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A-560-840, A-475-846, A-580-918, A-557-826,
A-201-860, A-583-874, A-549-847, A-489-850,
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C-201-861, and C-489-851
Investigations
Public Document
E&C/OI: Team

May 1, 2024

MEMORANDUM TO: James Maeder
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

FROM: Alex Villanueva
Senior Director, Office I
Antidumping and Countervailing Duty Operations

SUBJECT: Less-Than-Fair-Value and Countervailing Duty Investigations of
Aluminum Extrusions from People's Republic of China, Colombia,
Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia,
Mexico, Taiwan, Thailand, the Republic of Türkiye, the United Arab
Emirates, and the Socialist Republic of Vietnam: Preliminary Scope
Decision Memorandum II

I. SUMMARY

Commerce received numerous scope comments from interested parties in the above-referenced LTFV and CVD investigations.¹ On March 4, 2024, Commerce issued a preliminary scope memorandum finding that certain products were not subject to these investigations.² Further, Commerce preliminarily determined to modify the scope of the investigations to add two examples of excluded products, and to exclude precision non-electrically conductive coated buss bars and precision drawn aluminum tubing.³ Appendix I contains the revised scope of the investigations for these preliminary determinations, incorporating the scope language from Preliminary Scope Memo I. In this memorandum, Commerce now addresses the remaining scope comments received from the interested parties.

Appendix II contains a list of acronyms and abbreviations used throughout this memorandum. Appendix III contains a table of citations, including all scope-related comments from interested parties, referenced in this memorandum.

¹ See Appendix II for acronyms and abbreviations.

² See Preliminary Scope Memo I at 2-5 and Attachment.

³ *Id.*



II. BACKGROUND

On October 4, 2023, Commerce received AD petitions on imports of aluminum extrusions from China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, Korea, Malaysia, Mexico, Taiwan, Thailand, Türkiye, the United Arab Emirates, and Vietnam filed in proper form on behalf of the petitioner.⁴ The AD petitions were accompanied by CVD petitions concerning imports of aluminum extrusions from China, Indonesia, Mexico, and Türkiye.⁵

On October 24, 2023, Commerce published in the *Federal Register* the notices of initiation of the LTFV and CVD investigations concerning imports of aluminum extrusions from China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, Korea, Malaysia, Mexico, Taiwan, Thailand, Türkiye, the United Arab Emirates, and Vietnam.⁶

Consistent with our practice, as established in the *Preamble* to Commerce's regulations,⁷ Commerce set aside a period of time in the *Initiation Notices* for interested parties to raise issues regarding the scope of the investigations.⁸ Commerce provided this specific comment period so that it may be made aware of any areas in which the scope is unintentionally overinclusive, and, if appropriate, reconsider product coverage.⁹ In November 2023, the LTFV investigation regarding the Dominican Republic was terminated by the ITC, due to negligible imports.¹⁰

Commerce received scope comments on the official records of both the LTFV and CVD investigations from numerous companies regarding a variety of products. Due to the complexity and volume of the scope comments received, on March 4, 2024, Commerce addressed only certain comments.¹¹ Consequently, Commerce instructed CBP to suspend liquidation of and to collect cash deposits of estimated countervailing duties on entries of aluminum extrusions subject to the scope of the investigations. Prior to, and after, the issuance of Preliminary Scope Memo I, Commerce received additional scope comments from interested parties. Appendix III contains a list of the scope comments submitted by interested parties.

During these investigations, the petitioner submitted revisions to the scope language of the investigations. On February 9, 2024, the petitioner requested that Commerce accept Hydro Precision's proposed exclusion language.¹² On February 20, 2024, the petitioner filed its first revision to the scope language of the investigations.¹³ In response to the petitioner's revisions to the scope, Commerce issued a scope questionnaire.¹⁴ On March 18, 2024, the petitioner

⁴ See Petitions.

⁵ *Id.*

⁶ See *Initiation Notices*.

⁷ See *Preamble*.

⁸ See *Initiation Notices*, 88 FR at 74429-30 and 88 FR at 74438-40.

⁹ See *Preamble*, 62 FR at 27323.

¹⁰ See *ITC Preliminary Determination*.

¹¹ See Preliminary Scope Memo I at 3 ((1) fully assembled solar panels; (2) fully assembled off-grid solar charging modules; (3) aluminum and copper wires produced through a casting process; (4) stationary bicycles and rowing machines that enter unassembled as a packaged combination of parts to be assembled; (5) shower hooks and other articles made of cast aluminum, even where such cast aluminum is made from re-melted aluminum that had previously been extruded; and (6) precision non-electrically conductive coated buss bars and precision drawn aluminum tubing).

¹² See Petitioner Comments III at 2-3.

¹³ See Petitioner Comments IV.

¹⁴ See Scope Questionnaire.

submitted its response, which included additional revisions to the scope of the investigations.¹⁵ On March 28, 2024, the petitioner submitted additional scope language regarding exclusions of large, multi-finned extruded aluminum heat sinks meeting certain criteria and glass refrigerator shelves with glass decorative aluminum trim and certain other characteristics.¹⁶ On April 10, 2024, the petitioner submitted scope language that incorporated revisions from its previous submissions and Commerce's language from the Preliminary Scope Memo I.¹⁷

III. ANALYSIS

A. General Comments

Due to the large number of scope comments and rebuttal comments submitted by interested parties, we have not summarized each submission. The scope-related comments from interested parties are listed in Appendix III and we considered them in the below analyses.

1. **Comments Regarding Products Not Produced by the Petitioner & Alleging Unlawfully Broad Scope Language**¹⁸

Several parties commented that only certain aluminum extrusion products should be covered, because the petitioner does not manufacture all products covered by the scope of the investigations or intended to cover only certain forms of aluminum extrusions.

Further, some parties commented that because their downstream products would be subject to duties, based on the scope of these investigations, production of their products containing aluminum extrusions should have been reflected in the industry support calculation from the petition, as accepted by Commerce. Therefore, Commerce should revisit its industry support calculations and rescind its initiation of these investigations on that basis.

Commerce's Preliminary Determination:

The members of the Aluminum Extruders Coalition explained that they are aluminum extrusions producers of many types of aluminum extrusions, in various forms, for a multitude of industries that typically incorporate the aluminum extrusions into downstream products.¹⁹ Further, because the scope language is clear that only the aluminum extrusion portions is subject to duties, the fact that the petitioner does not produce the products into which the aluminum extrusion is incorporated does not prevent coverage of such products. Rather, it is the aluminum extrusion

¹⁵ See Petitioner Scope Questionnaire Response.

¹⁶ See Petitioner Comments V.

¹⁷ See Petitioner Comments VII.

¹⁸ See, e.g., Home Depot Comments I; Mayzon Comments I; LCI Comments I; JMD Comments I; Ashley Comments I; Kimball Comments I; Target Comments I; Wesko Comments I; Harbor Freights Comments I; Tricam Comments I; Downstream Industries Coalition Comments I; Downstream Industries Coalition Comments II; Moen Comments I; NMMA Comments I; NMMA Comments II; Whirlpool Comments I; Black & Decker Comments I; Fusheng Comments I; Fusheng Comments II; Capella Comments I; Capella Comments II; Masonite Comments I; Autos Drive America Comments I; AAPC Comments I; AHRI Comments I; Polaris Comments I; RILA Comments I; MAHLE Comments I; and MAHLE Comments II.

¹⁹ See Petitioner Comments I at 6-7 and Exhibit 1.

input that is the concern of the domestic industry. Accordingly, there is no merit to the argument that this scope fails on this point.

Section 732(c)(4)(E) of the Act states that “{a}fter the administrating authority makes a determination with respect to initiating an investigation, the determination regarding industry support shall not be reconsidered.” Further, the CIT, affirmed by the Federal Circuit, has rebutted the argument presented by interested parties here. Specifically, the CIT has stated that “{it} is unaware of {} any statute or regulation that makes an individual product’s inclusion within the scope of an order contingent upon the initiation by Commerce or the ITC of a specific investigation regarding that product.”²⁰ Finally, the Federal Circuit has held that Commerce is prohibited from revisiting that determination after initiation.²¹ Accordingly, parties’ arguments that Commerce should revisit its industry support determination at this stage is without merit.

With respect to the ITC, in the preliminary determination of these investigations, the ITC only considered producers of aluminum extrusions, regardless of whether or not they produce downstream products, to be part of the domestic industry.²² Further, the scope of these investigations states:

The merchandise subject to these investigations are aluminum extrusions, *regardless of form, finishing, or fabrication, whether assembled with other parts or unassembled*, whether coated, painted, anodized, or thermally improved.²³

In addition, in its preliminary determination, when evaluating product coverage, the ITC noted that:

where the domestically manufactured merchandise consists of a broad continuum of products, the Commission generally does not consider each item of merchandise to be a separate domestic like product that is only “like” its counterpart in the scope but considers the continuum itself to constitute the domestic like product.²⁴

Thus, in its Preliminary Report, the ITC concluded that “consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of aluminum extrusions.”²⁵ Therefore, given the above, Commerce did not modify the scope of these investigations regarding the aluminum portion of downstream products that is covered merchandise and will also not revisit the industry support calculations accepted at the initiation stage of these investigations.

²⁰ See *Shenyang Yuanda Co. v. United States*.

²¹ *M S Int'l v. United States*.

²² See ITC Report at III-1.

²³ See Appendix I (emphasis added).

²⁴ See ITC Preliminary Report at 35, footnote 122.

²⁵ *Id.* at 40.

2. Comments Regarding Substantial Transformation/Country of Origin & Customs Classification²⁶

Several parties commented that the scope of the investigations should not cover aluminum extrusions that are considered parts or subassemblies which undergo some fabrication in third countries. Those parties argue that some parts or subassemblies or products identified in the scope that contain aluminum extrusions as products of certain countries may, in fact, be substantially transformed in a third country before importation to the United States and, therefore, may have a different country of origin than is claimed.

Further, some parties commented that the scope language was written to cover products based on what they contain, rather than how they are classified under the HTSUS, either as a whole or based on its subcomponent parts, which is inconsistent with harmonized classification principles.

Commerce's Preliminary Determination:

As a preliminary matter, the scope of the investigations clearly indicates that “the country of origin of the aluminum extrusion is determined by where the metal is extruded (*i.e.*, pressed through a die),” *see* Appendix I. Therefore, we did not conduct substantial transformation/country of origin analyses in considering whether products are excluded from the scope of the investigations. Normally, most AD and CVD scopes do not contain such a clear-cut test to determine the country of origin, which is why Commerce usually applies its substantial transformation test. However, given the scope in this case does contain such a test, no further analysis on this point is necessary.

Further, the adopted scope language specifically includes products with aluminum extrusions that contain parts or subassemblies that undergo fabrication in third countries. The scope of these investigations state:

Subject aluminum extrusions are produced and imported with a variety of coatings and surface treatments, and types of fabrication. The types of coatings and treatments applied to aluminum extrusions include, but are not limited to, extrusions that are mill finished (*i.e.*, without any coating or further finishing), brushed, buffed, polished, anodized (including bright dip), liquid painted, electroplated, chromate converted, powder coated, sublimated, wrapped, and/or bead blasted. Subject aluminum extrusions may also be fabricated, *i.e.*, prepared for assembly, or thermally improved. Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, stretch-formed, hydroformed, knurled, swedged, mitered, chamfered, threaded, spun, etched, and engraved. Performing such operations in third countries does not otherwise remove the merchandise from the scope of the investigations.²⁷

²⁶ *See, e.g.*, Home Depot Comments I; LCI Comments I; Ashley Comments I; Kimball Comments I; Target Comments I; Wesko Comments I; Downstream Industries Coalition Comments I; Moen Comments I; NMMA Comments I; Masonite Comments I; Autos Drive America Comments I; AAPC Comments I; MAHLE Comments I; and MAHLE Comments II.

²⁷ *See* Appendix I.

Accordingly, because the scope contains a test to determine the merchandise's country of origin, as well as a statement of the petitioner's intent that the performance of such operations in third countries does not remove the merchandise from the scope's coverage, parties' arguments on this issue are meritless.

Finally, we noted that products covered by AD and CVD cases may include articles that are incorporated into other products, even if the resulting product is classifiable under a different HTSUS code, such as finished windows with glass, doors with glass or vinyl, picture frames with glass pane and backing material, and solar panels.²⁸

3. Comments Regarding Administrability²⁹

Several parties argued that the scope is unadministrable. For example, parties commented that under the scope of the AD and CVD orders on which Commerce initiated, importers would be unable to confirm the costs of the aluminum extrusion components used in their products, as such information may be multiple links behind in the supply chain and are unretrievable. Interested parties also commented that such a broad and complicated scope would not be administrable at the border, and it would be highly burdensome on CBP to determine what inputs are subject or non-subject merchandise, and whether imported merchandise is a part or subassembly of a larger system.

Commerce's Preliminary Determination:

Commerce is adopting the amended scope language, as it is more administrable and is less broad than the scope language presented at the initiation stage of these investigations.

In the *Initiation Notices*, Commerce highlighted concerns regarding the administrability of the proposed scope language. Commerce stated:

We have some concerns related to the administrability of certain provisions in the proposed scope. For example, we find the definition of subassemblies (included) and imported merchandise that is not a part or subassembly of a larger product or system (excluded) remains an outstanding issue. Accordingly, Commerce intends to continue evaluating the scope of these investigations, with the possibility of making additional modifications to clarify further what products are covered and not covered by the scope of these investigations.³⁰

Since the publication of the *Initiation Notice*, Commerce has met with various parties and worked to make the scope language more administrable. As noted above, Commerce invited

²⁸ See, e.g., *2011 AD Order*; and *2011 CVD Order*.

²⁹ See, e.g., Home Depot Comments I; Mayzon Comment I; LCI Comments I; JMD Comments I; Ashley Comments I; Kimball Comments I; Target Comments I; Wesko Comments I; Harbor Freights Comments I; Tricam Comments I; Downstream Industries Coalition Comments I; Downstream Industries Coalition Comments II; MSC Comments I; Moen Comments I; NMMA Comments I; NMMA Comments II; Whirlpool Comments I; Black & Decker Comments I; Fusheng Comments I; Fusheng Comments II; Capella Comments I; Capella Comments II; Masonite Comments I; Autos Drive America Comments I; AAPC Comments I; AHRI Comments I; Polaris Comments I; RILA Comments I; MAHLE Comments I; MAHLE Comments II; and Tecnoglass Comments I.

³⁰ See *Initiation Notices*, 88 FR at 74423 and 88 FR 74434.

parties to comment on the scope of the investigations, and parties submitted numerous comments, including comments regarding the applicability of the scope language to certain products, *see* Appendix III. In addition, Commerce officials met with multiple interested parties,³¹ including the petitioner.³² As a result, for example, we have adopted several revisions to the scope language submitted by the petitioner, such as product exclusions, a three-part test for multiple subassemblies, definitions for certain terms, clarification of what is meant by certain parts and subassemblies, etc.³³ Commerce also modified some of the scope language of the investigations in Preliminary Scope Memo I,³⁴ and is further clarifying the scope language in these preliminary determinations, *see* the “Additional Modification to Scope Language” section below.

Commerce has a practice of providing ample deference to the petitioner with respect to the products for which it seeks relief, unless there exists an “overarching reason to modify” the scope of an investigation.³⁵ Here, while the scope of these investigations may require parties to collect and provide additional information to CBP, we believe from interactions with various parties and CBP, that the scope of these investigations may be administrable and enforceable.

Nonetheless, we note that outstanding issues still remain, and Commerce will continue to seek input to improve and address concerns regarding the administrability of the scope language. As such, we are providing parties with an additional opportunity to submit scope-related comments and new factual information after these preliminary determinations, *see* “Public Comment” section. Therefore, interested parties and Commerce may introduce further modifications to the scope language before the final determinations in these investigations. Consequently, until the issuance of any potential AD or CVD orders, the scope language remains subject to change.

4. Comments Regarding End-Use Criteria³⁶

Several parties commented that determining whether a product is a ‘part or subassembly of a larger product or system’ will require Commerce to make scope determinations, and CBP to enforce the scope of any orders, based not on the imported article itself but, rather, on the end-use of the product after importation. Further, they noted that Commerce has previously recognized orders that rely on usage may lead to an unenforceable order because the importer may not know the end-use of its merchandise after importation.

³¹ *See, e.g.*, AHRI Ex Parte Meeting, Downstream Industries Ex Parte Meeting; Interested Parties Ex Parte Meeting; Outdoor Industry Association Ex Parte Meeting; RWW Ex Parte Meeting; Senator Peters Ex Parte Meeting; and Tesla Ex Parte Meeting.

³² *See* Petitioner Ex Parte Meeting I; Petitioner Ex Parte Meeting II; Petitioner and Ex Parte Meeting III; and CBP and Petitioner Ex Parte Meeting.

³³ *See* Petitioner Comments III; Petitioner Comments IV; Petitioner Comments V; and Petitioner Comments VII.

³⁴ *See* Preliminary Scope Memo I at 3-5 and Attachment.

³⁵ *See, e.g.*, *PVLT from China*, IDM at Comment 1; and *Aluminum Extrusions from China I*, IDM at Comment 3; *see also King Supply v. United States* (“While petitioners and other interested parties may propose the scope of merchandise to be investigated, Commerce alone defines the scope of the AD order.”).

³⁶ *See, e.g.*, Home Depot Comments I; Ashley Comments I; Kimball Comments I; Target Comments I; Wesko Comments I; Moen Comments I; MCS Comments I; NMMA Comments I; MAHLE Comments I; MAHLE Comments II; and Masonite Comments I.

Commerce's Preliminary Determination:

As explained by the petitioner and confirmed by product descriptions on the record and the ITC, aluminum extrusions are used in many applications across various industries.³⁷ Therefore, it is common for the aluminum extrusion industry to reference use in the manufacture, description, and application of aluminum extrusions. Further, the ITC acknowledges that the manufacturing process of extrusions necessarily includes end-use considerations:

After the billets have been homogenized, they are typically sent to a different facility or a different part of a vertically integrated facility. The billets are typically scalped, which removes the top layer of aluminum that may contain impurities or surface defects. The billets are then placed into a furnace to be reheated in order to make the aluminum more malleable (figure I-2). A film of lubricant is applied to the heated billet. From there, a heated billet enters the hydraulic extrusion press where a ram pushes a dummy block to force the softened metal through a *precision opening, or die, to produce the desired shape*.³⁸

As explained by the ITC at footnote 42 of that section, “dies can be produced on-site by extruders or purchased from a third-party.”³⁹ The petitioner explained that “extruders work with customers to design dies for their products, with each type of extrusion requiring a unique die. U.S. extruders have tens of thousands of dies and change dies even a hundred times a day.”⁴⁰ Therefore, as part of the extrusion process, an extrusion producer must consider the ultimate end-use of the aluminum extrusion. As such, in these investigations, it is appropriate to consider end-use in the scope of the investigations. While Commerce generally prefers not to rely on end-use to describe products covered in AD and CVD investigations and any resulting orders, the nature of this product is that end-use is intrinsic to the manufacturing process and inherent to the description of the product subject to these investigations.

5. Comments Regarding Non-Finished Products with Aluminum Subcomponents⁴¹

Several parties commented that duties may not be imposed on products where only a certain portion of the merchandise is composed of aluminum extrusions.

Commerce's Preliminary Determination:

Commerce finds the argument from parties are meritless, as this issue has been addressed by the Federal Circuit, which found that inputs incorporated into other products can be considered subject merchandise and be subject to duties. In *Shenyang Yuanda Aluminum Indus. Eng'g Co. v. United States*, the Federal Circuit upheld Commerce's scope ruling determination that the aluminum extrusion components incorporated into curtain wall units are covered by the language of the scope.⁴² Similarly, in *China Custom Mfg. Inc. v. United States*, the Federal Circuit upheld

³⁷ See ITC Prelim Report at 57.

³⁸ *Id.* at I-20 (emphasis added).

³⁹ *Id.*

⁴⁰ See Petitioner Comments I at 7.

⁴¹ See, e.g., JMD Comments I; MCS Comments I; Whirlpool Comments I; Whirlpool Comments II; Capella Comments I; Capella Comments II; Capella Comments III; and Masonite Comments I.

⁴² *Shenyang Yuanda Co. v. United States*.

Commerce's determination that solar panel mounts are a part or subassembly and, thus, covered by the *2011 AD Order* and *2011 CVD Order* scope, while the CIT noted in its underlying opinion that parties agreed the non-aluminum extrusion portions would ultimately not be subject to duties.⁴³ As such, Commerce has the authority to impose duties on subject merchandise, here aluminum extrusions inputs, that have been incorporated into other products.

B. Product-Specific Comments

We are preliminarily determining that certain products are either excluded from, or covered by, the scope of the investigations based on the limited description of the products on the records of the investigations. It is possible that a final scope determination may be affected by additional comments or by information or documentation regarding, among other possible factors, the importation, physical dimensions, proportion of the aluminum extrusions to non-aluminum extrusion components (by weight and pieces), and the further processing of these products. It is also possible that the petitioner may further refine their concerns on the records as to the potential injury caused by sales of certain imported aluminum extrusions products for less than fair value or that have received countervailable subsidies based on Commerce's findings in these preliminary determinations, as well as additional comments or information or documentation filed on the record by interested parties after the issuance of the preliminary determinations for these investigations. To that end, Commerce is providing parties with another opportunity to submit additional comments and documentation, *see* "Public Comment" section below. Further, Commerce identifies additional areas for comment to assist in issuing final scope determinations.

However, given time constraints, *i.e.*, the deadline for issuing preliminary antidumping duty determinations, the large number and detail of scope comments from interested parties, and the numerous revisions to the scope language, Commerce determines that it must provide the below analyses to guide interested parties as to the agency's analysis in determining whether a product is excluded from, or covered by, the scope of the investigations for purposes of these preliminary determinations.

1. Products Excluded from the Scope of the Investigations

A. Products Not Containing Aluminum Extrusions or Covered Aluminum Association Series

The following products were identified on the record by interested parties; however, there is no indication that the products contain aluminum extrusions. Therefore, we preliminarily find the following products to be excluded from the scope of these investigations.

- **Aluminum Scrap** (scrap that previously underwent an aluminum extrusion process that requires remelting into aluminum feedstock);⁴⁴

⁴³ *China Custom Mfg. Inc. v. United States* 2021; and *China Custom Mfg. Inc. v. United States* 2023.

⁴⁴ *See* Coalition Comments I at 19-20. Although this product did not contain a complete description, we consider that this product does not enter the United States market as an aluminum extrusion, but rather as an input for the manufacture of aluminum extrusions.

- **Aluminum Insert Bracket** (includes aluminum sheet, not aluminum extrusions, no product dimensions provided, “used to mount aluminum structural posts to the concrete floor”);⁴⁵
- **Bar Plate Oil Cooler**⁴⁶ (including long bar and short bar aluminum items, no product dimensions provided, imported as part to be used in cars, used to “keep engine oil cool.”);⁴⁷
- **Water Heater Anodes** (aluminum alloy used to produce this product is designated with the Aluminum Association series leading with “8” (not a series covered by the scope language), includes stainless steel or carbon steel core with a carbon steel cap, “inserted into a water heater tank in order to prevent the water heater tank from corroding”);⁴⁸

B. Fully and Permanently Assembled Merchandise (not a part or subassembly), Containing Components other than Aluminum Extrusions, and Without Further Processing or Addition of Parts or Materials, But Not Requiring Assembly

We preliminarily find the products under this section to meet the criteria under the following scope paragraph:

The scope excludes aluminum extrusions contained in fully and permanently assembled merchandise, if the assembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the assembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the assembled merchandise must be ready for use as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling).

We preliminarily find the following products to be excluded from the scope of the investigations.

- **Baseball Bats** (includes aluminum with coatings, decals, non-subject aluminum grip and polyurethane grip tape, with polycarbonate end caps, no product dimensions provided, ready for use as imported, used to hit baseballs);⁴⁹
- **Valet Rods** (“including the ball head and plastic bush” which are made from non-extruded materials, no product dimensions provided, ready for use as imported, used as a closet accessory);⁵⁰
- **Belt Racks** (includes hooks and finger pull made from non-extruded materials, dimensions vary, ready for use as imported, used as a closet accessory to hang belts);⁵¹

⁴⁵ See JMD Comments at 3.

⁴⁶ The petitioner stated that this type of cooler is typically “produced using folded tube to create the micro channels. Folded tube is not produced through an extrusion process, *i.e.*, pressing a billet through a die,” see Petitioner Scope Questionnaire Response at 4-5. Therefore, we preliminarily find bar plate oil coolers excluded from the scope of these investigations.

⁴⁷ See Downstream Coalition Comments I at 32-33.

⁴⁸ See A.O. Smith Comments I at 8-11.

⁴⁹ See Fusheng Comments I at 3.

⁵⁰ See Capella Comments I at 9.

⁵¹ *Id.* at 10.

- **Tie Racks** (includes hooks and finger pull made from non-extruded materials, dimensions vary, ready for use as imported, used as a closet accessory to hang ties);⁵²
- **Banner Stands** (includes a plastic core, plastic fin, steel locking pin clip, cast pole and nylon bag, no product dimensions provided, ready for use as imported, used to display material or advertisements.);⁵³
- **Handheld Flashlights with Battery** (includes steel tensions springs, steel, brass, bronze, plastic, and rubber components, and battery, no product dimensions provided, ready for use as imported, used as a handheld device to provide lighting);⁵⁴
- **Hanging Closet Organizers** (includes fabric shelving made of a canvas and polyester blend, no product dimensions provided, ready for use as imported, used to store items in a closet);⁵⁵
- **Assembled Step Stools** (Parties have submitted exclusion requests for several variations of this assembled step stool; each ready for use as imported);⁵⁶
- **Assembled Ladders** (Parties have submitted exclusion requests for several variations of this product; each ready for use as imported);⁵⁷
- **Box and Magnetic Levels** (includes rubber grips and ends, plastic, and liquid, no product dimensions provided, ready for use as imported, used to ensure construction projects are level).⁵⁸
- **Assembled Window/Door Units** (includes glass, no product dimensions provided, fully assembled and ready for use as imported, used to install a door or window);⁵⁹
- **Medicine Cabinets** (includes plastic, carbon steel, particleboard, MDF, stainless steel and aluminum, no product dimensions provided, ready for use as imported, used for the storage of medicine);⁶⁰
- **Full Extension Mirror** (includes plastic bushings, packaging and hardware, glass mirror, steel pivot arm, a steel mounting plate, steel slides mounting plate, steel slide assemblies, and a steel frame corner bracket, no product dimensions provided, ready for use as imported, used as a reflective surface);⁶¹
- **Chillers** ((1) Chillers; (2) Screw Chillers; (3) Scroll Chillers are large units that often sit on the rooftops of commercial buildings. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations.⁶² Ready for use as imported, used as part of a heating/cooling system);⁶³
- **Fuel Funnels** (includes a stainless-steel ball, valve, screen, and stainless steel or PVC hose, no product dimensions provided, ready for use as imported, used “to control and safely transfer fuel from a cannister to the boat engine without spillage.”);⁶⁴

⁵² *Id.* at 11-12.

⁵³ *See* Skyline Comments I at 5-6.

⁵⁴ *See* Target Comments I at 32-35.

⁵⁵ *Id.* at 39-42.

⁵⁶ *See* Tricam Comments I at 9-10 and Attachment 2; and Dorel Comments I at 3.

⁵⁷ *See* Tricam Comments I at 3-9; Dorel Comments I at 2-4; and Home Depot Comments I at 2-4 and Attachment 1.

⁵⁸ *See* Black and Decker Comments I at 7-10.

⁵⁹ *See* FISA Comments I at 2-4.

⁶⁰ *See* Mayzon Comments I at 8-9.

⁶¹ *See* TAG Comments I at 8-9.

⁶² *See* Petitioner Scope Questionnaire Response at Exhibit 1.

⁶³ *See* Downstream Coalition Comments I at 30-32.

⁶⁴ *See* NMMA Comments I at 42-47.

- **Paddles** (including plastic handles, shafts, grips, and blades, 7' 2" long, ready for use as imported, used to move kayaks.);⁶⁵
- **Oars** (including plastic connectors, grips, and blades, no product dimensions provided, ready for use as imported, used to move kayaks.);⁶⁶
- **Light Bar** (includes LED lights, cast aluminum panels and mounts, poly lens, wiring and reflector cones, no product dimensions provided, imported as a standalone product, used as an additional off road light source);⁶⁷
- **Assembled Boat Hooks** (includes vinyl handles and glass-reinforced nylon, dimensions vary, ready for use as imported, used to pull, or put covers on boats.);⁶⁸
- **Assembled Brush Kits** (includes nylon hook and a plastic brush attachment, no product dimensions provided, ready for use as imported, used to clean boats.);⁶⁹
- **Work Platforms** (includes handles, lever, spacer, mechanical guides, protective guards, and labels made of plastic, locking pins, fasteners, springs, hinges, and support made of steel, rubber feet, and resins, product dimensions vary, ready for use as imported, used in various locations around the home or construction site);⁷⁰
- **Picture Frames with Glass Included** (includes tempered glass, aluminum, mat board and backing board, no product dimensions provided, ready for use as imported, used to display, and protect photographs or artwork.);⁷¹
- **Hand Trucks** (includes steel, plastics and wheels, no product dimensions provided, ready for use as imported, used to move heavy items);⁷²
- **Light Commercial HVAC Unit** (includes sheet metal, motors or PCBs, valves, and control panels, no product dimensions provided, ready for use as imported, used in heating and cooling systems.);⁷³
- **Toilet Safety Bar** (includes a steel hook, supporting bar, and a polyethylene armrest (non-aluminum extrusion), 18.25" by 23.25" by 9.00", ready for use as imported, provides armrest and gripping point for toilet use);⁷⁴

C. *Unassembled Merchandise (not a part or subassembly), Containing Components that are not Aluminum Extrusions, Without Further Processing or Addition of Parts or Materials, Packaged Combination of Parts, Requiring Assembly*

We preliminarily find the products under this section to meet the criteria under the following scope paragraph:⁷⁵

The scope also excludes aluminum extrusions contained in unassembled merchandise, if the unassembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the unassembled merchandise must also contain a

⁶⁵ *Id.* at 84.

⁶⁶ *Id.*

⁶⁷ See Tractor Supply Comments I at 3-4.

⁶⁸ See NMMA Comments I at 73-74.

⁶⁹ *Id.* at 76.

⁷⁰ See Tricam Comments I at 11-12; and Home Depot Comments I at 45-51.

⁷¹ See MCS Comments I at 9-12.

⁷² See Dorel Comments I at 3 and Attachment 2.

⁷³ See Downstream Coalition I. at 26-28.

⁷⁴ See Moen Comments I at 32-36 and at Exhibit 5.

⁷⁵ See Section III.C.1. of this memorandum, below, for an explanation of revisions to this paragraph.

component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the unassembled merchandise must be a packaged combination of parts that is ready to be assembled as imported, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the unassembled merchandise must be sold and enter as a discrete kit on one Customs entry form.

We preliminarily find the following products to be excluded from the scope of the investigations.

- **Unassembled Ladders** (Parties have submitted exclusion requests for several variations of this product. These ladders are imported as an unassembled kit; ready to be assembled as imported.);⁷⁶
- **Unassembled Step Stools** (Parties submitted exclusion requests for several variations of this unassembled step stool. These step stools are imported as an unassembled kit; ready to be assembled as imported.);⁷⁷
- **Unassembled Chairs** (Parties submitted exclusion requests for several variations of this product that include aluminum extrusions. These chairs are imported as an unassembled kit; ready to be assembled as imported.);⁷⁸
- **Tables (With Non-Aluminum Extrusions Tops and Aluminum Extrusions Legs)** (includes tops made of aluminum sheet, stainless-steel hardware, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to provide an elevated surface);⁷⁹
- **Fire Pit Tables** (tops and sides made of aluminum sheet, glass beads, batteries, stainless-steel hardware, and a cover, no product dimensions provided, contains stainless-steel hardware, enters as an unassembled kit, ready to be assembled as imported, table that can be used as a firepit);⁸⁰
- **Wood-Mounted Wall Hook Rails** (includes a wood base, faux marble faces, screws, anchors, and a hook, “18 Inches (L), 3 Inches (W), 2.75 Inches thick,” imported as a discrete kit, ready to be assembled as imported, used as an accessory to hold clothing);⁸¹
- **Outdoor Wicker Furniture with Aluminum Extrusion Frames or Legs** (includes wicker, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture.);⁸²
- **Daybeds** (includes fabric coverings and cushions and cast aluminum, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture.);⁸³

⁷⁶ See Home Depot Comments I at 2-4 and Attachment 1; Harbor Freight Comments I at 8 and Attachment 1; LGLS Comments I at 2-5 and Attachment 1; and Coalition Comments I at 12-19.

⁷⁷ See Coalition Comments I at 12-14; and LGLS Comments I at 2 and Attachment 1.

⁷⁸ See Ashley Comments I at 27-32; Home Depot Comments I at 36-37 and Exhibit 5; and Kimball Comments I at 16-28.

⁷⁹ See Ashley Comments I at 17-18 and at Exhibit V; and Home Depot Comments I at 23-27.

⁸⁰ See Ashley Comments I at 22-26; and Home Depot Comments I at 28-31.

⁸¹ See Target Comments I at 36 and Exhibit 5.

⁸² See Home Depot Comments I at 32-36.

⁸³ *Id.* at 36-41.

- **Couches** (includes fabric coverings and cushions and cast aluminum, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture);⁸⁴
- **Patio Dining and Conversation Sets** (includes fabric coverings and cushions, cast aluminum, and wicker, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture);⁸⁵
- **Wall-Mounted Toilet Paper Holder** (includes plastic hardware, steel hardware, steel and zinc posts, steel rods, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold toilet paper);⁸⁶
- **Towel Bar** (includes steel finials, plastic and steel hardware, and steel and zinc posts, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold a towel);⁸⁷
- **Towel Ring** (includes plastic, steel and zinc posts, plastic and steel hardware, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold a towel);⁸⁸
- **Air Handlers** (includes sheet metal, motors or PCBs, and valves, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to “condition and circulate large volumes of air throughout a space via ductwork”);⁸⁹
- **Work Benches** (includes work bench body, drawers, locks, side handles, and pegboards made of stainless steel, tops made of rubberwood, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as elevated surface and storage);⁹⁰
- **Tool Chest** (includes a top lid, drawers, locks, side handles, and body made of stainless steel, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used for tool storage);⁹¹
- **Garage Cabinets** (includes a steel body, no product dimensions provided, imported “as a set, but in folded form,” used for storage);⁹²
- **Slide Glass Window** (includes window frames, a railing that can be made of plastic, glass panels, handles, and locking mechanisms made of steel or plastic, no product dimensions provided, imported “into the United States in a condition that is suitable for retail sale and “ready to install” into a building by the end user,” installed in buildings to keep the elements out);⁹³
- **Unassembled Window/Door Units** (includes glass, no product dimensions provided, imported as a discrete kit, ready to be assembled as imported, used to install a door or window);⁹⁴
- **Unassembled Marine Interior Products** (includes a fiberglass console with stainless-steel cup holders and an ethylene-vinyl acetate pad, and furniture with plastic, vinyl, and

⁸⁴ *Id.*

⁸⁵ *Id.* at 41-45.

⁸⁶ *See* Target Comments I at 20-24.

⁸⁷ *Id.*

⁸⁸ *Id.*

⁸⁹ *See* Downstream Industries Coalition Comments I at 26 and 43.

⁹⁰ *See* Trinity Comments I at 9-10.

⁹¹ *Id.* at 10-11 (Trinity provides a length and width dimension for the product, but it does not include height information).

⁹² *Id.* at 11-12.

⁹³ *See* Coalition Comments I at 9.

⁹⁴ *See* FISA Comments I at 2-4.

stainless-steel cupholders, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit. The fiberglass console is used as “a helmstand that serves as a base upon which all the electronics and controls for both surf boats and pontoons are built,” and the furniture forms an interior seating in boats);⁹⁵

- **Unassembled Shower Rods** (Parties submitted exclusion requests for several variations of this product that include aluminum extrusions (unlike those made of cast aluminum mentioned above). These shower rods are imported as an unassembled kit; ready to be assembled as imported.);⁹⁶
- **Shower Caddies** (includes cast aluminum supports, trays, hooks, and plastic rod, product dimensions not provided, ready to be assembled as imported, enters as a discrete kit, used to hold shower items such as soap);⁹⁷
- **Storage Baskets** (includes plastic, carbon steel, aluminum, and stainless steel, no products provided, ready to be assembled as imported, enters as a discrete kit used to hold shower items such as shampoo and conditioner);⁹⁸
- **Laundry Organizer** (includes a top cap, plastic side clip and locking clip, steel slide assembly, fabric laundry assembly, and steel handle, and a zinc end cap, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to hold, and organize laundry);⁹⁹
- **Jewelry Drawer** (includes a plastic front cap, a plastic back cap, a wrapped wood MDF base plank assembly, packaging and hardware, a fabric watch pillow, steel slide assemblies, a glass front, a wrapped insert, and a fabric ring holder insert, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to hold, and store jewelry);¹⁰⁰
- **Symphony** (includes PVC horizontal gaskets, packaging and hardware, a PVC horizontal wrap, a steel channel plate, a steel mounting post, a zinc side cap, a zinc top and bottom cap, and a zinc mounting standoff, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a wall hanging storage device);¹⁰¹
- **Divided Basket** (includes basket clips, plastic front caps, plastic back caps, fabric divide assembly, divider brackets, slide snaps, protective packaging, steel side bar, plastic rods, fabric and hardboard basket assembly, drawer front, and slide assemblies, ready to be assembled as imported, enters as a discrete kit, used for clothing storage);¹⁰²
- **Shoe Organizer** (includes plastic mounting brackets, plastic slide clips, plastic locking clips, packaging and hardware, steel slide assemblies, steel shoe hoops, and zinc end caps, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used for shoe storage);¹⁰³

⁹⁵ See NMMA Comments I at 54-57 and Exhibit 8.

⁹⁶ See Target Comments I at 26-31 and Exhibit 5; Moen Comments I at 22-27 and Exhibit 5; Mayzon Comments I at 4; and Home Depot Comments I at 15-21 and Exhibit 5.

⁹⁷ See Target Comments I at 16-18; and Mayzon Comments I at 5-6.

⁹⁸ See Mayzon Comments I at 5-6.

⁹⁹ *Id.* at 11.

¹⁰⁰ *Id.* at 13.

¹⁰¹ *Id.* at 13-14.

¹⁰² *Id.* at 15-16.

¹⁰³ *Id.* at 16-17.

- **Unassembled Shower Door Kits with Glass Included** (includes glass, frame, handles, hardware, fasteners, gaskets, threshold, and other components, dimensions vary, ready to be assembled as imported, enters as a discrete kit, used to provide access to shower);¹⁰⁴
- **Saw Stand** (includes rubber feet, soft-grip handles, wheels, axles leg supports, beams, brackets, locking levers, and other components based on model, dimensions vary, imported as an unassembled kit, ready to be assembled as imported, used to secure the mounting of saws);¹⁰⁵
- **Privacy Booths, also known as “PODS”** (includes steel frame, PET panels, glass, plywood panels, rubber, foam, steel parts, LED lights, cables, and wiring system, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to create an enclosed space for privacy in busy areas);¹⁰⁶
- **Panel Kits with Glass and Wood Panels** (includes glass and wood panels, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to put panels in rooms);¹⁰⁷
- **Monitor Arms** (includes plastic wire managers and grommets, single model 16.22” W x 16.3” H, double model 27.76”W x 9.45”D x 5.91”H, ready to be assembled as imported, enters as a discrete kit, “intended purpose to hold monitors”);¹⁰⁸
- **Unassembled Boat Hooks** (includes vinyl handles and glass-reinforced nylon, 3.5’ x 5.5’ or 3.5’ x 8,’ ready to be assembled as imported, enters as a discrete kit, used to pull, or put covers on boats.);¹⁰⁹
- **Unassembled Brush Kits** (includes nylon hook and a plastic brush attachment, no product dimensions provided, imported as a discrete kit, used to clean boats.);¹¹⁰
- **Inflatable Kayak Set** (includes varying plastic materials and a set of oars/paddles, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to make an inflatable kayak.);¹¹¹
- **Inflatable Boat Set** (includes varying plastic materials and a set of oars/paddles, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to make an inflatable boat.);¹¹²

D. Multiple Subassemblies of a Larger Whole with Components that are not Aluminum Extrusions, Beyond Fasteners, and Fully & Permanently Assembled with at Least One Different Subassembly, and Meets Three-Part Test

We preliminarily find the products under this section to be a list of products containing multiple subassemblies of a larger whole with non-extruded components beyond fasteners and that are fully and permanently assembled with at least one other different subassembly, and: (1) at least one of the subassemblies, if entered individually, would not itself be subject to the scope; (2) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the

¹⁰⁴ See Dreamline Comments I at 2-6 and Attachment 3.

¹⁰⁵ See Black & Decker Comments I at 3-6 and Attachment I.

¹⁰⁶ See Kimball Comments I at 28-32.

¹⁰⁷ *Id.* at 32-40.

¹⁰⁸ *Id.* at 40-45.

¹⁰⁹ See NMMA Comments I at 73-74.

¹¹⁰ *Id.* at 76.

¹¹¹ *Id.* at 84-90.

¹¹² *Id.*

actual weight of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations); and (3) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the number of pieces of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations). We preliminarily find the following products to be excluded from the scope of the investigations.¹¹³

- **Complete Boats Without Engines** (a boat structure containing all components and parts, except for an engine. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations.¹¹⁴ Complete boats without engines are imported fully assembled, and are used as a mode of transportation within a large body of water);¹¹⁵
- **Chart Plotter** (includes LCD screens, software, plastics, copper wires, and batteries. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations.¹¹⁶ Chart plotters are used to enhance boat experiences.);¹¹⁷
- **Multi-functional Marine Displays** (e.g., fish finders; an electronic display, with components like the chart plotter described above. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations.¹¹⁸ Multi-functional Marine Displays are used to “assist with charting plots and depth finding”);¹¹⁹

E. Glass Refrigerator Shelves with Glass Decorative Aluminum Trim & Certain Other Characteristics

We preliminarily find the products under this section to meet the criteria under the following scope paragraph:

The scope also excludes fully and permanently assembled glass refrigerator shelves with decorative aluminum trim meeting the following characteristics: (1) aluminum trim meeting Aluminum Association series 6063-T5 designation that is anodized; (2) aluminum trim length of not more than 800mm; and (3) aluminum trim width of not more than 40mm. Such fully and permanently assembled glass refrigerator shelves include other components in addition to the aluminum trim, including, but not limited to, glass, steel, and plastic. Only fully and permanently assembled glass refrigerator shelves that require no further processing, fabrication, finishing, assembly, or the addition of any parts or material are excluded.

We preliminarily find the following products to be excluded from the scope of the investigations.

¹¹³ For Commerce to issue a final scope determination for these products, parties must submit the necessary documentation to support the three-part test.

¹¹⁴ See Petitioner Scope Questionnaire Response at Exhibit 1.

¹¹⁵ See Downstream Industries Coalition Comments I at 22-23.

¹¹⁶ See Petitioner Scope Questionnaire Response at Exhibit 1.

¹¹⁷ See NMMA Comments I at 90-95.

¹¹⁸ See Petitioner Scope Questionnaire Response at Exhibit 1.

¹¹⁹ See Downstream Industries Coalition Comments I at 23-24.

- **Refrigeration Glass Shelves** (includes glass, steel and plastic components, no product dimensions provided, imported fully and permanently assembled, used to provide shelving in refrigerators).¹²⁰

2. Products Covered by the Scope of the Investigations

A. Products Listed in the Scope Language

We preliminarily find that the products under this section are covered by the scope of the investigations because they are specifically identified as covered merchandise in the scope language, as proposed by the petitioner, *see* Appendix I.

- **Door Sills** (door unit parts or subassemblies; includes horizontal beams, plastic caps, polystyrene, used to “prevent the door from swinging through and {to} help keep the elements out”);¹²¹
- **Heat Sinks** (appliance parts or subassemblies; not meeting the heat sinks exclusion; includes a small CNC-machined heat sink for electronics, and fan, no product dimensions provided, imported as a part or subassembly in downstream products, used to dissipate heat and maintaining safe temperature limits in computers);¹²²
- **Actuators for Solar Modules** (part of solar panel mounting systems or solar tracker assemblies with gears; includes a motor, retractable arm, and outer tube made of aluminum, no product dimensions provided, used “to angle solar panels into positions that maximize the ability to collect solar energy”);¹²³
- **Bearings for Solar Modules & Actuators** (part of solar panel mounting systems or solar tracker assemblies with gears; includes plastic wheel, no product dimensions provided, “used in conjunction with GameChange’s solar modules and actuator”);¹²⁴
- **Deck Railing Kits** (railing or deck system parts or subassemblies; includes aluminum casting base skirt, and aluminum casting top cap, no product dimensions provided, imported as an unassembled kit, used as a safety device to prevent a fall);¹²⁵
- **Fence Kits** (fence system parts or subassemblies; includes fabricated extrusions, and steel screws, no product dimensions provided, imported as an unassembled kit, used to construct fencing);¹²⁶
- **Screen Door Kits** (fenestration system parts or subassemblies; includes fabricated extrusions and steel screws, no product dimensions provided, imported as an unassembled kit, used to construct a screen door);¹²⁷
- **Screen Enclosure Angle Clips** (parts and subassemblies for screen enclosures (fenestration system parts), includes hole-punches, and powder coating, no product

¹²⁰ See Whirlpool Comments II at 2.

¹²¹ See Masonite Comments I at 3.

¹²² *Id.* at 29 and 57.

¹²³ See GameChange Comments I at 2.

¹²⁴ *Id.* at 4.

¹²⁵ See Container Direct Comments I at 2-3.

¹²⁶ *Id.* at 4-6.

¹²⁷ *Id.* at 7-10 (The Coalition provides a description of screen doors as an assembled product. However, Container Direct described this screen door as a kit).

dimensions provided, “used to connect, and hold together various aluminum members in the screen enclosure”);¹²⁸

- **Bugsweep for Screen Door** (parts and subassemblies for screen enclosures (fenestration system parts), including rubber strips, no product dimensions provided, “used as a seal between the door and concrete”);¹²⁹
- **Screen Door Hinges** (parts and subassemblies for screen enclosures (fenestration system parts), including aluminum profiles, stainless steel pin, and powder coating, no product dimensions provided, “used to connect screen door to aluminum frame and assist the door in swinging open and closed”);¹³⁰
- **Stainless Steel Cable Tie Assembly** (parts and subassemblies for screen enclosures; (fenestration system parts) includes stainless steel cable, stainless eyebolts and nuts, no product dimensions provided, “used to connect enclosure to concrete desk so as to keep the enclosure stable and secure”);¹³¹
- **Automotive Grade Bumper Beams** (motor vehicle parts or subassemblies, such as bumpers for motor vehicles);¹³²
- **Automotive Grade Structural Components** (motor vehicle parts or subassemblies, *e.g.*, cross members, support beams, and carriers designed to retain their shape and protect the occupants in the case of a crash¹³³);¹³⁴
- **Automotive Grade Crash Relevant Extrusions** (motor vehicle parts or subassemblies, *e.g.*, crush cans and side sills designed to crumple and dissipate energy in the event of a crash);¹³⁵
- **Sun/Moon Roof Framing** (includes guide rails, tubes, roller blinds, crossbars, tension bows, seal holders, and window deflector beams made from an aluminum alloy, with a wall thickness less than 25 mm and a length between 500 mm and 1400 mm, used in automotive applications);¹³⁶
- **Convertible Product Framing** (part of sun/moon roof framing; includes guide rails, tubes roller blinds, crossbars, tension bows, seal holders, and window deflector beams, with a wall thickness less than 25 mm, and a length between 500 mm and 1400 mm, imported as a part, used automotive applications);¹³⁷
- **Window Wall Units** (window wall fenestration system parts or subassemblies which are installed in the structure of a building, including parts or subassemblies of storefronts; includes *inter alia*, glass, non-extruded aluminum, sill and jamb receptors, and slab covers, no product dimensions provided, imported as a kit, used as a building installation of component);¹³⁸
- **Curtain Walls** (curtain wall fenestration system parts or subassemblies which are fully installed separate from a building structure and attached like a “curtain” to the building; includes *inter alia*, glass, non-extruded aluminum, sill and jamb receptors, and slab

¹²⁸ See JMD Comments I at 2.

¹²⁹ *Id.*

¹³⁰ *Id.* at 2-3.

¹³¹ *Id.* at 3.

¹³² See Tesla Comments I at 10-15.

¹³³ See Petitioner Scope Questionnaire Response at 17.

¹³⁴ *Id.*

¹³⁵ *Id.*

¹³⁶ See Webasto Comments II at 2-3.

¹³⁷ *Id.*

¹³⁸ See LSF Comments I at 5-9; *see also* Tecnoglass Comments I at 3-5.

covers, no product dimensions provided, imported as a kit, used as a building installation of component);¹³⁹

- **Astragals** (door unit parts or subassemblies; includes plastic, wood, steel, and other metals, no product dimensions provided, “used to secure double-door (*i.e.*, “French door”) units”);¹⁴⁰
- **Shock Absorbers** (motor vehicle parts or subassemblies; includes hydraulic fluid and gas, and other components, no product dimensions provided, imported as a complete car part, “used to absorb and dump shocks or impulses to the vehicle, control the impact and rebound movement of the vehicle’s springs and suspension, and keep the vehicle’s tires or tracks in contact with the ground to ensure that the vehicle’s ability to drive, steer, and brake is not compromised.”);¹⁴¹
- **Suspension Damper** (motor vehicle parts or subassemblies; includes oil and nitrogen gas, no product dimensions provided, imported as completed car part, “used to control vehicle body movement during dynamic road situations.”);¹⁴²
- **Exhaust Mount** (motor vehicle parts or subassemblies; includes welded brackets, no product dimensions provided, imported as a completed car part, “used to attach the exhaust system to the chassis of an off-road vehicle”);¹⁴³

B. Aluminum Extrusions and Fasteners (a fastener is a part that attaches or fastens two or more components, e.g., screws, nuts, bolts, etc.)

We preliminarily find that the products under this section are “merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled.” Therefore, we preliminarily find that the following products are covered by the scope of the investigations.

- **Stand-Alone Planks** (including plastic and rubber elements, no product dimensions provided, used to be “capable of being fully functional as a plank any time it is able to rest on two secure, weight-bearing points of contact.”);¹⁴⁴
- **Tub Grips** (including rubber anti-slip pads, 16.5” (L) by 3.75” – 5.75” (W) by 19.5” (H) imported as assembled merchandise, used to ensure an individual can safely enter and exit a tub);¹⁴⁵
- **Guide Rails** (including an edge protector, high friction strips, and rubber strips, no product dimensions provided, imported as assembled merchandise, used as a safety mechanism to obtain a clean cut with a variety of materials);¹⁴⁶
- **Closet Aluminum Poles** (solely alloy series 6 aluminum extrusions, round 1-5/16” diameter, extruded and anodized, varying lengths, no fasteners, imported in assembled form, unspecified usage);¹⁴⁷

¹³⁹ See Petitioner Scope Questionnaire Response at 28-33.

¹⁴⁰ See Masonite Comments I at 4-11.

¹⁴¹ See Polaris Comments I at 7-8.

¹⁴² *Id.* at 8-10.

¹⁴³ *Id.* at 10-11.

¹⁴⁴ See LGLS Comments 1 at 4-7.

¹⁴⁵ See Moen Comments I at 29-30 and Exhibit 5.

¹⁴⁶ See Black & Decker Comments I at 10.

¹⁴⁷ See Capella Comments I at 17; and Capella Comments IV at Exhibit 2.

- **Shoe Fences** (solely alloy series 6 aluminum extrusions, 8 FT, for ¾” boards, extruded and anodized, easy installation cut to fit H1-3/4 W1, no fasteners, imported in assembled form, used to hold shoes);¹⁴⁸
- **Aluminum U-Channel** (solely alloy series 6 aluminum extrusions, 8ft, H7/8 W15/16, no fasteners, imported in assembled form, used as a closet accessory);¹⁴⁹

C. *Aluminum Extrusions Contained in Merchandise that is a Part or Subassembly of a Larger Whole, With or Without Non-Aluminum Extrusions Components, Beyond a Fastener*

We preliminarily find that the products under this section are covered by the following scope language: “aluminum extrusions contained in merchandise that is a part or subassembly of a larger whole, whether or not the merchandise also contains a component other than aluminum extrusions that is beyond a fastener. Such merchandise may be either assembled or unassembled at the time of importation.”

- **Lacrosse Stick Handles** (includes aluminum tubes with rubber endcaps, no product dimensions provided, enters as a lacrosse-stick handle to be attached to a lacrosse stick with basket, used to play lacrosse sport);¹⁵⁰
- **Boat Ladders** (includes two 36-inch stainless steel cables with stainless-steel eyelet swaged ends, two plastic latches, two polypropylene and Kevlar strips, stainless steel springs, ultra-high molecular weight, polyethylene spacers, stainless steel hardware, aluminum pulleys, labels, and hinge plates, no product dimensions provided, ready for use as imported, used to give “access to a human on or off a boat through the use of tension and a combination of non-aluminum parts,” *i.e.*, boat is the larger whole);¹⁵¹
- **Boat Hull** (including aluminum sheet, formed aluminum, and PVC pipe, no product dimensions provided, imported as complete part to be used in further assembly of boats, used as bottom of a boat);¹⁵²
- **Flagpoles and Grill Posts** (flagpoles; wind sign frames; includes protective base, stamped aluminum plate, and stainless-steel hardware, no product dimensions provided, imported as a kit designed to be attached to a boat, used to support a grill, *i.e.*, boat is the larger whole);¹⁵³
- **Light Poles** (includes plastic or glass covers, copper wires, stainless-steel hardware, with brass terminals and light bases made of materials such as nylon, brass and stainless-steel, 24” to 54” long, imported as product or in discrete kits, used to mount lights for boats, *i.e.*, boat is the larger whole);¹⁵⁴
- **RV Ladders** (includes plastic, product dimensions vary, used to “climb to the top of your RV with enhanced stability, safety, and control,” *i.e.*, RV is the larger whole);¹⁵⁵
- **Boat Cover Extension Poles/Telescopic Poles** (includes plastic sleeves, liners, rings, and stainless-steel buttons, screws, and hardware, dimensions vary, ready for use as

¹⁴⁸ *Id.*

¹⁴⁹ See Capella Comments I at 18; and Capella Comments IV at Exhibit 2.

¹⁵⁰ See Fusheng Comments I at 4-5; and Fusheng Comments II at 2.

¹⁵¹ See NMMA Comments I at 35-42.

¹⁵² *Id.* at 61-67.

¹⁵³ *Id.* at 68-73.

¹⁵⁴ *Id.* at 74-76.

¹⁵⁵ See LCI Comments I at 6 and Exhibit 1.

imported or imported as discrete kits, used “between the boat deck and the under-side of the boat cover to prevent sagging,” *i.e.*, boat is the larger whole);¹⁵⁶

- **Automotive Heating System Mounting Brackets** (automotive heating and cooling system components; a bracket that has a wall thickness of 2 to 4 mm, connecting block fittings, and receiver driers or manifolds used on automotive heat exchangers, dimensions vary, imported as a part or subassembly, “used on automotive heat exchangers”);¹⁵⁷
- **T-Top Kits** (includes a metal frame, canvas or hard top, 73in (L) by 60in (W) by 83in (H), imported as an unassembled kit, used to “provide standing height shade while giving boat drivers an unobstructed area for movement and casting lines,” attached to boats *i.e.*, a larger whole);¹⁵⁸
- **Backrest Kits** (includes aluminum arms, padded cushions and ergonomic design, and folding arms, no product dimensions provided, imported as unassembled kit product, used to provide back support for a user, attached to boats *i.e.*, a larger whole);¹⁵⁹
- **Fishing Rod Holders/Racks** ((1) Fishing Rod Holders; (2) Fishing Rod Racks; includes a stainless-steel thumb screw, weld covers, and spline caps, product dimensions vary, used as storage for fishing rods, attached to boats *i.e.*, a larger whole);¹⁶⁰
- **Sport Fishing Aluminum Outrigger Poles** (includes gold or silver rings and tips, and a locking pin, product dimensions vary, imported as a kit, “used to provide stability for fishing boat and a platform from which to fish,” attached to boats *i.e.*, a larger whole);¹⁶¹
- **Marine Rod Holders** (includes plastic liners, stainless-steel screws, plastic sleeves, and fabric strips, no product dimensions provided, used to hold rods on boats *i.e.*, a larger whole);¹⁶²
- **Electronic Hydrofoils Imported With or Without Batteries** (includes a board, mast, and wing, primarily built of fiberglass and/or carbon fiber, no product dimensions provided, imported as separate parts, and then packaged for sale in United States, used to “allow users to fly over the water” for marine products *i.e.*, a larger whole);¹⁶³
- **Microchannel Heat Exchangers** (includes end plates, copper tube, plastic cap, manifold, no product dimensions provided, imported as a subassembly for downstream products, used as a part in “residential and commercial air conditioning systems as well as refrigeration equipment driven by energy efficiency and reduction of the refrigerant charge”);¹⁶⁴
- **Scene Lighting LED Head Subassembly** (a diagram was included as a description for this product. The LED head subassembly is imported with 6 LED lights, and is used as part of a lighting system);¹⁶⁵
- **Headboards with LED Housings** (includes wood headboards, cables, and LED lights, no product dimensions provided, used as part of a bed assembly *i.e.*, a larger whole);¹⁶⁶

¹⁵⁶ See NMMA Comments I at 73; and TACO Comments I at Attachment 2.

¹⁵⁷ See MAHLE Comments II at 21.

¹⁵⁸ See MAC Comments I at 3 and Exhibit 2; *see also* TACO Comments I at 3 and Attachment 3.

¹⁵⁹ See TACO Comments I at 3 and Attachment 3.

¹⁶⁰ *Id.* at 3 and Attachment 2.

¹⁶¹ *Id.* at 4 and Attachment 4.

¹⁶² See NMMA Comments I at 95-100.

¹⁶³ See Downstream Industries Coalition Comments I at 25.

¹⁶⁴ *Id.* at 28 and 44.

¹⁶⁵ *Id.* at 33-35.

¹⁶⁶ See Kimball Comments at 45-48.

- **Tunnel Rack** (including aluminum tubes, and aluminum brackets, product dimensions provided in diagram, “half of its parts are aluminum extrusions,” used to provide a structure to load with cargo and robustly secure to the full vehicle *i.e.*, a larger whole);¹⁶⁷
- **Hood Rack** (including powder-coated tube steel, product dimensions in diagram, “one small part of 14 parts is an aluminum extrusion,” used to increase the load-carrying capability and to protect the vehicle from brush and debris, vehicle is the larger whole);¹⁶⁸
- **Snowboard Rack** (includes rubber straps and ultra-high molecular weight polyethylene inserts, no product dimensions provided, “installed on an off-road vehicle to enable it to carry skis and snowboards,” off-road vehicle is the larger whole);¹⁶⁹
- **Solid Step® Premium RV Steps** (includes manual steel and aluminum steps, aluminum anti-slip treads, product dimensions vary, imported unassembled, “the Solid Step gets you in and out of your RV with peace of mind,” the RV is the larger whole);¹⁷⁰
- **Slide Toppers** (includes cold-rack-tested 13.5oz. vinyl with leak-proof, welded seams, product dimensions vary, imported unassembled, used to “give your RV slide-out an extra layer of protection from dirt, debris and the outdoor elements,” the RV is the larger whole);¹⁷¹
- **Assembled Motors for Furniture** (includes a motor, plastic, and wiring, no product dimensions provided, part or subassembly of furniture, “used in Ashley’s motion furniture,” motion furniture is the larger whole);¹⁷²
- **Anti-tip Furniture Systems** (includes interlock modules, spacers, plastic blocks, end caps, slides, springs, and spring blocks, no product dimensions provided, imported unassembled, part or subassembly of furniture systems, “serves as locking mechanisms for the drawers of file cabinets, credenzas, dressers, and other furniture”);¹⁷³
- **Boat Fences** (includes vinyl inserts and stainless-steel light housings, no product dimensions provided, assembled merchandise at time of importation, used exclusively on boats, *i.e.*, a larger whole);¹⁷⁴
- **Multiple Automatic Door Assembly Types Without Glass** ((1) Slide Door; (2) Swing Door; and (3) Revolving Door; includes decals, sensors, hardware and instructions, product dimensions provided, enter as product with all parts except glass, function as a barrier to entry and exit to a building, *i.e.*, the larger whole);¹⁷⁵
- **Boat Chairs** (chairs specific to boats which may include an aluminum or plastic frame, foam, and upholstered vinyl, or molded foam, and a gas or hydraulic cylinder, product dimensions vary, imported as fully assembled or partially assembled, used as seating on boats *i.e.*, a larger whole);¹⁷⁶

¹⁶⁷ See Polaris Comments I at 12 and Attachment 6 (Polaris incorrectly referenced Attachment 3 in their submission. Further, the submission contains two attachments labeled as Attachment 6. The dimensions can be found in the first Attachment 6 of the submission.)

¹⁶⁸ See Polaris Comments I at 14-15 and Attachment 5.

¹⁶⁹ *Id.* at 18 and Attachment 6.

¹⁷⁰ See LCI Comments I at 6 and Exhibit 1.

¹⁷¹ *Id.*

¹⁷² See Ashley Comments I at 32.

¹⁷³ See Wesko Comments I at 16-17 and Exhibit 5.

¹⁷⁴ See NMMA Comments I at 49.

¹⁷⁵ See Overhead Door Comments I at 2-5.

¹⁷⁶ See Springfield Comments I at 2-9 and Exhibit 1.

- **AC Condensers**¹⁷⁷ (includes non-extruded components, no product dimensions provided, used in a vehicle to cool down a refrigerant by transferring its heat to the flow of ambient air passing through it, the vehicle is the larger whole);¹⁷⁸
- **Wakeboard Towers** (includes non-aluminum parts such as rubber inserts, no product dimensions provided, imported ready for installation onto a boat, used to make towing higher in boats, *i.e.*, a larger whole);¹⁷⁹
- **Boat Cover Support System** (includes two or three extension poles with locking mechanisms composed of rubber or plastic, poly-web straps and bow spreaders, no product dimensions provided, entered as fully assembled merchandise or as a discrete kit, used in further assembly of boats to help support boat covers, the boat is the larger whole);¹⁸⁰
- **Boat Diving Boards** (includes stainless steel, rubber, plastic, urethane, and labels, 10.5” W x 38.5” H x 24” D, imported unassembled, used as a subassembly attachment to a boat to dive into a body of water);¹⁸¹
- **Pontoon Chassis** (includes aluminum sheet, formed aluminum, and PVC pipe, no product dimensions provided, imported as a part to be used in further assembly of boats, used as the bottom of a boat);¹⁸²
- **Bed Rack** (includes steel parts, no product dimensions provided, imported as unassembled merchandise, ready to be installed onto an off-road vehicle *i.e.*, a larger whole, used “to provide a platform for other attachments and enable the user to stack more cargo in the tonneau”);¹⁸³
- **Boat Pedestals** ((1) removeable pedestals; (2) fixed pedestals; (3) table pedestals; includes a gas or hydraulic cylinder, mount made of cast and rolled metal, no product dimensions provided, multiple types listed, imported as a subassembly of a boat, used to support boat seats, *i.e.*, a larger whole);¹⁸⁴
- **Canvas Boat Shades** (includes injection-molded nylon components, stainless-steel fasteners, and fabric, product dimensions vary, imported as an unassembled kit, ready to be used for further assembly onto boats, used “to be mounted on boat to provide shade protection that can withstand the harsh marine environment,” the boat is the larger whole).¹⁸⁵

3. Insufficient Information for Preliminary Scope Determination

The following is a list of products for which interested parties did not provide sufficient narrative information critical to issuing a preliminary scope determination, such as the composition of the product, product dimensions, whether it contains fasteners, whether completed or assembled at the time of importation, whether it is a part or subassembly of a larger product, etc. Although for some of the below products, photos, drawings, or images were provided, the narrative

¹⁷⁷ While a condenser shipped alone is covered merchandise as a part of heating and cooling systems components, a completed automotive heating and cooling system is comprised of multiple subassemblies, and may be eligible for an exclusion based on the multiple subassemblies three-part test in the scope language, *see* Appendix I.

¹⁷⁸ *See* Downstream Coalition Comments I at 21-22.

¹⁷⁹ *See* MAC Comments I at 2-6, 12-14.

¹⁸⁰ *Id.* at 74.

¹⁸¹ *Id.* at 29-32.

¹⁸² *Id.* at 61-67.

¹⁸³ *See* Polaris Comments I at 20-24.

¹⁸⁴ *See* Springfield Comments I at 10-14.

¹⁸⁵ *See* TACO Comments I at 4 and Attachment 5.

description did not include the above-mentioned information. In addition, some of the below products have similar names to products addressed above;¹⁸⁶ however, without a detailed description of the product, we are unable to conclude it is the same product.

As noted below, we are providing interested parties an opportunity to submit additional comments and information in response to this preliminary scope determination. Interested parties should consider including in their comments documents previously submitted to the Department, such as relevant scope decisions or other documents that may supplement the description of the products listed below. To the extent that a product has been previously examined by Commerce under the *2011 AD Order* and the *2011 CVD Order*, interested parties must submit all the relevant information to consider in a scope decision for these investigations, including the physical descriptions for the products at issue.

- Article Subject to a Patent;¹⁸⁷
- Bed Lifts;¹⁸⁸
- Adjustable Hitches;¹⁸⁹
- Roof Racks;¹⁹⁰
- Truck Racks;¹⁹¹
- Cargo Carriers;¹⁹²
- Motorcycle Carriers;¹⁹³
- Wheelchair Carriers;¹⁹⁴
- Greenhouses;¹⁹⁵
- RV Doors;¹⁹⁶
- RV Windows;¹⁹⁷
- RV Hydraulic;¹⁹⁸
- RV Awning Components;¹⁹⁹
- Bimini Top Frames;²⁰⁰
- Precision Multi-Port Extrusions;²⁰¹
- Precision Internal Enhanced Extruded Tubing;²⁰²

¹⁸⁶ For example, Skyline's banner stand may be like RILA's tradeshow display fixtures, but RILA did not provide a description of its tradeshow display. See RILA Comments I at 1.

¹⁸⁷ See Mayzon Comments I at 7.

¹⁸⁸ See LCI Comments I at 6.

¹⁸⁹ See Harbor Freight Comments I at 7 and Attachment 1.

¹⁹⁰ *Id.*

¹⁹¹ *Id.* at Attachment 1.

¹⁹² *Id.* at 7 and Attachment 1.

¹⁹³ *Id.*

¹⁹⁴ *Id.*

¹⁹⁵ *Id.*

¹⁹⁶ See LCI Comments I at 3.

¹⁹⁷ *Id.*

¹⁹⁸ *Id.*

¹⁹⁹ *Id.*

²⁰⁰ *Id.*

²⁰¹ See Hydro Precision Comments I at 3.

²⁰² *Id.* at 4.

- Control Arm,²⁰³
- Non-telescoping Tripod,²⁰⁴
- Undefined Boat Parts and Subassemblies,²⁰⁵
- Aluminum Frames for Solar Modules,²⁰⁶
- Vehicle Roof Rails,²⁰⁷
- Sun/Moon Roof Framing,²⁰⁸
- Solar Panel Racking Rails,²⁰⁹
- Tradeshow Display Fixtures and Framing,²¹⁰
- Tent Parts,²¹¹
- Clear Span Structures,²¹²
- Fence Posts,²¹³
- Drapery Rails or Rods,²¹⁴
- Electrical Conduits,²¹⁵
- Flooring Trim,²¹⁶
- Electric Vehicle Battery Trays,²¹⁷
- Heatsink,²¹⁸ (the description should address whether it meets the exclusion criteria).
- Signage Pole,²¹⁹
- Advertising pole,²²⁰
- Picture Frames,²²¹
- Telescoping Poles;²²² and
- Cleaning System Components.²²³

Additional Modification to Scope Language

On April 10, 2024, the petitioner submitted scope language incorporating all revisions made by either the petitioner or Commerce.²²⁴ However, for this preliminary scope determination, we

²⁰³ See Downstream Industries Coalition Comments I at 21.

²⁰⁴ See Harbor Freight Comments I at 7-8 and Attachment 1.

²⁰⁵ See NMMA Comments I at 2.

²⁰⁶ See QCELLS Comments I at 2-4.

²⁰⁷ See RILA Comments I at 1.

²⁰⁸ *Id.*

²⁰⁹ *Id.*

²¹⁰ *Id.*

²¹¹ *Id.*

²¹² *Id.*

²¹³ *Id.*

²¹⁴ *Id.*

²¹⁵ *Id.*

²¹⁶ *Id.*

²¹⁷ *Id.*

²¹⁸ *Id.*

²¹⁹ *Id.*

²²⁰ *Id.*

²²¹ *Id.*

²²² *Id.*

²²³ *Id.*

²²⁴ See Petitioner Comments VII.

revised the scope language to describe more clearly the products excluded from covered the scope of the investigations:

Existing Text:

The scope also excludes merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger whole that enters unassembled as a packaged combination of parts to be assembled as is for its intended use, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the merchandise must be sold and enter as a discrete kit on one Customs entry form.

Revisions to Text:

*The scope also excludes **aluminum extrusions contained in unassembled** merchandise, ~~containing non-extruded aluminum components beyond fasteners that~~ **if the unassembled merchandise** is not a part or subassembly of a larger whole. **To be excluded under this paragraph, the unassembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the unassembled merchandise must be** ~~that enters unassembled as~~ a packaged combination of parts **that is ready** to be assembled as **imported** ~~is for its intended use,~~ without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the **unassembled** merchandise must be sold and enter as a discrete kit on one Customs entry form.*

Preliminary Determination Text:²²⁵

The scope also excludes aluminum extrusions contained in unassembled merchandise, if the unassembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the unassembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the unassembled merchandise must be a packaged combination of parts that is ready to be assembled as imported, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the unassembled merchandise must be sold and enter as a discrete kit on one Customs entry form.

PUBLIC COMMENT

We invite interested parties to submit comments and information, including new factual information, regarding the scope language adopted in the Preliminary Scope Memo I and this preliminary scope determination memorandum no later than 5:00 pm, *i.e.*, **COB May 22, 2024**, on the record of all active investigations. Comments should contain only public information and be filed on the record of all investigations. However, to issue a final scope determination for some of these products, Commerce is asking parties to supplement prior submissions with production (*e.g.*, technical, installation, or user specifications, bills of materials), marketing (*e.g.*, brochures, website advertisements), sales (*e.g.*, invoices, contracts, packing list), or import

²²⁵ See Appendix I.

documentation (e.g., Customs 7501 entry forms, bills of lading), as applicable, to support product descriptions. Rebuttal comments, without new factual information, may be submitted no later than COB **May 29, 2024**. As noted above, if a product has been previously examined by Commerce under the *2011 AD Order* and the *2011 CVD Order*, interested parties must submit all the relevant information to consider in a scope decision for these investigations, including the physical descriptions for the products at issue.

All submissions to Commerce must be filed electronically via Enforcement and Compliance's ACCESS, unless an exception applies.²²⁶ An electronically filed document must be received successfully in its entirety by the time and date it is due on all investigation records.²²⁷ Commerce intends to issue final scope analyses with the final determinations of the LTFV and CVD investigations.

Finally, given the product analyses above, Commerce invites interested parties to also comment on the following areas:

- Propose a clearer definition of “fasteners,” as referenced in the scope language, which should include items that can be considered fasteners and part of an illustrative or exhaustive list to be included in the scope language. In response to a request for information, prior to the initiation of these investigations, the petitioner explained that “examples of fasteners include, but are not limited to, nuts, bolts, clamps and end caps.”²²⁸ However, based on product descriptions on the record, there may be other items that can be added to a fasteners definition for inclusion in the scope language.
- Propose clearer guidance for when a part of subassembly is necessary for the functioning of a larger product or system versus an accessory that may be optional and whether that difference should be considered in the scope language of the investigations. For example, there may be distinctions that need clarification for boating items such as fishing rod holders, racks, and outrigger poles, etc. as being part of a boat (part or larger whole), or steps or slide toppers for recreational vehicles, versus motor vehicle parts or subassemblies, such as bumpers.
- In response to a questionnaire from Commerce, the petitioner provided a non-exhaustive examples list of parts or subassemblies of various products that are covered by the scope of these investigations.²²⁹ However, the list is not part of the scope language. Please address whether it would be appropriate to include in the scope language the example list of parts or subassemblies for various products.
- Address whether the scope language includes the appropriate HTSUS codes for certain rectangular aluminum wire (not produced through a casting process)²³⁰ that is imported as precut wire or imported in coils.

²²⁶ See *Electronic Filing Procedures*, see also *Change of Electronic Filing System Name*.

²²⁷ Information regarding the ACCESS system can be found at <https://access.trade.gov/help.aspx> and a user handbook is available at https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf.

²²⁸ See Petitioner Comments VI.

²²⁹ See Petitioner Scope Questionnaire Response at 13-18, 40-49.

²³⁰ See Preliminary Scope Memo I at 3.

For the schedule regarding comments on non-scope/case specific, or company-specific calculation issues, please refer to the companion country-specific preliminary determination notices published in the *Federal Register*.

RECOMMENDATION

We recommend that Commerce preliminarily adopt the positions, as outlined above, concerning the concurrent LTFV investigations on imports of aluminum extrusions from China, Colombia, Ecuador, India, Indonesia, Italy, Korea, Malaysia, Mexico, Taiwan, Thailand, Türkiye, the United Arab Emirates, and Vietnam, and the CVD investigations on imports of aluminum extrusions from China, Indonesia, Mexico, and Türkiye. If this recommendation is accepted, Commerce will notify CBP of the change in the scope of the investigations within five days after the date of publication of the preliminary determinations for the LTFV investigations in the *Federal Register*, and where appropriate, CBP will continue the suspension of liquidation.

Agree

Disagree

5/1/2024

X *James Maeder*

Signed by: JAMES MAEDER

James Maeder
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

Appendix I

Scope of the Investigations

The merchandise subject to these investigations are aluminum extrusions, regardless of form, finishing, or fabrication, whether assembled with other parts or unassembled, whether coated, painted, anodized, or thermally improved. Aluminum extrusions are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by the Aluminum Association commencing with the numbers 1, 3, and 6 (or proprietary equivalents or other certifying body equivalents). Specifically, subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 1 contain not less than 99 percent aluminum by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 3 contain manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 6 contain magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight. The scope also includes merchandise made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) that have a magnesium content accounting for up to but not more than 2.0 percent of total materials by weight.

The country of origin of the aluminum extrusion is determined by where the metal is extruded (*i.e.*, pressed through a die).

Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, other solid profiles, pipes, tubes, bars, and rods. Aluminum extrusions that are drawn subsequent to extrusion (drawn aluminum) are also included in the scope.

Subject aluminum extrusions are produced and imported with a variety of coatings and surface treatments, and types of fabrication. The types of coatings and treatments applied to aluminum extrusions include, but are not limited to, extrusions that are mill finished (*i.e.*, without any coating or further finishing), brushed, buffed, polished, anodized (including bright dip), liquid painted, electroplated, chromate converted, powder coated, sublimated, wrapped, and/or bead blasted. Subject aluminum extrusions may also be fabricated, *i.e.*, prepared for assembly, or thermally improved. Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, stretch-formed, hydroformed, knurled, swaged, mitered, chamfered, threaded, spun, etched, and engraved. Performing such operations in third countries does not otherwise remove the merchandise from the scope of the investigations.

The types of products that meet the definition of subject merchandise include but are not limited to, the aluminum extrusion portions of vehicle roof rails and sun/moon roof framing, solar panel racking rails and framing, tradeshow display fixtures and framing, parts for tents or clear span structures, fence posts, drapery rails or rods, electrical conduits, door thresholds, flooring trim, electric vehicle battery trays, heat sinks, signage or advertising poles, telescoping poles, or cleaning system components.

Aluminum extrusions may be heat sinks, which are fabricated aluminum extrusions that dissipate heat away from a heat source and may serve other functions, such as structural functions. Heat sinks come in a variety of sizes and shapes, including but not limited to a flat electronic heat sink, which is a solid aluminum extrusion with at least one flat side used to mount electronic or mechanical devices; a heat sink that is a housing for electronic controls or motors; lighting heat sinks, which dissipate heat away from LED devices; and process and exchange heat sinks, which are tube extrusions with fins or plates used to hold radiator tubing. Heat sinks are included in the scope, regardless of whether the design and production of the heat sinks are organized around meeting specified thermal performance requirements and regardless of whether they have been tested to comply with such requirements. For purposes of these investigations on aluminum extrusions from the People's Republic of China, only heat sinks designed and produced around meeting specified thermal performance requirements and tested to comply with such requirements are included in the scope. Excluded from the scope of the investigations are large, multi-finned extruded aluminum heat sinks designed to dissipate heat, meeting the following criteria: (1) an aspect ratio (defined as the ratio of the area of a void in an extrusion to the size of the smallest gap opening at the entrance of that void and calculated by dividing the void area by the square of the gap opening) greater than 15 to 1; or (2) the circumscribing circle diameter (defined as the diameter of the smallest circle that will entirely enclose the extrusion's cross-sectional profile) rounded up to the next half inch, exceeds 10 inches, and the weight-per-foot (defined as the theoretical weight of the profile as extruded prior to any machining that may remove material and calculated by multiplying the area of the profile in square inches by 1.2) exceeds 3.50 pounds per foot.

Merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled, is covered by the scope in its entirety.

The scope also includes aluminum extrusions contained in merchandise that is a part or subassembly of a larger whole, whether or not the merchandise also contains a component other than aluminum extrusions that is beyond a fastener. Such merchandise may be either assembled or unassembled at the time of importation. A "part or subassembly" is defined as a unit designed to be attached to, or incorporated with, one or more other units or components into a larger completed product. Only the aluminum extrusion portion of the merchandise described in this paragraph, whether assembled or unassembled, is subject merchandise included in the scope and subject to duties. Examples of merchandise that is a part or subassembly of a larger whole include, but are not limited to, window parts or subassemblies; door unit parts or subassemblies; shower and bath parts or subassemblies; solar panel mounting systems; fenestration system parts or subassemblies, such as curtain wall and window wall units and parts or subassemblies of storefronts; furniture parts or subassemblies; appliance parts or subassemblies, such as fin evaporator coils and systems for refrigerators; railing or deck system parts or subassemblies; fence system parts or subassemblies; motor vehicle parts or subassemblies, such as bumpers for motor vehicles; trailer parts or subassemblies, such as side walls, flooring, and roofings; electric vehicle charging station parts or subassemblies; or signage or advertising system parts or subassemblies. Parts or subassemblies described by this paragraph that are subject to duties in their entirety pursuant to existing antidumping and countervailing duty orders (defined as those antidumping and countervailing duty orders that are in effect as of the date of publication of orders resulting from these investigations) are excluded from the scope of these investigations. Any part or subassembly that otherwise meets the requirements of this scope and that is not covered by other antidumping and/or countervailing duty orders remains subject to the scope of the investigations.

The scope excludes aluminum extrusions contained in fully and permanently assembled merchandise, if the assembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the assembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the assembled merchandise must be ready for use as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling).

The scope also excludes aluminum extrusions contained in unassembled merchandise if the unassembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the unassembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the unassembled merchandise must be a packaged combination of parts that is ready to be assembled as imported, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the unassembled merchandise must be sold and enter as a discrete kit on one Customs entry form.

Examples of such excluded assembled and unassembled merchandise include windows with glass, door units with door panel and glass, motor vehicles, trailers, furniture, appliances, and solar panels and solar modules.

The scope also excludes merchandise containing multiple subassemblies of a larger whole with non-extruded aluminum components beyond fasteners. A subassembly that meets the definition of subject merchandise, including any product expressly identified as subject merchandise in this scope, can only be excluded if it is fully and permanently assembled with at least one other different subassembly, and where (1) at least one of the subassemblies, if entered individually, would not itself be subject to the scope; (2) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the actual weight of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations); and (3) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the number of pieces of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations).

The scope also includes aluminum extrusions that have been further processed in a third country, including, but not limited to, the finishing and fabrication processes described above, assembly, whether with other aluminum extrusion components or with non-aluminum extrusion components, or any other processing that would not otherwise remove the merchandise from the scope if performed in the country of manufacture of the in-scope product. Third country processing; finishing; and/or fabrication, including those processes described in the scope, does not alter the country of origin of the subject aluminum extrusions.

The following aluminum extrusion products are excluded: aluminum extrusions made from an aluminum alloy with an Aluminum Association series designations commencing with the number 2 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 1.5 percent copper by weight; aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body

equivalents) and containing in excess of 2.0 percent magnesium by weight; and aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 7 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent zinc by weight.

The scope also excludes aluminum alloy sheet or plates produced by means other than the extrusion process, such as aluminum products produced by a method of continuous casting or rolling. Cast aluminum products are also excluded. The scope also excludes unwrought aluminum in any form.

The scope also excludes collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association (not including proprietary equivalents or other certifying body equivalents) where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) length of 37 millimeters (mm) or 62 mm; (2) outer diameter of 11.0 mm or 12.7 mm; and (3) wall thickness not exceeding 0.13 mm.

Also excluded from the scope are extruded drawn solid profiles made from an aluminum alloy with the Aluminum Association series designation commencing with the number 1, 3, or 6 (or proprietary equivalents or other certifying body equivalents), including variants on individual alloying elements not to circumvent the other Aluminum Association series designations, which meet each of the following characteristics: (1) solid cross sectional area greater than 62.4 mm² and less than 906 mm², (2) minimum electrical conductivity of 58% of the international annealed copper standard (IACS) or maximum resistivity of 2.97 μΩ/cm, (3) a uniformly applied nonelectrically conductive temperature-resistant coating co-extruded over characteristic (1) of either polyamide, cross-linked polyethylene, or silicone rubber material which meets the following standards: (a) Vicat A temperature threshold of > 140 degrees Celsius, (b) flammability requirements of UL 94V-0, and (c) a minimum coating thickness of 0.10 mm and maximum coating thickness of 2.0 mm, with a maximum thickness tolerance of +/- 0.20 mm, (4) characteristic 3 may or may not be encapsulated with a "Precision Drawn Tubing," wall thicknesses less than 1.2mm, which is mechanically fixed in place, and (5) packaged in straight lengths, bent or formed and/or attached to hardware.

Also excluded from the scope are extruded tubing and drawn over a ID plug and through a OD die made from an aluminum alloy with the Aluminum Association series designation commencing with the number 3, 5, or 6 (or proprietary equivalents or other certifying body equivalents), including variants on individual alloying elements not to circumvent the other Aluminum Association series designations, which meet each of the following characteristics: (1) an outside mean diameter no greater than 30 mm with a tolerance less than or equal to +/- 0.10 mm, (2) uniform wall thickness no greater than 2.7 mm with wall tolerances less than or equal to +/- 0.1 mm, (3) may be coated with materials, including zinc, such that the coating material weight is no less than 3 g/m² and no greater than 30 g/m², and (4) packaged in continuous coils, straight lengths, bent or formed.

The scope also excludes fully and permanently assembled glass refrigerator shelves with decorative aluminum trim meeting the following characteristics: (1) aluminum trim meeting Aluminum Association series 6063-T5 designation that is anodized; (2) aluminum trim length of not more than 800mm, and (3) aluminum trim width of not more than 40mm. Such fully and permanently assembled glass refrigerator shelves include other components in addition to the aluminum trim, including, but not limited to, glass, steel, and plastic. Only fully and permanently assembled glass refrigerator shelves that require no further processing, fabrication, finishing, assembly, or the addition of any parts or material are excluded. Imports of glass refrigerator shelves are classified under HTSUS 8418.99.8050, which is being included for convenience.

Also excluded from the scope of these investigations is certain rectangular wire, imported in bulk rolls or precut strips and produced from continuously cast rolled aluminum wire rod, which is subsequently extruded to dimension to form rectangular wire with or without rounded edges. The product is made from aluminum alloy grade 1070 or 1370 (not including proprietary equivalents or other certifying body equivalents), with no recycled metal content allowed. The dimensions of the wire are 2.95 mm to 6.05 mm in width, and 0.65 mm to 1.25 mm in thickness. Imports of rectangular wire are provided for under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7605.19.0000, 7604.10.5000, or 7616.99.5190.

Also excluded from the scope of these antidumping and countervailing duty investigations on aluminum extrusions from the People's Republic of China are all products covered by the scope of the antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China. *See Aluminum Extrusions from the People's Republic of China: Antidumping Duty Order*, 76 FR 30650 (May 26, 2011); and *Aluminum Extrusions from the People's Republic of China: Countervailing Duty Order*, 76 FR 30653 (May 26, 2011) (collectively, Aluminum Extrusions from the People's Republic of China). Solely for these investigations on aluminum extrusions from the People's Republic of China, the following is an exhaustive list of products where the aluminum extrusion portions thereof meet the definition of subject merchandise. The language contained in the rest of the scope applies to this exhaustive list of products. Merchandise that is not included in the following list that meets the definition of subject merchandise in the 2011 antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China remains subject to the earlier orders. No other section of this scope language that provides examples of subject merchandise is exhaustive.

The aluminum extrusion portions of the following products are included in the scope of these investigations on aluminum extrusions from the People's Republic of China, whether assembled or unassembled: heat sinks as described above; cleaning system components like mops and poles; banner stands/back walls; fabric wall systems; drapery rails; side mount valve controls; water heater anodes; solar panel mounting systems; automotive heating and cooling system components; assembled motor cases with stators; louver assemblies; event décor; window wall units and parts; trade booths; micro channel heat exchangers; telescoping poles, pole handles, and pole attachments; flagpoles; wind sign frames; foreline hose assembly; electronics enclosures; parts and subassemblies for storefronts, including portal sets; light poles; air duct registers; outdoor sporting goods parts and subassemblies; glass refrigerator shelves; aluminum ramps; handicap ramp system parts and subassemblies; frames and parts for tents and clear span structures; parts and subassemblies for screen enclosures, patios, and sunrooms; parts and subassemblies for walkways and walkway covers; aluminum extrusions for Light Emitting Diode (LED) lights; parts and subassemblies for screen, storm, and patio doors; pontoon

boat parts and subassemblies, including rub rails, flooring, decking, transom structures, canopy systems, seating; boat hulls, framing, ladders, and transom structures; parts and subassemblies for docks, piers, boat lifts and mounting; recreational and boat trailer parts and subassemblies, including subframes, crossmembers, and gates; solar tracker assemblies with gears; garage door framing systems; door threshold and sill assemblies; highway and bridge signs; bridge, street, and highway rails; scaffolding, including planks and struts; railing and support systems; parts and subassemblies for exercise equipment; weatherstripping; door bottom and sweeps; door seals; floor transitions and trims; parts and subassemblies for modular walls and office furniture; truck trailer parts and subassemblies; boat cover poles, outrigger poles, and rod holders; bleachers and benches; parts and subassemblies for elevators, lifts, and dumbwaiters; parts and subassemblies for mirror and framing systems; window treatments; parts and subassemblies for air foils and fans; bus and Recreational Vehicle (RV) window frames; sliding door rails; dock ladders; parts and subassemblies for RV frames and trailers; awning, canopy, and sunshade structures and their parts and subassemblies; marine motor mounts; linear lighting housings; and cluster mailbox systems.

Imports of the subject merchandise are primarily provided for under the following categories of the HTSUS: 7604.10.1000; 7604.10.3000; 7604.10.5000; 7604.21.0010; 7604.21.0090; 7604.29.1010; 7604.29.1090; 7604.29.3060; 7604.29.3090; 7604.29.5050; 7604.29.5090; 7608.10.0030; 7608.10.0090; 7608.20.0030; 7608.20.0090; 7609.00.0000; 7610.10.0010; 7610.10.0020; 7610.10.0030; 7610.90.0040; and 7610.90.0080.

Imports of the subject merchandise, including subject merchandise entered as parts of other products, may also be classifiable under the following additional HTSUS categories, as well as other HTSUS categories: 6603.90.8100; 7606.12.3091; 7606.12.3096; 7615.10.2015; 7615.10.2025; 7615.10.3015; 7615.10.3025; 7615.10.5020; 7615.10.5040; 7615.10.7125; 7615.10.7130; 7615.10.7155; 7615.10.7180; 7615.10.9100; 7615.20.0000; 7616.10.9090; 7616.99.1000; 7616.99.5130; 7616.99.5140; 7616.99.5190; 8302.10.3000; 8302.10.6030; 8302.10.6060; 8302.10.6090; 8302.20.0000; 8302.30.3010; 8302.30.3060; 8302.41.3000; 8302.41.6015; 8302.41.6045; 8302.41.6050; 8302.41.6080; 8302.42.3010; 8302.42.3015; 8302.42.3065; 8302.49.6035; 8302.49.6045; 8302.49.6055; 8302.49.6085; 8302.50.0000; 8302.60.3000; 8302.60.9000; 8305.10.0050; 8306.30.0000; 8414.59.6590; 8415.90.8045; 8418.99.8005; 8418.99.8050; 8418.99.8060; 8419.50.5000; 8419.90.1000; 8422.90.0640; 8424.90.9080; 8473.30.2000; 8473.30.5100; 8479.89.9599; 8479.90.8500; 8479.90.9596; 8481.90.9060; 8481.90.9085; 8486.90.0000; 8487.90.0080; 8503.00.9520; 8508.70.0000; 8513.90.2000; 8515.90.2000; 8516.90.5000; 8516.90.8050; 8517.71.0000; 8517.79.0000; 8529.90.7300; 8529.90.9760; 8536.90.8585; 8538.10.0000; 8541.90.0000; 8543.90.8885; 8547.90.0020; 8547.90.0030; 8547.90.0040; 8708.10.3050; 8708.29.5160; 8708.80.6590; 8708.99.6890; 8807.30.0060; 9031.90.9195; 9401.99.9081; 9403.99.1040; 9403.99.9010; 9403.99.9015; 9403.99.9020; 9403.99.9040; 9403.99.9045; 9405.99.4020; 9506.11.4080; 9506.51.4000; 9506.51.6000; 9506.59.4040; 9506.70.2090; 9506.91.0010; 9506.91.0020; 9506.91.0030; 9506.99.0510; 9506.99.0520; 9506.99.0530; 9506.99.1500; 9506.99.2000; 9506.99.2580; 9506.99.2800; 9506.99.5500; 9506.99.6080; 9507.30.2000; 9507.30.4000; 9507.30.6000; 9507.30.8000; 9507.90.6000; and 9603.90.8050.

While HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope is dispositive.

Appendix II

Acronyms & Abbreviations

| Acronym/Abbreviation | Complete Name |
|----------------------|---|
| ACCESS | Antidumping and Countervailing Duty Centralized Electronic Service System |
| AD | Antidumping |
| CVD | Countervailing Duty |
| LTFV | less-than-fair-value |
| the Act | Tariff Act of 1930, as amended |
| Commerce | U.S. Department of Commerce |
| China | The People's Republic of China |
| Korea | The Republic of Korea |
| Turkey or Türkiye | The Republic of Türkiye |
| UAE | United Arab Emirates |
| Vietnam | The Socialist Republic of Vietnam |
| IDM | Issues and Decision Memorandum |
| CBP | U.S. Customs and Border Protection |
| PDM | Preliminary Decision Memorandum |
| CIT | U.S. Court of International Trade |
| Federal Circuit | U.S. Court of Appeals for the Federal Circuit |
| HTSUS | Harmonized Tariff Schedule of the United States |
| ITC | International Trade Commission |
| COB | Close of Business (i.e., 5:00 pm) |
| AC | Air Conditioning |
| HVAC | Heating, Ventilation, and Air Conditioning |
| LCD | Liquid Crystal Display |
| LED | Light Emitting Diode |
| MDF | Medium-Density Fiberboard |
| PCB | Printed Circuit Board |
| PVC | Polyvinyl Chloride |
| RV | Recreational Vehicle |
| AAPC | American Automotive Policy Council |
| AHRI | Air-Conditioning, Heating, and Refrigeration Institute |
| A. O. Smith | A. O. Smith Corporation |
| Ashley | Ashley Furniture Industries |
| Black & Decker | Black & Decker (US) Inc. |
| Bodypoint | Bodypoint, Inc. |

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| Brunswick | Brunswick Corporation |
| Canadian Solar | Canadian Solar US Module Manufacturing Corporation (CSMMC), Canadian Solar (USA) Inc. (CSUSA), Canadian Solar International Limited (CSIL), and Canadian Solar Manufacturing (Thailand) Co., Ltd. (THSM) |
| Capella | Capella Hardware Co. |
| CATL | Contemporary Amperex Technology Co., Ltd. |
| Coalition | Coalition for Fair Mexican Exports of Aluminum Extrusions |
| Containers Direct | Containers Direct, LLC |
| Dorel | Dorel Home, a Division of Dorel Industries |
| Downstream Industries Coalition | Downstream Industry Coalition, comprised of the following companies: AutoZone Parts, Inc., Bracalente Manufacturing Co., Inc., Brunswick Corporation, Daikin Applied Americas, Inc., Daikin Comfort Technologies North American, Inc., Danfoss LLC, Dell Technologies, Inc., Johnson Controls, Inc., Modine Manufacturing Company, and Streamlight, Inc. |
| Dreamline | Bath Authority LLC, dba Dreamline |
| Ducab | Ducab Aluminum Company, LLC |
| ELICC | ELICC Americans Corporation |
| First Solar | First Solar, Inc. |
| FISA | FISA Fundiciones Industriales S.A. |
| Fusheng | Fusheng Precision Co., Ltd. |
| GameChange | GameChange Solar |
| GOM | Government of Mexico |
| Harbor Freight | Central Purchasing, LLC and Harbor Freight Tools USA, Inc. |
| Home Depot | Home Depot U.S.A., Inc. |
| Hydro Precision | Hydro Precision Tubing USA, LLC |
| Hyundai | Hyundai Motor Manufacturing Alabama LLC, Kia Georgia Inc., and Mobis Parts America, LLC |
| IKEA | IKEA Supply AG |
| Jinko | Jinko Solar Technology Sdn. Bhd. and its affiliates |
| JMD | JSN Master Distributors LLC |
| Kimball | Kimball International, Inc. |

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| LCI | LCI Industries and its wholly-owned subsidiary, Lippert Components, Inc. |
| LSF | LSF Logistics LLC |
| MAC | Marine Accessories Corporation |
| MAHLE | MAHLE Behr Charleston Inc., MAHLE Behr Dayton L.L.C., MAHLE Behr Manufacturing Management, Inc, MAHLE Behr Mexico S. de R.L. de C.V., MAHLE Behr Mt. Sterling, Inc., MAHLE Behr Rio Bravo, S. de R.L. de C V., MAHLE Behr Service American L.L.C., MAHLE Behr Service Mexico, S. de C.V., and MAHLE Behr USA, Inc. |
| Masonite | Masonite Corporation and Masonite International Corporation |
| Maxeon | Maxeon Solar Technologies, Ltd. And its subsidiary SunPower Corporation Mexico S. de R.L. de C.V. |
| Mayzon | Zenith Home Corporation of New Castle, Delaware and Maytex Mills, Inc. New York, New York. (collectively dba as Mayzon Corporation) |
| MCS | MCS Industries, Inc. |
| Mincey Marble | Mincey Marble Manufacturing, Inc. |
| Moen | Moen Incorporated |
| NCBFAA | The National Customs Brokers & Forwarders Association of America, Inc. |
| NextEra | Florida Power & Light Company, a subsidiary of NextEra Energy, Inc. |
| NMMA | National Marine Manufacturers Association |
| Overhead Door | Overhead Door Corporation |
| Peloton | Peloton Interactive, Inc. |
| Penn Aluminum | Penn Aluminum International LLC |
| Petitioner or the petitioner | U.S. Aluminum Extruders Coalition and the United Steel, Paper and Forestry, Rubber, Manufacturing Energy, Allied Industrial and Service Workers International Union |
| Polaris | Polaris Industries, Inc. |
| PT Indal | PT Indal Aluminum Industry/PT Indal Reiwa Auto |
| QCELLS | Hanwha QCELLS USA Inc. |
| RILA | Retail Industry Leaders Association |

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| Rowley | Rowley Company |
| RWW | Reflection Window + Wall LLC |
| SEIA | Solar Energy Industries Association |
| SHMC | Sanhua (Hangzhou) Micro Channel Heat Exchanger Co., Ltd. |
| Skyline | Skyline Displays LLC |
| Springfield | Springfield Marine Company |
| Sunrun | AEE Solar, Inc., a subsidiary of Sunrun Inc. |
| TACO | TACO Metals Inc. |
| TAG | TAG Hardware Systems Ltd. |
| Target | Target General Merchandise, Inc. |
| Tecnoglass | Tecnoglass, S.A.S. |
| Tesla | Tesla, Inc. |
| Tractor Supply | Tractor Supply Company |
| Tricam | Tricam Industries |
| Trinity | Trinity International Industries LLC |
| Webasto | Webasto Convertibles USA, Inc. and Webasto Roof Systems, Inc. |
| Wesko | Wesko Locks Ltd. |
| Whirlpool | Whirlpool Corporation |
| ZF | ZF North America, Inc. |
| U.S. Aluminum Extruders Coalition | The members of the U.S. Aluminum Extruders Coalition are Alexandria Extrusion Company; APEL Extrusions Inc.; Bonnell Aluminum; Brazeway; Custom Aluminum Products; Extrudex Aluminum; International Extrusions; Jordan Aluminum Company; M-D Building Products, Inc.; Merit Aluminum; MI Metals; Pennex Aluminum; Tower Extrusions; and Western Extrusions. |

Appendix III – Citation Table

| Short Citation | Document Title and Date |
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| <i>2011 AD Order</i> | <i>Aluminum Extrusions from the People’s Republic of China: Antidumping Duty Order</i> , 76 FR 30650 (May 26, 2011). |
| <i>2011 CVD Order</i> | <i>Aluminum Extrusions from the People’s Republic of China: Countervailing Duty Order</i> , 76 FR 30653 (May 26, 2011). |
| <i>AB-23 Regulations</i> | <i>Regulations Improving and Strengthening the Enforcement of Trade Remedies Through the Administration of the Antidumping and Countervailing Duty Laws</i> , 89 FR 20766 (March 25, 2024). |
| <i>Aluminum Extrusions from China I</i> | <i>Aluminum Extrusions from the People’s Republic of China: Final Determination of Sales at Less Than Fair Value</i> , 76 FR 18524 (April 4, 2011), and accompanying Issues and Decision Memorandum (IDM). |
| <i>APO and Service Final Rule</i> | <i>Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings</i> , 88 FR 67069, 67077 (September 29, 2023) |
| <i>Electronic Filing Procedures</i> | <i>Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures</i> , 76 FR 39263 (July 6, 2011). |
| <i>Change of Electronic Filing System Name</i> | <i>Enforcement and Compliance; Change of Electronic Filing System name</i> , 79 FR 69046 (November 20, 2014). |
| <i>China Custom Mfg. Inc. v. United States 2023</i> | <i>China Custom Mfg. Inc. v. United States</i> , 61 F.4th 956 (Fed. Cir. 2023). |
| <i>China Custom Mfg. Inc. v. United States 2021</i> | <i>China Custom Mfg. Inc. v. United States</i> , 2021 WL 5822715 (Ct. Int’l Trade 2021). |
| <i>King Supply v. United States</i> | <i>King Supply Co., LLC v. United States</i> , 674 F.3d 1343, 1344 (Fed. Cir. 2012). |
| <i>Hand Trucks AD Order</i> | <i>See Notice of Antidumping Duty Order: Hand Trucks and Certain Parts Thereof from the People's Republic of China</i> , 69 FR 70122 (December 2, 2004). |
| <i>HR from the Netherlands</i> | <i>Notice of Final Determination of Sales at Less Than Fair Value: Certain Hot-Rolled Carbon Steel Flat Products from the Netherlands</i> , 66 FR 50408 (October 3, 2001) and accompanying IDM. |
| <i>LWR from Mexico</i> | <i>Light-Walled Rectangular Pipe and Tube from Mexico: Notice of Final Determination of Sales at Less Than Fair Value</i> , 69 FR 53677 (September 2, 2024) and accompanying IDM. |

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| <i>M S Int'l v. United States</i> | <i>M S Int'l v. United States</i> , 32 F.4th 1145, 1152 (Fed. Cir. 2022). |
| <i>Shenyang Yuanda Co. v. United States</i> | <i>Shenyang Yuanda Co. v. United States</i> , 961 F. Supp. 2d 1291, 1299 (CIT 2014) (citing 19 C.F.R. 351.225), aff'd <i>Shenyang Yuanda Co.</i> (Fed. Circ. 2015) |
| <i>Initiation Notices</i> | <i>Aluminum Extrusions from the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations</i> , 88 FR 74421 (October 31, 2023); see also <i>Aluminum Extrusions from the People's Republic of China, Indonesia, Mexico, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i> , 88 FR 74433 (October 31, 2023). |
| <i>ITC Preliminary Determination</i> | <i>Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam: Preliminary</i> , 88 FR 82913 (November 27, 2023). |
| <i>ITC Preliminary Report</i> | <i>Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam</i> , Inv. Nos. 701-TA-695-698 and 731-TA-1643-1657, (Preliminary), USITC Pub. 5477 (November 2023). |
| <i>Petitions</i> | Petitioners' Letter, "Aluminum Extrusions from Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, the People's Republic of China, South Korea, Taiwan, Thailand, Turkey, the United Arab Emirates and Vietnam: Petitions for the Imposition of Antidumping and Countervailing Duties," dated October 4, 2023. |
| <i>Preamble</i> | <i>Antidumping Duties; Countervailing Duties; Final Rule</i> , 62 FR 27296, 27323 (May 19, 1997) (establishing procedures to address product coverage issues in investigations). |

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| <i>PVLT from China</i> | <i>Antidumping Duty Investigation of Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China: Final Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part, 80 FR 34893 (June 18, 2015), and accompanying Issues and Decision Memorandum (IDM).</i> |
| Scope Clarification Memo I | Commerce's Memorandum, "Scope Exclusion Request Clarification from the Petitioners," dated February 28, 2024. |
| Scope Modification Memo I | Commerce's Memorandum, "Scope Exclusion Request Modification from the Petitioners," dated February 29, 2024. |
| Scope Comment Schedule I | GameChange's Letter, "GameChange's Request for Comment Schedule," dated February 28, 2024. |
| Scope Comment Schedule II | Commerce's Memorandum, "Scope Comment Schedule," dated March 1, 2024. |
| Scope Comment Schedule III | Commerce's Memorandum, "Scope Comment Schedule," dated March 22, 2024. |
| Scope Questionnaire | Commerce's Letter, "Scope Questionnaire," dated March 8, 2024. |
| Petitioner Scope Questionnaire Response | Petitioner's Letter, "Answers to Scope Questionnaire and Revised Scope Language," dated March 18, 2024. |
| Preliminary Scope Memo I | Commerce's Memorandum, "Antidumping Duty Investigations and Countervailing Duty Investigations of Aluminum Extrusions from People's Republic of China, Colombia, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Preliminary Scope Decision Memorandum," dated March 4, 2024. |
| AAPC Comments I | AAPC's Letter, "Antidumping duty (AD) petitions concerning imports of aluminum extrusions from China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, Korea, Malaysia, Mexico, Taiwan, Thailand, Turkey, the UAE, and Vietnam. And Countervailing duty (CVD) petitions concerning imports of aluminum extrusions from China, Indonesia, Mexico, and Turkey," dated November 20, 2023. |
| AHRI Comments I | AHRI's Letter, "Initiation of Less-Than-Fair -Value Investigations," dated November 20, 2023. |
| A. O. Smith Comments I | A. O. Smith's Letter, "Scope Comments," dated November 20, 2023. |
| Ashley Comments I | Ashley's Letter, "Scope Comments on Behalf of Ashley Furniture Industries, LLC," dated November 20, 2023. |

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| Autos Drive America Comments I | Autos Drive America's Letter, "Scope Comments on Behalf of National Marine Manufacturers Association," dated November 20, 2023. |
| Black & Decker Comments I | Black & Decker's Letter, "Scope Comments," dated November 20, 2023. |
| Black & Decker Comments II | Black & Decker's Letter, "Scope Comments," dated March 28, 2024. |
| Bodypoint Comments I | Bodypoint's Letter, "Scope Comments," dated November 20, 2023. |
| Canadian Solar Comments I | CSMMC's Letter, "Rebuttal Comments on Scope," dated December 7, 2023. |
| Capella Comments I | Capella's Letter, "Scope Comments," dated November 20, 2023. |
| Capella Comments II | Capella's Letter, "Rebuttal Scope Comments on Proposed Scope of Antidumping and Countervailing Duty investigations on Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam," dated December 7, 2023. |
| Capella Comments III | Capella's Letter, "Scope Comments on Petitioners' March 18, 2024, Answers to Scope Questionnaire and Revised Scope Language," dated March 28, 2024. |
| CATL Comments I | CATL's Letter, "Rebuttal Scope Comments," dated December 7, 2023. |
| Coalition Comments I | Coalition's Letter, "Coalition Scope Comments," dated November 20, 2023. |
| Container Direct Comments I | Container Direct's Letter, "Comments on Scope," dated November 20, 2023. |
| Dorel Comments I | Dorel's Letter, "Scope Comments," dated November 20, 2023. |
| Downstream Industries Coalition Comments I | Downstream Coalition's Letter, "Scope Comments," dated November 20, 2023. |
| Downstream Industries Coalition Comments II ¹ | Downstream Coalition's Letter, "Scope Comments," dated March 28, 2024. |
| Dreamline Comments I | Dreamline's Letter, "Scope Comments," dated November 20, 2023. |

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| Dreamline Comments II | Dreamline’s Letter, “Scope Comments,” dated March 28, 2024. |
| Ducab Comments I | Ducab’s Letter, “Comments on the Scope of the Investigations,” dated November 20, 2023. |
| Ducab Comments II | Ducab’s Letter, “Request Not to be Chosen as Mandatory Respondent and for Confirmation on Scope of Investigations in light of Petitioners’ submission of December 7, 2023,” dated December 11, 2023. |
| ELICC Comments I | ELICC’s Letter, “Letter in Lieu of Rebuttal to Scope Comments,” dated December 6, 2023. |
| First Solar Comments I | First Solar’s Letter, “Scope Comments,” dated November 20, 2023. |
| FISA Comments I | FISA’s Letter, “Comments on Scope of the Investigations,” dated November 20, 2023. |
| Fusheng Comments I | Fusheng’s Letter, “Scope Comments,” dated November 20, 2023. |
| Fusheng Comments II | Fusheng’s Letter, “Response to Petitioner’s Scope Comments,” dated December 18, 2023. |
| Fusheng Comments III | Fusheng’s Letter, “Additional Scope Comments,” dated March 28, 2024. |
| GameChange Comments I | GameChange’s Letter, “GameChange Solar Scope Comments,” dated November 20, 2023. |
| GameChange Comments II | GameChange’s Letter, “GameChange’s Comments on Petitioners’ March 18, 2024, Submission,” dated March 28, 2024. |
| GOM Comments I | GOM’s Letter, “Aluminum Extrusions from Mexico GOM’s submission. Rebuttal on Scope Comments,” dated December 5, 2023. |
| Harbor Freight Comments I | Harbor Freight’s Letter, “Comments on Scope Related to Harbor Freight Tools,” dated November 20, 2023. |
| Home Depot Comments I | Home Depot’s Letter, “Scope Comments on Behalf of Home Depot U.S.A., Inc.,” dated November 20, 2023. |
| Hydro Precision Comments I | Hydro Precision’s Letter, “Comments on the Scope of the Investigations,” dated November 20, 2023. |
| Hydro Precision Comments I | Hydro Precision’s Letter, “Comments on Petitioners’ Revised Scope Language,” dated March 28, 2024. |
| Hyundai Comments I | Hyundai’s Letter, “Comments to Petitioner’s Response to Scope Questionnaire and Revised Scope Language,” dated March 28, 2024. |
| IKEA Comments I | IKEA’s Letter, “Scope Comments,” dated March 28, 2024. |

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| Jinko Comments I | Jinko's Letter, "Jinko Solar Scope Comments," dated November 20, 2023. |
| JMD Comments I | JMD's Letter, "Comments on Scope," dated November 20, 2023. |
| Kimball Comments I | Kimball's Letter, "Scope Comments on Behalf of Kimball International, Inc.," dated November 20, 2023. |
| LCI Comments I | LCI's Letter, "Comments on the Scope of the Investigations," dated November 20, 2023. |
| LSF Comments I | LSF's Letter, "Scope Comments of LSF Logistics LLC," dated November 20, 2023. |
| LSF Comments II | LSF's Letter, "LSF Logistics LLC Rebuttal to Petitioner's Scope Questionnaire Response," dated March 28, 2024. |
| MAC Comments I | MAC's Letter, "Marine Accessories Corporation's Comments on Scope of Investigations," dated November 20, 2023. |
| MAHLE Comments I | MAHLE's Letter, "Scope Comments," dated November 20, 2023. |
| MAHLE Comments II | MAHLE's Letter, "MAHLE's Second Scope Comments," dated March 28, 2024. |
| Masonite Comments I | Masonite's Letter, "Scope Comments of Masonite," dated November 20, 2023. |
| Maxeon Comments I | Maxeon's Letter, "Scope Comments," dated November 20, 2023. |
| Mayzon Comments I | Mayzon's Letter, "Request for Action on Request for General Docket," dated November 14, 2023. |
| MCS Comments I | MCS's Letter, "Scope Comments," dated November 20, 2023. |
| Mincey Marble Comments I | Mincey Marble's Letter, "Scope Comments on Petitioner's March 18, 2024 Answers to Scope Questionnaire and Revised Scope Language," dated March 28, 2024. |
| Moen Comments I | Moen's Letter, "Scope Comments on Behalf of Moen Incorporated," dated November 20, 2023. |
| NCBFAA Comments I | NCBFAA's Letter, "Scope Comments," dated November 20, 2023. |
| NextEra Comments I | NextEra's Letter, "Scope Comments," dated November 20, 2023. |
| NMMA Comments I | NMMA's Letter, "Scope Comments on Behalf of National Marine Manufacturers Association," dated November 20, 2023. |
| NMMA Comments II | NMMA's Letter, "Comments on Petitioners' Scope Questionnaire Response on Behalf of National Marine Manufacturers Association," dated March 28, 2024. |

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| Overhead Door Comments I | Overhead Door's Letter, "Comments on Petitioners' March 18, 2024, Response to the Department of Commerce's March 8, 2024 Scope Questionnaire," dated March 28, 2024. |
| Peloton Comments I | Peloton's Letter, "Scope Comment," dated November 20, 2023. |
| Penn Aluminum Comments I | Penn Aluminum's Letter, "Rebuttal Comments on Scope," November 30, 2023. |
| Petitioner Comments I | Petitioner's Letter, "Rebuttal Scope Comments," dated December 7, 2023. |
| Petitioner Comments II | Petitioner's Letter, "Response to Department Request Regarding Rebuttal Scope Comments," dated January 26, 2024. |
| Petitioner Comments III | Petitioner's Letter, "Request for Scope Exclusions," dated February 9, 2024. |
| Petitioner Comments IV | Petitioner's Letter, "Revised Scope Language," dated February 20, 2024. |
| Petitioner Comments V | Petitioner's Letter, "Request for Scope Exclusions," dated March 28, 2024. |
| Petitioner Comments VI | Petitioner's Letter, "Response to First Supplemental Scope Questions Regarding Common Issues and Injury Petition Volume I of the Petition," dated October 13, 2023. |
| Petitioner Comments VII | Petitioner's Letter, "Revised Scope Language," dated April 10, 2024. |
| Polaris Comments I | Polaris's Letter, "Polaris Scope Comments," dated November 20, 2023. |
| PT Indal Comments I | PT Indal's Letter, "Scope Rebuttal," dated December 7, 2023. |
| PT Indal Comments II | PT Indal's Letter, "Scope," dated February 26, 2024. |
| QCELLS Comments I | QCELLS's Letter, "Hanwha QCELLS USA Inc.'s Scope Comments," dated November 20, 2023. |
| RILA Comments I | RILA's Letter, "Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam [DOC Investigation Nos. A-570-158, A-301-806, A-247-004, A-331-804, A-533-920, A-560-840, A-475-846, A557-826, A-201-860, A-580-918, A-583-874, A-549-847, A-489-850, A-520-810, A-552-837, C-570-159, C-560-841, C-201-861, and C-489-851]," dated November 20, 2023. |
| Rowley Comments I | Rowley's Letter, "Scope Rebuttal Comments," dated December 7, 2023. |
| Rowley Comments II | Rowley's Letter, "Scope Comments," dated March 28, 2024. |
| SEIA Comments I | SEIA's Letter, "Scope Comments," dated November 20, 2023. |

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| SHMC Comments I | SEIA's Letter, "Less-Than-Fair-Value & Countervailing Duty Investigations: Aluminum Extrusions from the People's Republic of China, Colombia, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam; and Countervailing Duty Investigations: Aluminum Extrusions from the People's Republic of China, Indonesia, Mexico, and the Republic of Turkey," dated March 28, 2024. |
| Skyline Comments I | Skyline's Letter, "Scope Comments," dated March 28, 2024. |
| Springfield Comments I | Springfield's Letter, "Springfield Marine Company Scope Comments," dated November 20, 2023. |
| Sunrun Comments I | Sunrun's Letter, "Scope Comments," dated November 20, 2023. |
| TACO Comments I | TACO's Letter, "Scope Comments," dated November 20, 2023. |
| TACO Comments II | TACO's Letter, "TACO Metals Inc.'s Scope Comments In Response to the Petitioners' March 18, 2024 Letter," dated March 28, 2024. |
| TAG Comments I | TAG's Letter, "Scope Comments," dated March 28, 2024. |
| Target Comments I | Target's Letter, "Scope Comments on Behalf of Target General Merchandise, Inc.," dated November 20, 2023. |
| Tecnoglass Comments I | Tecnoglass's Letter, "Tecnoglass' Scope Comments," dated November 20, 2023. |
| Tesla Comments I | Tesla's Letter, "Tesla's Scope Comments," dated November 20, 2023. |
| Tesla Comments II | Tesla's Letter, dated March 25, 2024. |
| Tesla Comments III | Tesla's Letter, "Tesla's Comments on recent Scope Revisions," dated March 28, 2024. |
| Tesla Comments IV | Tesla's Letter, "Response to Petitioners' March 28, 2024 Letter," dated April 3, 2024. |
| Tractor Supply Comments I | Tractor Supply's Letter, "Scope Comments Addressing Petitioners' March 18 Scope Questionnaire Response," dated March 28, 2024. |
| Tricam Comments I | Tricam's Letter, "Scope Comments," dated November 20, 2023. |
| Tricam Comments II | Tricam's Letter, "Scope Comments," dated March 28, 2024. |
| Trinity Comments I | Trinity's Letter, "Scope Comments on the Proposed Scope," dated November 20, 2023. |
| Trinity Comments I | Trinity's Letter, "Scope Comments on Petitioners' March 18, 2024, Answer to Scope Questionnaire and Revised Scope Language," dated March 28, 2024. |

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| Webasto Comments I | Webasto's Letter, "Impact of the Antidumping and Countervailing Duty investigation for Aluminum Extrusions on the Global Automotive Supply Chain," dated February 29, 2024. |
| Webasto Comments II | Webasto's Letter, "Scope Comments," dated March 28, 2024. |
| Wesko Comments I | Wesko's Letter, "Scope Comments on Behalf of Wesko Locks Ltd.," dated November 20, 2023. |
| Whirlpool Comments I | Whirlpool's Letter, "Comments on Scope," dated November 20, 2023. |
| Whirlpool Comments II | Whirlpool's Letter, "Comments on Proposed Scope Exclusion Language," dated March 28, 2024. |
| ZF Comments I | ZF's Letter, "ZF North America, Inc.'s Scope Comments In response to the Petitions' March 18, 2024 Letter," dated March 28, 2024. |
| Plant Tour Memorandum | Commerce's Memorandum, "Visit to Pennex Aluminum Company, LLC Production Facilities," dated December 11, 2023. |
| Autos Drive America Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| MAHLE Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| Maxeon Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| Peloton Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| Polaris Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| RILA Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| Tecnoglass Submission Clarification | Commerce's Letter, "Scope Comment Submission Clarification," dated November 28, 2023. |
| GOM Submission Clarification | Commerce's Letter, "Scope Rebuttal Comment Submission Clarification," dated December 7, 2023. |
| GOM Ex Parte Memo | Commerce's Memorandum, " <i>Ex Parte</i> Memorandum," dated December 11, 2023. |
| AHRI Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte</i> Meeting," dated January 18, 2024. |
| Downstream Industries Coalition Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte</i> Meeting," dated December 11, 2023. |
| Interested Parties Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte</i> Meeting," dated February 26, 2024. |
| Outdoor Industry Association Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte</i> Meeting," dated April 30, 2024. |

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| Petitioner Ex Parte Meeting I | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated January 17, 2024. |
| Petitioner Ex Parte Meeting II | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated January 19, 2024. |
| Petitioner Ex Parte Meeting III | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated February 14, 2024. |
| Petitioner and CBP Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated April 19, 2024. |
| RWW Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated April 5, 2024. |
| Senator Peters Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated March 6, 2024. |
| Tesla Ex Parte Meeting | Commerce's Memorandum, " <i>Ex Parte Meeting</i> ," dated April 2, 2024. |
| Coalition Ex Parte Letter | Coalition's Letter, "Materials for <i>Ex Parte Meeting</i> ," dated February 26, 2024. |
| MAHLE Ex Parte Letter | MAHLE's Letter, "Provision of Slides from <i>Ex Parte Communication</i> ," dated February 22, 2024. |