability of subject imports and the domestic product on other factors, and, as described below, price would have therefore contributed to their decision to shift purchases from the domestic industry to subject imports during the POI.[168]

These purchasers' increased purchases of subject imports also cannot be fully explained as simply substituting product previously purchased from Fujifilm Manufacturing USA with

---

[163] CR/PR at Table I.6. In interim 2024, Fujifilm undersold Kodak in *** quarterly comparisons (*** percent) with *** square meters of subject imports in the quarters with underselling (*** percent of the volume). *Id*.

[164] Fujifilm argues that more frequent underselling resulted from domestic prices increasing over the POI, evidencing a lack of significant underselling by subject imports. Fujifilm Posthearing Br. at 11 at Attach. A, pp. 9-10. However, increased prices were needed to improve Kodak's anemic profitability, with operating income to net sales ratios of just *** percent in 2021 and *** percent in 2022. CR/PR at Table C-2. While higher prices resulted in an improved operating income to net sales ratio of *** percent in 2023, this came at the expense of lost market share to low-priced subject imports. *Id*.

[165] CR/PR at Table 5.14. The volume of confirmed lost sales accounts for *** percent of responding purchasers' total purchases of subject imports, and *** percent of U.S. importers' U.S. shipments of cumulated subject imports during the POI. *Calculated from* CR/PR at Tables 5.13, 5.14, C-1. However, other evidence on the record, discussed below, further indicates that underselling resulted in subject imports gaining sales and market share at the expense of the domestic industry.

[166] CR/PR at Table 5.13. ***. *Id.*

[167] CR/PR at Table 5.14.

[168] *** reported that ***. *** Purchaser Questionnaire at IV-2. *** reported that the U.S. product was ***. *Id*. at IV-4. It also stated "***." *Id.* at II-4 ***.

*** reported that the U.S. product was ***. *** Purchaser Questionnaire at IV-4. *** reported that "***" and that ***. *Id.* at III-24-25. *** reported that it ***. *** also reported that ***. *Id.* at III-20.

subject merchandise for non-price reasons.[169] *** reported that it bought subject imports instead of the domestic like product and that subject imports were lower-priced than the domestic product.[170] *** indicated that price was not a primary reason for buying subject imports instead of the domestic product, instead reporting that ***.[171] However, *** does not explain the change in ***'s purchases of domestically produced ALPs because ***'s purchases of subject imports did not decrease along with demand but rather increased and took share away from the domestic industry over the period.[172] The Greenwood shutdown in 2022 also does not explain ***'s purchasing patterns because *** purchased only *** square meters from Fujifilm Manufacturing USA in 2022, accounting for just *** percent of CJK's purchases of Fujifilm's subject imports from China and Japan in 2023.[173] While ***, as described above.[174]

With respect to ***, while it reported that it did not purchase subject imports instead of the domestic like product, *** purchases of subject imports increased steadily during the POI from *** square meters in 2021 to *** square meters in 2023, and at least some of this increase was at the direct expense of domestically produced ALPs.[175] *** reports that it ***."[176] However, ***'s reported data shows that subject imports increased as a share of ***'s total purchases by more than the decline in domestically produced ALPs' share of Gannett's total purchases. Specifically, subject imports increased as a share of ***'s total purchases by *** percentage points, while domestically produced ALPs' share of ***'s total purchases declined by *** percentage points.[177] We similarly are not persuaded by ***.[178] ***.[179] Therefore, this explanation does not account for ***.[180] Similarly, *** reported that demand for all ALPs and end-use products that use ALPs decreased steadily during the POI and did not indicate that there was any increase in demand for violet plates, or relatively smaller decrease

[169] *Calculated from* *** Purchaser Questionnaire at II-1 ***.

[170] *** Purchaser Questionnaire at II-3.

[171] *** Purchaser Questionnaire at II-1 ***.

[172] From 2021 to 2023, domestically produced ALPs' share of ***'s purchases declined by *** percentage points, as the share of subject imports in its purchases increased by *** percentage points and the share of nonsubject imports in its purchases *** percentage points. *Calculated from* *** Purchaser Questionnaire at II-1 ***.

[173] *** Purchaser Questionnaire at II-1 ***.

[174] *** Purchaser Questionnaire at II-1 ***.

[175] *** Purchaser Questionnaire at II-1. *** is the ***. FNAC's U.S. Importer Questionnaire at III-26; Kodak's U.S. Producer Questionnaire at IV-25.

[176] *** Purchaser Questionnaire at II-2.

[177] *Calculated from* *** Purchaser Questionnaire at II-1.

[178] *** Purchaser Questionnaire at III-20.

[179] *** Purchaser Questionnaire at III-8, III-11, III-12.

[180] *** Purchaser Questionnaire at III-1.

in demand as compared to other types of ALPs, such that it would otherwise explain the increase in subject import purchases.[181] [182]

Based on the foregoing, in particular the at least moderate-to-high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and record of evidence reviewed above indicating that subject imports were sold at lower prices than the domestic like product (including the predominant underselling by subject imports in the pricing data covering Kodak's and Fujifilm's top ten customers that helps control for varying prices to customers of different sizes), we find that cumulated subject imports significantly undersold the domestic like product during the POI. The underselling enabled cumulated subject imports to gain sales and market share over the period, causing a shift in market share from the domestic industry to cumulated subject imports from 2022 to 2023 and between interim periods, and preventing the domestic industry from gaining additional market share over the POI as the only other domestic producer exited the industry, as discussed further below in Section V.E.[183]

---

[181] *** Purchaser Questionnaire at III-5, III-7.

[182] Other record evidence also indicates that subject imports were lower priced than the domestic like product. Only one purchaser rated the U.S. product to be superior on price (*i.e.,* lower priced) to subject imports from China, and none did so for subject imports from Japan, contradicting the overall pricing data which show that the domestic product was allegedly lower-priced than subject imports in the large majority of comparisons. *Id.* While the average unit values ("AUVs") of the domestic industry's U.S. shipments were lower than the AUVs of U.S. importers' U.S. shipments of cumulated subject imports during 2021-2023, this likely reflects importers' relatively higher concentration in higher-priced sales to small-volume customers, as previously discussed. *Id.* at Table C.1.

[183] Fujifilm contends that it was selling ALPs produced domestically at Greenwood at the same prices that it was selling subject imports. Hearing Tr. at 195-96 (Anderson) ("But, the prices, and so the prices that we were selling out of our Japanese and Chinese stock, were the exact same prices we were selling out of Greenwood, because again, the contracts don't specify it."). However, the record indicates that ***. FNAC'S U.S. Importer Questionnaire at III-7, EDIS. Doc. 826696 (July 15, 2024). Although this response refers specifically to 2023, the record does not indicate that 2023 was aberrational in terms of the number of spot sale customers compared to 2022, suggesting that there was a comparable division of contract and spot sales in 2022, when Greenwood closed. *See* Fujifilm Posthearing Br. at Exh. 10. Thus, even if Fujifilm's contention is correct that when it closed Greenwood it simply substituted supply from Fujifilm Manufacturing USA to subject imports from Fujifilm at the same prices for its contract customers, that does not address the substantial amount of spot sales made by FNAC. Further, given that there is record evidence that subject imports were priced lower than the domestic like product during the POI particularly in 2022 and 2023, to the extent Fujifilm's contracts with its customers were up for renegotiation in 2022 or 2023 or FNAC was competing for spot sales during that time, FNAC would have been offering ALPs at lower prices than Kodak, which, as discussed below, contributed to (Continued...)

We have considered price trends during the POI. Prices for the domestic like product consistently increased for all three pricing products.[184] Between the first and last quarters of the POI, domestic prices increased by *** percent for Product 1, *** percent for Product 2, and *** percent for Product 3.[185] Over the same period, prices for subject imports fluctuated during 2021 but were relatively flat beginning in the first quarter of 2022 and for the remainder of the POI.[186]

We have also considered whether subject imports prevented price increases which would otherwise have occurred to a significant degree.[187] The domestic industry's COGS-to-net sales ratio increased from *** percent in 2021 to *** percent in 2022 before decreasing to its prior level of *** percent in 2023; it was *** percentage points lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[188] The domestic industry's unit COGS increased by $*** per square meter (*** percent) from 2021 to 2023 as its unit net sales value increased by $*** per square meter (*** percent).[189] The domestic industry's unit COGS was $*** per square meter (*** percent) lower in interim 2024 than in interim 2023, while its net sales unit value was $*** per square meter (*** percent) higher.[190]

Kodak's failure to gain more market share than it did over the POI with the Greenwood facility's closure and its loss of market share in 2023 and between interim periods.

[184] CR/PR at Tables 5.4—5.6.

[185] CR/PR at Table 5.7.

[186] CR/PR at Tables 5.4—5.6, 5.9. Pricing data covering the first and last quarters of the POI are unavailable for all but subject imports of product 2 from Japan, which increased *** percent over the period, and subject imports of product 3 from Japan, which declined *** percent over the period. *Id.* at Table 5.7.

[187] None of the 25 responding purchasers reported that U.S. producers had reduced prices in order to compete with lower-priced subject imports. *Id.* at Table 5.16. Six purchasers reported that they did not know. *Id*.

[188] CR/PR at Tables 6.1, C.1. The domestic industry's increase in COGS-to-net sales ratio from 2021 to 2022 was largely driven by ***. *Id.* at Table 6.3. Kodak's COGS-to-net sales ratio increased from *** percent to *** percent, then decreased to *** percent in 2023 and was lower in interim 2024 (*** percent) than in interim 2023 (*** percent). *Id.* Fujifilm Manufacturing USA's COGS-to-net sales ratio increased from *** percent in 2021 to *** percent in 2022. *Id.*

[189] CR/PR at Table 6.2. Kodak's unit COGS increased by $*** per square meter (*** percent) from 2021 to 2023 as its net sales unit value increased by $*** per square meter (*** percent). *Id*. at Table J.2. Fujifilm Manufacturing USA's unit COGS increased by $*** (*** percent) from 2021 to 2022 as its net sales unit value decreased by $*** (*** percent). *Calculated from id.* at Table 6.3.

[190] CR/PR at Table 6.2. The figures are the same for Kodak as it was the only domestic producer by interim 2023.

In sum, we find that the significant underselling by cumulated subject imports caused subject imports to gain sales and market share from the domestic industry. We therefore find that cumulated subject imports had significant price effects.

E. Impact of the Subject Imports[191]

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."[192] These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[193]

The domestic industry's performance declined by most measures during the POI. As apparent U.S. consumption declined and Fujifilm wound down and closed its U.S. production facility, the domestic industry lost market share to cumulated subject imports and the industry's output indicators – including production, capacity, and U.S. shipments – all declined by a substantially greater percentage than the *** percent decline in apparent U.S.

---

[191] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at less value, with respect ALPs from China, Commerce found antidumping duty margins ranging from 115.85 to 317.44 percent. *Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 89 Fed. Reg. 79256 (Sept. 27, 2024). In its final determination with respect to ALPs from Japan, Commerce found antidumping duty margins ranging from 91.83 to 160.11 percent. *Aluminum Lithographic Printing Plates From Japan: Final Affirmative Determination of Sales at Less-Than-Fair-Value*, 89 Fed. Reg. 79250 (Sept. 27, 2024). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China and Japan are selling subject imports in the United States at less than fair value. Further, our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[192] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

[193] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

consumption between 2021 and 2023. The domestic industry's net sales, gross profits, and operating profits also declined by more than apparent U.S. consumption on a percentage basis during that time. Although we base our impact analysis on the domestic industry as a whole, we have also considered the impact of subject imports on Kodak, as the only domestic producer to have produced ALPs throughout the POI and the lone remaining domestic producer after Fujifilm Manufacturing USA's closure in March 2022. Although Kodak's gross profit, operating income, net income, and profit margins all improved from 2021 to 2023 and were higher in interim 2024 than in interim 2023, its performance would have been stronger had subject import pricing not prevented Kodak from gaining substantially more market share over the POI than it did when the only other domestic producer exited the market, and had it not lost market share to subject imports after the closure of Greenwood.[194]

The domestic industry's production,[195] capacity,[196] capacity utilization,[197] and U.S. shipments,[198] all declined sharply from 2021 to 2023 and were generally lower in interim 2024 than in interim 2023. The domestic industry's market share decreased by *** percentage points from 2021 to 2023, declining from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent).[199] End-of-period inventories irregularly decreased during the POI.[200]

---

[194] CR/PR at Table C.2.

[195] CR/PR at Tables 3.7, C.1. U.S. producers' production declined from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023, an overall decrease of *** percent; it was lower in interim 2024 (*** square meters) than in interim 2023 (*** square meters). *Id.*

[196] CR/PR at Tables 3.7, C.1. U.S. producers' practical production capacity decreased from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023, an overall decline of *** percent; it was *** square meters in interim 2023 and interim 2024. *Id.*

[197] CR/PR at Tables 3.7, C.1. The domestic industry's practical capacity utilization rate increased from *** percent in 2021 to *** percent in 2022 before declining to *** percent in 2023, an overall decline of *** percentage points; it was lower in interim 2023, at *** percent, than in interim 2023, at *** percent. *Id.*

[198] CR/PR at Tables 3.9, C.1. U.S. producers' U.S. shipments declined from *** square meters in 2021 to *** square meters in 2022 and *** square meters in 2023, an overall decline of *** percent; they were *** percent lower in interim 2024 (*** square meters) than in interim 2023 (*** square meters). *Id.*

[199] CR/PR at Tables 4.15, C.1.

[200] CR/PR at Tables 3.10, C.1. End-of-period inventories increased from *** square meters in 2021 to *** square meters in 2022 before decreasing to *** square meters; they were *** square meters in interim 2024 and *** square meters in interim 2023. *Id.* As a share of total shipments, the (Continued...)

The domestic industry's employment indicia also declined. The industry's number of production-related worked ("PRWs"),[201] total hours worked,[202] wages paid,[203] and productivity[204] all declined from 2021 to 2023 and were lower in interim 2024 compared to interim 2023. The industry's hourly wages[205] and unit labor costs[206] increased over the POI.

The domestic industry's financial experience was mixed. The industry's gross profits and operating income irregularly declined by *** percent and *** percent, respectively, from 2021 to 2023, but were higher in interim 2024 than in interim 2023.[207] The domestic industry's operating income as a ratio to net sales irregularly increased, first declining from *** percent in 2021 to negative *** percent in 2022 before increasing to *** percent in 2023; it was higher in interim 2024 (*** percent) than in interim 2023 (*** percent).[208] The industry's net income as a ratio to net sales improved from negative *** percent in 2021 to negative *** percent in 2022 and *** percent in 2023; it was negative *** percent in interim 2024 compared to ***

---

domestic industry's end-of-period inventories increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024 (*** percent) than in interim 2023 (*** percent). *Id.*

[201] The industry's PRWs decreased from *** in 2021 to *** in 2022 and *** in 2023; they were lower in interim 2024 (***) than in interim 2023 (***). CR/PR at Tables III-13, C.1.

[202] Total hours worked (in thousands of hours) decreased from *** in 2021 to *** in 2022 and *** in 2023; they were lower in interim 2024 (***) than in interim 2023 (***). CR/PR at Tables 3.13, C.1.

[203] Wages paid decreased from $*** in 2021 to $*** in 2022 and $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Tables 3.13, C.1.

[204] Productivity decreased from *** square meters per hour in 2021 to *** square meters per hour in 2022 and *** square meters per hour in 2023; productivity was lower in interim 2024 (*** square meters per hour) than in interim 2023 (*** square meters per hour). CR/PR at Tables 3.13, C.1.

[205] Hourly wages increased irregularly, first decreasing from $*** per hour in 2021 to $*** per hour in 2022 before increasing to $*** per hour in 2023; they were higher in interim 2024, at $*** per hour, than in interim 2023, at $*** per hour. CR/PR at Tables 3.13, C.1.

[206] Unit labor costs increased from $*** per square meter in 2021 to $*** per square meter in 2022 and $*** per square meter in 2023; they were higher in interim 2024 ($*** per square meter) than in interim 2023 ($*** per square meter). CR/PR at Tables 3.13, C.1.

[207] CR/PR at Tables 6.1, C.1. The domestic industry's gross profit decreased from $*** in 2021 to $*** in 2022 before increasing to $*** in 2023; they were higher in interim 2024 ($***) than in interim 2023 ($***). *Id.*

Operating income declined from $*** in 2021 to a loss of $*** in 2022 before increasing to $*** in 2023; it was higher in interim 2024 ($***) than in interim 2023 ($***). *Id.*

Net income increased from a *** in 2021 to *** in 2022 to $*** in 2023; it was lower in interim 2024 (a loss of $*** than interim 2023 ($***). *Id.*

[208] CR/PR at Tables 6.1, C.1.

percent in interim 2023.[209] Capital expenditures and research and development ("R&D") spending increased from 2021 to 2023 and was lower in interim 2024 than in interim 2023.[210]

While we find the domestic industry to be comprised of both Kodak and Fujifilm Manufacturing USA, we have also considered Kodak's performance during the POI, as noted above. Kodak's production,[211] capacity utilization,[212] and U.S. shipments,[213] all declined overall from 2021 to 2023 and were generally lower in interim 2024 than in interim 2023. Its practical capacity remained *** square meters throughout the POI.[214] Kodak's market share irregularly increased by *** percentage points from 2021 to 2023, increasing from *** percent in 2021 to *** percent in 2022 before decreasing to *** percent in 2023; it was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent).[215] Kodak's end-of-period inventories irregularly decreased during the POI.[216]

[209] CR/PR at Tables 6.1, C.1.

[210] Capital expenditures increased from $*** in 2021 to $*** in 2022 and $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Tables 6.4, C.1.

R&D expenditures decreased from $*** in 2021 to $*** in 2022 before increasing to $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Tables 6.5, C.1.

[211] CR/PR at Table C.2. Kodak's production increased from *** square meters in 2021 to *** square meters in 2022 before decreasing to *** square meters in 2023, an overall decrease of *** percent; it was *** percent lower in interim 2024 (*** square meters) than in interim 2023 (*** square meters). *Id.*

[212] CR/PR at Table C.2. Kodak's practical capacity utilization rate increased from *** percent in 2021 to *** percent in 2022 before declining to *** percent in 2023, an overall decline of *** percentage points; it was lower in interim 2024, at *** percent, than in interim 2023, at *** percent. *Id.*

[213] CR/PR at Table C.2 Kodak' U.S. shipments increased from *** square meters in 2021 to *** square meters in 2022 before decreasing to *** square meters in 2023, an overall decline of *** percent; they were *** percent lower in interim 2024 (*** square meters) than in interim 2023 (*** square meters). *Id.*

[214] CR/PR at Table C.2.

[215] CR/PR at Table C.2. Using data from Table C-2, from 2021 to interim 2024, Kodak lost *** percentage points of market share. *Id.* at Table C-2. Using Fujifilm Manufacturing USA's commercial U.S. shipments of Fujifilm's U.S. produced ALPs in Table F.1, Kodak lost *** percentage points of market share. *Id.* at Table F.1. As explained in Section V.D, SLP's missing shipments in 2021 result in an understatement of the market share shift to subject imports. Including these shipments would show an even greater decline in market share for the domestic industry from 2021 to interim 2024.

[216] CR/PR at Table C.2. End-of-period inventories increased from *** square meters in 2021 to *** square meters in 2022 before decreasing to *** square meters; they were *** square meters in interim 2024 and *** square meters in interim 2023. *Id.* As a share of total shipments, the Kodak's end-of-period inventories increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was higher in interim 2024 (*** percent) than in interim 2023 (*** percent).

Kodak's employment indicia generally declined. Kodak's number of PRWs,[217] total hours worked,[218] wages paid,[219] and productivity[220] all declined from 2021 to 2023 and were lower in interim 2024 compared to interim 2023. Kodak's hourly wages[221] and unit labor costs[222] increased over the POI.

With respect to its financial performance, Kodak's gross profit increased by *** percent from 2021 to 2023, and was *** percent higher in interim 2024 than in interim 2023;[223] its operating income increased by *** percent from 2021 to 2023 and was *** percent higher in interim 2024 than in interim 2023; and its net income irregularly improved, first worsening from *** in 2021 to *** in 2022 before improving to $*** in 2023, and was *** in interim 2024 compared to negative $*** in interim 2023.[224] Kodak's operating income as a ratio to net sales increased by *** percentage points from 2021 to 2023 and was *** percentage points higher in interim 2024 than interim 2023.[225] Kodak's net income as a ratio to net sales worsened from *** percent in 2021 to *** percent in 2022 before improving to *** percent in 2023; it was *** percent in interim 2024 compared to *** percent in interim 2023.[226] Capital expenditures and

[217] Kodak's PRWs decreased from *** in 2021 to *** in 2022 and *** in 2023; they were lower in interim 2024 (***) than in interim 2023 (***). CR/PR at Table C.2.

[218] Kodak's total hours worked (in thousands of hours) increased from *** in 2021 to *** in 2022 before decreasing to *** in 2023; they were lower in interim 2024 (***) than in interim 2023 (***). CR/PR at Table C.2.

[219] Kodak's wages paid increased from $*** in 2021 to $*** in 2022 before decreasing to $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Table C.2.

[220] Kodak's productivity decreased from *** square meters per hour in 2021 to *** square meters per hour in 2022 and *** square meters per hour in 2023; productivity was lower in interim 2024 (*** square meters per hour) than in interim 2023 (*** square meters per hour). CR/PR at Table C.2.

[221] Kodak's hourly wages increased irregularly, first decreasing from $*** per hour in 2021 to $*** per hour in 2022 before increasing to $*** per hour in 2023; they were higher in interim 2024, at $*** per hour, than in interim 2023, at $*** per hour. CR/PR at Table C.2.

[222] Kodak's unit labor costs increased from $*** per square meter in 2021 to $*** per square meter in 2022 and $*** per square meter in 2023; they were higher in interim 2024 ($*** per square meter) than in interim 2023 ($*** per square meter). CR/PR at Table C.2.

[223] Kodak's gross profits increased from $*** in 2021 to $*** in 2022 and $*** in 2023; they were higher in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Table C.2.

Net income increased from a loss of $*** in 2021 a loss of $*** in 2022 to $*** in 2023; it was lower in interim 2024 (a loss of $*** than interim 2023 ($***). *Id.*

[224] CR/PR at Table C.2.

[225] CR/PR at Table C.2. Although Fujifilm Manufacturing USA ceased production in March 2022, it reported net income of $*** million in 2023 and interim 2023. As a result, Kodak's reported net income differs from that of the domestic industry despite being the only active U.S. producer in 2023. CR/PR at Table 6.3 and 6.15 n.15.

[226] CR/PR at Table C.2.

research and development ("R&D") spending increased from 2021 to 2023 but was lower in interim 2024 than in interim 2023.[227]

U.S. shipments of cumulated subject imports increased by *** percent from 2021 to 2023 and were *** percent higher in interim 2024 than in 2023.[228] During that time, the domestic industry's share of apparent U.S. consumption decreased *** percentage points from 2021 to 2023, while its share of apparent U.S. consumption was *** percentage points lower in interim 2024 than in interim 2023.[229] In contrast, cumulated subject imports' share of apparent U.S. consumption increased *** percentage points from 2021 to 2023 and their share of apparent U.S. consumption was *** percentage points higher in interim 2024 than in interim 2023, as subject imports increasingly undersold the domestic like product.[230]

We find that cumulated subject imports had a significant adverse impact on the domestic industry. While subject imports' gain in market share reflects, in part,[231] Fujifilm's decision to replace its domestic production with subject imports, we disagree with Fujifilm's premise that it was entitled to the entirety of the market share ceded by Fujifilm Manufacturing USA when it decided to close the Greenwood facility in favor of serving the U.S. market with dumped and subsidized imports. Even if we set aside the reason for the Greenwood facility's closure, in the context of an industry where price is an important purchasing factor and there is a moderate to high degree of substitutability, we find that Fujifilm's ability to gain nearly all the sales ceded by Fujifilm Manufacturing USA exiting the industry was facilitated by the availability of lower priced subject imports. Subject import underselling facilitated subject imports' gain in market share over the POI and limited Kodak to gaining only a fraction of the *** percentage points ceded by Fujifilm Manufacturing USA as it exited the industry.[232] Indeed, in 2022, the year when Greenwood closed, Kodak gained only *** percentage points of market share and

[227] Capital expenditures increased from $*** in 2021 to $*** in 2022 and $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Tables 6.4, C.2.

R&D expenditures decreased from $*** in 2021 to $*** in 2022 before increasing to $*** in 2023; they were lower in interim 2024 ($***) than in interim 2023 ($***). CR/PR at Tables 6.5, C.2.

[228] CR/PR at Tables 4.15, C.1.

[229] CR/PR at Tables 4.15, C.1. Using FNAC's commercial U.S. shipments rather than Fujifilm Manufacturing USA's transfers to calculate apparent U.S. consumption, domestic producers' market share decreased by *** percentage points from 2021 to 2023, declining from *** percent in 2021 to *** percent in 2022 and *** percent in 2023; it was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent). *Id.* at Table F.1.

[230] CR/PR at Tables 4.15, C.1, I.6.

[231] We note that subject imports from importers other than Fujifilm also increased in market share over the POI. *See* Fujifilm Prehearing Br. at Exh. 13.

[232] CR at Table C.2.

then from 2022 to 2023 and from interim 2023 to interim 2024 lost market share to subject imports, resulting in a net gain over the POI of only *** percentage points of market share from 2021 to 2023, and in an overall loss of market share from 2021 to interim 2024, as described above.[233] Given the at least moderate-to-high degree of substitutability, the importance of price in purchasing decisions, and the evidence that lower priced subject imports were available in the U.S. market, including the significant underselling by subject imports for sales to top ten customers, we find that the availability of low-priced subject imports caused Kodak to lose sales and market share to subject imports in 2023 and interim 2024 and prevented Kodak from gaining additional sales and market share over the POI after the closure of Greenwood in 2022. As a consequence, the lone remaining domestic producer after Fujifilm Manufacturing USA's closure in March 2022, Kodak, experienced production, capacity utilization, shipments, and revenues that were lower than they otherwise would have been. Indeed, Kodak's practical capacity utilization rate was only *** percent in 2022 and declined to *** percent in 2023, and was lower, at *** percent, in interim 2024 than in interim 2023, at *** percent.[234] Kodak thus had ample excess capacity with which it could have increased production and shipments of ALPs during the period. Although Kodak's financial performance improved over the POI, its gross income, operating income, and net income, in addition to its production and shipment quantities, would have been higher but for the sales and market share lost to cumulated subject imports.[235] [236]

---

[233] Coinciding with the closure of its Greenwood facility in 2022, Fujifilm Manufacturing USA's U.S. shipments decreased from *** square meters in 2021 to *** square meters in 2022. CR/PR at Table D.5. During that time, U.S. shipments of cumulated subject imports increased from *** square meters in 2021 to *** square meters. In contrast, although Kodak was operating at a low level of capacity utilization (*** percent) with *** square meters of available capacity, Kodak's U.S. shipments only increased from *** square meters in 2021 to *** square meters in 2022. *Id.* at Tables D.1, D.5.

[234] CR at Table 3.7.

[235] CR/PR at Table C.2. Kodak reported *** throughout the POI, with the exception of a positive net income margin of *** percent in 2023. *Id*.

[236] Commissioner Kearns also finds that Fujifilm's replacement of sales of domestically produced ALPs with sales of subject imports in the U.S. market itself constitutes material injury to the domestic industry by reason of subject imports, apart from its impact on Kodak specifically, whether across the POI or isolated to the period subsequent to Fujifilm ceasing domestic production. That switch to subject imports occurred during 2021 and 2022, the first two years of the POI. As Fujifilm shifted its production from the United States to China and Japan, significant and increasing volumes of cumulated subject imports entered the U.S. market and gained *** percentage points of market share from 2021 to 2023 as the domestic industry lost *** percentage points of market share, including *** percentage points of market share from 2021 to 2022. CR/PR at Table F.1. Between 2021 and 2023, the domestic industry's capacity declined by *** percent and its production declined *** percent, reducing the industry's (Continued...)

Fujifilm argues, citing the present tense of the relevant statutory language, that the Commission's analysis should focus on the impact of subject imports on the domestic industry as presently constituted, *i.e.,* Kodak.[237] We are unpersuaded by this argument. The focus of our impact analysis is the domestic industry, defined as domestic producers as a whole.[238] Having defined the domestic industry to include Fujifilm Manufacturing USA, we must consider the impact of subject imports on the domestic industry including Fujifilm Manufacturing USA.[239] In any event, although we have considered the domestic industry as a whole, we have also found that subject imports had a significant adverse impact on Kodak, as the sole remaining U.S. producer Kodak lost market share to cumulated subject imports after 2022 and was prevented from gaining additional market share from 2021 to 2023 as Fujifilm Manufacturing USA exited the industry. Kodak, as discussed above, would have performed better but for subject import underselling and the resulting impact on its market share. In addition, the Commission is not restricted to analyzing the domestic industry in any isolated point of time, but rather, normally examines data for a three-year period, plus any interim data, for its analysis of injury in original investigations.[240]

Fujifilm argues that there is no correlation between subject import volumes and the condition of the domestic industry because Kodak's financial performance improved as subject

---

capacity utilization rate from *** percent to *** percent; its net sales value declined by *** percent; and the number of PRWs employed by the industry in the United States declined by *** percent. *Id.* at Tables 3.13, C.1. In other words, by 2023, the domestic industry's capacity, production, net sales value and number of workers were roughly *** of what they were in 2021. The extent of this injury to the domestic industry could not have happened but for subject imports. Moreover, he notes that one of Fujifilm's stated reasons for replacing its domestic production with subject imports was that subject imports would be lower cost than its domestic production, by consolidating production in Asia near local supplies of lithographic grade aluminum. Fujifilm Prehearing Br. at 20-21. This further demonstrates that the role of subject imports is inextricable from the cessation of Fujifilm's domestic production.

[237] Fujifilm Prehearing Br. at 26-28.

[238] 19 U.S.C. § 1677(4)(A).

[239] 19 U.S.C. § 1677(7)(C)(iii).

[240] *Purified Carboxymethylcellulose From Finland, Mexico, Netherlands, and Sweden,* Inv. Nos. 731-TA-1084-1087 (Fina), USITC Pub. 3787 (June 2005) at 10 *citing Certain Aluminum Plate from South Africa,* Inv. No. 731-TA-1056 (Final), USITC Pub. 3734 (Nov. 2004) at 19, n.156*; Silicon Metal from Russia*, Inv. No. 731-TA-991 (Final), USITC Pub. 3584 (March 2003) at 11, n. 68, *citing, inter alia, Kenda Rubber Industrial Co. v. United States*, 630 F. Supp. 354, 359 (Ct. Int'l Trade 1986). As the Court of International Trade has explained, "the Court normally defers to the Commission's discretion in choosing the most appropriate period of time for its investigation." *Saarstahl AG v. United States,* 858 F. Supp. 196, 200 (1994) (citing *Kenda Rubber Indus. Co. v. United States*, 630 F. Supp. 354, 359 (1986) ("As the statute does not expressly command the Commission to examine a particular period of time, the Court finds that the Commission has discretion to examine a period that most reasonably allows it to determine whether a domestic industry is injured by LTFV imports.")).

import volumes increased.[241] We are unpersuaded by this argument. In response to the significant underselling by subject imports, Kodak reported that it implemented a "smart revenue" strategy beginning in 2022 to improve the company's financial viability, described as shifting from "chasing low-price sales…to pursuing sales where it could earn a reasonable return."[242] This strategy, as well as declining raw material costs from 2022 to 2023, resulted in improvements in Kodak's financial performance but at the expense of its production, capacity utilization, U.S. shipments, and market share.[243] Even though Kodak's trade-related indicators declined by less than apparent U.S. consumption from 2021 to 2023, we have found that Kodak's capacity utilization, shipments, and revenues would have been higher but for low-priced cumulated subject imports preventing Kodak from gaining additional sales and market share as Fujifilm Manufacturing USA exited the industry, and gaining market share at the expense of Kodak later in the POI.

Fujifilm also argues that subject import competition is attenuated because purchasers cannot easily switch from one brand's plates to another's due to the significant costs involved,[244] and due to the prevalence of longer-term contracts.[245] As discussed in section V.B.3 above, we have found that these factors would not pose a significant impediment to purchasers changing suppliers on the basis of price. Eight of 24 purchasers reported that they had changed suppliers since January 1, 2021, including four purchasers who dropped or reduced purchases from Kodak and began to purchase from Fujifilm.[246] After Fujifilm raised prices for its U.S. customers in response to Commerce's imposition of provisional measures, Kodak reports that nearly 100 customers contacted it "to test plates or request pricing conditions," leading to ***.[247] Additionally, the record indicates that purchasers often source from multiple suppliers concurrently.[248]

---

[241] Fujifilm Prehearing Br. at 107, 119-121.

[242] Hearing Tr. 40 (Herrmann); *see also* Hearing Tr. at 21-22 (Tellstone). We observe that Kodak reported operating income of just $*** in 2021 and $*** in 2022, corresponding to operating income to net sales ratios of *** percent and *** percent. CR/PR at Table C-2.

[243] CR/PR at Table C-2.

[244] Fujifilm Prehearing Br. at 47, 160.

[245] Fujifilm Prehearing Br. at 53.

[246] CR/PR at 2.14.

[247] Hearing Tr. at 64 (Cole); *see* Kodak Posthearing Br. at Exh 5, paras. 15-18; Kodak Prehearing Br. at 69, Exh. 1.

[248] Hearing Tr. at 65, 98 (Cole); *see* Purchaser Questionnaire Responses at II-6. For example, in 2023, responding purchaser *** purchased *** square meters of ALPs from Kodak, *** square meters from ECO3, and *** square meters from Fujifilm. *** Purchaser Questionnaire at Table II-1 ***.

We have also found that the prevalence of long-term contracts would not preclude purchasers from rapidly switching suppliers or from seeking more advantageous pricing.[249] As an initial matter, the record indicates that *** of importers' shares of commercial U.S. shipments were spot sales, for which contracts would not be an impediment to switching between domestic product and subject imports.[250] Further, as discussed in section V.B.3 above, *** a majority of importers reported that price can be renegotiated during the terms of such contracts.[251] In addition, Kodak reports that many of its customers are not required to purchase a minimum quantity from Kodak, and for its contracts that do contain minimum purchase requirements, purchasers will reduce the volume of their purchases to contractually minimum levels in order to increase purchases from other suppliers.[252] Given that *** percent subject import sales were in the spot market in 2023,[253] purchasers would have been in a position to rapidly switch from purchasing domestically produced ALPs under long-term contracts containing such terms to purchasing lower-priced subject imports on the spot market. Thus, we do not find that the prevalence of long-term contracts would have prevented low-priced subject imports from capturing market share from the domestic industry.

We are also unpersuaded by Fujifilm's argument that non-price factors explain any purchasers lost by Kodak to Fujifilm during the POI, consistent with its claim that non-price factors are more important than price in purchasing decisions.[254] As discussed in section V.B.3 above, we have found that domestically produced ALPs have at least a moderate-to-high degree of substitutability with cumulated subject imports.[255] In particular, we note that the vast majority of responding purchasers reported that domestically produced ALPs were comparable to subject imports with respect to all non-price factors, including quality meeting

[249] See Hearing Tr. at 21 (Tellstone), 35 (Herrmann), 148-149 (Kluetz).

[250] CR/PR at Table 5.3.

[251] CR/PR at 5.3.

[252] See Kodak Prehearing Br. at 60 and Exh. 1, para. 26; Hearing Tr. at 25 (Cole) ("Even with annual contracts in place, customers have been clear that if we are unable to compete with the low prices on plates from China and Japan, they will only purchase the minimum volume of plates required under their specific contract and will not renew their business with Kodak."), 64-65 (Cole) ("Some contracts do have minimums in place, although not all contracts have minimums in place. So not every customer that we transact business with are required to purchase a number of plates with us"), 104 (Cole).

[253] CR/PR at Table 5.3.

[254] Fujifilm Prehearing Br. at 85-94, 125-127; Hearing Tr. at 11 (Porter).

[255] Nearly all responding purchasers reported that the quality of U.S.-produced ALPs and subject imports always or usually met minimum quality standards, and the majority of purchasers reported that subject imports are always or frequently interchangeable with the domestic product. CR/PR at Tables 2.10, 2.15.

and exceeding industry standards, product consistency, product range, availability, reliability, and technical support/service.[256] Given this, as well as the importance of price to purchasers, we find that the significant subject import underselling would have caused the domestic industry to lose sales to cumulated subject imports and resulted in market share shifting from the domestic industry to subject imports.[257]

We are likewise unpersuaded by Fujifilm's various arguments that the increases in subject import market share in 2023 and interim 2024 at the expense of Kodak were not injurious. First, it argues that Kodak's *** percentage point loss of market share in 2023 is partially explained by a *** percentage point increase of market share in Kodak's nonsubject imports from Germany.[258] However, the record indicates that Kodak's nonsubject imports from Germany are violet plates and positive plates—as explained further below, these are products not domestically produced.[259] Thus, the increase in Kodak's nonsubject imports from Germany could not have displaced Kodak's U.S. shipments of domestically produced ALPs.

Fujifilm also argues that Kodak's market share loss from 2022 to 2023 resulted from Kodak's pre-existing customers reducing their purchases of domestically produced ALPs by more than Fujifilm's pre-existing customers.[260] The record does not support this argument. According to Fujifilm, two existing Kodak customers that closed their U.S. printing facilities in 2023 would have accounted for an estimated additional *** square meters of business for Kodak in 2023, which is equivalent to just *** percent of apparent U.S. consumption in that

[256] CR at Table 2.12. Fujifilm argues that in responding to these questions, purchasers likely compared Fujifilm's U.S.-produced ALPs to Fujifilm's subject imports, rather than comparing Kodak's U.S.-produced ALPs to Fujifilm's subject imports, if they bought Fujifilm's subject imports and U.S.-produced ALPs during the POI. Hearing Tr. at 218 (Porter). However, by the time that purchasers were responding to the questionnaire in mid-2024, Kodak had been the only domestic producer of ALPs for over two years since Fujifilm Manufacturing USA shuttered in March 2022, and Fujifilm's domestically produced ALPs had not been sold in the U.S. market since 2023, and then only in a very small quantity accounting for *** percent of the market, with *** of that sold in the first quarter of 2023. CR/PR at Table F.1. Additionally, even when considering just the questionnaire responses of the purchasers who bought from both Kodak and subject sources, a majority of these purchasers also rated domestically produced ALPs to be comparable to subject imports from China and Japan on non-price factors. Purchaser Questionnaires Responses of *** at IV-4.

[257] While Fujifilm argues that price is not the most important purchasing factor, the record indicates that price is an important purchasing factor, as discussed above in Section V.B.3. Notwithstanding some purchasers' anecdotal responses, the record also indicates that subject imports and the domestic like product are generally interchangeable and comparable on non-price purchasing factors.

[258] Fujifilm Posthearing Br. at Attach. A, p. 7.

[259] Hearing Tr. at 121 (Cole); *see* Fujifilm Prehearing Br. at 69-70.

[260] Fujifilm Posthearing Br. at Attach. A, pp. 7-9.

year.[261] Therefore, Kodak's loss of *** percentage points of market share to cumulated subject imports from 2022 to 2023 is not explained by these two customers. Moreover, the record does not indicate that demand for domestically produced ALPs declined more than demand for subject imports. Given the comparability between subject imports and the domestic like product, subject import underselling, rather than demand trends, more likely explains the shifts in market share.[262]

Fujifilm also argues that the market share shift in 2023 is overstated because Kodak's share of apparent U.S. consumption was inflated in 2022 due to anomalous market dynamics, including (1) an uptick in ALP demand as the COVID-19 pandemic eased and demand from commercial printers increased for election-related materials, (2) supply disruptions in 2022 that led customers to order more than they might have needed to hedge against the risk of additional disruptions, (3) speculation that Kodak's customers increased purchases in 2022 to protect against possible price increases due to rising aluminum prices,[263] and (4) Kodak's

[261] Fujifilm Posthearing Br. at Attach. A, pp. 7-8.

[262] We have considered that a larger proportion of domestically produced ALPs were process-free plates than wet plates (*e.g.,* *** percent process-free plates compared to *** percent wet plates in 2023), and a larger proportion of cumulated subject imports were wet plates than process-free plates (*e.g.*, *** percent process-free plates compared to *** percent wet plates in 2023). CR/PR at Table E.1. While apparent U.S. consumption of wet plates declined by more than apparent U.S. consumption of process-free plates, we do not find that these trends explain the shift in market share from the domestic industry to subject imports. *See* CR/PR at Table E.2. Indeed, cumulated subject imports increased their share of total sales of both wet and process-free plates at the expense of the domestic industry (and Kodak individually) from 2022 to 2023 and between interim periods.

For both wet and process-free plates, the domestic industry's (and Kodak's) U.S. shipments declined by a greater amount than apparent U.S. consumption of those plate types from 2022 to 2023 and between interim periods, even as the domestic industry reported substantial unused practical capacity. *See* CR/PR at Table E.2; Fujifilm Prehearing Br. at Exh. 12. Meanwhile, U.S. shipments of cumulated subject imports of both types of plates increased in volume. *Id*. As a result, cumulated subject imports increased their share of total shipments of wet and process-free plates while the domestic industry's (and Kodak's) shares declined. *Id*. Even if assuming *arguendo* that some of the increase in subject imports was to offset the decline in production from Fujifilm Manufacturing USA after its closure in 2022, the share of total purchases of wet and process-free plates held by cumulated subject imports and Fujifilm Manufacturing USA, combined, increased from 2022 to 2023 and between interim periods, even as Fujifilm Manufacturing USA stopped producing ALPs, while Kodak's share declined. Fujifilm Prehearing Br. at Exh. 12.

We also find that subject imports' and the domestic industry's different concentrations in wet and process-free plates do not attenuate competition between subject imports and the domestic industry. Both the domestic industry and subject importers reported substantial shipments of wet and process-free plates. CR/PR at Table E.2. Additionally, purchaser responses indicate that wet and process-free plates are generally interchangeable. *See* Purchaser Questionnaire Responses at IV-3.

[263] Fujifilm Prehearing Br. at 122-123.

integration of sales volume from SLP's former customers.[264] These claims are largely speculative and not supported by the record. The record does not indicate that there was any increase in ALP demand in 2022, as the decrease in apparent U.S. consumption from 2021 to 2022 (*** percent) was greater than the decline between 2022 and 2023 (*** percent).[265] As discussed in section V.B.2 above, Kodak absorbed SLP's customer base in 2021 and 2022 after entering into a brokerage agreement. Kodak reports that it shipped *** square meters of ALPs to SLP's former customers in 2021, *** square meters in 2022, and *** square meters in 2023.[266] Thus, Kodak's sales to SLP's former customers accounted for *** percent of apparent U.S. consumption in 2021, *** percent in 2022, and *** percent in 2023.[267] The record does not indicate that SLP's former customers were insulated from competition with subject imports.[268]

We are also unpersuaded by Fujifilm's argument that the increase in subject import market share in interim 2024 compared to interim 2023 could not have been injurious because it only replaced the market share formerly held by its nonsubject imports after Fujifilm closed its production facility in the Netherlands in 2023.[269] Even accepting *arguendo* Fujifilm's argument that its increased subject imports in interim 2024 replaced its nonsubject imports from the Netherlands, cumulated subject imports still increased their market share by *** percentage points between interim periods at the expense of the domestic industry when accounting for the decrease in Fujifilm's nonsubject imports.[270] Additionally, the record indicates that Fujifilm's nonsubject imports from the Netherlands consisted in substantial part of ALP products that were produced domestically by Kodak.[271] Given Kodak's low practical

[264] Fujifilm Prehearing Br. at 62-63.

[265] CR/PR at Tables 4.15, C.1.

[266] Kodak Posthearing Br. at Exh. 5, paras. 2-4.

[267] *Calculated from* Kodak Posthearing Br. at Exh. 5, paras. 2-4 and CR/PR at Tables 4.15, C.1.

[268] E.g., purchaser ***. *** Purchaser Questionnaire at III-20.

[269] Fujifilm Posthearing Br. at Attach. A, p. 10.

[270] Fujifilm's nonsubject imports decreased in market share by *** percentage points between interim 2023 and interim 2024. *See* Fujifilm's Prehearing Br. at Exh. 13. However, Fujifilm's subject imports increased in market share by *** percentage points between interim periods, more than the decline in Fujifilm's nonsubject imports. Moreover, subject imports from other importers increased in market share by *** percentage points between interim periods. *See id.* Therefore, cumulated subject imports increased in market share by *** percentage points more than the decline in Fujifilm's nonsubject imports.

[271] *See* Fujifilm's Importer Questionnaire at II-7c (*** percent of FNAC's sales of imports from the Netherlands were chemical-free plates in 2023, and *** percent were interim 2024); Fujifilm's Posthearing Br. at Exh. 2 (noting that *** percent of FNAC's sales of imports from the Netherlands were violet plates). While these types of ALPs are not produced domestically, as discussed below, a (Continued...)

capacity utilization rate of *** percent in interim 2024, and the fact that Fujifilm made *** of its sales of subject imports on the spot market,[272] Kodak should have been in a position to capture some of the market share relinquished by nonsubject imports from the Netherlands, but was unable to do so in the face of significant subject import underselling.

Fujifilm argues that much of the increase in subject imports consisted of violet plates, oven-baked positive plates, and chemical-free plates that are not produced domestically, and could therefore not have been injurious.[273] The record does not support this argument. At the outset, we observe that the record contains limited information specific to violet plates and positive plates because Fujifilm did not request that the Commission collect such information in its comments on draft questionnaires.[274] Nevertheless, while positive plates are not currently produced in the United States, the record indicates that positive plates and negative plates are interchangeable once a customers' CTP machines are calibrated, which is no more costly or disruptive than calibrating CTP machines to change ALP suppliers.[275] Although Kodak reported no shipments of domestically produced chemical-free plates during the POI, U.S. shipments of subject imported chemical-free plates accounted for only *** percent of apparent U.S. consumption in 2023 and *** percent of apparent U.S. consumption in interim 2024, and can therefore not explain the extent of the shift in market share from the domestic industry to subject imports over the period.[276]

Kodak concedes that it does not produce violet plates in the United States and that violet plates require different CTPs than non-violet plates.[277] As an initial matter, violet plates only accounted for a small portion of subject imports, whereas they accounted for a more

substantial portion of Fujifilm's nonsubject imports from the Netherlands were the same types of plates that Kodak produced domestically.

[272] FNAC U.S. Importer Questionnaire at III-7.

[273] Fujifilm Prehearing Br. at 68-72.

[274] *See* Fujifilm's Comments on Draft Questionnaires, EDIS. Doc. 811852 (Jan. 11, 2024).

[275] Hearing Tr. at 121-122 (Cole); *see* Kodak's Posthearing Br. at Exh. 6 (a Kodak company official attesting that positive and negative plates can be used interchangeably on the same CTP machines, including at Quad Graphics; and a list of 15 customers that Kodak transitioned from positive plates to negative plates over the last four years). *Contra* Hearing Tr. at 137 (Henderson) (a representative of Quad Graphics testifying that positive and negative plates each require a specific and separate non-transferable manufacturing network).

[276] CR/PR at Table E.1. The record does not contain information on the interchangeability between chemical-free plates and other ALPs.

[277] Hearing Tr. at 98 (Cole).

substantial portion of Fujifilm's nonsubject imports from the Netherlands.[278] Fujifilm argues that because its subject imports from China largely replaced its nonsubject imports from the Netherlands from interim 2023 to interim 2024, much of the increase in subject imports from China in interim 2024 would have consisted of violet plates not produced domestically.[279] As only *** percent of FNAC's sales of nonsubject imports from the Netherlands consisted of violet plates, only a portion of the increase in Fujifilm's subject imports from China in interim 2024 to replace nonsubject imports from the Netherlands would have consisted of violet plates.[280] Moreover, Fujifilm's subject imports from China only accounted for *** percentage points of the *** percentage point increase in cumulated subject imports in interim 2024 compared to interim 2023.[281] Therefore, violet plates would not explain most of the increase in subject import market share between interim periods. Nor would any shift from nonsubject to subject imports in interim 2024 explain the significant increases in the volume of subject imports over the entire POI. Based on the foregoing, we find that subject imports of violet plates, oven-baked positive plates, and chemical-free plates do not explain or vitiate the domestic industry's loss of market share to cumulated subject imports during the POI.

In sum, the factors alleged by Fujifilm do not explain the full extent of the market share lost by Kodak to cumulated subject imports from 2022 to 2023 or between interim periods or Kodak's failure to gain additional sales and market share over the POI.

We also have considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. As discussed in section V.B.2 above, nonsubject imports were the second largest source of supply throughout the POI, and the average unit values of U.S. shipments of nonsubject imports were generally lower than those of ALPs from domestic and subject sources.[282] Although nonsubject imports gained *** percentage points of market share from

---

[278] Fujifilm reports that violet plates consisted of *** percent of its subject imports from China, *** percent of its subject imports from Japan, and *** percent of its nonsubject imports from the Netherlands. Fujifilm Posthearing Br. at Exh. 2.

[279] Fujifilm Posthearing Br. at Attach. A, p. 32. In interim 2023, Fujifilm's U.S. shipments of nonsubject imports from the Netherlands were *** in size, at *** square meters, to Fujifilm's U.S. shipments of subject imports from China, at *** square meters. FNAC's U.S. Importer Questionnaire at II-5a, II-7a.

[280] Fujifilm's Posthearing Br. at Exh. 2.

[281] CR/PR at C.1, Fujifilm's Prehearing Br. at Exh. 13.

[282] *See* CR/PR at Table C.1. The AUVs of nonsubject imports U.S. shipments ranged from $*** per square meter to $*** per square meter during the POI, while the AUVs of subject imports ranged (Continued...)

2021 to 2022, their market share was unchanged from 2022 to 2023 and *** percentage points lower in interim 2024 than interim 2023.[283] In contrast, cumulated subject imports' market share increased by *** percentage points from 2021 to 2023, and was *** percentage points higher in interim 2024 than in interim 2023, and all of these gains came at the direct expense of the domestic industry.[284] We therefore find that nonsubject imports do not explain the injury that we have attributed to cumulated subject imports.

Furthermore, we acknowledge that apparent U.S. consumption decreased *** percent from 2021 to 2023 and was *** percent lower in interim 2024 than in interim 2023.[285] These declines in apparent U.S. consumption, however, do not explain the larger declines in the domestic industry's production during this period, nor the industry's loss of market share as well as its inability to gain additional sales and market share as cumulated subject imports undersold the domestic like product. Although Kodak's production and U.S. shipments declined by less than apparent U.S. consumption from 2021 to 2023, Kodak's production, capacity utilization, and U.S. shipments declined by more than the decline in apparent U.S. consumption from 2022 to 2023, as it lost *** percentage points of market share to cumulated subject imports.[286] Kodak lost an additional *** percentage points of market share to cumulated subject imports in interim 2024 compared to interim 2023, representing further injury not

---

from $*** per square meter to $*** per square meter, and the AUVs of domestic producers' U.S. shipments ranged from $*** per square meter to $*** per square meter. *Id.*

[283] CR/PR at Tables 4.15, C.1. Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2021 to *** percent in 2022 and 2023, an increase of *** percentage points; their share was *** percentage points lower in interim 2024 (*** percent) than in interim 2023 (*** percent). *Id.*

[284] CR/PR at Tables 4.15, C.1. Cumulated subject imports' market share increased by *** percentage points from 2021 to 2022 as the domestic industry's market share declined by *** percentage points. From 2022 to 2023, cumulated subject imports' market share increased by *** percentage points as the domestic industry's market share decreased by *** percentage points. Cumulated subject imports' market share was *** percentage points higher in interim 2024 than in interim 2023, while the domestic industry's market share was *** percentage points lower. *Id*.

[285] CR at Tables 4.15, C.1.

[286] *See* CR/PR at Table C.2. While apparent U.S. consumption declined by *** percent from 2022 to 2023, Kodak's U.S. shipment quantity declined by a greater amount, *** percent. *Id*. Thus, declining demand does not explain Kodak's loss in market share.

attributable to declining demand.[287] Thus, the decline in demand cannot account for the injury that we have attributed to cumulated subject imports.[288]

In sum, based on the record of the final phase of these investigations, we conclude that subject imports had a significant impact on the domestic industry.

VI. Critical Circumstances

A. Legal Standards and Party Arguments

In its final antidumping duty determination, Commerce found that critical circumstances exist with respect to Fujifilm China and all other producers/exporters in China.[289] In its final countervailing duty determination, Commerce found that critical circumstances exist with respect to Fujifilm China and Shanghai National Ink Co., Ltd.[290] Because we have determined that the domestic industry is materially injured by reason of subject imports from China, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."[291]

The SAA indicates that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."[292] The legislative history for the critical

[287] CR/PR at Table C.2. Apparent U.S. consumption was *** percent lower in interim 2024 than in interim 2023, while Kodak's U.S. shipments were *** percent lower. *Id*.

[288] Fujifilm argues that Kodak has been working to convert its traditional print customers to digital printing, thus reducing its sales of ALPs. Fujifilm Prehearing Br. at 123-125. Contrary to this argument, however, Kodak reports that digital printing often complements, rather than replaces, traditional printing with ALPs, and that digital printing accounted for less than four percent of pages printed in 2022. *See* Hearing Tr. at 108-110 (Cole, Continenza) ("That doesn't pull from our plate revenue from our plate customers in any way, shape, or form"); Fujifilm Prehearing Br. at Exh. 11. As Kodak testified that ALPs represent "by far" its largest source of revenue in the print industry, it is not likely that it would significantly reduce its own sales ALPs. Hearing Tr. at 65 (Cole).

[289] *Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 89 Fed. Reg. 79256 (Sept. 27, 2024).

[290] *Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances,* 89. Fed. Reg. 79248 (Sept. 27, 2024).

[291] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[292] SAA at 877.

circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."[293] An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

> (I) the timing and the volume of the imports,
>
> (II) a rapid increase in inventories of the imports, and
>
> (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.[294]

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.[295]

B. Party Arguments

Petitioner's Arguments. Kodak has not addressed the issue of critical circumstances the final phase of these investigations.

Respondents' Arguments. Respondents argue that the criteria for finding critical circumstances have not been met. They argue that U.S. imports and inventories of subject imports from China subject to Commerce's critical circumstances determination did not

---

[293] *ICC Industries, Inc. v United States,* 812 F.2d 694, 700 (Fed. Cir. 1987), *quoting* H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). *See* 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

[294] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[295] *See Lined Paper School Supplies from China, India, and Indonesia,* Inv. Nos. 701-TA-442-43, 731-TA-1095-97**,** USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India,* Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam,* Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

increase by the requisite magnitude.[296] Fujifilm also argues that other circumstances, including Kodak's strong performance, confirm that the remedial effect of any order does not require retroactive duties.[297]

C. Analysis

We first consider the appropriate period for comparisons in our critical circumstances analysis of pre-petition and post-petition levels of subject imports from China. The petitions in these investigations were filed on September 29, 2023. The Commission frequently relies on comparisons of the six-month periods preceding and following filing of the petitions, but has relied on shorter periods when Commerce's preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.[298] As Commerce issued its preliminary affirmative determination in its countervailing duty investigation of ALPs from China on March 1, 2024, during the sixth month following the filing of the petitions, we will compare the volume of subject imports in the five months prior to the filing of the petitions (May 2023 – September 2023) with the volume of subject imports in the five months after the filing of the petitions (October 2023 – February 2024).[299]

1. China Countervailing Duty Investigation

Subject imports from China subject to Commerce's affirmative critical circumstances determination decreased from *** square meters in the pre-petition period to *** square meters in the post-petition period, a decrease of *** percent.[300] In addition, end-of-period inventories of the relevant subject imports were at *** square meters at the end of September

---

[296] Fujifilm Prehearing Br. at 162, 166-167, 169-170; ECO3 Prehearing Br. at 7-10.

[297] Fujifilm Prehearing Br. at 162, 170-171.

[298] *See Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan,* Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

We note that the Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis. *See Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

[299] CR/PR at Table 1.1.

[300] CR/PR at Table 4.7.

2023 and *** square meters at the end of February 2024, a level *** percent lower, indicating that there was no stockpiling of subject imports after the filing of the petition.[301]

Therefore, we do not find that an increase in subject imports from China in the post-petition period that would seriously undermine the remedial effect of the order. Consequently, we find that critical circumstances do not exist with respect to subject imports from China subject to Commerce's affirmative determination of critical circumstances in the countervailing duty investigation.

2. China Antidumping Duty Investigation

Subject imports from China subject to Commerce's affirmative critical circumstances determination increased from *** square meters in the pre-petition period to *** square meters in the post-petition period, an increase of *** percent.[302] In addition, end-of-period inventories of the relevant subject imports were *** square meters at the end of September 2023 and *** square meters at the end of February 2024, a level *** percent lower, indicating that there was no stockpiling of subject imports after the filing of the petition.[303]

We do not find the relatively small increase in subject imports from China in the post-petition period to be of such a magnitude as to seriously undermine the remedial effect of the order. Consequently, we find that critical circumstances do not exist with respect to subject imports from China subject to Commerce's affirmative determination of critical circumstances in the antidumping duty investigation.

VII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of imports of ALPs from China and Japan found by Commerce to be sold in the United States at less than fair value and subsidized by the government of China. We also find that critical circumstances do not exist with respect to imports of ALPs from China that are subject to Commerce's final affirmative critical circumstances determinations.

[301] CR/PR at Table 4.8.
[302] CR/PR at Table 4.9.
[303] CR/PR at Table 4.10.

Dissenting Views of Commissioner David S. Johanson

Based on the record in the final phase of these investigations, I find that an industry in the United States is not materially injured or threatened with material injury by reason of imports of aluminum lithographic printing plates ("ALPs") from China and Japan, found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value and to be subsidized by the government of China. Except as otherwise noted, I join with and adopt sections I-V.C of the majority's affirmative opinion.

My finding that there is no material injury, or threat thereof, reflects my differing view of the record regarding the price effects and impact of subject imports. As elaborated below, I do not find price effects by reason of subject imports for the following reasons: (1) there were steadily increasing U.S. prices for all pricing products and so no price depression by subject imports; (2) subject imports did not prevent price increases which otherwise would have occurred, as evidenced by the aforementioned U.S. price increases and by an improving COGS-to-net-sales ratio, and (3) any market share shift away from the domestic industry was not the result of price-based competition with subject imports. With no price effects attributable to subject imports, I do not find that there was a significant impact due to price-based competition by subject imports. I also find that there was no threat of material injury because the recent trends for Kodak, taken by itself, do not show it to be vulnerable to injury from subject imports in the imminent future.

I. No Material Injury by Reason of Subject Imports

I adopt the analysis of the majority for subsections (A) Legal Standards, (B) Conditions of Competition, and (C) Volume of Subject Imports.

A. Price Effects of Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that in evaluating the price effects of the subject imports, the Commission shall consider whether –

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[1]

[1] 19 U.S.C. 1677(7)(C)(ii).

1. Importance of Price to Purchasers

An unusual aspect of the U.S. market for ALPs is that both Kodak and Fujifilm sell their products into an offset printing ecosystem that includes, in addition to the ALPs, platesetting machines used to etch the ALPs, plate developers, chemicals associated with the plate developer process, software, various customer services, and ultimately, the printing presses.[2] Dan Larkin, Vice President of Operations for Fujifilm, stated that "{m}uch of the capital equipment is purchased or leased through the ALP suppliers."[3] The majority of purchasers agreed that prices for ALPs and their associated equipment and services depend on whether these goods and services are bundled.[4] Although ***.[5] Indeed, the ***.[6] While the Commission and the parties' economists required access to detailed economic and accounting data to construct apples-to-apples price comparisons, it seems likely that many purchasers face more opaque pricing comparisons for ALPs. I take this into consideration when approaching questions associated with perceived shortcomings of the pricing product data.[7]

By themselves, ALPs account for between *** and *** percent of the costs of printed materials, and importers estimated that ALPs make up only *** percent of the costs of printed materials, such as retail inserts.[8] As noted above, while price is an important factor in purchasing decisions, ALPs are one component in an extended chain that includes capital equipment and complex processes; therefore, purchasers must also take into account total cost.[9] Additionally, only *** of *** purchasers stated that they considered price to be the top factor in purchasing decisions.[10]

2. Pricing Product Comparisons

There were three pricing products, differing only in their thickness. The pricing product data compiled in the staff report shows predominant overselling by cumulated subject imports. There were *** quarterly comparisons (or *** percent) in which there was overselling by subject imports and *** quarterly comparisons in which there is underselling (or *** percent).[11]

---

[2] CR/PR at 1.8-1.10, 2.21-2.22. Hearing Tr. at 134 (Larkin), 295 (Anderson), 296-97 (Durling), 300 (Anderson), 314 (Anderson), 319-20 (Anderson), 323 (Porter).

[3] Hearing Tr. at 134 (Larkin).

[4] CR/PR at 2.21-2.22.

[5] Hearing Tr. at 319-20 (Anderson).

[6] Hearing Tr. at 322-23 (Anderson).

[7] *See, e.g.*, Hearing Tr. at 8, 35-39 (Herrmann).

[8] CR/PR at 2.9.

[9] Hearing Tr. at 134-35 (Crawford).

[10] CR/PR at Table 2.8. *See also* Fujifilm's prehearing brief at 88.

[11] CR/PR at Tables 5.10-5.12.

On a quantity basis, there were *** square meters of subject imports (or *** percent) that oversold domestically produced ALPs and *** square meters of subject imports (or *** percent) that undersold.[12]

Nor are these the only data that indicates that subject import prices were generally higher than domestic producers' U.S. prices. The AUV of U.S. producers' U.S. shipments were lower than that of U.S. shipments of subject imports in each of the three full years.[13] Also, the lost sales and lost revenue survey indicates that, of the 25 purchasers surveyed, only *** considered subject import prices lower.[14]

I have taken notice of the alternative pricing data compiled in Appendix I of the Commission's report.[15] Petitioner cites these data, which show predominant underselling, as evidence that the Commission's standard pricing product data is biased in favor of respondent.[16] Considering the presentation in Appendix I, I continue to rely on pricing products comparison data in chapter five of the Commission's report. Respondent testified that they exercised due diligence in following the Commission's instructions[17] and, as I noted in the preceding paragraph, there are some independent indications that the data in chapter five capture the market situation. Further, whatever issues might be present in the Commission's pricing product database, the data relied on below to analyze price effects are data supplied by the domestic industry and so, especially in the later years, free from influence by the defects alleged in respondent's data.

3. Price Depression

The U.S. prices of all three pricing products increased substantially over the POI.

For pricing product 1, U.S. prices increased ***.[18] The U.S. price for pricing product 1 ended the POI *** percent higher than at the beginning.[19]

---

[12] CR/PR at Tables 5.10-5.12.

[13] In 2021, the AUV of subject import shipment was $*** per square meter, while U.S. producers' AUV was $***; in 2022, the AUV of subject import shipments was $*** per square meter, while U.S. producers' AUV was $***; in 2023, the AUV of subject import shipments was $*** per square meter, while U.S. producers' AUV was $***. Only in interim 2024 was the AUV of U.S. producers' shipments higher, at $*** per square meter, than subject imports' AUV, which was $***. CR/PR at Table C-1.

[14] CR/PR at Table 5.14.

[15] CR/PR at Appendix I.

[16] Petitioner's posthearing brief at 8-10.

[17] Hearing Tr. at 319 (Porter).

[18] CR/PR at Table 5.4.

[19] CR/PR at Table 5.7.

For pricing product 2, U.S. prices increased *** per square meter.[20] The U.S. price for pricing product 2 ended the POI *** percent higher than at the beginning.[21]

For pricing product 3, after ***, U.S. prices ***.[22] The U.S. price for pricing product 3 ended the POI *** percent higher than at the beginning.[23]

Corroborating the pricing product data, the AUV of U.S. producers' U.S. shipments increased steadily from $*** per square meter in 2021 to $*** per square meter in 2023, or by *** percent. The AUV of U.S. producers' U.S. shipments was *** percent higher in interim 2024 than in interim 2023.

The degree to which U.S. prices increased, and remained elevated throughout the POI, is greater than might be expected (1) given the steadily declining apparent U.S. consumption of ALPs, which declined by *** percent over the three full years and was *** percent lower in interim 2024 than in interim 2023,[24] and (2) because both unit raw material costs and unit COGS were lower in 2023 than in their peak year of 2022, and were lower in interim 2024 than in interim 2023.[25] Accordingly, these price data do not indicate price depression by reason of subject imports.

4. Price Suppression

The trends for all three pricing products are similar and are derived from the trend in the cost of raw materials, notably aluminum, which spiked from $*** per pound in January 2021 to $*** per pound in March 2022, or by *** percent.[26] From this peak, aluminum prices, while remaining elevated for several months, declined steadily for *** months to $*** per pound in October 2022, whereupon prices leveled out, fluctuating in a narrower range for the remainder of the POI, from $*** per pound to $*** per pound. At the end of the period, the aluminum price stood at $*** per pound, a level *** percent higher than at the beginning of the POI.

[20] CR/PR at Table 5.5.

[21] CR/PR at Table 5.7.

[22] CR/PR at Table 5.6.

[23] CR/PR at Table 5.7.

[24] CR/PR at Table C-1.

[25] CR/PR at Table 6.3. After increasing from $*** per square meter in 2021 to $*** per square meter in 2022, unit raw material costs declined to $*** per square meter in 2023. Unit raw material costs were lower in interim 2024, at $*** per square meter, than in interim 2023, when it was $*** per square meter. After increasing from $*** per square meter in 2021 to $*** per square meter in 2022, unit COGS declined to $*** per square meter in 2023. Unit COGS were lower in interim 2024, at $*** per square meter, than in interim 2023, when it was $*** per square meter. *Id*.

[26] CR/PR at Figure 5.1 and Table 5.1.

It is notable that even after the price of aluminum, which accounted for *** percent of raw material costs for ALPs,[27] had retreated from its peak by the end of 2022, prices for ALPs stayed elevated. With the prices of ALPs increasing by more than raw material costs, the COGS-to-net-sales ratio returned to its 2021 level (*** percent) in 2023, after increasing during 2022, when the aluminum price spike occurred.[28] The COGS-to-net-sales ratio was lower in interim 2024 than in interim 2023. Therefore, the trends in the domestic industry's COGS-to-net-sales ratio indicate that the domestic industry was able to increase its pricing, even in the face of raw material volatility, restoring its COGS-to-net-sales ratio to the level at which it began the POI.[29]

Further evidence that subject imports did not prevent price increases that would otherwise have occurred is the absence of any report among the *** purchasers who responded that domestic producers reduced prices to compete with subject imports.[30]

5. Lost Sales and Lost Revenue

In the absence of evidence that subject imports have depressed prices to a significant degree or that subject imports have prevented price increases which would otherwise have occurred, I also consider whether price competition by subject imports has led to a loss of U.S. market share by the domestic industry. Although the domestic industry steadily lost *** percentage points of U.S. market share over the three full years and was lower in interim 2024 than in interim 2023,[31] I find that this market share loss is not attributable to price-based competition by subject imports.

As Fujifilm initially wound down its domestic production, finally ending production in early 2022,[32] the domestic industry lost *** percentage points of U.S. market share, falling from *** percent in 2021 to *** percent in 2022.[33] At the same time, however, that the domestic industry was experiencing the largest part (nearly ***) of its total market share loss over the POI, overselling by subject imports was at its most concentrated, leading me to conclude that

[27] CR/PR at 6.12.

[28] CR/PR at 6.13 and Table C-1.

[29] Hearing Tr. at 66 (Cole).

[30] CR/PR at Table 5.16.

[31] The domestic industry's U.S. market share declined steadily from *** percent in 2021 to *** percent in 2023, and was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. CR/PR at Table C.1. Using the alternative measure in Appendix F, the domestic industry lost *** percentage points of U.S. market share, falling steadily from *** percent in 2021 to *** percent in 2023, and was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. CR/PR at Table F.1. In the remainer of this subsection, I will use the alternative measure as it reflects Fujifilm's market presence more accurately. CR/PR at 6.14 n.12.

[32] CR/PR at 3.1 n.1 and 6.2 n.6.

[33] CR/PR at Table F.1.

price-based competition did not play a role in the domestic industry's U.S. market share loss in 2022. In the first two years of the POI, out of a total *** quarterly comparisons, *** quarterly comparisons showed overselling, or in *** percent of the quarterly comparisons.[34] Therefore, while there was a loss of market share by the domestic industry in 2022, the record does not support the contention that this loss of market share was caused by price competition by subject imports.[35]

I also note that the increase in the U.S. shipments of subject imports in 2022, *** square meters,[36] was less than the decrease in the volume of net sales from Fujifilm's domestic operations, which declined by *** in 2022.[37] Fujifilm's overall presence, therefore, declined by *** square meters.[38] As a result, with Kodak's U.S. shipments increasing slightly and apparent U.S. consumption falling, the share that Kodak held in the U.S. market actually increased between 2021 and 2022, from *** percent in 2021 to *** percent in 2022.[39]

In 2023, Fujifilm no longer produced ALPs in the United States, and its domestically produced U.S. shipments were only *** square meters, *** square meters less than in 2022;[40] at the same time, subject imports increased by *** square meters in 2023 (or by *** percent).[41] Fujifilm's overall presence therefore declined by another *** square meters. However, with apparent U.S. consumption declining in 2023 by *** square meters, or by *** percent, U.S. producers' U.S. shipments declined by *** square meters, Kodak lost *** percentage points of U.S. market share.[42] It was primarily declining demand, therefore, that caused Kodak to lose market share in 2023, by which time Kodak was the only member of the domestic industry.

---

[34] CR/PR at Table 5.12. Over 2021-2022, there were *** square meters of subject import ALPs that oversold the domestic like product (or *** percent of total volume in 2021-2022) and *** square meters that undersold (or *** percent). *Id*.

[35] Fujifilm contends that the largest customers it served with its domestic production in 2021 continued to be served by Fujifilm's subject imports, but at higher prices in 2022 and 2023. Fujifilm's prehearing brief at 22. This would signify that Fujifilm lost market share to itself, but at higher, not lower, prices, and would not represent price-based competition leading to lost domestic industry market share. *See also* Hearing Tr. at 136 (Crawford).

[36] CR/PR at Table F.1.

[37] CR/PR at Table F.1.

[38] Assuming that nearly all of the increase in subject imports was due to Fujifilm, which was conceded by Fujifilm itself. Hearing Tr. at 156 (Durling).

[39] CR/PR at Table F.1. Kodak's U.S. shipments increased by *** square meters and apparent U.S. consumption declined from *** square meters in 2021 to *** square meters in 2022, or by *** square meters (by *** percent). CR/PR at Tables F.1 and F.3.

[40] CR/PR at Table F.1.

[41] CR/PR at Table F.1.

[42] CR/PR at Table F.1.

Considering the full three years, the combined U.S. market share of Fujifilm's domestic production and subject imports was lower in 2023 (*** percent) than it was in 2021 (*** percent) while at the same time Kodak's U.S. market share was *** percentage points higher in 2023 than in 2021.[43]

Nor was price-based competition any more visible in 2023 and interim 2024 than in the previous years of the POI. While Kodak's U.S. market share in interim 2024 was *** percentage points lower than it was in interim 2023,[44] there was still predominant overselling—in the last five quarters of the POI, out of a total *** quarterly comparisons, *** quarterly comparisons showed overselling, or in *** percent of the quarterly comparisons.[45] Additionally, U.S. prices for all three pricing products were higher in 2024 Q1 than in 2023 Q1[46] and the domestic industry's COGS-to-net-sales ratio was *** percent in interim 2024, *** percentage points lower than in interim 2023, when it was *** percent.[47]

Also, any lessening in the predominance of overselling later in the POI was caused by a steady increase in U.S. prices for all three pricing products, rising to meet subject import prices, not by subject import prices falling to undercut U.S. pricing.[48] These trends are also borne out by comparing the AUV of U.S. producers' U.S. shipments and the AUV of subject import shipments, mentioned above in subsection (2) on pricing product comparisons.[49]

In summary, offshoring of domestic production (which was not motivated by price-based competition with domestically produced ALPs[50]), paired with a decline in apparent U.S. consumption, led to a loss of market share for the domestic industry. Neither of these causes of the domestic industry's lower U.S. market share, then, resulted from price-based competition between subject imports and the domestic like product.

---

[43] CR/PR at Table F.1. *See also* Hearing Tr. at 157-58 (Durling).

[44] CR/PR at Table F.1. Kodak's U.S. market share was *** percent in interim 2023 and *** percent in interim 2024. *Id*.

[45] CR/PR at Table 5.12. Over 2023-interim 2024, *** square meters of subject import ALPs that oversold the domestic like product (or *** percent of the total volume in 2023-interim 2024) and *** square meters that undersold (or *** percent).

[46] CR/PR at Tables 5.4, 5.5, and 5.6. Between 2023 Q1 and 2024 Q1, the U.S. price for product 1 was *** percent higher, product 2 was *** percent higher, and product 3 was *** percent higher. *Id*.

[47] CR/PR at Table C.1.

[48] CR/PR at Tables 5.4, 5.5, and 5.6 and Figures 5.2, 5.3, and 5.4.

[49] CR/PR at Table C.1. The AUV of U.S. producers' U.S. shipments increased steadily by *** percent from 2021 to 2023 and was *** percent higher in interim 2024 than in interim 2023. *Id*. The AUV of subject imports declined by only *** percent from 2021 to 2023 and was *** percent lower in interim 2024 than in interim 2023. *Id*.

[50] Fujifilm explained its motivations as based on four considerations relating to differences in relative market sizes, trends in expected growth, the location and cost of key raw materials, and proximity to R&D facilities in Japan. Fujifilm's prehearing brief at 18-22.

Further corroboration of this lack of price competition is apparent when examining the responses of purchasers. Of the 25 purchasers that responded to the lost sales and lost revenue questions, only *** indicated that subject imports were lower priced than domestically produced ALPs and only *** agreed that their choice of subject imports was primarily based on that lower price.[51] The quantity of subject imports associated with those *** affirmative responses was *** square meters of ALPs, accounting for only *** percent of subject import volume reported by these 25 purchasers over the POI.[52] As explained by petitioner, there are "thousands of purchasers of ALPs in the United States."[53] It is not unexpected, with so many purchasers, to have scattered reports of confirmed lost sales.

In view of the foregoing, I find that subject imports, notwithstanding their increasing volumes, did not have the effect of depressing prices or preventing price increases that would otherwise have occurred to a significant degree. Accordingly, I do not find that the subject imports caused significant price effects.

B. Impact of Subject Imports[54]

Section 771(7)(C)(iii) of the Tariff Act provides that in examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."[55] These factors include output, sales, inventories, capacity

[51] CR/PR at Table 5.14.

[52] Calculated comparing CR/PR at Table 5.14 with Table 5.15. Compared to all purchases reported by the 25 purchasers (including domestic and non-subject imports), the share accounted for by confirmed lost sales is *** percent.

[53] Hearing Tr. at 30 (Herrmann); at 289 (Anderson).

[54] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at less value, with respect ALPs from China, Commerce found antidumping duty margins ranging from 115.85 to 317.44 percent. *Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 89 Fed. Reg. 79256 (Sept. 27, 2024). In its final determination with respect to ALPs from Japan, Commerce found antidumping duty margins ranging from 91.83 to 160.11 percent. *Aluminum Lithographic Printing Plates From Japan: Final Affirmative Determination of Sales at Less-Than-Fair-Value*, 89 Fed. Reg. 79250 (Sept. 27, 2024). I take into account in my analysis the fact that Commerce has made final findings that all subject producers in China and Japan are selling subject imports in the United States at less than fair value.

[55] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[56]

Fujifilm, once a producer of ALPs in the United States, is no longer a U.S. producer due to the closure of its U.S. facility in Greenwood, South Carolina, which was completed in March 2022, and its decision to replace that production with subject imports. This switch from domestic production to servicing its U.S. purchasers with subject imports resulted in an increased volume of subject imports and incontrovertible declines in the domestic industry. As I noted above in the price section, however, subject imports—notwithstanding their increasing volumes—did not have the effect of depressing prices or preventing price increases that would otherwise have occurred to a significant degree.

There were consistent declines in U.S. producers' production capacity,[57] production,[58] net sales,[59] U.S. shipments,[60] market share,[61] inventories as a share of total shipments,[62]

[56] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[57] The domestic industry's production capacity declined steadily from *** square meters in 2021 to *** square meters in 2023. Capacity was constant between the interim periods. CR/PR at Table C.1.

[58] The domestic industry's production declined steadily from *** square meters in 2021 to *** square meters in 2023. Production was lower in interim 2024, at *** square meters, than in interim 2023, when it was *** square meters. CR/PR at Table C.1.

[59] The domestic industry's net sales value declined steadily from $*** in 2021 to $*** in 2023 and was lower in interim 2024, at $***, than in interim 2023, when it was $***. CR/PR at Table C.1.

[60] The domestic industry's U.S. shipments declined steadily from *** square meters in 2021 to *** square meters in 2023. U.S. shipments were lower in interim 2024, at *** square meters, than in interim 2023, when they were *** square meters. CR/PR at Table F.1.

[61] The domestic industry's market share declined steadily from *** percent in 2021 to *** percent in 2023. The share was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. CR/PR at Table F.1.

[62] Inventories held by the domestic industry declined irregularly, from *** square meters in 2021 to *** square meters in 2023; inventories in interim 2024 were higher, at *** square meters, than in interim 2023, when they were *** square meters. CR/PR at Table C.1. Inventories as a share of total shipments, however, increased steadily, from *** percent in 2021 to *** percent in 2023 and were higher in interim 2024, at *** percent, than they were in interim 2023, when they were *** percent. CR/PR at Table C.1.

production-related workers (PRWs),[63] hours worked,[64] wages paid,[65] and labor productivity.[66] Capacity utilization also showed a downward trend, albeit irregular.[67]

The downward trends of the domestic industry connected to Fujifilm's offshoring primarily occurred in 2022. For instance, of the total reduction of *** PRWs over the three full years of the POI, *** PRWs, or *** percent, were lost between 2021 and 2022.[68] The impact of subject imports on Kodak, taken by itself, is less clear. I will use the rest of this section to point out trends that mitigate any impact on Kodak, which will lay the foundation for my analysis of threat of material injury in the next section.

The domestic industry's operating income ***,[69] from $*** in 2021 to an $*** in 2022 to $*** in 2023. Operating income was higher in interim 2024, at $***, than in interim 2023, when it was $***.[70] As a ratio to net sales, the operating income margin increased irregularly and was *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was higher in interim 2024, at *** percent, than in interim 2023, when it was *** percent.[71]

[63] The number of PRWs declined steadily from *** in 2021 to *** in 2023. The number of PRWs was lower in interim 2024, at ***, than in interim 2023, when it was ***. CR/PR at Table C.1.

[64] Hours worked declined steadily from *** hours in 2021 to *** hours in 2023. Hours worked were lower in interim 2024, at *** hours, than in interim 2023, when they were *** hours. CR/PR at Table C.1.

[65] Wages paid declined steadily from $*** in 2021 to $*** in 2023. Wages paid were lower in interim 2024, at $***, than in interim 2023, when they were $***. CR/PR at Table C.1.

[66] Labor productivity declined steadily from *** square meters per hour in 2021 to *** square meters per hour in 2023. Labor productivity was lower in interim 2024, at *** square meters per hour, than in interim 2023, when it was *** square meters per hour. CR/PR at Table C.1.

[67] Capacity utilization initially improved from *** percent in 2021 to *** percent in 2022, largely due to the subtraction of Fujifilm's capacity that year, but then declined to *** percent in 2023. Capacity utilization was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. CR/PR at Table 3.5.

[68] CR/PR at Table C.1. On the topic of workers, which received much attention from petitioner during the hearing (*see, e.g.*, Hearing Tr. at 30 and 43 (Herrmann) and at 50, 69, 279, and 331 (Rosenthal)), it appears that many workers that exited the domestic industry were redirected to other Fujifilm operations. Hearing Tr. at 132 (Larkin). A contemporary article by the *Greenwood Index-Journal*, placed in the record, discusses the elimination of positions by Fujifilm. The article notes that Fujifilm intended to work to move workers to other Fujifilm facilities; that Fujifilm would continue to operate two divisions at the site in Greenwood County; that the workers whose jobs were scheduled for elimination at Fujifilm have skills that are highly sought by other manufactures in the region; and that Greenwood County had a large number of job openings. *Greenwood Index-Journal*, July 1, 2021, EDIS Doc. 832459.

[69] CR/PR at 6.14 n.12.

[70] CR/PR at Table C.1.

[71] CR/PR at Table 6.3.

Net income also improved *** over the three full years of the POI, moving ***, but was *** in interim 2024 while it had been *** in interim 2023.[72] The ratio of net income to sales also improved steadily over the three full years of the POI from ***, while the ratio in interim 2024 was ***, but had been *** in interim 2023.[73]

Capital expenditures and R&D expenses, both of which were ***, showed increasing trends over the three full years of the POI and were lower in interim 2024 than in interim 2023.[74]

The domestic industry's assets declined steadily, as might be expected given the closure of the Fujifilm facility, but the domestic industry's return on assets increased ***, *** from *** percent in 2021 to *** in 2022 before increasing to *** percent in 2023.[75]

The indicators related to production clearly show declines over the POI as they directly relate to Fujifilm's closure. However, financial indicators are more equivocal. The domestic industry's financial trends are dominated by Fujifilm's poor results in the final year of its production, 2022, and by Kodak's trend of improving profitability. The industry's operating income margin improved irregularly over the POI and was higher in interim 2024 than in interim 2023 while the net income margin improved steadily over the three full years of the POI but was lower in interim 2024 than in interim 2023.[76] Considering that the industry's lower net income margin in interim 2024 results from ***[77] realized by *** in the United States, and that Kodak's net income margin *** in interim 2024, as compared to interim 2023,[78] I am not able to find a significant impact by subject imports on the domestic industry's financial measures.

In sum, based on the record of the final phase of these investigations, I conclude that the offshoring of Fujifilm's U.S. production led to declines in production and employment measures of the domestic industry. These declines, however, did not result from price-based competition between domestically produced ALPs and subject imports. Although I have found

[72] CR/PR at Table 6.3. Net income started *** in 2021, improved to *** in 2022, and continued improving to *** in 2023. Net income in interim 2024 was ***, worse than *** reported in interim 2023. *Id*.

[73] CR/PR at Table 6.1. The ratio of net income to net sales started at *** percent in 2021, improved to *** percent in 2022, and continued improving to *** percent in 2023. Net income in interim 2024 was *** percent, worse than *** percent reported in interim 2023. *Id*.

[74] Capital expenditures increased steadily from $*** in 2021 to $*** in 2023; they were lower in interim 2024, at $***, than in interim 2023, when they were $***. CR/PR at Table 6.4. R&D expenses, which increased irregularly from $*** in 2021 to $*** in 2022 to $*** in 2023. These R&D expenses were lower in interim 2024, at $***, than in interim 2023, when they were $***. CR/PR at Table 6.5.

[75] CR/PR at Tables 6.7 and 6.8.

[76] CR/PR at Table 6.1.

[77] CR/PR at 6.15 n.15.

[78] CR/PR at Table 6.3.

there to be a significant volume of subject imports, I do not find significant price effects. Further, I find that the declines recorded by the domestic industry were not causally related to price-based competition with subject imports. Accordingly, I find that the domestic industry is not materially injured by reason of subject imports of ALPs from China and Japan that were found by Commerce to be sold in the United States at less than fair value and subsidized by the government of China.

II. No Threat of Material Injury by Reason of Subject Imports

A. Legal Standards

Section 771(7)(F) of the Tariff Act directs the Commission to determine whether the domestic industry is threatened with material injury by reason of the subject imports by analyzing whether "further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted."[79] The Commission may not make such a determination "on the basis of mere conjecture or supposition," and considers the threat factors "as a whole" in making its determination whether dumped or subsidized imports are imminent and whether material injury by reason of subject imports would occur unless an order is issued.[80] In making our determination, we consider all statutory threat factors that are relevant to these investigations. investigations.[81]

[79] 19 U.S.C. § 1677(7)(F)(ii).

[80] 19 U.S.C. § 1677(7)(F)(ii).

[81] These factors are as follows: (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the WTO Subsidies and Countervailing Measures Agreement ("WTO SCM Agreement")) and whether imports of the subject merchandise are likely to increase; (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports; (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports; (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices and are likely to increase demand for further imports; (V) inventories of the subject merchandise; (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products; (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually

B. Likely Volume of Subject Imports[82]

As discussed above, I have found the volume of subject imports to be significant during the POI. Although I have found that subject imports have increased significantly and gained significant U.S. market share over the POI, I ultimately credit Fujifilm's testimony that, with its corporate restructuring behind it, subject imports will stabilize.[83] As I elaborated above in my section on lost sales and lost revenue, while Fujifilm's overall market presence declined over the POI in absolute volume terms, its U.S. market share only increased because of the decline in apparent U.S. consumption. Further, I explained that any gain in U.S. market share by subject imports was not due to price-based competition; I do not expect that to change in the imminent future.[84]

Four usable questionnaire responses were received from foreign producers: two from China and two from Japan, ***.[85] These responding companies accounted for all, or nearly all,

---

being imported at the time). 19 U.S.C. § 1677(7)(F)(i). To organize our analysis, we discuss the applicable statutory threat factors using the same volume/price/impact framework that applies to our material injury analysis. Statutory threat factors (I), (II), (III), (V), and (VI) are discussed in the analysis of likely subject import volume. Statutory threat factor (IV) is discussed in the analysis of likely subject import price effects. Statutory factors (VIII) and (IX) are discussed in the analysis of likely impact. Statutory factor (VII) concerning agricultural products is inapplicable to these investigations.

[82] In my analysis, I have considered the nature of the subsidies Commerce has found to be countervailable, particularly whether the countervailable subsidies are ones described in Articles 3 or 6.1 of the WTO Agreement on Subsidies and Countervailing Measures, and whether imports of the subject merchandise are likely to increase. 19 U.S.C. § 1677(7)(F)(i)(I). I observe that Commerce found seven countervailable subsidy programs, including one that appears directed specifically towards exports: Foreign Trade Development Fund Grants. *See Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances*, 89 Fed. Reg. 79248 (Sept. 27, 2024); *Decision Memorandum for the Final Affirmative Determination in the Countervailing Duty Investigation of Aluminum Lithographic Printing Plates from the People's Republic of China* (Dep't Commerce, Sept. 20, 2024) at 4-5 and App. II. I have taken these subsidy findings into account in my analysis of likely subject import volume.

I have also taken into account that third-country trade remedy actions on ALPs from China or Japan have been implemented in Brazil, India, and South Korea, and an investigation is underway in Taiwan. CR/PR at 7.16.

[83] Hearing Tr. at 163-65 (Durling).

[84] While apparent U.S. consumption of ALPs declined over the POI, and the perceptions of market participants accorded with that trend, purchasers were less certain regarding demand trends for the end use products (i.e., printed products). Of the 23 purchasers that responded to the question about printing, 11 considered that demand either steadily increased, fluctuated up, or didn't change, while 12 considered that demand fluctuated down or steadily decreased, suggesting that underlying demand may be healthier than the consumption data would indicate. CR/PR at Table 2.6.

[85] CR/PR at 7.3 and Table 7.1.

of subject imports.[86] Production capacity in subject countries increased steadily by *** percent over the three full years of the POI, from *** square meters in 2021 to *** square meters in 2023; capacity in interim 2024 was lower in interim 2024 than in interim 2023.[87] Capacity utilization in the subject countries declined steadily by *** percentage points, from *** percent in 2021 to *** percent in 2023; capacity utilization was higher in interim 2024 than in interim 2023.[88] Excess capacity in subject countries in 2023 was *** square meters, *** to apparent U.S. consumption in 2023.[89] Nevertheless, exports to the United States accounted for less than *** of total shipments by the responding foreign producers throughout the three full years of the POI and in interim 2024.[90]

Although inventories of subject imports held by importers in United States increased, the ratio of inventories to U.S. shipments of imports declined steadily.[91] Merchandise held in subject countries as inventory increased irregularly and was lower in interim 2024 than in interim 2023.[92]

Section 301 duties of 25 percent on imports of ALPs, and of the aluminum used to make ALPs, from China have been in place since 2019; recently, exemptions on duties for the import of aluminum raw material were withdrawn.[93] The Commission's report notes that "a plurality of

[86] CR/PR at 7.3.

[87] CR/PR at Table 7.6. Respondents explained the increase in capacity in the context of their rationalization of worldwide capacity, claiming that whatever capacity was added in subject countries was less than the capacity shutdown in the United States and the Netherlands. Hearing Tr. at 177-82. Almost all of the increase was in ***. CR/PR at Table 7.9.

[88] CR/PR at Table 7.6. Practical ALPs capacity utilization in interim 2024 was *** percent, higher than in interim 2023, when it was *** percent. *Id*.

[89] Calculated from CR/PR at Tables 7.6 and C.1.

[90] CR/PR at Table 7.8. Despite capacity utilization declining over the three full years of the POI, the share of shipments exported to the United States increased irregularly by only *** percentage points, from *** percent in 2021 to *** percent in 2022 to *** percent in 2023. The share was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. *Id*.

[91] While subject inventories held by importers increased from *** square meters in 2021 to *** square meters in 2023, the ratio to U.S. shipments of imports declined steadily from *** percent in 2021 to *** percent in 2023. Both the volume of inventories and the share of inventories to U.S. shipments of imports were lower in interim 2024 than in interim 2023. CR/PR at Table 7.12.

[92] End-of-period inventories held by producers in subject countries fluctuated from *** square meters in 2021 to *** square meters in 2022 to *** square meters in 2023. End-of-period inventories in interim 2024 were lower, at *** square meters, than in interim 2023, when they were *** square meters. As a share of total shipments, inventories fluctuated from *** percent in 2021 to *** percent in 2022 to *** percent in 2023; it was lower in interim 2024, at *** percent, than in interim 2023, when it was *** percent. CR/PR at Table 7.8.

[93] CR/PR at 1.8 and 2.3. Hearing Tr. at 114-16 (Herrmann, Rosenthal).

purchasers reported that section 301 tariffs had an impact on the U.S. market and these purchasers generally reported that section 301 tariffs had increased the prices of ALPs."[94]

With respect to product shifting, all four responding firms did not report other production on the same machinery used to produce ALPs, nor do they have the ability to switch production between ALPs and other products using the same machines.[95]

In sum, given the subject industry's high capacity utilization rates, the non-price related reasons for the increase in subject import volume and market share during the POI, modest inventory levels, and the lack of potential for product shifting, I do not find a likelihood of substantially increased subject import volume in the imminent future.

C. Likely Price Effects of Subject Imports

In my discussion above, I found no significant underselling.[96] While I conceded above that margins of overselling were diminishing over the POI, I found that this was primarily due to U.S. prices increasing to reach the higher prices of subject imports, and not that U.S. prices were being driven down. Further, I found no evidence of significant price depressing or suppressing effects. U.S. prices for all three pricing products were higher in 2024 Q1 than they were in 2023 Q1, and U.S. prices remained elevated, even after raw material costs had moderated following a spike in the first half of 2022. This accounted for the COGS-to-net-sales ratio returning to its 2021 value in 2023, following the 2022 spike, and improving in interim 2024 relative to interim 2023.[97]

In light of my finding that an imminent significant increase in the volume of subject imports is unlikely, and the absence of evidence that increasing volumes of subject imports from China and Japan have caused significant price effects, I find that these imports are unlikely to cause significant price effects in the imminent future. Consequently, the record indicates that subject imports from China and Japan are not likely to enter the U.S. market at prices that are likely to have significant price depressing or suppressing effects on prices of the domestic like product and to increase demand for further imports.

D. Likely Impact of Subject Imports

When considering the likely impact of subject imports, I focus on the impact on Kodak because it is likely to be the sole domestic producer in the imminent future. I do not find that

[94] CR/PR at 2.3.
[95] CR/PR at 7.13.
[96] CR/PR at Tables 5.4-5.6, Tables 5.10-5.12.
[97] CR/PR at Tables 6.3 and C.1.

subject imports are likely to have actual or potential negative effects on the existing development and production efforts of the domestic industry. The domestic industry's (Kodak's) total capital expenditures increased steadily over the three full years of the POI, rising from $*** in 2021 to $*** in 2023, for a total of $*** of investments over the POI.[98] Kodak's R&D expenses also increased steadily over the three full years of the POI, from $*** in 2021 to $*** in 2023, for a total of $*** of R&D expenses over the POI.[99]

Kodak's operating income margin improved steadily over the POI and was higher in interim 2024 than in interim 2023.[100] Kodak's net income margin improved over the three full years of the POI, rising from a negative to a positive value, and improved slightly in interim 2024, as compared to interim 2023.[101] Kodak was able to move forward with ***.[102]

Given the level of Kodak's investment and operating income margin in 2023 and interim 2024, neither do I find it vulnerable to material injury by reason of subject imports, nor do I find that subject imports would likely have an adverse impact on the domestic industry in the imminent future.

For the reasons stated above, I find that the domestic industry is not threatened with material injury by reason of subject imports.

III. Conclusion

For the reasons stated above, I determine that an industry producing ALPs in the United States is not materially injured or threatened with material injury by reason of subject imports of ALPs from China and Japan that are sold in the United States at less than fair value and subsidized by the government of China.

[98] CR/PR at Table 6.4.

[99] CR/PR at Table 6.5.

[100] Kodak's operating income margin increased steadily from *** percent in 2021 to *** percent in 2023 and was *** percent in interim 2024, higher than it was in interim 2023, when it was *** percent. CR/PR at Table 6.3.

[101] Kodak's net income margin was *** percent in 2021, *** percent in 2022, and *** percent in 2023. In interim 2024, the net income margin was *** percent, slightly better than it was in interim 2023, when it was *** percent. CR/PR at Table 6.3.

[102] CR/PR at Table 6.6.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by Eastman Kodak Company ("Eastman Kodak"), Rochester, New York, on September 28, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of aluminum lithographic printing plates ("ALPs")[1] from China and less-than-fair-value ("LTFV") imports of ALPs from China and Japan. Table 1.1 presents information relating to the background of these investigations.[2] [3]

Table 1.1 ALPs: Information relating to the background and schedule of this proceeding

Effective date	Action
September 28, 2023	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (88 FR 68669, October 4, 2023)
October 18, 2023	Commerce's notice of initiation (CVD for China: 88 FR 73313, October 25, 2023; AD for China and Japan: 88 FR 73316, October 25, 2023)
November 13, 2023	Commission's preliminary determinations (88 FR 80338, November 17, 2023)
March 1, 2024	Commerce's preliminary determination (CVD for China and alignment of final determination with final AD determination: 89 FR 15134, March 1, 2024)
May 1, 2024	Commerce's preliminary determinations (AD for China and Japan: 89 FR 35062 and 89 FR 35065, May 1, 2024); scheduling of final phase of Commission investigations (89 FR 41993, May 14, 2024)
June 3, 2024	Amended preliminary determination (AD duty for China: 89 FR 47516, June 3, 2024)
August 5, 2024	Revised scheduling of final phase of Commission investigations (89 FR 65933, August 13, 2024)
September 17, 2024	Commission's hearing
September 27, 2024	Commerce's final determinations (AD for China and Japan: 89 FR 79256 and 89 FR 79250, September 27, 2024; CVD for China: 89 FR 79248, September 27, 2024)
October 22, 2024	Commission's vote
November 12, 2024	Commission's views

[1] See the section entitled "The subject merchandise" in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

[2] Pertinent Federal Register notices are referenced in appendix A, and may be found at the Commission's website (www.usitc.gov).

[3] Appendix B presents the witnesses who appeared at the Commission's hearing.

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the "Act") (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

> *shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.*

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--[4]

> *In evaluating the volume of imports of merchandise, the Commission shall 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.. . .In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . .(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.*

[4] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[5]

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part 1 of this report presents information on the subject merchandise, subsidy and dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

ALPs are generally used to produce printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials. The only known current U.S. producer of ALPs is Eastman Kodak,[6] while leading producers of ALPs outside the United States include ***, *** of China, and *** of Japan. The leading U.S. importer of ALPs from China and Japan is ***. Leading importers of ALPs from nonsubject countries (primarily Germany the Netherlands, and France), include ***. U.S. purchasers of ALPs are publishers or printers in the printing industry; leading purchasers include ***.

[5] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.
[6] Conference transcript, pp. 7 to 8.

Apparent U.S. consumption of ALPs totaled approximately *** square meters ($***) in 2023. Currently, one firm is known to produce ALPs in the United States.[7] U.S. producers' U.S. shipments of ALPs totaled *** square meters ($***) in 2023, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** square meters ($***) in 2023 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** square meters ($***) in 2023 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, tables C.1 and C.2. The Commission's questionnaires collected data for the years 2021 to 2023 and interim periods January to March of 2023 ("interim 2023") and January to March of 2024 ("interim 2024"). Except as noted, U.S. industry data are based on questionnaire responses of two firms (Eastman Kodak and Fujifilm) that accounted for all known U.S. production of ALPs during 2023. U.S. imports are based on questionnaire responses submitted to the Commission.

Previous and related investigations

ALPs have not been the subject of prior antidumping and countervailing duty investigations in the United States.

[7] Fujifilm Manufacturing USA, Inc. ("Fujifilm") and Southern Lithoplate, Inc. ("Southern Litho") ceased manufacturing in the United States. Fujifilm produced ALPs at its Greenwood, South Carolina facility until 2022, and Southern Litho produced ALPs at its Grand Rapids, Michigan and Youngsville, North Carolina facilities until 2021. Further, Agfa Corporation ("Agfa USA" now known as ECO3), produced ALPs at its Branchburg, New Jersey facility, but ceased production of ALPs in 2018. Petition, pp. 2-3. Accordingly, Eastman Kodak, is the only known remaining U.S. producer of ALPs in 2023.

Nature and extent of subsidies and sales at LTFV

Subsidies

On September 27, 2024, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of ALPs from China.[8] Table 1.2 presents Commerce's findings of subsidization of ALPs in China.

Table 1.2 ALPs: Commerce's final subsidy determination with respect to imports from China

Entity	Final countervailable subsidy rate (percent)
Fujifilm Printing Plate (China) Co., Ltd.	35.66
Shanghai National Ink Co. Ltd.	229.54
All others	35.66

Source: 89 FR 79248, September 27, 2024.

Note: Shanghai National Ink Co. Ltd.'s subsidy rate is based on adverse facts available ("AFA").

Note: For further information on programs determined to be countervailable, see Commerce's associated Issues and Decision Memorandum.

Sales at LTFV

On September 27, 2024, Commerce published a notice in the Federal Register of its final determinations of sales at LTFV with respect to imports from China[9] and Japan.[10] Tables 1.3 and 1.4 present Commerce's dumping margins with respect to imports of ALPs from China and Japan.

Table 1.3 ALPs: Commerce's final weighted-average LTFV margins with respect to imports from China

Exporter/producer	Final dumping margin (percent)
Fujifilm Printing Plate (China) Co., Ltd.	115.85
China-wide entity	317.44

Source: 89 FR 79256, September 27, 2024.

Note: The China-wide entity margin is based on AFA.

[8] 89 FR 79248, September 27, 2024.
[9] 89 FR 79256, September 27, 2024.
[10] 89 FR 79250, September 27, 2024.

Table 1.4 ALPs: Commerce's final weighted-average LTFV margins with respect to imports from Japan

Exporter/producer	Final dumping margin (percent)
Fujifilm Corporation	91.83
Fujifilm Shizuoka Co., Ltd.	91.83
Miraclon Corporation Ltd.	160.11
All others	91.83

Source: 89 FR 79250, September 27, 2024.

Note: Miraclon Corporation Ltd. is an exporter of out-of-scope flexographic, photopolymer (resin-based) printing plates but was assigned a final dumping margin based on AFA. (Miraclon also reported *** to the Commission during the period for which data were collected). See part 4 of this report for more information.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[11]

> *The merchandise covered by these investigations is aluminum lithographic printing plates. Aluminum lithographic printing plates consist of a flat substrate containing at least 90 percent aluminum by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the production of newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials through an offset printing process, where an aluminum lithographic printing plate facilitates the transfer of an image onto the printed media.*
>
> *Aluminum lithographic printing plates within the scope of these investigations include all aluminum lithographic printing plates, irrespective of the dimensions or thickness of the underlying aluminum substrate, whether the plate requires processing after an image is applied to the plate, whether the plate is ready to be mounted to a press and used*

[11] 89 FR 79256, September 27, 2024.

in printing operations immediately after an image is applied to the plate, or whether the plate has been exposed to light or heat to create an image on the plate or remains unexposed and is free of any image.

Subject merchandise also includes aluminum lithographic printing plates produced from an aluminum sheet coil that has been coated with a light-sensitive image-recording layer in a subject country and that is subsequently unwound and cut to the final dimensions to produce a finished plate in a third country (including the United States), or exposed to light or heat to create an image on the plate in a third country (including in a foreign trade zone within the United States).

Excluded from the scope of these investigations are lithographic printing plates manufactured using a substrate produced from a material other than aluminum, such as rubber or plastics.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that merchandise subject to these investigations is imported under statistical reporting numbers 3701.30.0000 and 3701.99.6060 of the Harmonized Tariff Schedule of the United States ("HTS"). The 2024 general rate of duty is free for HTS subheadings 3701.30.00 and 3701.99.60. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Section 232 tariff treatment

The relevant HTS subheadings within the scope of these investigations, 3701.30.00 and 3701.99.60, were not included in the enumeration of aluminum products that are subject to the additional 10-percent ad valorem national-security duties under Section 232 of the Trade Expansion Act of 1962, as amended.[12] However, aluminum, which is subject to the additional duties, is used as an input in ALP production, as discussed below. Petitioner has applied and been granted exclusions[13] on aluminum inputs used in the manufacturing of ALPs imported under HTS statistical reporting numbers 7607.11.9090 and 7607.11.6090 as recently as August 16, 2023.[14]

[12] 83 FR 11619, March 15, 2018.

[13] These exclusions where first granted to petitioners on March 29, 2020, and have been extended during the period of investigation.

[14] U.S. Department of Commerce, Published Exclusion Requests, accessed October 17, 2023. https://232app.azurewebsites.net/steelalum. Conference transcript, p. 91 (Herrmann).

Section 301 tariff treatment

Chinese products subject to these investigations are also subject to additional duties under Section 301 of the Trade act of 1974. Subheadings 3701.30.00 and 3701.99.60 were included among the group of products from China that are subject to and additional duty of 25 percent ad valorem, under HTS subheading 9903.88.03.[15] Section 301 tariff exemptions on HTS statistical reporting numbers 7607.11.9090 and 7607.11.6090, which are inputs of ALPs, were removed following the recent announcement by USTR on September 12, 2024.[16]

The product

Description and applications

Aluminum lithographic plates (ALPs)[17] are image carriers that are used in offset printing processes that are made from rolls of lithographic grade aluminum.[18] ALPs are capable of capturing an image that is transferred onto the plate by either light or heat and then reproducing this image onto a receiving material (e.g. cloth, paper, or plastic) using various fountain solutions or inks.[19] ALPs are commonly used to produced printed goods such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.

ALPs are frequently sold in ISO industry standard thicknesses of 20-gauge (0.184 mm), 30-gauge (0.27 mm), and 40-gauge (0.36 mm).[20] The majority of ALPs manufactured and used in printing processes within in the United States are of 30-gauge thickness.[21] The gauge of an ALP determines not only its specific use in printing but also its run time, or time spent used in the printing process, as the thickness of the gauge typically corresponds with the length of the run time (i.e. thicker gauges correspond to longer run times). For example, a 20-gauge ALP is more commonly used in newspaper applications because of the need to swap ALPs daily.[22]

[15] 84 FR 20459, May 9, 2019.

[16] 89 FR 76581, September 18, 2024.

[17] ALPs may also be referred to as digital printing plates, offset printing plates, photosensitive printing plates, or thermal printing plates.

[18] Lithographic plates may also be manufactured from plastic or rubber but such products are excluded from the scope of this investigation.

[19] Petition, p. 7.

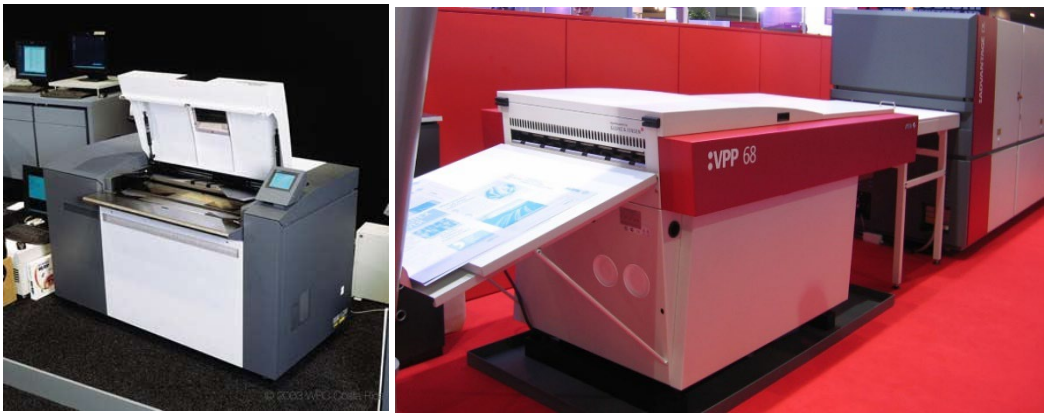
[20] Petition, p. 8. Conference transcript, p. 87 (Tellstone). Petitioner's postconference brief, p. 5.

[21] Conference transcript, p. 87 (Tellstone).

[22] Conference transcript, p. 88 (Tellstone).

Once ALPs are sold to the end user, the plates are put into a device called an imagesetter or platesetter which imparts the desired image onto the ALP (Figure 1.1). The platesetter may transfer the image through conventional means or "computer to film" ("CTF") or digital means or "computer-to-plate" ("CTP").[23] In CTF printing, the image is first imparted onto photographic film and then applied to the plates through an exposure process.[24] In CTP printing, the image is created in a desktop publishing application and is then directly applied to the plates.[25] CTP is currently the primary type of platesetter used in the market.[26] There are three different types of CTP methods and models that are based on an imagesetter's construction focused mainly around three types of critical parts: an internal drum, external drum, and flat-bed imagesetters.[27] Once the image has been etched onto the ALP, some ALPs (commonly referred to as "wet" or "off-press" plates) are fed through a plate developer which, using chemicals, removes any hydrophobic layers that were not etched into the ALP.[28]

Figure 1.1
Imagesetter and plate developer



Source: Offsetprinting, How Are Printing Plates Made?, July 7, 2020. http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html, retrieved August 12, 2024.

[23] Petition, p. 8.
[24] Petition, p. 8.
[25] Petition, p. 8. Toptica, "High-Performance Diode Lasers for Computer-To-Plate (CtP) Applications", accessed October 17, 2023. https://www.toptica.com/applications/industrial-manufacturing/computer-to-plate
[26] Conference transcript, p. 26 (Tellstone).
[27] Platesetters, "3 Types of Computer-to-Plate Methods", retrieved October 17, 2023. https://www.platesetters.com/3-types-of-computer-to-plate-methods/.
[28] Offsetprinting, How Are Printing Plates Made?, July 7, 2020. http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html

Other ALPs (commonly referred to as "process free," "development on-press," "low-chem," "chemfree," or "chemical-free" plates) do not require this additional processing after the image is applied to be ready to be used in the printing process.[29] Process free plates do not require the additional processing step during the etching process, thus saving the customer time and cost. However, process free plates do not last as long as wet plates.[30] Process free plates are also exposed earlier in the production process, meaning that they can be scratched as they are physically handled, and it can be more difficult to see the image once it emerges from the CTP machine.[31] Both wet and dry plates can be produced in the same production plants and on the same production lines.[32] ALPs from different manufacturers can generally be used on any CTP machine which allows for customers to shift their purchasing of plates from one supplier to another.[33] There are some barriers to switching plates faced by the end user such as: recalibration of CTP equipment to "unlock" the ability to use a different manufacturer's plates and swapping out a manufacturer's plate processor.[34]

ALPs are ultimately mounted into a printing press and used in a combination of various fountain solutions and inks to reproduce the etched image on a suitable receiving material. Each individual plates carries a specific color record, which means, that multiple plates and inks must be used to generate a colored image. This quality, along with etching, makes the plate non-reusable and thus each plate is recycled and mostly sold as aluminum scrap to recoup some of the initial investment.[35] Each plate can produce hundreds, thousands, or millions of impressions before replacement is required.[36]

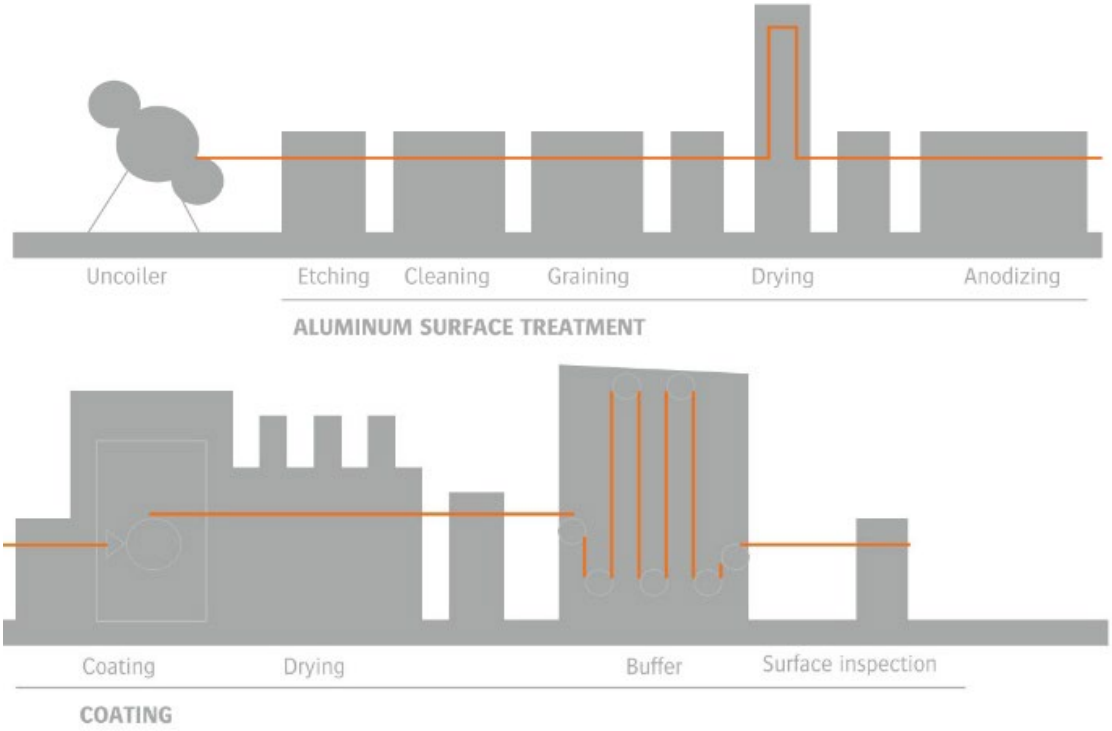
Manufacturing processes

Aluminum lithographic plates (ALPs) are manufactured in a process that includes five major steps: (1) uncoiling, (2) graining, (3) anodizing, (4) coating, and (5) finishing (Figure 1.2). This process is generally continuous from raw material to finished product and can be run multiple times. While some production processes vary by manufacturer these differences are

[29] Petition, p. 9.
[30] Conference transcript, p. 128 (Crawford).
[31] Conference transcript, p. 128 (Crawford).
[32] Hearing transcript, p.20 (Tellstone).
[33] Conference transcript, p. 60 (Cole).
[34] Conference transcript, p. 60 (Cole). Conference transcript, p. 189 (Aquino).
[35] Conference transcript, p. 88 (Continenza).
[36] Petition, p. 9.

very minor and production processes between domestic and foreign produced ALPs are very similar.[37]

Figure 1.2
ALPs: Production process



Source: Offsetprinting, How Are Printing Plates Made?, July 7, 2020. http://www.offsetprinting.info/2020/07/how-are-printing-plates-made.html, retrieved August 12, 2024.

Uncoiling

Specialized machinery uncoils rolls of lithographic grade aluminum[38] to produce an aluminum substrate in an automatic and seamless process that allows production to continue through exhaustion of aluminum rolls. Lithographic grade aluminum sheet is used in manufacturing process to ensure certain mechanical properties that are required for ALPs, such

[37] Conference transcript, p. 46 (Tellstone).

[38] Also known as litho-stock, lithographic grade aluminum is generally defined as 1XXX series aluminum alloy such as 1050 grade aluminum and 1020 grade aluminum. 1XXX grade aluminum has a minimum of 99 percent aluminum with no other alloying additions. Hearing transcript, p.19 (Tellstone).

as: high degree of flatness, low degree of surface roughness, tight thickness and width tolerances, corrosion resistance, high thermal and electrical conductivity, and workability.[39]

Graining

The uncoiled aluminum then undergoes a "graining" process meant to roughen the surface area of the aluminum sheet to make it more hydrophilic. Graining is mostly done through an electrochemical process where the substrate is roughened using an acidic solution and a high alternating current but can also be done through strictly mechanical[40] or chemical processes.[41] Computers are used to control the currents, temperatures, and pressures during this process.[42] Immediately after the graining process the substrate undergoes an "etching" procedure in which the substrate is exposed to caustic chemicals to dissolve small particles from the surface of the substrate.[43] This etching process ensures that the substrate will be smooth which improves its printing capabilities.

Anodizing

The third major step in the manufacturing process involves creating a hydrophilic layer of aluminum oxide using an acidic solution and a high direct current. This hydrophilic layer will retain water while repelling oil-based inks which will ensure a proper balance between water and ink during the printing process.[44] This layer also strengthens the plate by reinforcing its structure and improves its scratch resistance which will protect it from chemical and mechanical damage. The anodization process may be repeated multiple times before it is then sealed with an additional hydrophilic treatment to seal any remaining pores in the layer of aluminum oxide.

---

[39] Petition, p. 11. Ulbrich, 1000 Series Aluminum Alloys, https://www.ulbrich.com/alloys/1000-series-aluminum-alloys/, accessed October 12, 2023. Staff virtual field trip report, Kodak, September 4, 2024.

[40] More mechanical graining techniques include ball graining and sand blasting. These techniques are more often used in noncommercial production of ALPs. For more information on different graining techniques see https://www.polymetaal.nl/beguin/mapg/graining.htm.

[41] Petition, p. 11.

[42] Petition, p. 11.

[43] Petition, p. 11.

[44] Petition, p. 11. Staff virtual field trip report, Kodak, September 4, 2024. Hearing transcript, p.19 (Tellstone).

Coating

The substrate is then coated with a polymer-based binding material which is applied on top of the hydrophilic layer of aluminum oxide.[45] This is done in "clean room"[46] conditions to ensure that there are no particles or impurities in the final layer.[47] This polymer layer allows for the ALP to capture an image using light (violet plates) or heat (thermal plates) and transfer the image by maintaining printing and non-printing areas over the course of the ALP's run length.[48] As with anodization, this process can be repeated multiple times to ensure a suitable layer, after which, it is buffed, dried, and prepped for packaging.

Finishing

The substrate undergoes quality control where it is inspected and if found to be substandard removed. The substrate that passes quality control is then cut to fit specified dimensions in a single movement using rotary and scissor knives.[49] The finished plates are then wrapped, packaged, and then shipped to the end user.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposed that the Commission define a domestic like product consisting of all ALPs, regardless of size or gauge, consistent with Commerce's scope, and respondent Fujifilm did not contest the petitioner's proposed definition.[50] In the preliminary phase of these investigations, the Commission defined a single domestic like product consisting of all ALPs, coextensive with the scope.[51] In the final phase of these investigations, no parties requested data or other information necessary for the analysis of the domestic like product.

[45] Petition, p. 11. Staff virtual field trip report, Kodak, September 4, 2024.

[46] Cleanrooms are controlled environments that use filtration devices to provide the cleanest area possible devoid of pollutants such as aerosol particles, dust, and airborne microbes. Staff virtual field trip report, Kodak, September 4, 2024.

[47] Petition, p. 11.

[48] Petition, pp. 11-12.

[49] Petition, p. 12. Staff virtual field trip report, Kodak, September 4, 2024.

[50] Petitioner's prehearing brief, pp. 4 and 5.

[51] Aluminum Lithographic Printing Plates from China and Japan, Inv. Nos. 701-TA-694 and 731-TA-1641-1642 (Preliminary), USITC Publication 5475, November 2023, p. 10.

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

ALPs consist of a flat substrate containing at least 90 percent aluminum, by weight. The aluminum-containing substrate is generally treated using a mechanical, electrochemical, or chemical graining process, which is followed by one or more anodizing treatments that form a hydrophilic layer on the aluminum-containing substrate. An image-recording, oleophilic layer that is sensitive to light, including but not limited to ultra-violet, visible, or infrared, is dispersed in a polymeric binder material that is applied on top of the hydrophilic layer, generally on one side of the aluminum lithographic printing plate. The oleophilic light-sensitive layer is capable of capturing an image that is transferred onto the plate by either light or heat. The image applied to an aluminum lithographic printing plate facilitates the plate's use in offset printing processes to produce materials such as newspapers, magazines, books, yearbooks, coupons, packaging, and other printed materials.

The sole responding U.S. producer, ***,[1] and the majority of responding importers indicated that the market *** subject to distinctive conditions of competition. Specifically, *** reported that lower priced imports from China have created distinctive conditions of competition in the U.S. market. Importer *** reported that digital printing is reducing the demand for ALPs. The majority of purchasers reported that the market was not subject to distinctive conditions of competition. However, some purchasers reported that manufacturers are charging surcharges for ALPs; and that raw materials impact the availability, lead times, and prices of ALPS.

Apparent U.S. consumption of ALPs decreased from January 2021 to December 2023 and was lower in January to March ("interim") 2024 than in interim 2023.

[1] ***.

U.S. purchasers

The Commission received 25 usable questionnaire responses from firms that had purchased ALPs during January 2021 to March 2024.[2] [3] [4] Twenty-two responding purchasers are end users, two are distributors, and one firm reported that it was both an end user and a reseller. In general, responding U.S. purchasers were located in the Northeast, Midwest, Southeast, and Central Southwestern regions of the United States. The responding purchasers generally are producers of printed materials such as books, magazines newspapers, yearbooks, and coupons. Large purchasers of ALPs include ***.

[2] The following firms provided purchaser questionnaire responses: ***.

[3] Of the 25 responding purchasers, 20 purchased the domestic ALPs, 18 purchased subject imports from China, 11 purchased subject imports from Japan, and 14 purchased imports of ALPs from other sources.

[4] Twenty-one purchasers indicated they had marketing/pricing knowledge of domestic product, 17 of Chinese product, 12 of Japanese product, and 14 of nonsubject countries. Nonsubject countries include Germany, the Netherlands, the United Kingdom, and Brazil.

Impact of section 301 tariffs and 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs and 232 tariffs on the overall demand, supply, prices, or raw material costs (tables 2.1 and 2.2). The sole responding U.S. producer, ***, reported that ***.

Half of responding importers reported that section 301 tariffs impacted the U.S. market. Specifically, importer *** reported that section 301 tariffs had increased the price of Chinese imports of ALPs by 25 percent, while importer *** reported that section 301 tariffs alleviated pricing pressure in the U.S. market. The majority of importers reported that section 232 tariffs had no impact on the U.S. market for ALPs. Importer *** reported there was no impact because both Kodak and Fujifilm applied for and were granted exclusions to section 232 tariffs. Importer *** reported that ALPs were not subject to section 232 tariffs and exclusions mitigate any impact.

The majority of purchasers reported they did not know if section 301 tariffs had an impact on the U.S. market. However, a plurality of purchasers reported that section 301 tariffs had an impact on the U.S. market and these purchasers generally reported that section 301 tariffs had increased the prices of ALPs. Purchaser *** reported that there had been a 35 percent price increased due to section 301 tariffs and that there is no domestic capacity to meet industry demand. Purchaser *** reported that section 301 tariffs increased its business costs by $430,000 per year. A majority of purchasers reported that they were unaware of the impact of 232 tariffs on the U.S. ALPs market. The purchasers that reported section 232 tariffs had an impact on the U.S. market generally reported that section 232 tariffs increased the prices for ALPs. Purchaser *** reported that it was notified of increased surcharges as a result of section 232 tariffs, while purchaser *** reported that all ALP producers increased their pricing as a result of section 232 tariffs.

Table 2.1 ALPs: Count of firms' responses regarding the impact of the 301 tariffs on Chinese origin products

Firm type	Yes	No	Don't know
U.S. producers	***	***	***
Importers	2	1	1
Purchasers	9	2	13

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.2 ALPs: Count of firms' responses regarding the impact of the 232 tariffs on steel and aluminum imports

Firm type	Yes	No	Don't know
U.S. producers	***	***	***
Importers	0	3	1
Purchasers	5	2	18

Source: Compiled from data submitted in response to Commission questionnaires.

Channels of distribution

U.S. producers shifted from selling the majority of ALPs to distributors in 2021 to mainly selling to end users throughout the remainder of the period of investigation. This shift was caused by ***. Importers sold mainly to end users, as shown in table 2.3.

Table 2.3 ALPs: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January to March

Source	Channel	2021	2022	2023	Interim 2023	Interim 2024
United States	Distributor	***	***	***	***	***
United States	End user	***	***	***	***	***
China	Distributor	***	***	***	***	***
China	End user	***	***	***	***	***
Japan	Distributor	***	***	***	***	***
Japan	End user	***	***	***	***	***
Subject sources	Distributor	***	***	***	***	***
Subject sources	End user	***	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***	***
Nonsubject sources	End user	***	***	***	***	***
All import sources	Distributor	***	***	***	***	***
All import sources	End user	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Geographic distribution

*** importers reported selling ALPs to all regions of the United States (table 2.4). For the U.S. producer, *** percent of sales were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold 13.8 percent within 100 miles of their U.S. point of shipment, 78.3 percent between 101 and 1,000 miles, and 7.9 percent over 1,000 miles.

Table 2.4 ALPs: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China	Japan	Subject sources
Northeast	***	2	1	2
Midwest	***	3	1	3
Southeast	***	3	1	3
Central Southwest	***	3	1	3
Mountain	***	3	1	3
Pacific Coast	***	2	1	2
Other	***	2	1	2
All regions (except Other)	***	2	1	2
Reporting firms	***	3	1	3

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table 2.5 provides a summary of the supply factors regarding ALPs from U.S. producers and from subject countries.

Table 2.5 ALPs: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 square meters; ratios and shares in percent; Count in number of firms reporting

Factor	Measure	United States	China	Japan
Capacity 2021	Quantity	***	***	***
Capacity 2023	Quantity	***	***	***
Capacity utilization 2021	Ratio	***	***	***
Capacity utilization 2023	Ratio	***	***	***
Inventories to total shipments 2021	Ratio	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***
Home market shipments 2023	Share	***	***	***
Non-US export market shipments 2023	Share	***	***	***
Ability to shift production	Count	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for all known of U.S. production of ALPs in 2023. Responding foreign producer/exporter firms accounted for over 75 percent of U.S. imports of ALPs from China and Japan during 2023. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part 1, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of ALPs have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced ALPs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and some ability to shift shipments from alternate markets. Factors mitigating the responsiveness of supply include limited inventories and the inability to shift production to or from alternate products.

U.S. producers reported a large decrease in capacity over the period with Fujifilm exiting the U.S. industry. However, production decreased more than capacity, leading to a decrease in capacity utilization. U.S. producers' inventories increased from 2021 to 2023 but remained below *** percent of total shipments in all years. U.S. producers reported selling just under *** of total shipments in markets other than the United States in 2023. *** responding U.S. producers reported that they were *** to produce other products on the same equipment used to produce ALPs.

Subject imports from China

Based on available information, producers of ALPs from China have the ability to respond to changes in demand with large changes in the quantity of shipments of ALPs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and the ability to shift shipments to or from alternate markets. Factors mitigating the responsiveness of supply include limited inventories and the inability to shift production to or from alternate products.

Chinese producers reported increased production capacity and production from 2021 to 2023. Production capacity increased more than production, leading to a decrease in capacity utilization from 2021 to 2023. Chinese producers' inventories decreased over the period but remained below *** percent of total shipments in all years. Chinese producers reported selling just over *** of total shipments in their home market and approximately *** of total shipments to markets other than the United States in 2023. *** responding Chinese producers reported that they were *** to produce other products on the same equipment used to produce ALPs.

Subject imports from Japan

Based on available information, producers of ALPs from Japan have the ability to respond to changes in demand with moderate changes in the quantity of shipments of ALPs to

the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity and the ability to shift shipments to or from alternate markets. Factors mitigating the responsiveness of supply include limited inventories and the inability to shift production to or from alternate products.

Japanese producers increased production capacity and decreased production leading to a decrease in capacity utilization from 2021 to 2023. Japanese producers' inventories increased over the period but remained below *** percent of total shipments in all years. Japanese producers reported selling just over *** of total shipments in their home market and over *** to markets other than the United States in 2023. *** responding Japanese producers reported that they were unable to produce other products on the same equipment used to produce ALPs.

Imports from nonsubject sources

Based on official import statistics, nonsubject imports accounted for 62.4 percent of total U.S. imports by value in 2023. The largest sources of nonsubject imports during 2023 were the United Kingdom and Belgium. Combined, these countries accounted for 44.9 percent of nonsubject imports by value in 2023.

Supply constraints

U.S. producer *** reported that it *** to supply ALPs at any time from January 2021 through March 2024. The majority of responding importers reported that they had refused, declined, or been unable to supply ALPs between January 1, 2021 and when the petition was filed on September 28, 2023; but all responding importers reported that they have not refused, declined, or been unable to supply ALPs since the petition was filed. Importers *** and *** reported that COVID-19 had caused supply constraints.

The majority of purchasers reported that no firms had refused, declined, or been unable to supply them with ALPs at any time from January 2021 through March 2024. However, of the firms that reported supply constraints, purchaser *** reported that the availability of shipping containers across the world had caused supply constraints from January 1, 2021 to September 28, 2023. Purchaser *** reported that Fujifilm was unable to fill orders for ALPs in a timely manner from January 1, 2021 to September 28, 2023. Purchaser *** reported that Kodak struggled to supply ALPs during periods of peak demand during the same period of time.

Three purchasers that reported supply constraints since the petition was filed. Purchaser *** reported that it now pays Kodak $5,500 in additional costs to ensure a continual supply,

and Purchaser *** reported supply constraints due to ocean freight lead times and shortages in the supply of aluminum coil. Purchaser *** reported that Kodak refused to ship ALPs that were allocated to it after it announced changing suppliers to Fuji.

New suppliers

Twenty-three of 24 responding purchasers indicated that no new suppliers entered the U.S. market since January 1, 2021. Purchaser *** reported that IBF Printing Plates and Chemicals had entered the U.S. market since January 1, 2021.

U.S. demand

Based on available information, the overall demand for ALPs is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small cost share of ALPs in production of publications. Due to the large capital expenditures that establishing a printing line requires, firms typically do not change production methods until they have recouped their investments, which can take years.[5] This results in a relatively stable demand for ALPs in the short-to-medium-term but potential fluctuations in demand in the long-term.[6]

End uses and cost share

U.S. demand for ALPs depends on the demand for U.S.-produced publications such as newspapers, magazines, and retail inserts. ALPs account for small share of the cost of these publications. Importers *** reported that ALPs account for *** percent of the costs of printed materials. Importer *** reported that ALPs account for *** percent of the costs of retail inserts. Purchasers reported that ALPs generally make up between *** and *** percent of the costs of printed materials such as books, newspapers, and yearbooks.

Business cycles

*** subject to business cycles. Specifically, U.S. producer ***. Importer *** reported that demand for ALPs followed economic cycles and that production of downstream products such as printed packaging and printed advertisements varies based on the level of

[5] Conference transcript, p. 66 (Continenza).
[6] Conference transcript, p. 67 (Rosenthal).

economic activity and impacts the demand for ALPs. Importer *** reported that there is some seasonality in the ALPs market driven by demand for printed products around the holidays. Purchaser *** reported that the seasonal production of yearbooks drives demand for ALPs. Purchaser *** reported that demand for ALPs increases during the fourth quarter of each year in response to demand for printed holiday products. Purchaser *** reported that summer is the peak of its demand for ALPs. Purchaser *** reported that the financial season is the peak demand for ALPs.

Demand trends

*** reported that U.S. and foreign demand for ALPs has fluctuated *** since January 1, 2021 (table 2.6). Purchaser responses on the demand for end use products made using ALPs were mixed.

Table 2.6 ALPs: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	***	***	***	***	***
Domestic demand	Importers	0	0	0	3	1
Domestic demand	Purchasers	0	1	1	3	13
Foreign demand	U.S. producers	***	***	***	***	***
Foreign demand	Importers	0	0	0	3	1
Foreign demand	Purchasers	0	0	1	1	6
Demand for end use products	Purchasers	4	4	3	4	8

Source: Compiled from data submitted in response to Commission questionnaires.

Substitute products

*** responding U.S. producers, importers, and purchasers reported that there *** substitutes for ALPs.

Substitutability issues

This section assesses the degree to which U.S.-produced ALPs and ALPs imported from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of ALPs from domestic and imported sources based on those factors. Based on available data, staff believes that there is at least a moderate-to-high degree of substitutability between domestically produced ALPs and ALPs imported from

subject sources.[7] [8] Factors contributing to this level of substitutability include similar quality, availability, and lead times from inventory; little preference for particular country of origin, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors limiting substitutability are that end users must recalibrate printing equipment for plates produced by each individual firm. This reduces a firm's willingness to shift purchases from one producing firm to another on a frequent basis.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table 2.7, most purchasers and their customers never make purchasing decisions based on the producer or country of origin. Of the seven purchasers that reported that they always make decisions based on the manufacturer, five firms cited that they always purchase Fujifilm. Purchaser *** reported that Fujifilm provides superior product quality and unparalleled domestic technical service and regional sales support. Purchaser *** reported that it usually purchases ALPs from Fujifilm because it uses Krause imaging equipment and Fujifilm is the authorized seller and repair firm for Krause equipment. Purchaser *** reported always purchasing ALPs based on the producer because it has an exclusive supply agreement with one producer. Purchasers *** reported that they always made purchasing decisions based on the producer because they prefer ALPs produced by Fujifilm.

Table 2.7 ALPs: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	7	3	1	13
Customer	Producer	0	0	1	16
Purchaser	Country	1	2	3	19
Customer	Country	1	0	1	16

Source: Compiled from data submitted in response to Commission questionnaires.

[7] The degree of substitution between domestic and imported ALPs depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced ALPs to the ALPs imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

[8] Respondents believe this estimate to be overstated as the use of long-term contracts in the ALPs market further limits firms' ability to switch from one producing firm to another. Hearing transcript, pp. 240-241 (Porter).

Importance of purchasing domestic product

All responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. None of the responding purchasers reported that domestic product was required by law or required by their customers.

Most important purchase factors

The most often cited top factors firms consider in their purchasing decisions for ALPs were price/cost (20 firms), quality (17 firms), availability/supply (13 firms), and service/support (7 firms) as shown in table 2.8. Quality was the most frequently cited first-most important factor (cited by 14 firms), followed by availability/supply (6 firms); price/cost and service/support were the second-most frequently reported factors (6 firms each); price was the third-most frequently reported important factor (11 firms).

Table 2.8 ALPs: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	3	6	11	20
Quality	14	1	2	17
Availability / Supply	6	4	3	13
Service / Support	0	6	1	7
All other factors	1	5	4	NA

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other factors include reliability, compatibility with the printing press, trust in partnership, contracts and consignment agreements.

The majority of purchasers (14 of 21) reported that they sometimes or never purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 16 factors in their purchasing decisions (table 2.9). The factors rated as very important by more than half of responding purchasers were product consistency and reliability of supply (23 firms each); availability (22 firms); quality meets industry standards (21 firms); technical support/service (19 firms); delivery time and price (18 firms each); quality exceeds industry standards (16 firms); and delivery terms (13 firms).

Table 2.9 ALPs: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Availability	22	0	0
Associated products	8	11	4
Delivery terms	13	9	1
Delivery time	18	5	0
Discounts offered	10	10	2
Minimum quantity requirements	5	8	10
Packaging	8	10	5
Payment terms	9	9	5
Price	18	5	0
Product consistency	23	0	0
Product range	7	11	5
Quality meets industry standards	21	2	0
Quality exceeds industry standards	16	6	1
Reliability of supply	23	0	0
Technical support/service	19	4	0
U.S. transportation costs	9	9	4

Source: Compiled from data submitted in response to Commission questionnaires.

Lead times

ALPs are primarily sold from inventory. U.S. producer *** reported that *** percent of their commercial shipments ***, with lead times averaging *** days. The remaining *** percent of their commercial shipments were ***, with lead times averaging *** days. Importers reported that *** of commercial shipments came from U.S. inventories with lead times averaging *** days.

Supplier certification

Ten of 24 responding purchasers require their suppliers to become certified or qualified to sell ALPs to their firm. Purchasers reported that the time to qualify a new supplier ranged from 14 to 180 days. Purchasers generally reported that the process of certification requires firms to use plates, reconfigure equipment, and conduct tests to ensure that the final product meets quality standards. Only one purchaser, ***, reported that any domestic or foreign supplier had failed in its attempt to qualify ALPs, or had lost its approved status since 2021. It reported that negative plates are not certified to run on its imaging equipment because the quality of the product suffered.

Minimum quality specifications

As can be seen from table 2.10, the majority of firms that reported having knowledge of the quality of ALPs from the United States, China, Japan, and nonsubject sources reported that they always or usually meet minimum quality standards.

Table 2.10 ALPs: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	10	5	1	1	4
China	13	5	0	0	4
Japan	8	4	0	0	7
Nonsubject sources	8	2	1	0	5

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Purchasers were asked how often domestically produced or imported ALPs meets minimum quality specifications for their own or their customers' uses.

Twenty-two of 25 responding purchasers reported factors that determined quality were related to performance of ALPs over the lifecycle of the printing process. Purchasers generally reported that consistency in the gauge of aluminum, the durability of the ALP as it impacts the length of printing runs, and the quality of the print produced including color and image precision are factors that determine quality.

Changes in purchasing patterns

Eight purchasers reported that they had changed suppliers since January 1, 2021, while 16 reported that they had not. Specifically, four firms reported that they dropped or reduced purchases from Kodak and began to purchase from Fujifilm. A number of purchasers reported that they had purchased ALPs from Southern Litho until it was acquired by Kodak. These firms reported that they had continued to purchase ALPs from Kodak after the acquisition but there was a decline in the quality of the plates and the quality of the service these firms received. Purchaser *** reported that it had switched from Kodak to Fujifilm because Kodak had failed to provide reliable deliveries, had poor service, and imposed additional surcharges. One purchaser, ***, reported that Fujifilm was unwilling to renew the previous contract in January 2023, so it sought new suppliers. Purchaser *** reported that it switched from Kodak to Fuji because Kodak increased the cost of ALPs.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2021 (table 2.11). The majority of purchasers reported that purchases of U.S.-produced product fluctuated down or steadily decreased because Fujifilm closed operations in Greenwood, SC and the presence of high-quality Fujifilm plates imported into the U.S. market at a time when the overall demand for printed products decreased. Purchasers reported purchases of product from China steadily increased or fluctuated up because Fujifilm began to manufacture ALPs in China. Purchasers reported mixed purchases of product from Japan. Purchasers reported that purchases of product from nonsubject countries

fluctuated down or steadily decreased because Fujifilm closed manufacturing facilities in Europe. The majority of responding purchasers reported that they did not purchase ALPs from unknown sources.

Table 2.11 ALPs: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	0	1	1	5	14	2
China	7	6	2	1	1	2
Japan	5	2	0	4	2	4
Nonsubject	0	1	0	7	3	3
Sources unknown	0	0	1	1	0	8

Source: Compiled from data submitted in response to Commission questionnaires.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing ALPs produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 16 factors (table 2.9) for which they were asked to rate the importance. The majority of purchasers reported that U.S., Chinese, Japanese and nonsubject ALPs were comparable on all factors (table 2.12).

Table 2.12 ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. China	1	12	3
Associated products	U.S. v. China	0	13	2
Delivery terms	U.S. v. China	1	13	2
Delivery time	U.S. v. China	2	10	4
Discounts offered	U.S. v. China	0	10	5
Minimum quantity requirements	U.S. v. China	0	14	2
Packaging	U.S. v. China	0	14	2
Payment terms	U.S. v. China	0	14	2
Price	U.S. v. China	1	9	6
Product consistency	U.S. v. China	0	12	3
Product range	U.S. v. China	0	15	1
Quality meets industry standards	U.S. v. China	0	14	2
Quality exceeds industry standards	U.S. v. China	0	13	2
Reliability of supply	U.S. v. China	0	12	3
Technical support/service	U.S. v. China	0	11	4
U.S. transportation costs	U.S. v. China	1	11	3

Table continued.

Table 2.12 (Continued) ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Japan	2	8	2
Associated products	U.S. v. Japan	0	10	2
Delivery terms	U.S. v. Japan	1	8	3
Delivery time	U.S. v. Japan	2	8	2
Discounts offered	U.S. v. Japan	0	9	3
Minimum quantity requirements	U.S. v. Japan	0	10	2
Packaging	U.S. v. Japan	0	10	2
Payment terms	U.S. v. Japan	0	10	2
Price	U.S. v. Japan	0	7	5
Product consistency	U.S. v. Japan	0	10	1
Product range	U.S. v. Japan	0	11	1
Quality meets industry standards	U.S. v. Japan	0	11	1
Quality exceeds industry standards	U.S. v. Japan	0	10	1
Reliability of supply	U.S. v. Japan	0	10	1
Technical support/service	U.S. v. Japan	0	9	2
U.S. transportation costs	U.S. v. Japan	1	8	2

Table continued.

Table 2.12 (Continued) ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	China v. Japan	0	7	0
Associated products	China v. Japan	0	7	0
Delivery terms	China v. Japan	0	7	0
Delivery time	China v. Japan	1	6	0
Discounts offered	China v. Japan	0	7	0
Minimum quantity requirements	China v. Japan	0	7	0
Packaging	China v. Japan	0	7	0
Payment terms	China v. Japan	0	7	0
Price	China v. Japan	0	7	0
Product consistency	China v. Japan	0	6	0
Product range	China v. Japan	0	7	0
Quality meets industry standards	China v. Japan	0	7	0
Quality exceeds industry standards	China v. Japan	0	6	0
Reliability of supply	China v. Japan	0	6	0
Technical support/service	China v. Japan	0	6	0
U.S. transportation costs	China v. Japan	0	6	0

Table continued.

Table 2.12 (Continued) ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	1	9	2
Associated products	U.S. v. Nonsubject	0	11	1
Delivery terms	U.S. v. Nonsubject	1	10	1
Delivery time	U.S. v. Nonsubject	3	8	1
Discounts offered	U.S. v. Nonsubject	0	9	3
Minimum quantity requirements	U.S. v. Nonsubject	0	11	1
Packaging	U.S. v. Nonsubject	0	11	1
Payment terms	U.S. v. Nonsubject	0	11	1
Price	U.S. v. Nonsubject	0	8	4
Product consistency	U.S. v. Nonsubject	0	10	2
Product range	U.S. v. Nonsubject	0	11	1
Quality meets industry standards	U.S. v. Nonsubject	0	11	1
Quality exceeds industry standards	U.S. v. Nonsubject	0	11	1
Reliability of supply	U.S. v. Nonsubject	0	9	3
Technical support/service	U.S. v. Nonsubject	0	9	3
U.S. transportation costs	U.S. v. Nonsubject	1	8	3

Table continued.

Table 2.12 (Continued) ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	China v. Nonsubject	0	11	0
Associated products	China v. Nonsubject	0	11	0
Delivery terms	China v. Nonsubject	0	11	0
Delivery time	China v. Nonsubject	0	10	1
Discounts offered	China v. Nonsubject	1	10	0
Minimum quantity requirements	China v. Nonsubject	0	11	0
Packaging	China v. Nonsubject	0	10	0
Payment terms	China v. Nonsubject	0	10	0
Price	China v. Nonsubject	1	9	0
Product consistency	China v. Nonsubject	0	11	0
Product range	China v. Nonsubject	0	11	0
Quality meets industry standards	China v. Nonsubject	0	11	0
Quality exceeds industry standards	China v. Nonsubject	0	11	0
Reliability of supply	China v. Nonsubject	0	11	0
Technical support/service	China v. Nonsubject	0	11	0
U.S. transportation costs	China v. Nonsubject	0	10	0

Table continued.

Table 2.12 (Continued) ALPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Japan v. Nonsubject	0	8	0
Associated products	Japan v. Nonsubject	0	8	0
Delivery terms	Japan v. Nonsubject	0	8	0
Delivery time	Japan v. Nonsubject	0	8	0
Discounts offered	Japan v. Nonsubject	1	6	0
Minimum quantity requirements	Japan v. Nonsubject	0	8	0
Packaging	Japan v. Nonsubject	0	8	0
Payment terms	Japan v. Nonsubject	0	8	0
Price	Japan v. Nonsubject	2	6	0
Product consistency	Japan v. Nonsubject	0	8	0
Product range	Japan v. Nonsubject	0	8	0
Quality meets industry standards	Japan v. Nonsubject	0	8	0
Quality exceeds industry standards	Japan v. Nonsubject	0	8	0
Reliability of supply	Japan v. Nonsubject	0	8	0
Technical support/service	Japan v. Nonsubject	0	8	0
U.S. transportation costs	Japan v. Nonsubject	0	8	0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: With respect to cost/price factors, a rating of superior means that price/transportation cost for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported ALPs

In order to determine whether U.S.-produced ALPs can generally be used in the same applications as imports from China, Japan, and nonsubject countries; U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.13 to 2.15, *** reported that ALPs from the United States, China, Japan, and nonsubject countries are *** interchangeable while all responding importers and a majority of purchasers reported that ALPs from the United States, China, Japan, and nonsubject countries are always or frequently interchangeable. Purchaser *** reported that specific equipment requires either a violet or thermal plate and that while violet plates are no longer produced in the United States thermal plates from any source are always interchangeable for all country pairings. Purchaser *** reported that the interchangeability of ALPs depends on the application in which they are used.

Table 2.13 ALPs: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	***	***	***	***
U.S. vs. Japan	***	***	***	***
China vs. Japan	***	***	***	***
U.S. vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Japan vs. Other	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.14 ALPs: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	2	2	0	0
U.S. vs. Japan	2	2	0	0
China vs. Japan	2	1	0	0
U.S. vs. Other	2	2	0	0
China vs. Other	2	1	0	0
Japan vs. Other	2	1	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.15 ALPs: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	5	6	2	2
U.S. vs. Japan	8	3	3	2
China vs. Japan	5	3	2	0
U.S. vs. Other	6	2	2	2
China vs. Other	5	2	3	0
Japan vs. Other	7	1	3	0

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of ALPs from the United States, subject, or nonsubject countries. As seen in tables 2.16 to 2.18, *** reported that there are *** differences other than price between ALPs produced in the United States, China, Japan, and nonsubject countries. The majority of importers reported that there are sometimes or never differences other than price between ALPs produced in the United States, China, Japan, and nonsubject countries. The majority of purchasers reported that there are always or frequently differences other than price between ALPs produced in the United States and ALPs produced in China and Japan. Purchaser responses on the differences other than price between ALPs produced in China, Japan and nonsubject countries were mixed. The majority of

purchasers reported that there are always or frequently differences between ALPs produced in the United States and nonsubject countries. Purchaser *** reported that availability is always a factor other than price between thermal plates from different country sources while equipment maintenance, availability, and technical service support are frequently factors other than price between thermal plates from different country sources.

Table 2.16 ALPs: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	***	***	***	***
U.S. vs. Japan	***	***	***	***
China vs. Japan	***	***	***	***
U.S. vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Japan vs. Other	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.17 ALPs: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	0	1	2	1
U.S. vs. Japan	0	1	2	1
China vs. Japan	0	0	2	1
U.S. vs. Other	0	1	1	2
China vs. Other	0	0	2	1
Japan vs. Other	0	0	2	1

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.18 ALPs: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	7	2	3	2
U.S. vs. Japan	9	3	2	2
China vs. Japan	4	0	3	3
U.S. vs. Other	7	2	2	2
China vs. Other	4	1	3	3
Japan vs. Other	6	1	3	2

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers, importers, and purchasers were asked if ALPs from different producers were compatible with all types of machinery without major modification to the machinery. ***, the majority of importers, and a number of purchasers (8 of 23) reported that ALPs from different producers *** compatible with all types of machinery with modification. U.S. producer *** reported that computer-to-plate or plate setter

might need to be calibrated when a firm changes plate suppliers but that the cost of recalibrating is modest and not a significant capital investment. Importer *** reported that ALPs from different producers are not compatible because recalibrating the plate-setter can result in considerable down-time. Importer *** reported that Kodak will penalize customers for switching from its plates to Fujifilm by dramatically raising the costs of servicing the plate-setter. Purchaser *** reported that switching suppliers requires a very easy re-calibration. Purchaser *** reported that the costs of switching ALPs suppliers is limited to equipment downtime as firms other that Kodak cover the costs of re-calibration of CPT devices. Purchaser *** reported that Kodak locks CPT devices so that other firms cannot work on them and charge $10,000 per media change when a firm uses another producer's ALPs and that Fujifilm and ECO3 do not charge for this service. Purchaser *** reported that it projects $1.3 million, not including the cost of equipment downtime, to change its machinery from one firm's ALPs to another's. Purchaser *** reported that Kodak charged $10,000 per plate device to recalibrate the machinery for another firm's ALPs.

Purchasers were also asked if ALPs are purchased in tandem with other products or services. The majority of purchasers (18 of 23) reported that ALPs are purchased in tandem with other products or services. Purchaser *** reported that capital equipment and press consumables are purchased in tandem with ALPs. Purchaser *** reported that CTP devices and service agreements are sometimes bundled with ALPs. Purchaser *** reported that ALPs are sold in tandem with auto-loaders, chemistry supplies, service agreements, and technical support. Purchaser *** reported that Fujifilm provides technical support and assistance on plate manufacturing equipment, including equipment loan agreements. Purchaser *** reported that ALPs are sold in tandem with pre-press supplies and press room supplies. Purchaser *** reported that ALPs purchase contracts have been linked to service agreements and machinery, such as plate imagers and processors. Purchaser *** reported that CTP service usually goes with plate contracts. Purchaser *** reported that it started purchasing ALPs from Fujifilm as a part of a larger purchase of products but that when they purchased ALPs from Kodak it was independent of any other purchases. Purchaser *** reported that its ALPs supplier is the supplier for its imaging and processing equipment and the only certified repair company in the United States. Purchaser *** reported that ALPs are purchased in tandem with imaging equipment and service support.

Purchasers were asked if prices of additional equipment or services were linked to the purchase of additional ALPs. The majority of purchasers (15 of 23) reported that the prices of

additional equipment or services were linked to the purchases of additional ALPs. Purchaser *** reported that pricing can be determined by bundling ALPs with equipment and services. Purchaser *** reported that Kodak ties service pricing to ALPs purchasing. Purchaser *** reported that services and support supplies are paired with ALP purchasing volumes. Purchaser *** reported that companies will package equipment purchases with consumable agreements and offer discounts in some cases. Purchaser *** reported that machinery service agreements have been linked to plate purchase contracts in the past. Purchaser *** reported that equipment is usually loaned for no cost as part of agreeing to purchase ALPs from suppliers. Purchaser *** reported that Eastman Kodak contracts specified that all purchases of ALPs had to be from them. Purchaser *** reported that chemicals are included in the contract price. Purchaser *** reported that chemicals needed to process ALPs are included as a part of the plate purchasing price.

Purchasers were asked how the prices of additional equipment or service change if a firm purchased ALPs from alternative suppliers. All responding purchasers reported that prices for additional equipment or services would increase if a firm purchased ALPs from another firm. Purchaser *** reported that equipment maintenance and service could be impacted by purchasing ALPs from another firm. Purchaser *** reported that Kodak has steadily increased cost on additional services as it has shifted ALPs purchases to other suppliers. Purchaser *** reported that Kodak eliminates all discounts for services if you do not buy its plates.

Elasticity estimates

This section discusses elasticity estimates.

U.S. supply elasticity

The domestic supply elasticity for ALPs measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of ALPs. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced ALPs. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 10 is suggested. ***

***.[9]

U.S. demand elasticity

The U.S. demand elasticity for ALPs measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of ALPs. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the ALPs in the production of any downstream products. Based on the available information, the aggregate demand for ALPs is likely to be highly inelastic; a range of -0.25 to -0.5 is suggested. ***.[10]

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[11] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced ALPs and imported ALPs is likely to be in the range of 3 to 6. The majority of firms reported that ALPs from different sources were always or frequently interchangeable, price was an important purchase factor, and there was little reported preference for ALPs particular country of origin. However, recalibrating printing equipment for plates produced by each individual firm reduces a firm's willingness to shift purchases from one producing firm to another on a frequent basis and limits the substitution of ALPs from different producers.

***.[12]

[9] ***.

[10] ***.

[11] The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

[12] ***.

Part 3: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and Part 6 and (except as noted) is based on the questionnaire responses of two firms that accounted for all known U.S. production of ALPs during 2023.[1]

[1] The Commission received questionnaire responses from Eastman Kodak and Fujifilm. However, Eastman Kodak is the only known U.S. producer of ALPs in 2023 since Fujifilm ceased operations in 2022. Specifically, Fujifilm closed ***. Respondent Fujifilm's postconference brief, attachment A, p. 4.

In addition, Southern Litho produced ALPs at its Grand Rapids, Michigan and Youngsville, North Carolina facilities until May 2021 and has switched to producing corrugated cardboard boxes. Eastman Kodak entered into a brokerage agreement with Southern Litho and absorbed its customer base in 2021 and 2022, but didn't purchase its equipment. Petition, pp. 2-3, Petitioner's postconference brief, p. 7 and exh. 4, and conference transcript, pp. 8, 9, and 43 (Herrmann and Continenza).

Prior to the period for which data were collected, Agfa USA, now known as ECO3 after the sale of Agfa's Offset Solutions to Aurelius in April 2023, produced ALPs at its Branchburg, New Jersey facility until 2018. Conference transcript, p. 103 (Larkin); https://www.agfa.com/corporate/news-item/agfa-graphics-intends-to-close-offset-printing-plate-factory-in-branchburg-new-jersey-usa/; https://aurelius-group.com/en/news/aurelius-closes-the-acquisition-of-agfa-offset-solutions/; and https://eco3.com/news/eco3-launched-as-new-name.

U.S. producers

The Commission issued a U.S. producer questionnaire to three firms based on information contained in the petitions. Two firms (Eastman Kodak and Fujifilm) provided usable data on their operations.[2] Table 3.1 lists U.S. producers of ALPs, their production locations, positions on the petitions, and shares of total production in 2023.

Table 3.1 ALPs: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2023

Firm	Position on petition	Production locations	Share of production
Eastman Kodak	Petitioner	Columbus, GA	***
Fujifilm	***	Greenwood, SC	***
All firms	Various	Various	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table 3.2 ALPs: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

[2] The Commission sent a U.S. producer questionnaire to Southern Litho, but the firm did not respond. Edward Casson III, Southern Litho's Chief Executive Officer, estimated that Southern Litho produced and sold approximately *** square meters of ALPs in 2021, equivalent to about *** percent of all U.S. ALPs production in 2021. Petitioner's postconference brief, Exh. 4.

As indicated in table 3.2, ***, (***) are related to foreign producers of the subject merchandise and one U.S. producer (***) is related to a U.S. importer of the subject merchandise. In addition, as discussed in greater detail below, one U.S. producer (***) directly imported ALPs from China and Japan. *** producers purchase the subject merchandise from U.S. importers.[3]

Table 3.3 presents events in the U.S. industry since January 1, 2021.

Table 3.3 ALPs: Important industry events since 2021

Item	Firm	Event
Acquisition	Kodak	On June 24, 2021, Kodak announced the acquisition of the service and parts assets of Southern Lithoplate Inc. Kodak's service team took over the servicing of Southern Lithoplate's accounts on August 1, 2021.
Plant Closure	Fujifilm	In July of 2021, Fujifilm announced the closure of four manufacturing plants in Greenwood, South Carolina by the end of 2022. These four manufacturing plants were responsible for the production of printing plants, inks, papers, and disposable cameras.

Source: Kodak, "Kodak Reaches Agreement to form Strategic Alliance with Southern Lithoplate Inc. (SLP)", December 15, 2020. https://www.kodak.com/en/company/press-release/southern-lithoplate-strategic-alliance/. Kodak, "Kodak strengthens commitment to Print, acquiring Southern Lithoplate Inc. (SLP) service & parts assets", June 24, 2021. https://www.kodak.com/en/company/press-release/kodak-acquires-southern-lithoplate-service-parts-assets/. Petapixel, "Fujifilm To Close Four U.S. Photo Equipment Plants and Cut 400 Jobs", July 1, 2021. https://petapixel.com/2021/07/01/fujifilm-to-close-four-u-s-photo-equipment-plants-and-cut-400-jobs/.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of ALPs since 2021. *** indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

[3] *** clarified that ***. Email from ***, November 1, 2023.

Table 3.4 ALPs: U.S. producers' reported changes in operations, since January 1, 2021

Item	Firm name and narrative response on changes in operations
Plant closings	***
Prolonged shutdowns	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. producers' installed and practical capacity and production on the same equipment. Installed overall capacity decreased by *** percent from 2021 to 2023, as a result of ***, and was *** from interim 2023 to interim 2024.[4] [5] Likewise, installed overall production declined by *** percent from 2021 to 2023 and was *** percent lower in interim 2024 than in interim 2023. Installed overall capacity utilization rates increased by *** percentage points from 2021 to 2022, but then decreased overall from 2021 to 2023 by *** percentage points, and were lower by *** percentage points in interim 2024 compared to interim 2023. Since *** did not report product shifting or other products produced on the same equipment as ALPs, practical overall and practical ALPs capacity, production, and corresponding utilization rates match throughout the period. Practical capacity decreased from 2021 to 2023 by *** percent, but was unchanged during interim periods.

Table 3.5 ALPs: U.S. producers' installed and practical capacity, production, and capacity utilization on the same equipment as in-scope production, by period

Capacity and production in 1,000 square meters; utilization in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical ALPs	Capacity	***	***	***	***	***
Practical ALPs	Production	***	***	***	***	***
Practical ALPs	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

[4] As previously stated, ***. *** U.S. producer questionnaire response, section II-3f.

[5] ***. *** U.S. producer's questionnaire response, section II-3a and II-3e.

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints.

Table 3.6 ALPs: U.S. producers' reported practical overall capacity constraints since January 1, 2021

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.7 and figure 3.1 present U.S. producers' production, capacity, and capacity utilization. U.S. producers' capacity decreased by *** percent from 2021 to 2023, driven by *** *** percent capacity reduction from 2021 to 2022. *** reported no changes in capacity during the period of data collection. In 2021, *** and *** accounted for approximately *** and *** percent of total U.S. production of ALPs, respectively, while *** accounted for *** U.S. production in 2023.[6] [7] U.S. producers' aggregate capacity utilization rates ranged between *** to *** percent during full year periods, between 2021 and 2023, and were lower by *** percentage points in interim 2024 compared to interim 2023.

Table 3.7 ALPs: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 square meters; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

[6] As previously stated, the other known U.S. producer at the time, Southern Litho, produced and sold approximately *** square meters in 2021 (see footnote 2). Petitioner's postconference brief, Exh. 4.

[7] *** U.S. production and U.S. shipment quantities of ALPs declined between 2022 and 2023. These declines reflect the firm's decision to ***. Email from ***, August 20, 2024.

Table 3.7 (Continued) ALPs: U.S. producers' output, by firm and period

Production

Production in 1,000 square meters; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.7 (Continued) ALPs: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table 3.7 (Continued) ALPs: U.S. producers' output, by firm and period

Share of production

Share in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Figure 3.1 ALPs: U.S. producers' output, by period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Foreign trade zone production activities

Eastman Kodak *** had operations as a foreign trade zone ("FTZ"). Eastman Kodak's Columbus, Georgia manufacturing facility is a production FTZ site (FTZ subzone site 0260N02) ***.

*** reported importing aluminum used to manufacture ALPs from ***.

Table 3.8 presents U.S. producers' narrative on FTZ operations since January 1, 2021.[8]

Table 3.8 ALPs: U.S. producers' narrative on FTZ operations, since January 1, 2021

Item	Firm name and narrative on FTZ operations
Tariff inversion: Parts admitted	***
Tariff inversion: Original country of origin	***
Tariff inversion: Countries for withdrawals and which dropped	***
Non-Tariff inversion: Parts	***
Non-Tariff inversion: HTS numbers	***
Non-Tariff inversion: Countries of origin	***
Tariff inversion: Parts admitted	***
Tariff inversion: Original HTS numbers	***
Tariff inversion: Original country of origin	***
Non-Tariff inversion: Parts	***
Non-Tariff inversion: HTS numbers	***
Non-Tariff inversion: Countries of origin	***

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

U.S. producers reported producing *** on the same equipment during the period for which data were collected.

[8] Petition, p. 4, conference transcript p. 21 (Tellstone), and *** U.S. producer questionnaire response, section II-6a to II-6c.

U.S. producers' U.S. shipments and exports

Table 3.9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. The quantity of U.S. shipments (inclusive of commercial U.S. shipments and transfers)[9] decreased steadily from 2021 to 2023 by *** percent (***) square meters, and was lower by *** percent in interim 2024 compared to interim 2023.[10] The value of U.S. shipments decreased by *** percent from 2021 to 2023 and was lower by *** percent in interim 2024 than in interim 2023. U.S. shipments unit values increased from $*** per square meter in 2021 to $*** per square meter 2023 and were higher in interim 2024 than in interim 2023. U.S. shipments accounted for the largest share of total shipments and remained well above *** percent by quantity and value in all periods.

*** was the only U.S. producer to report exports during 2021 to 2023.[11] The quantity of exports declined by *** percent during 2021 to 2023 and was lower by *** percent in interim 2024 than in interim 2023. Export shipment values increased from 2021 to 2022 by *** percent but declined by *** percent from 2022 to 2023, and were lower by *** percent in interim 2024 than in interim 2023. Export shipments unit values increased from $*** to $*** per square meter from 2021 to 2023 and were lower in interim 2024 than in interim 2023.

Total shipment quantities decreased from 2021 to 2023 by *** percent (*** square meters), and were lower by *** percent in interim 2024 than in interim 2023. The value of total shipments decreased by *** percent from 2021 to 2023 and was lower by *** percent in interim 2024 than in interim 2023. Total shipments unit values increased from 2021 to 2023 from $*** to $*** per square meter and were higher in interim 2024 than in interim 2023.

[9] ***. ***. *** U.S. producer questionnaire response, section II-12.

[10] *** U.S. operations are mostly responsible for the decline, with the firm's overall drop of *** percent in U.S. shipments between 2021 and 2022, and *** reported U.S. shipments after that time.

[11] Principal export markets include ***. *** U.S. producer questionnaire response, section II-7.

Table 3.9 ALPs: U.S. producers' shipments, by destination and period

Quantity in 1,000 square meters; value in 1,000 dollars; unit value in dollars per square meter; shares in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' inventories

Table 3.10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments.[12] U.S. producers' inventories increased by *** percent from 2021 to 2022 before decreasing by *** percent from 2022 to 2023, and were *** percent lower in interim 2024 than in interim 2023. As a ratio to U.S. production, inventories increased by *** percentage points from 2021 to 2023, and were *** percentage points higher in interim 2024 than in interim 2023. As a ratio to U.S. shipments, inventories increased by *** percentage points from 2021 to 2023 and were *** percentage points higher in interim 2024 than in interim 2023. Inventory ratios to total shipments also increased throughout the period, and were higher in interim 2024 compared to interim 2023.

[12] ***. *** U.S. producer questionnaire response, section II-7.

Table 3.10 ALPs: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 square meters; ratio in percent; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' imports from subject sources

U.S. producers' imports of ALPs are presented in table 3.11 and reasons for importing are presented in table 3.12. *** imports of ALPs from *** increased overall by *** percent during 2021 to 2023 and rose from *** percent as a ratio to U.S. production in 2021 to *** percent in 2022, before declining to *** percent in 2023, when the firm *** production of ALPs.[13] [14] Similarly, *** imports of ALPs from Japan rose by *** percent from 2021 to 2023 and as ratio to U.S. production increased from *** percent of U.S. production in 2021 to *** percent in 2022, before decreasing to *** percent in 2023. Conversely, imports from both *** and *** were lower in interim 2024 compared to interim 2023.

Table 3.11 ALPs: *** U.S. production, subject imports, and ratio of subject imports to production, by source and period

Quantity in 1,000 square meters; ratio in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[13] No ratios to U.S. production are shown for 2023 and interim periods because ***. *** U.S. producer questionnaire response, section II-2a.

[14] Appendices D and J present U.S. producers' data excluding ***.

Table 3.12 ALPs: U.S. producers' reasons for importing

Item	Narrative response on reasons for importing
*** reason for importing	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of ALPs between January 2021 and March 2024.

U.S. employment, wages, and productivity

Table 3.13 shows U.S. producers' employment-related data. From 2021 to 2023, the number of production and related workers ("PRWs"), total hours worked, wages paid, and productivity decreased. Hours worked per PRW increased from 2021 to 2022, before decreasing in 2023; hourly wages decreased in 2022 before increasing in 2023, and unit labor costs increased during 2021 to 2023.[15] Except for hours worked per PRW, hourly wages, and unit labor costs which increased slightly in interim 2024 compared to interim 2023, all other labor indicators (production and related workers, total hours worked, wages paid, and productivity were lower in interim 2024 compared to interim 2023.

Table 3.13 ALPs: U.S. producers' employment related information, by period

Item	2021	2022	2023	Interim 2023	Interim 2024
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (square meters per hour)	***	***	***	***	***
Unit labor costs (dollars per square meter)	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

[15] Aggregate decreasing trends, especially for PRWs, hours worked, wages paid, and productivity are largely driven by ***. *** U.S. producer questionnaire response, sections II-3e and II-11.

Part 4: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 19 firms believed to be importers of subject ALPs, as well as to all U.S. producers of ALPs.[1] Usable questionnaire responses were received from five companies,[2] representing the vast majority of U.S. imports from China, Japan, and nonsubject sources in 2023 under HTS subheading 3701.30.00, a "basket" category.[3] [4] Table 4.1 lists all responding U.S. importers of ALPs from China, Japan, and other sources, their locations, and their shares of U.S. imports, in 2023.

Table 4.1 ALPs: U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Headquarters	China	Japan	Subject	Nonsubject sources	All import sources
Eastman Kodak	Rochester, NY	***	***	***	***	***
ECO3 USA	Carlstadt, NJ	***	***	***	***	***
Fujifilm USA	Valhalla, NY	***	***	***	***	***
Grafsolve	North Chicago, IL	***	***	***	***	***
Heidelberg	Kennesaw, GA	***	***	***	***	***
All firms	Various	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[1] The Commission issued questionnaires to those firms identified in the petitions; staff research; and proprietary, Census-edited Customs' import records.

[2] Nine firms (***) certified they did not import ALPs during the period of data collection.

[3] Nonsubject coverage is based on staff research and proprietary, Census-edited Customs' import records.

[4] Petitioner stated that merchandise classified under 3701.30.00 represents the overwhelming majority of subject imports. Conference transcript, p. 38 (Herrmann). In addition, both petitioner and respondent Fujifilm stated that U.S. importer questionnaire responses were "quite comprehensive" and "close to a hundred percent coverage." Conference transcript, p.39 (Herrmann), p. 174 (Porter), and p. 190 (Durling). Moreover, according to the petitioner the U.S. importer questionnaire responses account for "*** imports of ALPs from both subject and nonsubject sources." Petitioner's prehearing brief, p. 31.

U.S. imports

Table 4.2 and figure 4.1 present data for U.S. imports of ALPs from China and Japan and all other sources. Tables 4.3 and 4.4 present data for U.S. imports by U.S. producers and/or affiliated firms and table 4.5 presents data on U.S. producers' and/or affiliated firms' U.S. imports excluding one U.S. producer ***.

Subject imports accounted for *** percent of total imports of ALPs by quantity and *** percent by value in 2023. The quantity of subject imports increased by *** percent or by *** square meters from 2021 to 2023 and was lower by *** percent or by *** square meters in interim 2024 than in interim 2023. The vast majority of the increase in U.S. imports from subject sources was accounted for by ***.[5] The value of subject imports also increased by *** percent from 2021 to 2023 and was lower by *** percent in interim 2024 than in interim 2023. The average unit value of subject imports steadily decreased by *** percent from 2021 to 2023, and was lower during interim 2024 than in interim 2023 by *** percent. The ratio of subject imports to U.S. production increased from *** percent in 2021 to *** percent in 2023 and was lower in interim 2024 than in interim 2023.

Nonsubject imports of ALPs to the United States decreased irregularly from 2021 to 2023 by *** percent or by *** square meters, and were lower in interim 2024 by *** percent than in interim 2023. During 2021 to 2023, the value of nonsubject imports decreased by *** percent and was lower by *** percent in interim 2024 than in interim 2023. *** accounted for the majority of nonsubject imports in all periods.[6] The average unit value for ALPs imports from nonsubject sources fluctuated, increasing by *** percent from 2021 to 2023, and was lower by *** percent in interim 2024 than in interim 2023. The ratio of nonsubject imports to U.S. production increased irregularly from *** percent in 2021 to *** percent in 2023 and was lower in interim 2024 than in interim 2023.

[5] Of the four firms that reported imports of ALPs from subject sources in 2023 (***), *** accounted for *** percent of those imports by quantity. ***. ***'s U.S. importer's questionnaire response, section II-4. Consequently, respondent Fujifilm asserts that virtually all of Fujifilm USA's increased subject imports of ALPs went to replace the firm's lost U.S. production with the closing of its facility in Greenwood, South Carolina. Further, it noted that it transitioned lower-volume customers first to imports and subject imports did not manage to replace its pre-existing volume sold from Greenwood in 2021. Conference transcript pp. 137-138 and 175 (Porter) and hearing transcript, p. 10 (Porter) and p. 158 (Durling).

[6] *** reported importing mostly from Germany, France, and Brazil during 2021 to 2023. ***'s U.S. importer questionnaire response, section II-7a.

Table 4.2 ALPs: U.S. imports by source and period

Quantity in 1,000 square meters; value in 1,000 dollars; unit value in dollars per square meters; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Japan	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

Table 4.2 (Continued) ALPs: Share of U.S. imports by source and period

Share and ratio in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
China	Share of quantity	***	***	***	***	***
Japan	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Japan	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to production.

Figure 4.1 ALPs: U.S. import quantities and average unit values, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.3 ALPs: Changes in import quantity and values between comparison periods

Changes in percent; interim is January to March

Source	Measure	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
China	%Δ Quantity	▲***	▲***	▲***	▼***
Japan	%Δ Quantity	▲***	▲***	▼***	▼***
Subject sources	%Δ Quantity	▲***	▲***	▼***	▼***
Nonsubject sources	%Δ Quantity	▼***	▲***	▼***	▼***
All import sources	%Δ Quantity	▲***	▲***	▼***	▼***
China	%Δ Value	▲***	▲***	▲***	▼***
Japan	%Δ Value	▲***	▲***	▼***	▼***
Subject sources	%Δ Value	▲***	▲***	▼***	▼***
Nonsubject sources	%Δ Value	▼***	▲***	▼***	▼***
All import sources	%Δ Value	▲***	▲***	▼***	▼***
China	%Δ Unit value	▼***	▼***	▲***	▲***
Japan	%Δ Unit value	▼***	▼***	▼***	▼***
Subject sources	%Δ Unit value	▼***	▼***	▼***	▼***
Nonsubject sources	%Δ Unit value	▲***	▲***	▼***	▼***
All import sources	%Δ Unit value	▲***	▲***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table 4.4 ALPs: U.S. producers' and/or affiliated firms' U.S. imports, by source and period

Quantity in 1,000 square meters; ratios represent ratio to U.S. imports; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.5 ALPs: U.S. producers' and/or affiliated firms' U.S. imports excluding one U.S. producer ***, by source and period

Quantity in 1,000 square meters; ratios represent ratio to U.S. imports; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[7] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[8] Table 4.6 presents information on imports from subject countries during the applicable 12-month period for which the data were collected. Imports from China and Japan accounted for *** percent and *** percent, respectively, of total imports of ALPs by quantity between September 1, 2022 and August 31, 2023.

[7] Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

[8] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table 4.6 ALPs: U.S. imports in the twelve-month period preceding the filing of the petitions, September 1, 2022 through August 31, 2023

Quantity in 1,000 square meters; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
Japan	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Critical circumstances

On April 8, 2024, Commerce issued its preliminary determination that "critical circumstances" exist with regard to subsidized imports of ALPs from China with respect to Fujifilm Printing Plate (China) Co., Ltd. and Shanghai National Ink Co., Ltd.[9] On September 27, 2024, Commerce issued its final affirmative determination that critical circumstances exist with respect to imports of subject merchandise for Fujifilm Printing Plate (China) Co., Ltd. and Shanghai National Ink Co., Ltd, and do not exist with respect to imports of subject merchandise for all other exporters and producers.[10] In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from April 8, 2024, the effective date of Commerce's preliminary affirmative LTFV determination. Tables 4.7 and 4.8, and figure 4.2 present data on Commerce's final affirmative critical circumstances determination in the countervailing duty investigation.

[9] 89 FR 24433, April 8, 2024; and 89 FR 26125, April 15, 2024 referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

[10] 89 FR 79248, September 27, 2024.

Table 4.7 ALPs: U.S. imports from China subject to Commerce's affirmative final critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 square meters

Month	Relation to petition	Quantity
April 2023	Before	***
May 2023	Before	***
June 2023	Before	***
July 2023	Before	***
August 2023	Before	***
September 2023	Before	***
October 2023	After	***
November 2023	After	***
December 2023	After	***
January 2024	After	***
February 2024	After	***
March 2024	After	***

Table continued.

Table 4.7 (Continued) ALPs: U.S. imports from China subject to Commerce's affirmative final critical circumstances determination in the CVD investigation, by differing number of months before and after the filing of the petition

Quantity in 1,000 square meters

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure 4.2 ALPs: U.S. imports from China potentially subject to Commerce's final critical circumstances determination in the CVD investigation, by month

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.8 ALPs: U.S. importers' U.S. inventories of imports from China subject to Commerce's affirmative final critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 square meters; indexed quantities in percent; September 2023=100

Item	Quantity	Indexed
September 2023	***	100.0
October 2023	***	***
November 2023	***	***
December 2023	***	***
January 2024	***	***
February 2024	***	***
March 2024	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

On May 1, 2024, Commerce issued its preliminary determination that "critical circumstances" exist with regard to imports of ALPs sold at LTFV from China for Fujifilm Printing Plate (China) Co., Ltd. and the China-wide entity.[11] On September 27, 2024, Commerce issued its final determination that it continued to find that critical circumstances exist for Fujifilm Printing Plate (China) Co., Ltd. and the China-wide entity.[12] In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations,

[11] 89 FR 35062, May 1, 2024; 89 FR 47516, June 3, 2024 referenced in app. A.
[12] 89 FR 79252, September 27, 2024.

certain subject imports may be subject to antidumping duties retroactive by 90 days from May 1, 2024, the effective date of Commerce's preliminary affirmative LTFV determination.

Tables 4.9 and 4.10, and figure 4.3 present data on Commerce's final affirmative critical circumstances determination in the antidumping duty investigation.

Table 4.9 ALPs: U.S. imports from China subject to Commerce's affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 square meters

Month	Relation to petition	Quantity
April 2023	Before	***
May 2023	Before	***
June 2023	Before	***
July 2023	Before	***
August 2023	Before	***
September 2023	Before	***
October 2023	After	***
November 2023	After	***
December 2023	After	***
January 2024	After	***
February 2024	After	***
March 2024	After	***

Table continued.

Table 4.9 (Continued) ALPs: U.S. imports from China subject to Commerce's affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 square meters; n/a is not applicable or available

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The Commerce final affirmative circumstances determination is for all producers from China.

Figure 4.3 ALPs: U.S. imports from China potentially subject to Commerce's final critical circumstances determination in the AD investigation, by month

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.10 ALPs: U.S. importers' U.S. inventories of imports from China subject to Commerce's affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 square meters; indexed quantities in percent; September 2023=100

Item	Quantity	Indexed
September 2023	***	100.0
October 2023	***	***
November 2023	***	***
December 2023	***	***
January 2024	***	***
February 2024	***	***
March 2024	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part 2. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table 4.11 and figure 4.4 present U.S. producers' and U.S. importers' U.S. shipments in 2023 by chemical treatment status (wet, process free, and chemical free ALPs).[13] U.S. producers' U.S. shipments accounted for *** percent of wet ALPs and *** percent of process free ALPs, while the majority of U.S. importers' U.S. shipments from China were *** ALPs and some *** ALPs. *** of U.S. importers' U.S. shipments from Japan consisted of *** ALPs as well as the *** of U.S. importers' U.S. shipments from subject and *** nonsubject sources. In contrast, U.S. producers' U.S. shipments and U.S. importers' U.S. shipments from Japan had *** chemical free ALPs.

Table 4.11 ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2023

Quantity in 1,000 square meters

Source	Wet ALPs	Process free ALPs	Chemical free ALPs	All chemical treatment status
U.S. producers	***	***	***	***
China	***	***	***	***
Japan	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

[13] Additional information on U.S. producers' and U.S. importers' U.S. shipments by chemical treatment status and by plate thickness is also presented for the entire period in Appendix E of this report.

Table 4.11 (Continued) ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2023

Share across in percent

Source	Wet ALPs	Process free ALPs	Chemical free ALPs	All chemical treatment statuses
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
Japan	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table 4.11 (Continued) ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2023

Share down in percent

Source	Wet ALPs	Process free ALPs	Chemical free ALPs	All chemical treatment statuses
U.S. producers	***	***	***	***
China	***	***	***	***
Japan	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

Table continued.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure 4.4 ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and by chemical treatment status, 2023

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.12 and figure 4.5 present U.S. producers' and U.S. importers' 2023 U.S. shipments by thickness. *** gauges were shipped from each source while U.S. shipments of *** consisted of approximately *** of all U.S. shipments of ALPs within each source in 2023.

U.S. shipments of *** ALPs accounted for the second largest share of U.S. shipments from U.S. producers' and of U.S. importers' U.S. shipments from China and nonsubject sources within each source, while U.S. shipments of *** ALPs were the second largest for Japan and subject sources combined during 2023. 15 gauge ALPs accounted for a small share of U.S. shipments, between *** percent within the different sources in 2023.[14]

[14] *** reported importing other gauge sizes.

Table 4.12 ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and plate thickness, 2023

Quantity in 1,000 square meters

Source	15 gauge	20 gauge	30 gauge	40 gauge	All thicknesses
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table 4.12 (Continued) ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and plate thickness, 2023

Shares across in percent

Source	15 gauge	20 gauge	30 gauge	40 gauge	All thicknesses
U.S. producers	***	***	***	***	100.0
China	***	***	***	***	100.0
Japan	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table 4.12 (Continued) ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and plate thickness, 2023

Shares down in percent

Source	15 gauge	20 gauge	30 gauge	40 gauge	All thicknesses
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure 4.5 ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and plate thickness, 2023

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Geographical markets

Table 4.13 presents data on U.S. imports by source and border of entry in 2023. Imports from all sources entered through all borders of entry in 2023. The vast majority of U.S. imports from subject and nonsubject sources entered through the Eastern borders of entry in 2023.

Table 4.13 ALPs: U.S. imports by source and border of entry, 2023

Quantity in 1,000 square meters

Source	East	North	South	West	All borders
China	5,822	147	46	109	6,124
Japan	10,757	2,309	1,303	210	14,580
Subject sources	16,579	2,456	1,349	319	20,703
Nonsubject sources	26,747	612	144	125	27,627
All import sources	43,326	3,069	1,493	443	48,331

Table continued.

Table 4.13 (Continued) ALPs: U.S. imports by source and border of entry, 2023

Share in percent

Source	East	North	South	West	All borders
China	95.1	2.4	0.8	1.8	100.0
Japan	73.8	15.8	8.9	1.4	100.0
Subject sources	80.1	11.9	6.5	1.5	100.0
Nonsubject sources	96.8	2.2	0.5	0.5	100.0
All import sources	89.6	6.3	3.1	0.9	100.0

Table continued.

Table 4.13 (Continued) ALPs: U.S. imports by source and border of entry, 2023

Share in percent

Source	East	North	South	West	All borders
China	13.4	4.8	3.1	24.5	12.7
Japan	24.8	75.2	87.3	47.4	30.2
Subject sources	38.3	80.0	90.4	71.9	42.8
Nonsubject sources	61.7	20.0	9.6	28.1	57.2
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed July 9th, 2024. Imports are based on the imports for consumption data series.

Note: Imports are likely overstated because they may include out-of-scope merchandise and ***

Presence in the market

Table 4.14 and figures 4.6 and 4.7 present data on U.S. imports by source and month from January 2021 to March 2024. Imports from both aggregate subject sources and nonsubject sources were present in every month from January 2021 to March 2024. Imports from China were present in 37 of the 39 months in this period while imports from Japan and nonsubject sources were present in 39 of 39 months in this period.

Table 4.14 ALPs: Quantity of U.S. imports, by source and month

Quantity in 1,000 square meters

Year	Month	China	Japan	Subject	Nonsubject sources	All import sources
2021	January	0	90	90	4,735	4,825
2021	February	0	52	52	4,433	4,485
2021	March	1	311	312	5,379	5,691
2021	April	24	1,343	1,367	4,218	5,585
2021	May	3	478	481	3,790	4,272
2021	June	6	289	295	4,473	4,769
2021	July	56	337	393	5,231	5,624
2021	August	9	800	809	4,409	5,218
2021	September	81	520	601	4,136	4,737
2021	October	199	540	740	4,286	5,026
2021	November	180	388	568	4,183	4,751
2021	December	139	926	1,065	3,764	4,829
2022	January	50	1,352	1,401	3,747	5,148
2022	February	242	716	958	3,083	4,040
2022	March	353	1,389	1,742	6,188	7,929
2022	April	290	1,231	1,521	3,869	5,389
2022	May	240	396	636	3,065	3,701
2022	June	504	1,381	1,885	2,992	4,877
2022	July	748	836	1,584	3,416	5,000
2022	August	742	1,392	2,134	2,538	4,673
2022	September	99	976	1,076	3,964	5,040
2022	October	382	1,381	1,763	4,079	5,842
2022	November	646	2,120	2,765	3,654	6,420
2022	December	954	1,496	2,449	2,485	4,934

Table continued.

Table 4.14 (Continued) ALPs: Quantity of U.S. imports, by source and month

Quantity in 1,000 square meters

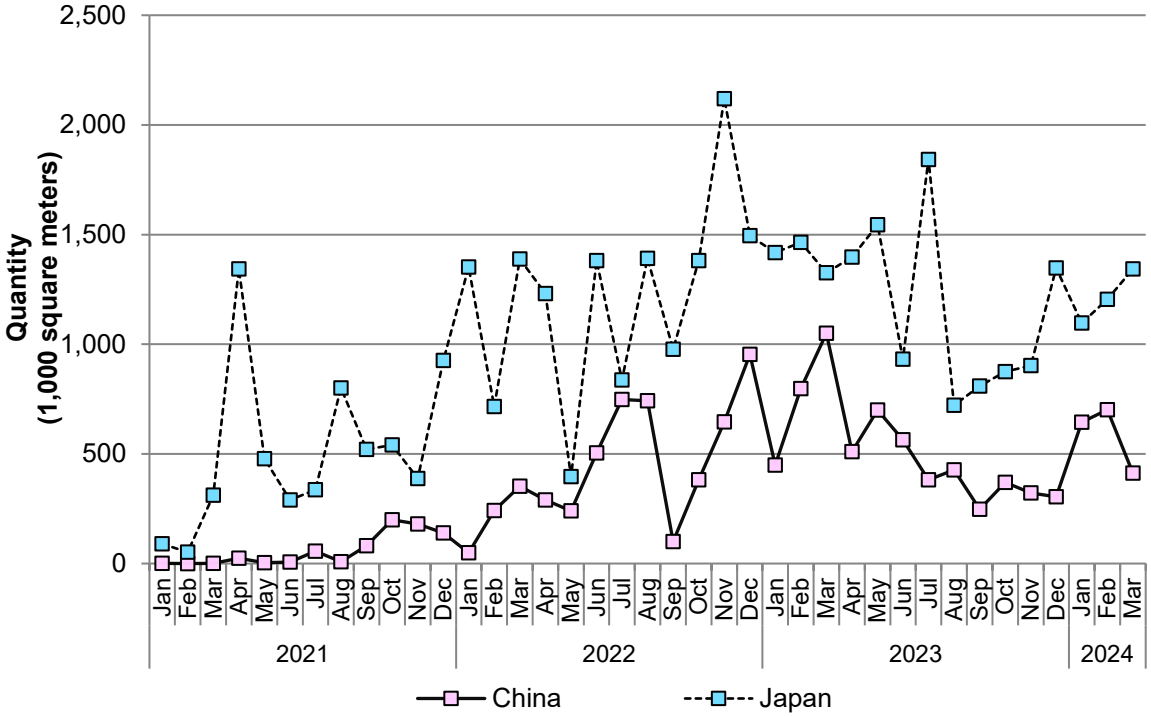
Year	Month	China	Japan	Subject	Nonsubject sources	All import sources
2023	January	449	1,418	1,867	3,061	4,928
2023	February	797	1,464	2,262	2,676	4,937
2023	March	1,050	1,326	2,376	2,430	4,805
2023	April	511	1,397	1,908	2,802	4,710
2023	May	700	1,544	2,245	2,104	4,349
2023	June	565	932	1,497	2,294	3,791
2023	July	382	1,842	2,224	2,175	4,399
2023	August	428	722	1,149	2,109	3,258
2023	September	247	810	1,057	1,796	2,852
2023	October	370	874	1,244	2,041	3,285
2023	November	321	902	1,223	1,928	3,152
2023	December	304	1,348	1,653	2,212	3,865
2024	January	645	1,097	1,741	1,826	3,568
2024	February	702	1,205	1,906	2,057	3,963
2024	March	412	1,344	1,755	2,456	4,211

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed July 9th, 2024. Imports are based on the imports for consumption data series.

Note: Imports are likely overstated because they may include out-of-scope merchandise and ***

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

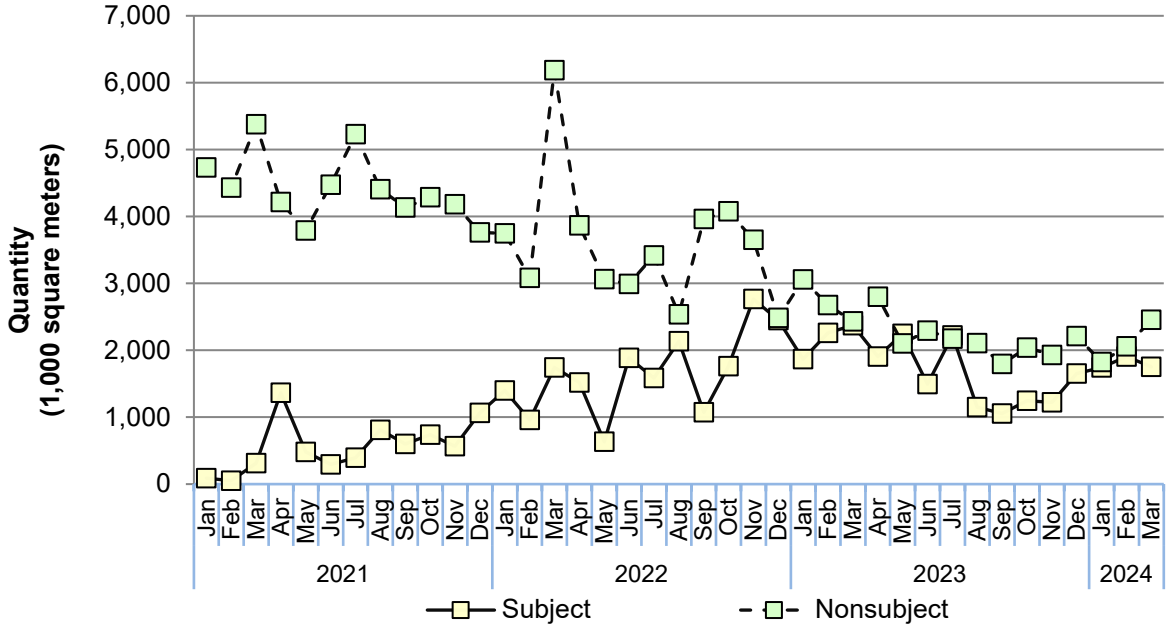
Figure 4.6 ALPs: U.S. imports from individual subject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed July 9th, 2024. Imports are based on the imports for consumption data series.

Note: Imports are likely overstated because they may include out-of-scope merchandise and ***

Figure 4.7 ALPs: U.S. imports from aggregated subject and nonsubject sources, by source and month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 3701.30.0000, accessed July 9th, 2024. Imports are based on the imports for consumption data series.

Note: Imports are likely overstated because they may include out-of-scope merchandise and ***

Apparent U.S. consumption and market shares

Quantity

Table 4.15 and figure 4.8 present data on apparent U.S. consumption and U.S. market shares by quantity for ALPs.[15] Apparent U.S. consumption, by quantity, decreased by *** percent from 2021 to 2023, and was *** percent lower in interim 2024 than in interim 2023. The share of quantity held by U.S. producers decreased by *** percentage points from 2021 to 2023 and was *** percentage points lower in interim 2024 than in interim 2023. The share of quantity held by subject imports increased by *** percentage points from 2021 to 2023 and was *** percentage points higher in interim 2024 than in interim 2023.[16] The share of

[15] Appendix F presents quantity data for apparent consumption utilizing *** U.S. shipments of U.S. produced ALPs. Data for U.S. producers presented in part 4 of this report utilizes U.S. producer *** transfers to ***.

[16] This is largely due to ***.

quantity held by nonsubject imports increased by *** percentage points from 2021 to 2023 and was *** percentage points lower in interim 2024 than in interim 2023.

Table 4.15 ALPs: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 square meters; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers: Eastman Kodak	Quantity	***	***	***	***	***
U.S. producers: Fujifilm	Quantity	***	***	***	***	***
U.S. producers: All firms	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers: Eastman Kodak	Share	***	***	***	***	***
U.S. producers: Fujifilm	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure 4.8 ALPs: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table 4.16 and figure 4.9 present data on apparent U.S. consumption and U.S. market shares by value for ALPs.[17] Apparent consumption by value decreased by *** percent from 2021 to 2023 and was *** percent lower in interim 2024 than in interim 2023. The share of value held by U.S. producers decreased by *** percentage points from 2021 to 2023 and was *** percentage points lower in interim 2024 than in interim 2023. The share of value held by subject imports increased by *** percentage points from 2021 to 2023 and was *** percentage points higher in interim 2024 than in interim 2023. The share of value held by nonsubject imports increased by *** percentage points from 2021 to 2023 but was *** percentage points lower in interim 2024 than in interim 2023.

[17] Appendix F presents value data for apparent consumption utilizing *** U.S. shipments of U.S. produced ALPs. Data for U.S. producers presented in part 4 of this report utilizes U.S. producer *** transfers to ***.

Table 4.16 ALPs: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers: Eastman Kodak	Value	***	***	***	***	***
U.S. producers: Fujifilm	Value	***	***	***	***	***
U.S. producers: All firms	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers: Eastman Kodak	Share	***	***	***	***	***
U.S. producers: Fujifilm	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure 4.9 ALPs: Apparent U.S. consumption based on value, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Part 5: Pricing data

Factors affecting prices

Raw material costs

The principal raw material used in the production of ALPs is aluminum. Published prices for aluminum increased by *** percent between January 2021 and March 2024 (figure 5.1 and table 5.1). Aluminum prices spiked in the first quarter of 2022 in part due to the Russian invasion of Ukraine and Russian producer Rusal shutting down production in the Nikolaev alumina refinery, which produced roughly 2.5 million tons annually.[1] The European energy crisis in the first quarter of 2022 suppressed aluminum production in Europe, while worldwide increased energy costs added to the cost of aluminum production elsewhere.[2] Aluminum prices began to decrease from their highest points starting in the second quarter of 2022 and generally decreased throughout the remainder of the period but remained above initial prices.

Figure 5.1 ALPs: Raw materials prices of Aluminum P1020A, by month, January 2021 to March 2024

* * * * * * *

Source: ***.

[1] MetalMiner, https://agmetalminer.com/2022/12/29/aluminum-prices-and-global-market-a-2022-review/, retrieved October 12, 2023.

[2] Ibid.

Table 5.1 ALPs: Raw materials prices of Aluminum P1020A, by month, January 2021 to March 2024

Prices in cents per pound

Month	2021	2022	2023	2024
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	***
May	***	***	***	***
June	***	***	***	***
July	***	***	***	***
August	***	***	***	***
September	***	***	***	***
October	***	***	***	***
November	***	***	***	***
December	***	***	***	***

Source: ***.

Transportation costs to the U.S. market

Transportation costs for ALPs shipped from subject countries to the United States averaged 6.7 percent for China and 5.5 percent for Japan during 2023. These estimates were derived from official import data and represent the transportation and other charges on imports.[3]

U.S. inland transportation costs

*** importers reported that they typically arrange transportation to their customers. The U.S. producer reported U.S. inland transportation costs of *** percent while importers reported costs of 3.0 to 4.4 percent.

Pricing practices

Pricing methods

*** and importers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists (table 5.2).

[3] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting number 3701.30.0000.

Table 5.2 ALPs: Count of U.S. producers' and importers' reported price setting methods

Count in number of firms reporting

Method	U.S. producers	Importers
Transaction-by-transaction	***	1
Contract	***	4
Set price list	***	2
Other	***	0
Responding firms	***	4

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

The responding U.S. producer sold most of its ALPs under *** while importers reported selling the vast majority of their ALPs in the spot market and under long-term contracts (table 5.3).

Table 5.3 ALPs: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Because of rounding, figures may not add to the totals shown.

***. It also reported that ***.

The majority of importers reported fixing price and quantity but renegotiating prices for long-term contracts. These importers also reported that they indexed prices to raw materials in long-term contracts. Importer *** reported that it used LME to index prices to raw materials.[4] The importer reported ***. It also reported that ***.

[4] ***.

One purchaser reported that it purchases product daily, five purchase weekly, and 18 purchase monthly. All 21 responding purchasers reported that their purchasing frequency had not changed since 2021. Most purchasers contact one to four suppliers before making a purchase.

Sales terms and discounts

The responding U.S. producer and the majority of importers typically quote prices on a ***. The responding U.S. producer reported offering *** discounts. Two importers reported offering quantity discounts, four reported offering total volume discounts and two reported offering other discounts. Importer *** reported offering discounts for purchase contracts lasting 12 months or more and importer *** reported offering discounts after review of a centralized pricing and control team review.

Price leadership

Thirteen purchasers did not report any price leaders in the ALPs market while 12 reported one or more price leaders including Fujifilm (listed by 8 firms), Agfa (7 firms), Kodak (4 firms), and ECO3 (3 firms). Purchaser *** reported that if Kodak changes its price other firms will follow to stay competitive. Purchaser *** reported that Fujifilm and Kodak were the two largest suppliers and changed prices in tandem with each other. Purchaser *** reported that Agfa was a price leader because it offered the lowest prices.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following ALPs products shipped to unrelated U.S. customers during January 2021 to March 2024.

Product 1.-- 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Product 2.-- 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Product 3.-- 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

One U.S. producer and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[5] [6] [7] Pricing data reported by these firms accounted for approximately *** percent of the U.S. producer's U.S. shipments of ALPs in 2023, *** percent of U.S. shipments of subject imports from China and *** percent of U.S. shipments of subject imports from Japan.[8] [9] Price data for products 1-3 are presented in tables 5.4 to 5.6 and figures 5.2 to 5.4.

Table 5.4 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

[5] Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

[6] ***.

[7] Appendix F presents import cost data for the three pricing products.

[8] Pricing coverage is based on U.S. shipments reported in questionnaires.

[9] Pricing data reported by these firms accounted for approximately *** percent of the U.S. producer's U.S. shipments of ALPs in 2023 if Fujifilm USA U.S.-produced sales data is included. Price data including Fujifilm USA's sales of U.S. produced ALPs are presented in Appendix H

Figure 5.2 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table 5.5 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Figure 5.3 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Table 5.6 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Figure 5.4 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Price trends

In general, prices increased during January 2021 to March 2024. Table 5.7 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2021 to March 2024 while import prices increased by *** for product 2 from Japan and decreased by *** percent for product 3 from Japan. Indexed prices are shown in tables 5.8 and 5.9 and figures 5.5 and 5.6.

Table 5.7 ALPs: Summary of price and purchase cost data, by product and source, January 2021 through March 2024

Prices in dollars per square meter; quantity in square meters; change in percent

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China	***	***	***	***	***	***	***
Product 1	Japan	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China	***	***	***	***	***	***	***
Product 2	Japan	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China	***	***	***	***	***	***	***
Product 3	Japan	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percent change column is percentage change from the first quarter 2021 to the last quarter in 2024.

Table 5.8 ALPs: Indexed U.S. producer prices, by quarter

Indexed prices in percent; 2021 Q1=100.0

Period	Product 1	Product 2	Product 3
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***
2023 Q1	***	***	***
2023 Q2	***	***	***
2023 Q3	***	***	***
2023 Q4	***	***	***
2024 Q1	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Figure 5.5 ALPs: Indexed U.S. producer prices, by quarter

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table 5.9 ALPs: ALPs: Indexed subject U.S. importer prices, by quarter

Indexed prices in percent; 2021 Q1=100.0

Period	Product 1	Product 2	Product 3
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***
2023 Q1	***	***	***
2023 Q2	***	***	***
2023 Q3	***	***	***
2023 Q4	***	***	***
2024 Q1	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Product 1 is not shown since no data were reported for Q4 2021.

Figure 5.6 ALPs: Indexed subject U.S. importer prices, by quarter

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1 is not shown since no data were reported for Q1 2021.

Price comparisons

As shown in table 5.10 through 5.12, prices for product imported from China were below those for U.S.-produced product in *** instances (*** square meters); margins of underselling ranged from *** to *** percent. In the remaining *** instances (*** square meters), prices for product from China were between *** and *** percent above prices for the domestic product. Prices for product imported from Japan were below those for U.S.-produced product in *** instances (*** square meters); margins of underselling ranged from *** to *** percent. In the remaining *** instances (*** square meters), prices for product from Japan were between *** and *** percent above prices for the domestic product.

Table 5.10 ALPs: Instances of underselling and overselling and the range and average of margins, by product

Quantity in square meters; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table 5.11 ALPs: Instances of underselling and overselling and the range and average of margins, by source

Quantity in square meters; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	***	***	***	***	***
Japan	Underselling	***	***	***	***	***
All subject sources	Underselling	***	***	***	***	***
China	Overselling	***	***	***	***	***
Japan	Overselling	***	***	***	***	***
All subject sources	Overselling	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table 5.12 ALPs: Instances and quantities of underselling/overselling and the range and average of margins, by period

Quantity in square meters; margin in percent

Period	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	Underselling	***	***	***	***	***
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024 Jan-Mar	Underselling	***	***	***	***	***
All periods	Underselling	***	***	***	***	***
2021	Overselling	***	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024 Jan-Mar	Overselling	***	***	***	***	***
All periods	Overselling	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of ALPs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of ALPs from China and Japan since January 1, 2020. One U.S. producer, Eastman Kodak, submitted lost sales and lost revenue allegations. It identified 13 firms with which it lost sales or revenue (six consisting of lost sales allegations and seven consisting of lost revenue allegations).

In the final phase of the investigations, the responding U.S. producer reported that it had to roll back announced price increases and that it had lost sales.

Staff contacted 37 purchasers and received responses from 25 purchasers.[10] [11] Responding purchasers reported purchasing 34.8 million square meters of ALPs during January 2021 to March 2024 (table 5.13).

Of the 25 responding purchasers, 19 reported that, since 2021, they had purchased imported ALPs from China or Japan instead of U.S.-produced product. Five of these purchasers reported that subject import prices were lower than U.S.-produced product, and two of these

[10] Four additional purchasers submitted lost sales lost revenue survey responses in the preliminary phase, but did not submit purchaser questionnaire responses in this final phase proceeding.

[11] Staff contacted nine additional purchasers following the hearing. Staff received two additional questionnaires from ***.

purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product (table 5.15). These two purchasers estimated the quantity of ALPs from China and Japan purchased instead of domestic product were *** square meters (table 5.14). Purchasers identified quality, production facility closings, and service and support as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 25 responding purchasers, none reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries. Six purchasers reported that they did not know (table 5.16).

Table 5.13 ALPs: U.S. purchasers' reported purchases and imports, by firm and source

Quantity in square meters; change in shares in percentage points

Purchaser	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject country share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	17,161,898	7,035,967	10,624,783	(36.1)	34.4

Source: Compiled from data submitted in response to Commission questionnaires.

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table 5.14 ALPs: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in square meters

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--19; No--4	Yes--5; No--14	Yes--2; No--17	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: *** narrative on the reasons for purchasing imports: ***

Note: *** reported purchasing 475,008 square meters of ALPs from subject countries instead of U.S. produced ALPs. *** reported that these ALPs purchased from subject countries were lower priced than ALPs produced in the United States but that price was not the primary reason that they chose to purchase subject imports instead of domestic product.

Table 5.15 ALPs: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Count in number of firms reporting; quantity in 1,000 square meters

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	14	4	1	***
Japan	11	3	1	***
Subject sources	19	5	2	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 5.16 ALPs: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Reported producers lowered prices	Estimated percent of U.S. price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes--0; No--18	***	NA

Source: Compiled from data submitted in response to Commission questionnaires.

Part 6: Financial experience of U.S. producers

Background[1]

Two U.S. producers provided usable financial results on their ALP operations. *** of the U.S. producers provided *** financial data on a calendar-year and GAAP basis. Staff verified the results of Eastman Kodak with its corporate records and all adjustments were incorporated into this report.[2]

Commercial sales accounted for *** percent, *** percent, and *** percent of total ALP net sales, by quantity, in 2021, 2022, and 2023, respectively. Transfers to related firms, which were reported by ***, accounted for ***. Transfers to related firms are included in the financial data, but not shown separately in this section of the report.[3]

[1] The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] Staff verification report, Eastman Kodak, September 25, 2024. The company's U.S. producer questionnaire response included revisions to the following items: ***. These revisions are discussed in more detail in the relevant sections. Ibid, p. 4.

[3] ***. *** U.S. producer questionnaire response, section II-12. In order to provide the values of these transfers to related firms at fair market value, staff has relied on ***. *** U.S. producer questionnaire response, section III-19 ***.

The composition of the ALP industry in the United States has changed somewhat during the period examined.[4] [5] [6] Figure 6.1 presents each responding firm's share of the total reported net sales quantity in 2021, 2022, and 2023.

Figure 6.1 ALPs: U.S. producers' share of net sales quantity, by firm and year

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

[4] Southern Litho ceased its domestic ALP operations in 2021 and did not provide a response to the U.S. producers' questionnaire. The firm's data are not included in the aggregated financial data or any narrative responses.

[5] Eastman Kodak acquired the service and parts assets of Southern Litho in 2020 and took over the servicing of Southern Litho's accounts beginning August 1, 2021. (Eastman Kodak did not acquire any of Southern Litho's physical assets). https://www.kodak.com/en/company/press-release/kodak-acquires-southern-lithoplate-service-parts-assets/. ***. Petitioner's postconference brief, p. 11

[6] Fujifilm closed its Greenwood, South Carolina facility and stopped producing ALPs in the United States in early 2022. Fujifilm indicated that the closure was the result of a strategic consolidation of Fujifilm's global operations due to declining demand in the printing and photo industry. Conference transcript, p. 125 (Beaty); Hearing transcript, pp. 127-131; Fujifilm's prehearing brief, pp. 13-14.

Operations on ALPs

Table 6.1 presents aggregated data on U.S. producers' operations in relation to ALPs, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data.

Table 6.1 ALPs: U.S. producers' results of operations, by item and period

Quantity in 1,000 square meters; value in 1,000 dollars; ratios in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Aluminum sheet cost	Value	***	***	***	***	***
COGS: Other raw materials	Value	***	***	***	***	***
COGS: Total raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Less scrap revenue	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expenses/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Aluminum sheet cost	Ratio to NS	***	***	***	***	***
COGS: Other raw materials	Ratio to NS	***	***	***	***	***
COGS: Total raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Less scrap revenue	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table 6.1 (Continued) ALPs: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per square meter; count in number of firms reporting; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
COGS: Aluminum sheet cost	Share	***	***	***	***	***
COGS: Other raw materials	Share	***	***	***	***	***
COGS: Total raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
COGS: Aluminum sheet cost	Unit value	***	***	***	***	***
COGS: Other raw materials	Unit value	***	***	***	***	***
COGS: Total raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Less scrap revenue	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS before scrap offset. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table 6.2 ALPs: Changes in AUVs between comparison periods

Changes in percent; interim is January to March

Item	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲***	▲***	▲***	▲***
COGS: Aluminum sheet cost	▲***	▲***	▼***	▼***
COGS: Other raw materials	▲***	▲***	▼***	▲***
COGS: Total raw materials	▲***	▲***	▼***	▼***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▼***	▼***
COGS: Less scrap revenue	▲***	▲***	▼***	▲***
COGS: Total	▲***	▲***	▼***	▼***

Table continued.

Table 6.2 (Continued) ALPs: Changes in AUVs between comparison periods

Changes in dollars per square meter; interim is January to March

Item	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲***	▲***	▲***	▲***
COGS: Aluminum sheet cost	▲***	▲***	▼***	▼***
COGS: Other raw materials	▲***	▲***	▼***	▲***
COGS: Total raw materials	▲***	▲***	▼***	▼***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▼***	▼***
COGS: Less scrap revenue	▲***	▲***	▼***	▲***
COGS: Total	▲***	▲***	▼***	▼***
Gross profit or (loss)	▲***	▼***	▲***	▲***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▲***	▼***	▲***	▲***
Net income or (loss)	▲***	▲***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table 6.3 ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 square meters; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit (less) scrap revenue

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) ALPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per square meter; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Net sales

As shown in table 6.1, total net sales quantity decreased from *** square meters in 2021 to *** square meters in 2022 and to *** square meters in 2023, a total decrease of *** percent from 2021 to 2023. The decrease in net sales volume between 2021 and 2022 was ***, reflecting the ***.[7] The decline between 2022 and 2023 is attributable to ***. Total net sales volume was lower in interim 2024, at *** square meters, than in interim 2023, at *** square meters.

Net sales value declined each year between 2021 and 2023, from $*** in 2021 to $*** in 2022, and to $*** in 2023. It was lower in interim 2024, at $***, than in interim 2023, at $***. The decline in net sales value from 2021 to 2022 was ***. Both companies reported a decrease in net sales value between 2022 and 2023, ***.

[7] *** reported a *** in its net sales quantity between 2021 and 2022.

On an average per-square meter basis, net sales values increased from $*** in 2021 to $*** in 2023 and were higher in interim 2024, at $***, compared with interim 2023, at $***. There was some variability in the directional trends of the net sales AUVs between the firms. ***'s net sales AUV decreased from 2021 to 2022, whereas *** reported an increase each year from 2021 to 2023, and a higher net sales AUV in interim 2024 relative to interim 2023.[8]

Cost of goods sold and gross profit or loss

Raw material costs, the *** component of COGS, accounted for between *** and *** percent of total COGS during the period examined. On a total value basis, raw material costs decreased from 2021 to 2023 and were lower in interim 2024 than in interim 2023, which is consistent with the *** decreases in net sales volume during this time. On a per-square meter basis, raw material costs increased from $*** in 2021 to $*** in 2022, decreased to $*** in 2023, and were lower in interim 2024, at $***, than in interim 2023, at $***. Aluminum sheet costs comprised the majority of total raw material costs during the period examined (approximately *** percent). They were also the main driver in the directional trends, which were consistent with published price trends for aluminum (see Part 5 for further information). As a ratio to net sales, total raw material costs increased from *** percent in 2021 to *** percent in 2022, decreased to *** percent in 2023, and were lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[9]

[8] Eastman Kodak discussed the increase in its prices in its 2023 Form 10-K. The company explained that it has "implemented various pricing actions to mitigate the impact of increased manufacturing costs, primarily within its Print and Advanced Materials and Chemicals segments. Largely beginning in the latter part of the second quarter of 2021, in order to mitigate the impact of higher aluminum, energy and packaging costs within Prepress Solutions, the Print segment implemented surcharges on purchases of plates that continue to be periodically reviewed and adjusted accordingly." Eastman Kodak's 2023 Form 10-K, p.35 (as filed).

[9] ***. *** preliminary phase U.S. producers' questionnaire response, sections III-6, III-7a, and III-7b.

Direct labor costs, the *** component of COGS during the period examined, decreased overall from 2021 to 2023, primarily because ***. On an average per-square meter basis, direct labor costs increased from $*** in 2021 to $*** in 2023 and were higher in interim 2024, at $***, compared with $*** in interim 2023. As shown in table 6.3, *** direct labor AUVs increased *** in 2022 due to ***. As a ratio to net sales values, direct labor costs increased irregularly from *** percent in 2021 to *** percent in 2023 and were higher in interim 2024, at *** percent, than in interim 2023, at *** percent.

Other factory costs, *** component of COGS during the period examined, decreased on a total value basis between 2021 and 2023, and were lower in interim 2024 than in interim 2023. On an average per-square meter basis, other factory costs increased from $*** in 2021 to $*** in 2022, decreased to $*** in 2023, and were essentially unchanged between the comparable interim periods. As shown in table 6.3, while ***. As a ratio to net sales, other factory costs increased from *** percent in 2021 to *** percent in 2022, and then decreased to *** percent in 2023. They were lower in interim 2024, at *** percent, compared to *** percent in interim 2023.

*** of the U.S. producers reported receiving revenue from aluminum scrap created during the ALP production process. This revenue is classified as a reduction of COGS in the financial results in this section.[10] The average value of the scrap revenue per-square meter of ALPs sold increased from $*** in 2021 to $*** in 2022, decreased to $*** in 2023, and was higher in interim 2024, at $***, than in interim 2023, at $***.

Total COGS, net of scrap revenue, decreased from 2021 to 2023, and was lower in interim 2024 than in interim 2023. On an average per-square meter basis, total COGS increased from $*** in 2021 to $*** in 2022, decreased to $*** in 2023, and was lower in interim 2024, at $***, than in interim 2023, at $***. As a ratio to net sales, total COGS increased from *** percent in 2021 to *** percent in 2022, decreased to *** percent in 2023, and was lower in interim 2024, at *** percent, than in interim 2023, at *** percent.

[10] ***. U.S. producer questionnaire responses, section III-8b.

As shown in table 6.1, gross profit decreased from $*** in 2021 to $*** in 2022, increased to $*** in 2023, and was higher in interim 2024, at $***, than in interim 2023, at $***. As a ratio to net sales, gross profit decreased from *** percent in 2021 to *** percent in 2022, returned to *** percent in 2023, and was higher in interim 2024, at *** percent, than in interim 2023, at *** percent. As shown in table 6.3, ***. Conversely, ***.

SG&A expenses and operating income or loss

U.S. producers' SG&A expenses decreased from 2021 to 2023 but were higher in interim 2024 than in interim 2023. As shown in table VI-3, the two U.S. producers' directional trends for SG&A expenses varied.[11] ***'s SG&A expenses increased each year from 2021 to 2023 and were higher in interim 2024 than in interim 2023. ***'s SG&A expenses decreased from 2021 to 2022.[12] The corresponding SG&A expense ratio (total SG&A expenses divided by total sales value) decreased from *** percent in 2021 to *** percent in 2022 and 2023, and was higher in interim 2024, at *** percent than in interim 2023, at *** percent.

U.S. producers' operating income decreased from $*** in 2021 to *** $*** in 2022, improved to $*** in 2023, and was higher in interim 2024 at $*** compared to $*** in interim 2023. As a ratio to net sales, operating income decreased from *** percent in 2021 to *** percent in 2022, increased to *** percent in 2023, and was higher in interim 2024, at *** percent, than in interim 2023, at *** percent.

[11] ***. ***.

[12] As previously discussed, ***. Emails from ***, October 18 and October 19, 2023; *** U.S. producer questionnaire response, ***.

As shown in table 6.3, the year-to-year directional trends for operating income between 2021 and 2023 were ***. ***.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expenses, and other income. Interest expense, other expenses, and other income were combined and only the net amount is shown.[13] The net amount decreased from $*** in 2021 to *** $*** in 2022, increased to $*** in 2023, and was higher in interim 2024 ($***) than in interim 2023 (*** $***). The *** indicate that ***.[14] [15]

[13] ***.

[14] ***. *** U.S. producer questionnaire response, sections III-10a and III-10b.

[15] *** *** U.S. producer questionnaire response, sections III-10a and III-10b, and email from ***, October 20, 2023.

Net income improved from *** $*** in 2021 to *** $*** in 2023 but was lower in interim 2024, *** $***, than in interim 2023, at $***. As a ratio to net sales, net income improved from *** percent in 2021 to *** percent in 2023 but was lower in interim 2024, at *** percent, compared to *** percent in interim 2023. As with operating income, aggregate net income was ***.[16] [17] [18]

Capital expenditures and research and development expenses

Tables 6.4 and 6.5 present capital expenditures and R&D expenses, by firm. Table 6.6 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures.[19] Total capital expenditures and R&D expenses were ***. Capital expenditures and R&D expenses increased overall from 2021 to 2023 but were lower in interim 2024 than in interim 2023.

Table 6.4 ALPs: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeros, null values, and undefined calculations are suppressed and shown as "---".

[16] The company's ***.

[17] ***.

[18] A variance analysis is not shown due to ***.

[19] ***. ***.

Table 6.5 ALPs: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; interim is January to March

Firm	2021	2022	2023	Interim 2023	Interim 2024
Eastman Kodak	***	***	***	***	***
Fujifilm	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeros, null values, and undefined calculations are suppressed and shown as "---".

Table 6.6 ALPs: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Eastman Kodak	***
Fujifilm	***

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table 6.7 presents data on the U.S. producers' total assets while table 6.8 presents their operating ROAs.[20] Table 6.9 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets decreased between 2021 and 2023. The decrease between 2021 and 2022 was ***.[21]

[20] The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

[21] ***. ***.

Table 6.7 ALPs: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023
Eastman Kodak	***	***	***
Fujifilm	***	***	***
All firms	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeros, null values, and undefined calculations are suppressed and shown as "---".

Table 6.8 ALPs: U.S. producers' ROA, by firm and period

Ratio in percent

`	2021	2022	2023
Eastman Kodak	***	***	***
Fujifilm	***	***	***
All firms	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeros, null values, and undefined calculations are suppressed and shown as "---". ***.

Table 6.9 ALPs: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Eastman Kodak	***
Fujifilm	***

Source: Compiled from data submitted in response to Commission questionnaires.

Capital and investment

The Commission requested U.S. producers of ALPs to describe any actual or potential negative effects of imports of ALPs from China and Japan on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.10 presents the number of firms reporting an impact in each category and table 6.11 provides the U.S. producers' narrative responses.

Table 6.10 ALPs: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2021, by effect

Count in number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 6.11 ALPs: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2021, by firm and effect

Item	Firm name and narrative on impact of imports
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part 7: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to nine firms believed to produce and/or export ALPs from China[3] and three firms believed to produce and/or export ALPs from Japan. The Commission received four usable questionnaire responses: two from producer/exporters in China,[4] and two from producer/exporters from Japan.[5]

These responding producer/exporters in China accounted for *** U.S. imports of ALPs from China in 2023 while the responding producer/exporters in Japan accounted for *** percent of U.S. imports of ALPs from Japan in 2023.[6] Additionally, the responding producer/exporters from China estimated that they accounted for approximately *** percent of overall production of ALPs in China[7] in 2023, and the two responding producer/exporters collectively estimate that they accounted for *** of production of ALPs in Japan in 2023.[8]

Tables 7.1, 7.2, and 7.3 present information on the ALPs operations of the responding producers, exporters, and resellers in China and Japan in 2023. Both tables include breakouts by production, production shares, exports to the United States, exports to the United States shares, total shipments, and total shipment shares. The 2023 production of one responding producer in Japan accounted for *** percent of total reported 2023 production of subject merchandise from China and Japan combined and *** percent of reported 2023 exports of subject merchandise to the United States.

[3] These firms were identified through a review of information submitted in the petition and presented in third-party sources.

[4] One foreign producer, *** also reported limited resales of ALPs produced by another entity ***. ***. Email from ***, August 28, 2024.

[5] Additionally, two firms (***) submitted a response certifying that they had not produced or exported ALPs from China or Japan since January 1, 2021.

[6] These estimates were calculated using data from questionnaire responses to the Commission.

[7] Foreign producers' questionnaire response, section II-7a.

[8] The responding producers/exporters from Japan estimated that they collectively account for *** percent of ALPs production in Japan. Since firms often don't have access to data about their home market, estimates may add up to more the 100 percent.

Table 7.1 ALPs: Summary data for subject producers, 2023

Firm and (subject country)	Production (1,000 square meters)	Share of reported production (percent)	Exports to the United States (1,000 square meters)	Share of reported exports to the United States (percent)	Total shipments (1,000 square meters)	Share of firm's total shipments exported to the United States (percent)
ECO3 (China)	***	***	***	***	***	***
Fujifilm (China)	***	***	***	***	***	***
Kodak (Japan)	***	***	***	***	***	***
Fujifilm (Japan)	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.2 ALPs: Summary data for foreign resellers in China, by firm, 2023

Reseller and (subject country)	Resales exported to the United States (1,000 square meters)	Share of resales exported to the United States (percent)
Fujifilm (China)	***	100.0
All individual resellers	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.3 Summary data for subject foreign producers, by industry, 2023

Subject country	Production (1,000 square meters)	Share of reported production (percent)	Exports to the United States (1,000 square meters)	Share of reported exports to the United States (percent)	Total shipments (1,000 square meters)	Share of firm's total shipments exported to the United States (percent)
China	***	***	***	***	***	***
Japan	***	***	***	***	***	***
All subject countries	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of ALPs since 2021. Three producers, *** indicated in their questionnaires that they had experienced such changes. Two of the producers reported plant closings and expansions, one reported acquisitions. Tables 7.4 and 7.5 present the changes identified by these producers.

Table 7.4 ALPs: Count of reported changes in operations since January 1, 2021, by subject foreign producing country and type of change in operation

Count in number of firms reporting

Item	China	Japan	Subject producers
Plant openings	***	***	0
Plant closings	***	***	2
Prolonged shutdowns	***	***	0
Production curtailments	***	***	0
Relocations	***	***	0
Expansions	***	***	1
Acquisitions	***	***	1
Consolidations	***	***	0
Weather-related or force majeure events	***	***	0
Other	***	***	0
Any change	***	***	3

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.5 ALPs: Reported changes in operations in subject countries since January 1, 2021, by reported change category and firm

Item	Firm name (subject country) and accompanying narrative response regarding changes in operations
Plant closings	***
Plant closings	***
Expansions	***
Acquisitions	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on ALPs

Table 7.6 presents data on subject producers' installed capacity, practical overall capacity, and practical ALPs capacity and production on the same equipment. The subject producers ***, therefore, reported practical overall and practical ALPs capacity data were identical. Subject producers' aggregate installed capacity rose during the period from approximately *** square meters in 2021 to *** square meter in 2023, an increase of *** percent in installed capacity during the period.[9] Practical capacity increased by *** percent or by *** square meters from 2021 to 2023, while it was lower by *** percent or by *** square meters in interim 2024 compared to interim 2023.[10]

[9] Although *** accounted for the largest share of the total aggregate installed capacity, *** had the largest increase at *** percent from 2021 to 2023.

[10] *** explained that there were a couple of reasons for the capacity trends. ***. Email from ***, October 9, 2024.

Subject producers' ALPs production decreased irregularly across the period (increasing from approximately *** square meters in 2021 to *** square meters in 2022, before decreasing to *** square meters in 2023) with an overall decrease of *** percent from 2021 to 2023. As a result, subject producers' practical capacity utilization ratios decreased *** percentage points across the period from *** percent in 2021, to *** percent in 2022, then to *** percent in 2023, while interim practical capacity was higher interim 2024 than in interim 2023.

Table 7.6 ALPs: subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Quantity in 1,000 square meters; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical ALPs	Capacity	***	***	***	***	***
Practical ALPs	Production	***	***	***	***	***
Practical ALPs	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.7 presents subject producers' reported capacity constraints since January 1, 2021.

Table 7.7 ALPs: subject producers' reported capacity constraints since January 1, 2021

Item	Firm name (subject country) and narrative response on constraints to practical overall capacity
Existing labor force	***
Fuel or energy	***
Other constraints	***
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.8 presents information on the ALPs operations of the responding subject producers and exporters. As previously shown in table 7.6, subject foreign producers' practical capacity increased during the period by *** percent while production decreased irregularly by *** percent from 2021 to 2023.

Subject foreign producers' exports to the United States increased irregularly over the period, nearly doubling from approximately *** square meters in 2021 to *** square meters in 2022, before decreasing to *** square meters in 2023 (an overall increase of *** percent from 2021 to 2023). Subject exports to the United States accounted for *** percent of total shipments in 2023, a share which responding producers projected a decrease to *** percent in 2024 and to *** percent in 2025. Three of four producers' exports to the United States increased from 2021 to 2023 ***, while *** did not export to the United States during the period.

The producers collectively projected that 2024 exports to the United States would be *** percent lower in 2024 than 2023 and that 2025 exports would decrease again by *** percent from 2024 projected figures. Two of the three responding producer/exporters to the U.S. projected a decrease in export volumes in 2025, while *** did not report projected export volumes in 2025. Foreign producers' home market shipments accounted for *** percent of total shipments in 2023 and steadily declined during the period, with an overall decrease of *** percent from 2021 to 2023. While home market shipments accounted for at least *** of total shipments in all full year periods, exports to other markets accounted for approximately a *** of total shipments from 2021 to 2023 and are projected to increase in 2024 and 2025.

Table 7.8 ALPs: Data on subject country, by period

Quantity in 1,000 square meters; ratio and share in percent; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

Table continued.

Table 7.8 (Continued) ALPs: Data on subject country, by item and period

Quantity in 1,000 square meters; ratios in percent; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	***	***	***	***	***	***
Total exports to the United States by producers	***	***	***	***	***	***	***
Total exports to the United States by resellers	***	***	***	***	***	***	***
Adjusted total shipments exported to the United States	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table 7.9 presents information on the ALPs practical capacity, production, capacity utilization, and production shares by country. As a share of aggregate production, China represented *** and *** percent of total production in 2021 and 2023, respectively, while Japan's ALPs production represented *** and *** percent of reported production in 2021 and 2023, respectively. The aggregate share of ALPs production in China is projected to rise to *** percent in 2025 while projections for the share of production in Japan are expected to decrease to *** percent in the same period.

Practical ALPs capacity in China increased by *** percent from 2021 to 2023 with *** accounting for *** of the capacity growth since ***'s capacity has remained unchanged throughout the period. Projections for China's capacity in 2024 and 2025 are expected to be at approximately the same levels as 2023. Practical capacity for ALPs in Japan grew modestly by *** percent from 2021 to 2023 and is accounted entirely by ***. Capacity projections for Japan in 2024 and 2025 are lower than reported capacity in 2023.

Production of ALPs in China increased irregularly from 2021 to 2023 by *** percent across the period and is projected to increase to higher levels in 2024 and 2025 than levels in 2023. *** accounts for the vast majority of the ALPs production in Japan. Together, the two responding producers in Japan reported a decrease of *** percent in production from 2021 to 2023. Japanese producers projected that production in 2024 will be *** percent higher than in 2023 and then decline by *** percent in 2025 from the previous year.

Table 7.9 ALPs: Subject countries' output, by source and period

Practical capacity

Quantity in 1,000 square meters

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.9 (Continued) ALPs: Subject countries' output, by source and period

Production

Quantity in 1,000 square meters

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.9 (Continued) ALPs: Subject countries' output, by source and period

Capacity utilization

Ratios in percent

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.9 (Continued) ALPs: Subject countries' output, by source and period

Share of production

Shares in percent

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	43.0	40.6	48.0	50.4	50.6	51.5	54.3
Japan	57.0	59.4	52.0	49.6	49.4	48.5	45.7
All subject countries	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.10 ALPs: Subject countries' exports, by source and period

Exports to the United States

Quantity in 1,000 square meters

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.10 (Continued) ALPs: Subject countries' exports, by source and period

Share of total shipments exported to the United States

Share in percent

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.10 (Continued) ALPs: Subject countries' exports, by source and period

Total exports

Quantity in 1,000 square meters

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Table continued.

Table 7.10 (Continued) ALPs: Subject countries' exports, by source and period

Share of total shipments exported

Share in percent

Country	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***
All subject countries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

The four responding firms in China and Japan did not report other production on the same machinery used to produce ALPs. Additionally, all four firms reported they do not have the ability to switch production between ALPs and other products using the same machinery.

Exports

Table 7.11 presents Global Trade Atlas ("GTA") data for exports of "photographic plates and flat film," a category that includes ALPs and out-of-scope merchandise, from subject countries to the United States and to all destination markets.

Table 7.11 : Photographic plates and flat film: Global exports from subject exporters: Exports to the United States, by exporter and period

Value in 1,000 dollars

Exporter	2021	2022	2023
China	5,081	22,790	27,812
Japan	45,165	77,703	54,887
Subject exporters	50,246	100,493	82,699

Table continued.

Table 7.11 (Continued): Photographic plates and flat film: Global exports from subject exporters: Exports to all destination markets, by exporter and period

Value in 1,000 dollars

Exporter	2021	2022	2023
China	721,350	891,333	787,987
Japan	496,072	468,775	455,794
Subject exporters	1,217,423	1,360,108	1,243,781

Table continued.

Table 7.11 (Continued): Photographic plates and flat film: Global exports from subject exporters: Share of exports to the United States, by exporter and period

Share in percent

Exporter	2021	2022	2023
China	0.7	2.6	3.5
Japan	9.1	16.6	12.0
Subject exporters	4.1	7.4	6.6

Source: Official exports statistics for China and Japan under HS subheadings 3701.30, as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 18, 2024.

Note: Shares represent the shares of value exported to the United States out of all destination markets.

U.S. inventories of imported merchandise

Table 7.12 presents data on U.S. importers' reported end-of-period inventories of imported ALPs. Inventories of imports from subject sources increased by *** percent from 2021 to 2023 but was lower by *** percent in interim 2024 compared to interim 2023. Subject inventory ratios to U.S. shipments were *** percent in 2023 and *** percent to total shipments in the same year.[11]

Table 7.12 ALPs: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 square meters; ratio in percent; interim is January to March

Measure	Source	2021	2022	2023	Interim 2023	Interim 2024
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total Shipments of imports	China	***	***	***	***	***
Inventories quantity	Japan	***	***	***	***	***
Ratio to imports	Japan	***	***	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***	***	***
Ratio to total Shipments of imports	Japan	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total Shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total Shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total Shipments of imports	All	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

[11] *** accounted for the majority of the inventories, while ***.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of ALPs from China and Japan after March 31, 2024. The five responding importers' reported data is presented in table 7.13.

Table 7.13 ALPs: U.S. importers' arranged imports, by source and period

Quantity in 1,000 square meters

Source	Apr-Jun 2024	Jul-Sep 2024	Oct-Dec 2024	Jan-Mar 2025	Total
China	***	***	***	***	***
Japan	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Third-country trade actions[12]

In May 2023, Taiwan initiated an anti-dumping investigation on Chinese imports of offset printing plates; this investigation is still ongoing. In April 2021, South Korea imposed antidumping duties between 3.60 percent and 7.61 percent on presensitized aluminum plate with double-layered coating for offset printing applications from China. In May 2019, India imposed antidumping duties on digital offset printing plates from China, Japan, South Korea, Taiwan, and Vietnam with a rate of $0.77 per square meter. In May 2021, Brazil extended antidumping duties on presensitized offset aluminum printing plates from China, Hong Kong, the European Union, and the United States with an applied rate of $2.35 per kilogram.

[12] Unless otherwise noted, information in this section was obtained using the World Trade Organization's database of anti-dumping investigations. For more information see https://trade-remedies.wto.org/en/antidumping/investigations.

Information on nonsubject countries

During the period for which data were collected, major global suppliers of ALPs had production facilities in several nonsubject countries including ECO3 in Brazil and Germany; Eastman Kodak in Germany; and Fujifilm in the Netherlands.[13] Table 7.14 presents global export data for aluminum lithographic printing plates and some out-of-scope products by source in descending order of value for 2023. China is the largest global exporter representing 27.4 percent of global export value for 2023. The next three leading exporters in 2023, by value, were Germany, Japan, and Belgium. When paired with China, these four countries represent 75 percent of global export value in 2023.

[13] Fujifilm ceased production operations at its Tilburg facility in 2023. Fujifilm, "Restructuring Fujifilm in Tilburg," November 24, 2022. https://www.fujifilm.com/ef/en/news/restructuring-fujifilm-in-tilburg, retrieved October 3, 2024.

Table 7.14 Photographic plates and flat film (of material other than paper, paperboard or textiles) nesoi, with any side exceeding 255 mm, sensitized, unexposed: Global exports by exporter and period

Value in 1,000 dollars; share in percent

Exporting country	Measure	2021	2022	2023
United States	Value	329,514	287,888	292,306
China	Value	721,350	891,333	787,987
Japan	Value	496,072	468,775	455,794
Subject exporters	Value	1,217,423	1,360,108	1,243,781
Germany	Value	662,599	610,556	557,643
Belgium	Value	347,031	370,388	332,542
Netherlands	Value	182,365	214,096	137,995
South Korea	Value	39,506	41,290	61,298
Spain	Value	40,353	31,980	34,383
Taiwan	Value	22,692	28,215	31,566
Brazil	Value	20,255	24,956	23,388
Singapore	Value	2,654	7,500	18,568
United Kingdom	Value	27,434	27,832	17,545
All other exporters	Value	112,268	118,274	124,323
All reporting exporters	Value	3,004,094	3,123,082	2,875,336
United States	Share	11.0	9.2	10.2
China	Share	24.0	28.5	27.4
Japan	Share	16.5	15.0	15.9
Subject exporters	Share	40.5	43.6	43.3
Germany	Share	22.1	19.5	19.4
Belgium	Share	11.6	11.9	11.6
Netherlands	Share	6.1	6.9	4.8
South Korea	Share	1.3	1.3	2.1
Spain	Share	1.3	1.0	1.2
Taiwan	Share	0.8	0.9	1.1
Brazil	Share	0.7	0.8	0.8
Singapore	Share	0.1	0.2	0.6
United Kingdom	Share	0.9	0.9	0.6
All other exporters	Share	3.7	3.8	4.3
All reporting exporters	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 3701.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 18, 2024.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2023 data.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
88 FR 68669, October 4, 2023	*Aluminum Lithographic Printing Plates From China and Japan; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-10-04/pdf/2023-21930.pdf
88 FR 73313, October 25, 2023	*Aluminum Lithographic Printing Plates From the People's Republic of China: Initiation of Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2023-10-25/pdf/2023-23531.pdf
88 FR 73316, October 25, 2023	*Aluminum Lithographic Printing Plates From the People's Republic of China and Japan: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-10-25/pdf/2023-23530.pdf
88 FR 80338, November 17, 2023	*Aluminum Lithographic Printing Plates From China and Japan*	https://www.govinfo.gov/content/pkg/FR-2023-11-17/pdf/2023-25402.pdf
88 FR 85219, December 7, 2023	*Aluminum Lithographic Printing Plates From the People's Republic of China: Postponement of Preliminary Determination in the Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2023-12-07/pdf/2023-26876.pdf
89 FR 11248, February 14, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China and Japan: Postponement of Preliminary*	https://www.govinfo.gov/content/pkg/FR-2024-02-14/pdf/2024-03071.pdf

Citation	Title	Link
	Determinations in the Less-Than-Fair-Value Investigations	
89 FR 15134, March 1, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.govinfo.gov/content/pkg/FR-2024-03-01/pdf/2024-04392.pdf
89 FR 24433, April 8, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Preliminary Determination of Critical Circumstances, in Part, in the Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2024-04-08/pdf/2024-07346.pdf
89 FR 26125, April 15, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Preliminary Determination of Critical Circumstances, in Part, in the Countervailing Duty Investigation; Correction*	https://www.govinfo.gov/content/pkg/FR-2024-04-15/pdf/2024-07903.pdf
89 FR 35062, May 1, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, and Postponement of Final Determination and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09457.pdf

Citation	Title	Link
89 FR 35065, May 1, 2024	*Aluminum Lithographic Printing Plates From Japan: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09456.pdf
89 FR 41993, May 14, 2024	*Aluminum Lithographic Printing Plates From China and Japan; Scheduling of the Final Phase of Antidumping and Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-05-14/pdf/2024-10502.pdf
89 FR 47516, June 3, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Amended Preliminary Determination of the Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2024-06-03/pdf/2024-12117.pdf
89 FR 65933, August 13, 2024	*Aluminum Lithographic Printing Plates From China and Japan; Revised Schedule for the Subject Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-08-13/pdf/2024-18019.pdf
89 FR 79248, September 27, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-09-27/pdf/2024-22156.pdf
89 FR 79250, September 27, 2024	*Aluminum Lithographic Printing Plates From Japan: Final Affirmative*	https://www.govinfo.gov/content/pkg/FR-2024-09-27/pdf/2024-22157.pdf

Citation	Title	Link
	Determination of Sales at Less-Than-Fair-Value	
89 FR 79256, September 27, 2024	*Aluminum Lithographic Printing Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-09-27/pdf/2024-22155.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject: Aluminum Lithographic Printing Plates from China and Japan

Inv. Nos.: 701-TA-694 and 731-TA-1641-1642 (Final)

Date and Time: September 17, 2024 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**John M. Herrmann**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**Daniel L. Porter**, Curtis, Mallet-Prevost, Colt & Mosle LLP)

SESSION 1: SUPPORT DIRECT PRESENTATION (Open to Public)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Kelley Drye & Warren LLP
Washington, DC
on behalf of

Eastman Kodak Company

James V. Continenza, Executive Chairman and Chief Executive Officer, Eastman Kodak Company

Laura Cole, Vice President, Pricing and Product Management, Eastman Kodak Company

Jodi Tellstone, Finance Director, Print, Eastman Kodak Company

Paul Smith, Global Director, International Trade and Compliance, Eastman Kodak Company

Brad Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Jacob Jones, Trade Analyst, Georgetown Economic Services, LLC

John M. Herrmann)
Paul C. Rosenthal)
) – OF COUNSEL
Joshua R. Morey)
Elizabeth C. Johnson)

SESSION 2: OPPOSITION DIRECT PRESENTATION (Open to Public)

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders:

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

FUJIFILM North America Corporation ("FUJIFILM-USA")
FUJIFILM Corporation ("FUJIFILM-Japan")
FUJIFILM Printing Plate (China) Co ("FUJFILM-China")
(collectively "FUJIFILM")

Patrick Henderson, Executive Director of Public and Regulatory Affairs
Quad/Graphics, Inc.

Karl Kluetz, Director of Operations, T Enterprises, Inc. dba 1Vision

Doug McWilliams, Vice President of Operations & Supply Chain, Varsity Yearbook

Adam Meyer, Publisher, Chief Operating Officer, Vice President,
Teton Media Works, Inc.

Joe Thomas, Production Manager, Bedwick & Jones Printing, Inc.

Dan Larkin, Vice President of Operations,
FUJIFILM North America Corp., Graphic Communication Division

Jim Crawford, Director, Consumable Sales,
FUJIFILM North America Corporation, Graphic Communications Division

Anthony Aquino, Vice President, Advanced Account Sales
FUJIFILM North America Corporation, Graphic Communication Division

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Charles Anderson, Principal, Capital Trade Inc.

Andrew Szamosszegi, Principal, Capital Trade Inc.

Travis Pope, Principal, Capital Trade Inc.

Daniel L. Porter)
James P. Durling) – OF COUNSEL
Katherine R. Afzal)

SESSION 3: SUPPORT ANSWERS IN CAMERA COMMISSIONERS' Q&A (Closed to Public)

SESSION 4: OPPOSITION ANSWERS IN CAMERA COMMISSIONERS' Q&A (Closed to Public)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Paul C. Rosenthal**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**James P. Durling**, Curtis, Mallet-Prevost, Colt & Mosle LLP)

Schedule for Hearing

September 17, 2024

Inv. Nos. 701-TA-694 and 731-TA-1641-1642 (Final)
Aluminum Lithographic Printing Plates from China and Japan

Public Opening Statements

Session 1: Support Public Presentation (not to exceed 60 minutes)
Questions by the Commission, Staff, and Opposition Counsel

Session 2: Opposition Public Presentation (not to exceed 60 minutes)
Questions by the Commission, Staff, and Support Counsel

Session 3: Support Answers *In Camera* Commissioners Q&A
*** CLOSED TO ALL BUT APO SIGNATORIES**
Questions by the Commission, Staff, and Opposition Counsel

Session 4: Opposition Answers *In Camera* Commissioners Q&A
*** CLOSED TO ALL BUT APO SIGNATORIES**
Questions by the Commission, Staff, and Support Counsel

Public Rebuttal/Closing Statements

APPENDIX C

SUMMARY DATA

CONTENTS

All U.S. producers

Table C.1
ALPs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 square meters; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square meter; Period changes=percent--exceptions noted

Item	Reported data: Calendar year 2021	2022	2023	Interim 2023	2024	Period changes: Comparison years 2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Japan:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. producers':									
Practical capacity quantity	***	***	***	***	***	▼***	▼***	▼***	***
Production quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C.1 Continued
ALPs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 square meters; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square meter; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Interim		Comparison years			Interim
Item	2021	2022	2023	2023	2024	2021 to 2023	2021 to 2022	2022 to 2023	2023 to 2024
Production workers	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s)	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid ($1,000)	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▼***	▲***	▲***
Productivity (square meters per hour)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▼***	▼***	▼***	▼***
Gross profit or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit COGS	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1)	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Capital expenditures	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses	***	***	***	***	***	▲***	▼***	▲***	▼***
Total assets	***	***	***	***	***	▼***	▼***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts 1, 4, 6, and 7 of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. Interim = January to March.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Related party exclusion

Table C.2
ALPs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Interim		Comparison years			Interim
Item	2021	2022	2023	2023	2024	2021 to 2023	2021 to 2022	2022 to 2023	2023 to 2024
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1):									
Included producer	***	***	***	***	***	▲***	▲***	▼***	▼***
Excluded producer	***	***	***	***	***	▼***	▼***	▼***	***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1):									
Included producer	***	***	***	***	***	▲***	▲***	▼***	▼***
Excluded producer	***	***	***	***	***	▼***	▼***	▼***	***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Japan	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Japan:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***

Table continued.

Table C.2 Continued
ALPs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**
Quantity=1,000 square meters; value=1,000 dollars; unit values, unit labor costs, and unit expenses=dollars per square meter; period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Interim		Comparison years			Interim
Item	2021	2022	2023	2023	2024	2021 to 2023	2021 to 2022	2022 to 2023	2023 to 2024
Included U.S. producer:									
Practical capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s)	***	***	***	***	***	▼***	▲***	▼***	▼***
Wages paid ($1,000)	***	***	***	***	***	▼***	▲***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▼***	▲***	▲***
Productivity (square meters per hour)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▲***
SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▲***
Net income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit COGS	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit net income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
COGS/sales (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Capital expenditures	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses	***	***	***	***	***	▲***	▼***	▲***	▼***
Net assets	***	***	***	***	***	▼***	▲***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in appendix D and J of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. Interim = January to March.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

U.S. PRODUCER DATA EXCLUDING ***

Table D.1 ALPs: U.S. producers' capacity, production, and capacity utilization excluding one U.S. producer ***, by period

Capacity and production in 1,000 square meters; utilization in percent; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure D.1 ALPs: U.S. producers' capacity, production, and capacity utilization excluding one U.S. producer ***, by period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table D.2 ALPs: U.S. producers' total shipments excluding one U.S. producer ***, by destination and period

Quantity in 1,000 square meters; value in 1,000 dollars; unit values in dollars per square meters; shares in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table D.3 ALPs: U.S. producers' inventories and their ratio to select items, excluding one U.S. producer ***, by period

Quantity in 1,000 square meters; ratios in percent; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table D.4 ALPs: U.S. producers' employment related information excluding one U.S. producer ***, by item and period; interim is January to March

Item	2021	2022	2023	Interim 2023	Interim 2024
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (square meters per hour)	***	***	***	***	***
Unit labor costs (dollars per square meter)	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table D.5 ALPs: Apparent U.S. consumption and market shares based on quantity data excluding one U.S. producer ***, by source and period

Quantity in 1,000 square meters; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Included U.S. producer	Quantity	***	***	***	***	***
Excluded U.S. producer	Quantity	***	***	***	***	***
All U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
Included U.S. producer	Share	***	***	***	***	***
Excluded U.S. producer	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Data for import sources are based on U.S. shipments of imports from the specified country.

Table D.6 ALPs: Apparent U.S. consumption and market shares based on value data excluding one U.S. producer ***, by source and period

Value in 1,000 dollars; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
Included U.S. producer	Value	***	***	***	***	***
Excluded U.S. producer	Value	***	***	***	***	***
All U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
Included U.S. producer	Share	***	***	***	***	***
Excluded U.S. producer	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Data for import sources are based on U.S. shipments of imports from the specified country.

APPENDIX E

U.S. SHIPMENTS BY CHEMICAL TREATMENT STATUS AND THICKNESS

Table E.1 ALPs: U.S. producers' U.S. shipments, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share of quantity	***	***	***	***	***
Process free	Share of quantity	***	***	***	***	***
Chemical free	Share of quantity	***	***	***	***	***
All ALPs types	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.1 (Continued) ALPs: U.S. importers' U.S. shipments from China, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share	***	***	***	***	***
Process free	Share	***	***	***	***	***
Chemical free	Share	***	***	***	***	***
All ALPs types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.1 (Continued) ALPs: U.S. importers' U.S. shipments from Japan, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share	***	***	***	***	***
Process free	Share	***	***	***	***	***
Chemical free	Share	***	***	***	***	***
All ALPs types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.1 (Continued) ALPs: U.S. importers' U.S. shipments from subject sources, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share	***	***	***	***	***
Process free	Share	***	***	***	***	***
Chemical free	Share	***	***	***	***	***
All ALPs types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.1 (Continued) ALPs: U.S. importers' U.S. shipments from nonsubject sources, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share	***	***	***	***	***
Process free	Share	***	***	***	***	***
Chemical free	Share	***	***	***	***	***
All ALPs types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.1 (Continued) ALPs: U.S. importers' U.S. shipments from all sources, by chemical treatment status and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Wet	Quantity	***	***	***	***	***
Process free	Quantity	***	***	***	***	***
Chemical free	Quantity	***	***	***	***	***
All ALPs types	Quantity	***	***	***	***	***
Wet	Share	***	***	***	***	***
Process free	Share	***	***	***	***	***
Chemical free	Share	***	***	***	***	***
All ALPs types	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Table E.2 Wet ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Table continued.

Table E.2 (Continued) Process free ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Table continued.

Table E.2 (Continued) Chemical-free ALPs: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios represent the ratio to overall apparent consumption in part 4.

Table E.3 ALPs: U.S. producers' U.S. shipments, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.3 (Continued) ALPs: U.S. importers' U.S. shipments from China, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.3 (Continued) ALPs: U.S. importers' U.S. shipments from Japan, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.3 (Continued) ALPs: U.S. importers' U.S. shipments from subject sources, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.3 (Continued) ALPs: U.S. importers' U.S. shipments from nonsubject sources, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table E.3 (Continued) ALPs: U.S. importers' U.S. shipments from all sources, by plate thickness and period

Quantity in 1,000 square meters; share in percent; interim is January to March

Thickness	Measure	2021	2022	2023	Interim 2023	Interim 2024
15 gauge	Quantity	***	***	***	***	***
20 gauge	Quantity	***	***	***	***	***
30 gauge	Quantity	***	***	***	***	***
40 gauge	Quantity	***	***	***	***	***
All types	Quantity	***	***	***	***	***
15 gauge	Share	***	***	***	***	***
20 gauge	Share	***	***	***	***	***
30 gauge	Share	***	***	***	***	***
40 gauge	Share	***	***	***	***	***
All types	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E.4 ALPs: 15 gauge thickness, U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Table continued.

Table E.4 (Continued) ALPs: 20 gauge thickness, U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Table continued.

Table E.4 (Continued) ALPs: 30 gauge thickness, U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Table continued.

Table E.4 (Continued) ALPs: 40 gauge thickness, U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in 1,000 square meters; share and ratios in percent; interim is January to March

Type	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios represent the ratio to overall apparent consumption in part 4.

APPENDIX F

APPARENT U.S. CONSUMPTION UTILIZING

FUJIFILM USA'S U.S. SHIPMENTS OF U.S. PRODUCED ALPS

Table F.1 and figure F.1 present data on apparent U.S. consumption and U.S. market shares, by quantity, using Fujifilm USA's U.S. shipments of Fujifilm's U.S. produced ALPs. Table F.2 and figure F.2 present data on apparent U.S. consumption and U.S. market shares, by value, using Fujifilm USA's U.S. shipments of Fujifilm's U.S. produced ALPs. Table F.3 presents changes in apparent U.S. consumption by quantity and value between comparison periods, using Fujifilm USA's U.S. shipments of Fujifilm's U.S. produced ALPs.

Table F.1 ALPs: Apparent U.S. consumption and market shares based on quantity data using Fujifilm USA's U.S. shipments of U.S.-produced ALPs, by source and period

Quantity in 1,000 square meters; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers: Eastman Kodak	Quantity	***	***	***	***	***
U.S. producers: Fujifilm via Fujifilm USA	Quantity	***	***	***	***	***
U.S. producers: All firms	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers: Eastman Kodak	Share	***	***	***	***	***
U.S. producers: Fujifilm via Fujifilm USA	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and Fujifilm's posthearing brief, exhibit 7.

Note: Shares shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure F.1 ALPs: Apparent U.S. consumption based on quantity data using Fujifilm USA's U.S. shipments of U.S.-produced ALPs, by source by period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and Fujifilm's posthearing brief, exhibit 7.

Table F.2 ALPs: Apparent U.S. consumption and market shares based on value data using Fujifilm USA's U.S. shipments of U.S.-produced ALPs, by source and period

Value in 1,000 dollars; shares in percent; interim is January to March

Source	Measure	2021	2022	2023	Interim 2023	Interim 2024
U.S. producers: Eastman Kodak	Value	***	***	***	***	***
U.S. producers: Fujifilm via Fujifilm USA	Value	***	***	***	***	***
U.S. producers: All firms	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Japan	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers: Eastman Kodak	Share	***	***	***	***	***
U.S. producers: Fujifilm via Fujifilm USA	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and Fujifilm's posthearing brief, exhibit 7.

Note: Shares shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure F.2 ALPs: Apparent U.S. consumption based on value data using Fujifilm USA's U.S. shipments of U.S.-produced ALPs, by source by period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and Fujifilm's posthearing brief, exhibit 7.

Table F.3 ALPs: Changes in apparent U.S. consumption by quantity and value between comparison periods

Changes in percent; interim is January to March

Source	Measure	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
U.S. producers: Eastman Kodak	%Δ Quantity	▼***	▲***	▼***	▼***
U.S. producers: Fujifilm via Fujifilm USA	%Δ Quantity	▼***	▼***	▼***	▼***
U.S. producers: All firms	%Δ Quantity	▼***	▼***	▼***	▼***
China	%Δ Quantity	▲***	▲***	▲***	▲***
Japan	%Δ Quantity	▲***	▲***	▼***	▲***
Subject sources	%Δ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Quantity	▼***	▼***	▼***	▼***
All import sources	%Δ Quantity	▲***	▲***	▲***	▼***
All sources	%Δ Quantity	▼***	▼***	▼***	▼***
U.S. producers: Eastman Kodak	%Δ Value	▲***	▲***	▼***	▼***
U.S. producers: Fujifilm via Fujifilm USA	%Δ Value	▼***	▼***	▼***	▼***
U.S. producers: All firms	%Δ Value	▼***	▼***	▼***	▼***
China	%Δ Value	▲***	▲***	▲***	▲***
Japan	%Δ Value	▲***	▲***	▼***	▼***
Subject sources	%Δ Value	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Value	▲***	▲***	▼***	▼***
All import sources	%Δ Value	▲***	▲***	▼***	▼***
All sources	%Δ Value	▲***	▲***	▼***	▼***
Nonsubject sources	%Δ Value	▲***	▲***	▲***	▼***
All import sources	%Δ Value	▼***	▼***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires and Fujifilm's posthearing brief, exhibit 7.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data for import sources are based on U.S. shipments of imports from the specified country.

APPENDIX G

IMPORT COST DATA

Tables G.1 through G.5 present import cost data.[1] In all quarterly comparisons but one, the average f.o.b. sales unit value of the pricing data exceeded the average landed, duty-paid ("LDP") unit value of the import cost data as would be expected of accurately reported imports.[2]

Table G.1 ALPs: Weighted-average f.o.b. import prices and unit LDP value of product 1 and differentials in percentage, by source and quarter

Prices and unit LDP values in dollars per square meter; differential in percent

Period	China price	China unit LDP value	China differential	Japan price	Japan unit LDP value	Japan differential
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

[1] In the preliminary phase of these investigations, petitioners raised concerns with the accuracy of the import pricing data. Petitioner's postconference brief, pp. 25-26.

[2] Staff notes that there may have been a lag between the period of importation and the period of sale.

Table G.2 ALPs: Weighted-average f.o.b. import prices and LDP value of product 2 and differentials in percentage, by source and quarter

Prices and values in dollars per square meter; differential in percent

Period	China price	China unit LDP value	China differential	Japan price	Japan unit LDP value	Japan differential
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Table G.3 ALPs: Weighted-average f.o.b. import prices and LDP value of product 3 and differentials in percentage, by source and quarter

Prices and values in dollars per square meter; differential in percent

Period	China price	China unit LDP value	China differential	Japan price	Japan unit LDP value	Japan differential
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Table G.4 ALPs: Import LDP and pricing data average unit value and differential for products imported from China

Prices and values in dollars per square meter; differential in percent

Data Type	Product	2021	2022	2023	Interim 2024
Unit LDP value	Product 1	***	***	***	***
Unit LDP value	Product 2	***	***	***	***
Unit LDP value	Product 3	***	***	***	***
Price	Product 1	***	***	***	***
Price	Product 2	***	***	***	***
Price	Product 3	***	***	***	***
Differential	Product 1	***	***	***	***
Differential	Product 2	***	***	***	***
Differential	Product 3	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table G.5 ALPs: Import and pricing data average unit value and differential for products imported from Japan

Prices and values in dollars per square meter; differential in percent

Data Type	Product	2021	2022	2023	Interim 2024
Unit LDP value	Product 1	***	***	***	***
Unit LDP value	Product 2	***	***	***	***
Unit LDP value	Product 3	***	***	***	***
Price	Product 1	***	***	***	***
Price	Product 2	***	***	***	***
Price	Product 3	***	***	***	***
Differential	Product 1	***	***	***	***
Differential	Product 2	***	***	***	***
Differential	Product 3	***	***	***	***

APPENDIX H

PRICING DATA UTILIZING FUJIFILM USA SALES OF U.S. PRODUCED ALPS

Tables H.1 through H.3 present pricing data using Fujifilm USA sales of Fuji's U.S.-produced ALPs. Table H.4 through H.6 presents the pricing comparisons between U.S.-produced product, including Fujifilm USA sales of Fuji's U.S. produced ALPs, and imports from China and Japan.

Table H.1 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Figure H.1 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table H.2 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Figure H.2 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Table H.3 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Figure H.3 ALPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Table H.4 ALPs: Instances of underselling and overselling and the range and average of margins, by product

Quantity in square meters; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table H.5 ALPs: Instances of underselling and overselling and the range and average of margins, by source

Quantity in square meters; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	***	***	***	***	***
Japan	Underselling	***	***	***	***	***
All subject sources	Underselling	***	***	***	***	***
China	Overselling	***	***	***	***	***
Japan	Overselling	***	***	***	***	***
All subject sources	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table H.6 ALPs: Instances and quantities of underselling/overselling and the range and average of margins, by period

Quantity in square meters; margin in percent

Period	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	Underselling	***	***	***	***	***
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024 Jan-Mar	Underselling	***	***	***	***	***
All periods	Underselling	***	***	***	***	***
2021	Overselling	***	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024 Jan-Mar	Overselling	***	***	***	***	***
All periods	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.
Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

APPENDIX I

PRICING DATA FOR EASTMAN KODAK'S AND FUJIFILM'S TOP 10 PURCHASERS

Tables I.1 through I.3 and figures I.1 through I.3 present pricing data for sales made by U.S. producer Eastman Kodak and importer Fujifilm USA to their top 10 purchasers by volume.[1] This data does not include Fujifilm USA sales of Fujifilm's U.S. produced ALPs. Tables I.4 through I.6 presents the pricing comparisons between U.S.-produced product produced by Eastman Kodak and Fujifilm USA's sales ALPs imports from China and Japan.

Table I.1 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 1 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

[1] ***.

Figure I.1 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: 20 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.16 mm or greater and less than 0.24 mm.

Table I.2 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 2 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Figure I.2 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: 30 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.24 mm or greater and less than 0.33 mm.

Table I.3 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 3 and margins of underselling/(overselling), by source and quarter

Quantity in square meters; prices in dollars per square meter; margins in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Japan price	Japan quantity	Japan margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Figure I.3 ALPs: Weighted-average f.o.b. prices and quantities of Eastman Kodak's domestic and Fujifilm USA's imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: 40 gauge, aluminum lithographic printing plates – any plate with an actual thickness of 0.33 mm or greater and less than 0.43 mm.

Table I.4 ALPs: Instances of underselling and overselling and the range and average of margins, by product for Eastman Kodak's domestic and Fujifilm USA's imported products from China and Japan

Quantity in square meters; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table I.5 ALPs: Instances of underselling and overselling and the range and average of margins, by source for Eastman Kodak and Fujifilm USA's imported products from China and Japan

Quantity in square meters; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	***	***	***	***	***
Japan	Underselling	***	***	***	***	***
All subject sources	Underselling	***	***	***	***	***
China	Overselling	***	***	***	***	***
Japan	Overselling	***	***	***	***	***
All subject sources	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table I.6 ALPs: Instances and quantities of underselling/overselling and the range and average of margins, by period for Eastman Kodak's domestic and Fujifilm USA's imported products from China and Japan

Quantity in square meters; margin in percent

Period	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	Underselling	***	***	***	***	***
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024 Jan-Mar	Underselling	***	***	***	***	***
All periods	Underselling	***	***	***	***	***
2021	Overselling	***	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024 Jan-Mar	Overselling	***	***	***	***	***
All periods	Overselling	***	***	***	***	***

Source**:** Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

APPENDIX J

U.S. PRODUCER FINANCIAL DATA EXCLUDING ***

Table J.1 ALPs: Results of operations of U.S. producers excluding one U.S. producer ***, by item and period

Quantity in 1,000 square meters; value in 1,000 dollars; ratios in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Aluminum sheet	Value	***	***	***	***	***
COGS: Other raw materials	Value	***	***	***	***	***
COGS: Total raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Less scrap revenue	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expense/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Aluminum sheet	Ratio to NS	***	***	***	***	***
COGS: Other raw materials	Ratio to NS	***	***	***	***	***
COGS: Total raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Less scrap revenue	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table J.1 (Continued) ALPs: Results of operations of U.S. producers excluding one U.S. producer ***, by item and period

Shares in percent; unit values in dollars per square meter; count in number of firms reporting; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
COGS: Aluminum sheet	Share	***	***	***	***	***
COGS: Other raw materials	Share	***	***	***	***	***
COGS: Total raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
COGS: Aluminum sheet cost	Unit value	***	***	***	***	***
COGS: Other raw materials	Unit value	***	***	***	***	***
COGS: Total raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Less scrap revenue	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS before scrap offset. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table J.2 ALPs: Changes in AUVs between comparison periods excluding one U.S. producer ***

Changes in percent; interim is January to March

Item	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲***	▲***	▲***	▲***
COGS: Aluminum sheet cost	▲***	▲***	▼***	▼***
COGS: Other raw materials	▲***	▲***	▼***	▲***
COGS: Total raw materials	▲***	▲***	▼***	▼***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Less scrap revenue	▼***	▲***	▼***	▲***
COGS: Total	▲***	▲***	▼***	▼***

Table continued.

Table J.2 (Continued) ALPs: Changes in AUVs between comparison periods excluding one U.S. producer ***

Changes in dollars per square meter; interim is January to March

Item	2021 to 2023	2021 to 2022	2022 to 2023	Interim 2023 to 2024
Total net sales	▲***	▲***	▲***	▲***
COGS: Aluminum sheet cost	▲***	▲***	▼***	▼***
COGS: Other raw materials	▲***	▲***	▼***	▲***
COGS: Total raw materials	▲***	▲***	▼***	▼***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Less scrap revenue	▼***	▲***	▼***	▲***
COGS: Total	▲***	▲***	▼***	▼***
Gross profit or (loss)	▲***	▲***	▲***	▲***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▲***	▲***	▲***	▲***
Net income or (loss)	▲***	▼***	▲***	▲***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “---”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table J.3 ALPs: Capital expenditures, R&D expenses, net assets, and operating return on assets of U.S. producers excluding one U.S. producer ***, by item and period

Value in 1,000 dollars; ratios in percent; interim is January to March

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Capital expenditures	Value	***	***	***	***	***
R&D expenses	Value	***	***	***	***	***
Net assets	Value	***	***	***	***	***
Return on assets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.