# III. SCOPE OF THE PETITIONS AND DESCRIPTION OF THE SUBJECT MERCHANDISE

## A. Scope of the Petitions

The scope of the petitions is provided below:

> The scope of the petitions covers truck bed covers ("TBCs"), which are protective shields made of aluminum, fiberglass, carbon fiber, plastic, and/or water-resistant fabric that are sized to span the open-top area of a pickup truck. When fully assembled, truck bed covers have a width between 45 and 75 inches (actual) and a length between 55 and 100 inches (actual), and can be used to secure the cargo area of a pickup truck and/or repel water.
>
> TBCs typically encompass four general configurations — *i.e.*, folding,[12] roll-up,[13] one-piece,[14] and retractable.[15] The scope of the petitions includes not only the cover material, but also any hardware for the mounting or storage of the cover (*e.g.*, rails, latches, straps, clasps, clamps, nuts, bolts, washers, screws, hitch pins, weather strips/seals/gaskets) or other parts (*e.g.*, locks, struts, drain tubes, canisters, motors), provided that such items accompany the cover at the time of importation or are otherwise invoiced together with the cover.
>
> Excluded from the scope are truck caps (also known as camper shells, toppers, or canopies), which are enclosures that can be mounted on truck bed rails to extend the height of a truck bed by at least 12 inches (actual), thus creating a fully-enclosed, lockable storage area for cargo.
>
> Also excluded from the scope of the petitions are any products already covered by the scope of any extant antidumping and/or countervailing duty orders, including *Aluminum Extrusions from the People's Republic of China: Antidumping Duty Order*, 76 Fed. Reg. 30650 (May 26, 2011), and *Aluminum*

[12] Folding TBCs consist of two or more interconnected, hinged panels which may be made from a rigid material or a soft material with a rigid frame.

[13] Roll-up TBCs can be made of soft material with rigid crossbars or slats which allow the cover to roll forward for access to the truck bed, and which can be secured with straps, buckles, or other fasteners.

[14] One-piece TBCs are rigid covers that open from the tailgate end of the truck bed using a hinge or pivot, typically with the assistance of struts for opening and closing.

[15] Retractable TBCs are made of interconnected rigid slats or one-piece aluminum-reinforced polycarbonate that retract into a recessed canister to allow access to the truck bed. Retractable TBCs may be manually operated or electrically powered with a motor. Electric models may include additional features such as fob keys, Bluetooth connectivity, or LED lights.

*Extrusions from the People's Republic of China: Countervailing Duty Order*, 76 Fed. Reg. 30653 (May 26, 2011).

The products subject to the petitions are currently classifiable under subheading 8708.29.5160 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheading is provided for convenience and customs purposes, the written description of the scope of the petitions is dispositive.

## B. Physical Characteristics and Uses

Truck bed covers — also known as "tonneau covers" — serve various functional purposes, including securing truck bed contents and weather resistance. TBCs are also designed for accessibility by facilitating easier loading and unloading of cargo, and they are typically customized to fit specific pickup truck models.

Truck bed covers come in a variety of different physical configurations. Folding TBCs consist of two or more interconnected panels which may be made from a rigid material (*e.g.*, aluminum, fiberglass, carbon fiber) or soft material (*e.g.*, vinyl) kept taut with a rigid frame. Illustrations of hard folding and soft folding TBC are provided below:

| **Image 1** |
| --- |
| |
| **Hard folding truck bed cover** |