

domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition.

Webb is a domestic producer of gray cast iron brake drums weighing more than 50 pounds with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, and accounts for over 50 percent of the total production of the domestic like product.

Exhibit I-1. To Petitioner’s knowledge, the only other U.S. producer of subject brake drums during 2023 (and currently) was Accuride Corporation, through its brand Gunite Wheel End Components. *See Exhibit I-7.* As such, Webb’s support of the petition satisfies both of the above statutory requirements within the meaning of 19 U.S.C. § 1673a (c)(4)(A).

C. Petitioner Has Not Sought Previous Import Relief for the Subject Merchandise

Webb has not filed for import relief pursuant to section 337 of the Act, 19 U.S.C. § 1337, or section 201 or 301 of the Trade Act of 1974, 19 U.S.C. §§ 2251 or 2411, or section 232 of the Trade Expansion Act of 1962, 19 U.S.C. § 1862, with respect to the subject merchandise. To Petitioner’s knowledge, the subject merchandise has not been subject to previous antidumping and/or countervailing duty investigations under sections 702 and 732 of the Trade Act of 1930, as amended (the “Act”) (19 U.S.C. §§ 1671a and 1673a). As such, currently, there are no antidumping or countervailing duty orders on the subject merchandise from China or Turkey.

D. Tariff Classification and Requested Scope Language

This petition covers certain brake drums, made of gray cast iron, weighing more than 50 pounds with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches for use in commercial vehicles. These brake drums are classified under the Harmonized Tariff Schedule of the United States (“HTSUS”) number 8708.30.5020 as “Brake Drums Of Vehicles Of Headings 8701 to 8705.” Because Headings 8701 to 8705 describe tractors, motor

vehicles for transport of more than ten people, passenger cars, motor vehicles for the transport of goods, and special purpose motor vehicles, HTSUS number 8708.30.5020 covers a broader range of merchandise than in-scope brake drums. Brake drums may enter under HTSUS number 8708.30.5020 or 8708.30.5090 when combined with a hub to form an assembly. These HTSUS numbers are provided for convenience purposes only. The written description of the scope is dispositive.

Based on the product description and production process described in the sections below, this petition requests the following scope language:

The merchandise covered by this investigation is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. The scope of this investigation does not include any products already covered by the AD and CVD Orders on certain chassis and subassemblies thereof from the People's Republic of China (A-570-135; C-570-136).

The scope also excludes composite brake drums that contain more than 40% steel by weight, while certain brake drums that meet the above criteria and that contain 40% or less steel by weight are within the scope.