

USITC Inv. No. 701-TA ____, 731-TA-__ - __
DOC Inv. No. A-489-858
Total Pages: 200
Investigation

PUBLIC VERSION

Petitioners' Business Proprietary Information
Removed from Pages 6-8, the Table of Exhibits,
and Exhibits III-8–III-14 and III-22.

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**WELDED STAINLESS LINE AND PRESSURE PIPE FROM INDIA,
TÜRKIYE, AND THE UNITED ARAB EMIRATES**

**PETITION FOR THE IMPOSITION
OF ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED**

**VOLUME III
INFORMATION RELATING TO TÜRKIYE – DUMPING**

SCHAGRIN ASSOCIATES
900 Seventh Street NW
Washington, D.C. 20001
(202) 223-1700

*Counsel to Bristol Pipe and Tube Inc.,
Felker Brothers Corporation, and
Primus Pipe and Tube Inc.*

July 15, 2026

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I. INTRODUCTION

This petition is filed on behalf of Bristol Pipe and Tube Inc., Felker Brothers Corporation, and Primus Pipe and Tube Inc. (collectively, “Petitioners”). As demonstrated below, producers and exporters from the Republic of Türkiye (“Türkiye”) sold, or offered for sale, welded stainless line and pressure pipe (“WSLPP”) in the United States at less than fair value. Petitioners demonstrate that WSLPP imported from Türkiye is being sold or offered for sale at less than fair value by comparing the U.S. price with the normal value for such merchandise in accordance with the statute and the regulations and practice of the U.S. Department of Commerce (“Commerce”). Petitioners ultimately calculate dumping margins for the subject merchandise based on such comparisons.

Petitioners use export price as the basis for U.S. price because information regarding sales of WSLPP by Turkish producers and/or exporters through affiliated parties in the United States is not reasonably available to Petitioners. Petitioners were unable to obtain any suitable quotations or offers for the sale of WSLPP from Türkiye. Therefore, as the best information available, Petitioners use official U.S. import statistics to determine U.S. price. Petitioners adjust U.S. price to account for movement expenses and other expenses in Türkiye incident to exporting the merchandise to the United States.

Petitioners use constructed value as the basis for normal value because Petitioners were unable to obtain suitable offers for the sale of WSLPP in Türkiye. Petitioners calculate constructed value by applying the usage rates of a U.S. producer to the unit factor costs in the Turkish home market for each production input used to manufacture the products in question. In

accordance with Section 773(e) of the Tariff Act of 1930, as amended (the “Act”),¹ Petitioners also include manufacturing overhead expenses, selling, general and administrative (“SG&A”) expenses, interest expenses, and profit in the constructed value calculation.

Finally, Petitioners calculate dumping margins for the subject merchandise based on comparisons of the ex-factory export prices to the constructed values. As established below, Commerce should initiate an investigation into sales of WSLPP from Türkiye at less than fair value and should impose antidumping duties in an amount equal to the amount by which the normal value exceeds the U.S. price.

II. UNITED STATES PRICE

A. Sales Price

Petitioners were unable to obtain specific prices or offers for the sale of WSLPP from Türkiye within the United States. As the best information available, Petitioners use official import statistics downloaded from the U.S. Census Bureau’s USA Trade Online database to calculate an average unit value (“AUV”) per metric ton (“MT”) for WSLPP imported from Türkiye under the relevant subheadings of the Harmonized Tariff Schedule of the United States (“HTSUS”) during the period of investigation (“POI”).² **Exhibit III-1** provides the official import statistics for imports of WSLPP into the United States from Türkiye. The AUVs used as the basis for U.S. price are for HTS subheadings (*i.e.*, 7306.11.0050 and 7306.40.5040) representing a significant volume of imports from Türkiye during the POI and correspond to the products for which normal value was calculated. In particular, the imports under the HTSUS 7306.11.0050 (“Other tubes, pipes and hollow profiles (for example, open seamed or welded,

¹ See 19 U.S.C. § 1677b(e).

² The POI is from July 1, 2025 to June 30, 2026.

riveted or similarly closed), of iron or steel: Line pipe of a kind used for oil or gas pipelines: Welded, of stainless steel, With an outside diameter exceeding 114.3 mm”) represent over 90 percent of the volume from Türkiye. The use of AUVs calculated using official import data as the basis for export price is consistent with Commerce’s practice.³

B. Foreign Inland Freight and Brokerage and Handling

To compute ex-factory U.S. prices, Petitioners make adjustments for foreign inland freight and brokerage and handling. Petitioners calculate foreign inland freight based on the distance between Borusan Birleşik Boru Fabrikaları Sanayi ve Ticaret Anonim Şirketi (“Borusan Boru”), a Turkish producer of WSLPP, and the nearest port of export in Türkiye. The materials included in **Exhibit III-2** show that Borusan Boru produces an identical or comparable product, and **Exhibit III-3** contains the estimated distance from Borusan Boru’s plant in Gemlik, Türkiye, to the nearest port. Petitioners derive the per unit freight expense in Türkiye from the World Bank’s *Doing Business 2020: Economy Profile – Turkey* (“*Doing Business Turkey 2020*”), which is included as **Exhibit III-4**. To compute brokerage and handling expenses in Türkiye, Petitioners use the data from *Doing Business in Turkey 2020* for the cost of export border compliance and documentary compliance. Petitioners adjust foreign inland freight and brokerage and handling costs for inflation using data from International Monetary Fund (“IMF”) Statistics.⁴

³ See, e.g., *Certain Oil Country Tubular Goods from Austria, Taiwan, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations*, 91 Fed. Reg. 22,806, 22,808 (Dep’t Commerce Apr. 28, 2026); *Unwrought Palladium from the Russian Federation: Initiation of Less-Than-Fair-Value Investigation*, 90 Fed. Reg. 41,032, 41,035 (Dep’t Commerce Aug. 22, 2025); *Certain Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, the Republic of Türkiye, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 89 Fed. Reg. 80,196, 80,200 (Dep’t Commerce Oct. 2, 2024).

⁴ See Türkiye Consumer Price Index at **Exhibit III-5**. Petitioners note that Producer Price Index (“PPI”) data for Türkiye is not reasonably available for the period of investigation. Accordingly, Petitioners use Consumer Price Index (“CPI”) data to inflate non-contemporaneous data for the

The resulting calculations of foreign inland freight and brokerage and handling in Türkiye, as adjusted for inflation, are shown in **Exhibit III-6**.

C. Calculation of Ex-Factory U.S. Price

Petitioners subtract the calculated expenses for foreign inland freight and foreign brokerage and handling from the U.S. import AUVs to arrive at ex-factory U.S. prices. The calculations of the ex-factory U.S. prices are provided in **Exhibit III-7**.

III. NORMAL VALUE

A. Home Market and Third Country Prices

Petitioners were able to obtain one home market price quote for products in the home market. However, Petitioners have not relied on that quote for normal value because the quoted products are not sufficiently comparable to the U.S. product used for export price. Suitable publicly available third-country pricing information is also unavailable. Accordingly, Petitioners rely on constructed value to estimate normal value.

B. Constructed Value

To calculate the constructed value of WSLPP from Türkiye, Petitioners use Commerce's standard methodology in accordance with Section 773(e) of the Act.⁵ Petitioners do not have access to Turkish producers' factors of production or usage rates for those factors of production (*i.e.*, the quantities of raw materials consumed, the number of hours of labor required, and the amount of energy consumed). Consequently, Petitioners rely on the experience of Bristol Pipe

purposes of this allegation. Petitioners also note that Commerce has accepted less-than-fair-value allegations in which CPI data, not PPI data, are used for inflation adjustments. *See, e.g., Ammonium Sulfate from the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation*, 81 Fed. Reg. 40,665, 40,668 (Dep't Commerce June 22, 2016); *Utility Scale Wind Towers from the People's Republic of China and Socialist Republic of Vietnam: Initiation of Antidumping Duty Investigations*, 77 Fed. Reg. 3,440, 3,445 (Dep't Commerce Jan. 24, 2012).

⁵ *See* 19 U.S.C. § 1677b(e).

and Tube (“Bristol”), a domestic producer of WSLPP and member of the petitioning industry, and other reasonably available information.⁶

Bristol’s production process is similar to the production processes of Turkish producers and is therefore representative for the purposes of this petition.⁷ Moreover, while Bristol does not produce welded stainless line pipe, the attached affidavit from the Vice President and General Manager of Bristol attests to the fact that the process for manufacturing welded stainless pressure pipe is substantially similar to the process for manufacturing welded stainless line pipe and the usage rates for welded stainless pressure pipe are reasonably reflective of the usage rates for welded stainless line pipe of the same dimensions. Thus, the usage rates for the direct materials and other factors used to produce WSLPP are comparable for producers in the United States and Türkiye.

In addition, as reviewed in Volume I of these petitions, stainless welded line pipe meeting the American Petroleum Institute (“API”) 5LC specification matches the outer diameter and wall thickness dimensions for other welded stainless pipe meeting the American Society for Testing and Materials (“ASTM”) standard A-314. Thus, pipe in standard sizes specified in ASTM A-314 provide a reasonable source for usage rates for line pipe meeting API 5LC.

Petitioners have provided four cost models for the production of WSLPP products made to the following specifications and dimensions:

⁶ All data supplied by Bristol for use in this petition were derived from records prepared by Bristol’s personnel in the ordinary course of business. **Exhibit III-8** contains an affidavit from Kris Podsiad, Vice President and General Manager of Bristol.

⁷ See Affidavit of Kris Podsiad, **Exhibit III-8**.

<i>Product Description</i>	<i>Schedule</i>	<i>Grade</i>	<i>Outside Diameter (Inches)</i>
Welded Stainless Pressure Line Pipe	[]	[]	[]
Welded Stainless Pressure Line Pipe	[]	[]	[]
Welded Stainless Pressure Pipe	[]	[]	[]
Welded Stainless Pressure Pipe	[]	[]	[]

The cost models were chosen to provide two comparisons within the outside diameter range of each of the two HTS codes collectively accounting for more than 95 percent of U.S. imports of WSLPP from Türkiye,⁸ and are thus representative of the costs to produce the pipe in those codes.

1. Direct Materials

Petitioners value the unit factor costs for direct materials based on Turkish import statistics from Global Trade Atlas (“GTA”). Petitioners exclude from such import data the following, where appropriate: (1) imports reflecting a zero quantity or from an unidentified source; (2) imports from nonmarket economy countries (*i.e.*, Armenia, Azerbaijan, Belarus, China, Georgia, Kyrgyzstan, Moldova, Russia, Tajikistan, Turkmenistan, Uzbekistan, and Vietnam); and (3) imports from countries that maintain broadly-available, non-industry specific export subsidies (*i.e.*, India, Indonesia, South Korea, and Thailand). Petitioners multiply each direct material unit factor cost by the usage rate for the corresponding input material to derive the factor cost of that input.

⁸ See U.S. Imports of WSLPP from Türkiye at **Exhibit III-1**.

a) Stainless Steel Substrate

Stainless steel substrate is the primary input used in the production of WSLPP. To value the stainless steel input for the cost models corresponding to HTS 7306.11.0050, Petitioners use an average per MT value of Turkish imports under the six-digit HTS categories 7219.11, 7219.21, 7219.31, 7220.11, and 7220.20 for the product with [] outside diameter and 7219.12, 7219.22, 7219.31, 7220.11, and 7220.20 for the product with [] outside diameter.⁹ For the cost models corresponding to HTS 7306.40.5040, Petitioners use an average per MT value of Turkish imports under the six-digit HTS categories 7219.31, 7219.32, 7219.33, and 7220.20.¹⁰ In order to construct the most accurate normal value, Petitioners relied only on 12-digit HTS subcategories which specify a nickel content of above 2.5%, since the [] specification []. Additionally, Petitioners did not rely on two 12-digit categories for which there was a small amount of imports with aberrational AUVs during the period of investigation and “Other” stainless steel under six-digit HTS 7220.90.

For the constructed value model corresponding to HTS 7306.11.0050, the resulting average unit cost of steel is \$3,730.22 per MT for the [] outside diameter product¹¹ and \$5,330.56 per MT for the [] outside diameter product.¹² For the constructed value models corresponding to HTS 7306.40.5040, the resulting average unit cost of steel substrate is \$4,037.45 per MT for both the [] outside diameter and [] outer diameter products.¹³

⁹ See Steel Substrate Data at **Exhibit III-9**.

¹⁰ See *id.*

¹¹ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

¹² *Id.*

¹³ *Id.*

To calculate the total cost of steel substrate, Petitioners multiply the unit factor cost by the amount of substrate used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.¹⁴

b) Steel Scrap

Steel scrap is generated as the steel input is slit to the desired width, formed into a tubular shape, and welded together at the edges. The recovery of steel scrap represents an offset to the cost of production. Petitioners value steel scrap using Turkish imports under HTS 7204.21 (“Stainless Steel Waste And Scrap”), excluding 12-digit HTS codes [

] for the reasons discussed above. The unit factor cost for steel scrap is \$1,043.82 per MT.¹⁵ To calculate the total offset to the cost of production, Petitioners multiply the steel scrap unit factor value by the amount of steel scrap generated by Bristol in the WSLPP production process.¹⁶

c) Argon

Argon is used as a “purging gas” in stainless steel welding. Petitioners value argon using an average per kilogram value of Turkish imports under HTS 2804.21 (“Argon”). As usage rates for argon were provided in cubic feet (“CuFT”), Petitioners convert the import data from kilograms to CuFT using conversion information provided at **Exhibit III-15**.¹⁷ The resulting unit factor cost for argon is \$0.03 per CuFT.¹⁸ To calculate the total cost of argon, Petitioners

¹⁴ See constructed value calculations at **Exhibits III-11 – III-14**.

¹⁵ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

¹⁶ See constructed value calculations at **Exhibits III-11 – III-14**.

¹⁷ “Converting Units of Measure for Gas,” Airgas.com, attached at **Exhibit III-15**.

¹⁸ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

multiply the unit factor cost by the amount of argon used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.¹⁹

d) Hydrogen

Hydrogen is also used in the welding process for WSLPP. Petitioners value hydrogen using an average per kilogram value of Turkish imports under HTS 2804.10.00 (“Hydrogen”). As usage rates for hydrogen were provided in CuFT, Petitioners again convert the import data from kilograms to CuFT using conversion information provided at **Exhibit III-15**.²⁰ The resulting unit factor cost for hydrogen is \$0.09 per CuFT.²¹ To calculate the total cost of hydrogen, Petitioners multiply the unit factor cost by the amount of hydrogen used by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²²

2. Labor

Petitioners value labor using national statistics published by the International Labour Organization.²³ According to these data, the Turkish average wage rate for workers engaged in manufacturing is equivalent to \$4.75 per hour.²⁴ To calculate the total cost of labor, Petitioners multiply the hourly wage rate by the labor hours expended by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²⁵

¹⁹ See constructed value calculations at **Exhibits III-11 – III-14**.

²⁰ “Converting Units of Measure for Gas,” Airgas.com, attached at **Exhibit III-15**.

²¹ Turkish Imports July 2025-May 2026 at **Exhibit III-10**.

²² See constructed value calculations at **Exhibits III-11 – III-14**.

²³ See ILOSTAT Data Explorer, “Average monthly earnings of employees by sex and economy activity”, attached at **Exhibit III-16**.

²⁴ See Calculation of Turkish Labor Rate at **Exhibit III-17**. 2024 data has been inflated to reflect POI using CPI data, as discussed above, and data reported in local currency has been converted to USD using currency conversion attached at **Exhibit III-18**.

²⁵ See constructed value calculations at **Exhibits III-11 – III-14**.

3. Electricity

Petitioners calculate a unit factor cost for electricity based on the average rate reported by GlobalPetrolPrices.com.²⁶ The Turkish electricity price for businesses is equivalent to \$0.105 per kilowatt hour.²⁷ To calculate the total cost of electricity, Petitioners multiply the electricity rate by the amount of electricity consumed by Bristol to produce WSLPP that meets the specifications and dimensions detailed above.²⁸

4. Overhead, SG&A Expenses, Interest Expenses, and Profit

Petitioners calculate financial ratios for manufacturing overhead, SG&A expenses, interest expenses, and profit from the 2025 financial statements of Borusan Birleşik Boru Fabrikaları Sanayi ve Ticaret Anonim Şirketi (“Borusan”).²⁹ The calculations of these financial ratios are contained in **Exhibit III-21**.

C. Calculation of Normal Value

Petitioners add the factor costs for direct materials, labor, and energy to arrive at the total variable cost of manufacture. To derive the value for factory overhead costs, Petitioners multiply the factory overhead ratio based on Borusan’s financial statements (*i.e.*, 18.12%) by the variable cost of manufacture.³⁰ Petitioners add the value for factory overhead to the variable cost of manufacture to arrive at the total cost of manufacture. Petitioners calculate a value for SG&A

²⁶ See Calculation of Turkish Electricity Prices, attached at **Exhibit III-19**.

²⁷ *Id.*

²⁸ See constructed value calculations at **Exhibits III-11 – III-14**.

²⁹ See Borusan 2025 Financial Statements at **Exhibit III-20**.

³⁰ See Calculation of Surrogate Financial Ratios: Manufacturing Overhead, SG&A, and Profit at **Exhibit III-21**.

and interest expenses by multiplying the SG&A expense and interest ratio from Borusan's financial statements (*i.e.*, 6.25%) by the total cost of manufacture.³¹ Petitioners add the values for SG&A and interest expenses to the total cost of manufacture to arrive at the total cost of production. Next, Petitioners multiply the profit ratio derived from Borusan's financial statements (*i.e.*, 2.84%) by the total cost of production.³² Petitioners then add the value for profit to the total cost of production to arrive at the constructed values of the products in question.

IV. DUMPING MARGINS

The dumping margins, based on comparisons of the U.S. prices and constructed values, are shown in **Exhibit III-22**. These comparisons result in dumping margins ranging from 14.88 percent to 113.28 percent.

V. INJURY TO THE DOMESTIC INDUSTRY

Petitioners allege that less-than-fair-value imports of WSLPP from Türkiye have caused, are causing, and are threatening to cause material injury to the domestic industry. The factual information in support of this allegation is provided in Volume I of this petition.

VI. CONCLUSION AND REQUEST FOR INVESTIGATION

Based on the information in this petition, Petitioners request that Commerce initiate an antidumping duty investigation of WSLPP from Türkiye.

³¹ *Id.*

³² *Id.*

TABLE OF EXHIBITS

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