

BILLING CODE: 3510-DS-P

DEPARTMENT OF COMMERCE

International Trade Administration

[C-570-175, C-489-854]

Certain Brake Drums from the People's Republic of China and the Republic of Türkiye:
Initiation of Countervailing Duty Investigations

AGENCY: Enforcement and Compliance, International Trade Administration, Department of
Commerce.

DATES: Applicable July 10, 2024.

FOR FURTHER INFORMATION CONTACT: Nathan James (the People's Republic of China
(China)), and Kyle Clahane (Republic of Türkiye (Türkiye)), AD/CVD Operations, Offices V
and III, Enforcement and Compliance, International Trade Administration, U.S. Department of
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5305, and (202) 482-5449, respectively.

SUPPLEMENTARY INFORMATION:

The Petitions

On June 20, 2024, the U.S. Department of Commerce (Commerce) received
countervailing duty (CVD) petitions concerning imports of certain brake drums (brake drums),
from China and Türkiye filed in proper form on behalf of Webb Wheel Products, Inc. (the
petitioner), a U.S. producer of brake drums.¹ The CVD petitions were accompanied by
antidumping duty (AD) petitions concerning imports of brake drums from China and Türkiye.²

¹ See Petitioner's Letters, "Antidumping and Countervailing Duty Petitions on Behalf of Webb Wheel Products
Inc.," dated June 20, 2024 (Petitions).

² See, generally, Petitions.

Between June 24 and July 5, 2024, Commerce requested supplemental information pertaining to certain aspects of the Petitions.³ Between June 28 and July 8, 2024, the petitioner filed timely responses to these requests for additional information.⁴

In accordance with section 702(b)(1) of the Tariff Act of 1930, as amended (the Act), the petitioner alleges that the Government of China (GOC) and the Government of Türkiye (GOT) (collectively, Governments) are providing countervailable subsidies, within the meaning of sections 701 and 771(5) of the Act, to producers of brake drums from China and Türkiye, and that such imports are materially injuring, or threatening material injury to, the domestic industry producing brake drums in the United States. Consistent with section 702(b)(1) of the Act and 19 CFR 351.202(b), for those alleged programs on which we are initiating CVD investigations, the Petitions were accompanied by information reasonably available to the petitioner supporting its allegations.

Commerce finds that the petitioner filed the Petitions on behalf of the domestic industry because the petitioner is an interested party as defined in section 771(9)(C) of the Act. Commerce also finds that the petitioner demonstrated sufficient industry support with respect to the initiation of the requested CVD investigations.⁵

³ See Commerce's Letters, "Supplemental Questionnaire," dated June 24, 2024 (General Issues Questionnaire); "Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from the Republic of Türkiye: Supplemental Questions," dated June 24, 2024; "Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from China: Supplemental Questions," dated June 25, 2024; and "Supplemental Questions," dated July 5, 2024; *see also* Memoranda, "Phone Call with Counsel to the Petitioner," dated July 2, 2024 (July 2, 2024, Memorandum).

⁴ See Petitioner's Letters, "Supplemental Questionnaire Response, Volume I," dated June 28, 2024 (General Issues Supplement); "Certain Brake Drums from Türkiye: Supplemental Questionnaire Response, Volume V," dated July 1, 2024; "Certain Brake Drums from the People's Republic of China: Supplemental Questionnaire Response," dated July 2, 2024; "Supplemental Questionnaire Response, Volume I," dated July 5, 2024 (Second General Issues Supplement); and "Supplemental Questionnaire Response, Volume I," dated July 8, 2024 (Industry Support Supplement).

⁵ See section on "Determination of Industry Support for the Petitions," *infra*.

Periods of Investigation

Because the Petitions were filed on June 20, 2024, the periods of investigation for the China and Türkiye CVD investigations are January 1, 2023, through December 31, 2023.⁶

Scope of the Investigations

The products covered by these investigations are brake drums from China and Türkiye. For a full description of the scope of these investigations, *see* the appendix to this notice.

Comments on the Scope of the Investigations

Between June 24 and July 2, 2024, Commerce requested information and clarification from the petitioner regarding the proposed scope to ensure that the scope language in the Petitions is an accurate reflection of the products for which the domestic industry is seeking relief.⁷ Between June 28 and July 5, 2024, the petitioner provided clarifications and revised the scope.⁸ The description of merchandise covered by these investigations, as shown in the appendix to this notice, reflects these clarifications.

As discussed in the *Preamble* to Commerce's regulations, we are setting aside a period for interested parties to raise issues regarding product coverage (*i.e.*, scope).⁹ Commerce will consider all comments received from interested parties and, if necessary, will consult with interested parties prior to the issuance of the preliminary determinations. If scope comments include factual information, all such factual information should be limited to public information.¹⁰ To facilitate preparation of its questionnaires, Commerce requests that scope comments be submitted by 5:00 p.m. Eastern Time (ET) on July 30, 2024, which is 20 calendar

⁶ See 19 CFR 351.204(b)(2).

⁷ See General Issues Questionnaire; *see also* July 2 Memorandum.

⁸ See First General Issues Supplement at 1-2 and Exhibit I-S1-3; and Second General Issues Supplement at 1-2.

⁹ See *Antidumping Duties; Countervailing Duties; Final Rule*, 62 FR 27296, 27323 (May 19, 1997) (*Preamble*).

¹⁰ See 19 CFR 351.102(b)(21) (defining "factual information").

days from the signature date of this notice.¹¹ Any rebuttal comments, which may include factual information, must be filed by 5:00 p.m. ET on August 9, 2024, which is 10 calendar days from the initial comment deadline.

Commerce requests that any factual information that parties consider relevant to the scope of the investigations be submitted during that time period. However, if a party subsequently finds that additional factual information pertaining to the scope of the investigations may be relevant, the party must contact Commerce and request permission to submit the additional information. All scope comments must be filed simultaneously on the records of the concurrent AD and CVD investigations.

Filing Requirements

All submissions to Commerce must be filed electronically via Enforcement and Compliance's Antidumping Duty and Countervailing Duty Centralized Electronic Service System (ACCESS), unless an exception applies.¹² An electronically filed document must be received successfully in its entirety by the time and date it is due.

Consultations

Pursuant to sections 702(b)(4)(A)(i) and (ii) of the Act, Commerce notified the Governments of the receipt of the Petitions and provided an opportunity for consultations with

¹¹ See 19 CFR 351.303(b)(1).

¹² See *Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures*, 76 FR 39263 (July 6, 2011); see also *Enforcement and Compliance; Change of Electronic Filing System Name*, 79 FR 69046 (November 20, 2014), for details of Commerce's electronic filing requirements, effective August 5, 2011. Information on using ACCESS can be found at <https://access.trade.gov/help.aspx> and a handbook can be found at https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf.

respect to the Petitions.¹³ Commerce held consultations with the GOT on July 9, 2024.¹⁴ The GOC filed consultation remarks in lieu of consultations on July 8, 2024.¹⁵

Determination of Industry Support for the Petitions

Section 702(b)(1) of the Act requires that a petition be filed on behalf of the domestic industry. Section 702(c)(4)(A) of the Act provides that a petition meets this requirement if the domestic producers or workers who support the petition account for: (i) at least 25 percent of the total production of the domestic like product; and (ii) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition. Moreover, section 702(c)(4)(D) of the Act provides that, if the petition does not establish support of domestic producers or workers accounting for more than 50 percent of the total production of the domestic like product, Commerce shall: (i) poll the industry or rely on other information in order to determine if there is support for the petition, as required by subparagraph (A); or (ii) determine industry support using a statistically valid sampling method to poll the “industry.”

Section 771(4)(A) of the Act defines the “industry” as the producers as a whole of a domestic like product. Thus, to determine whether a petition has the requisite industry support, the statute directs Commerce to look to producers and workers who produce the domestic like product. The U.S. International Trade Commission (ITC), which is responsible for determining whether “the domestic industry” has been injured, must also determine what constitutes a domestic like product in order to define the industry. While both Commerce and the ITC apply

¹³ See Commerce’s Letters, “Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from China: Invitation for Consultations,” dated June 25, 2024; and “Countervailing Duty Petition on Certain Brake Drums from the Republic of Türkiye,” dated June 20, 2024.

¹⁴ See Memorandum, “Consultation with Officials from Government of Türkiye,” dated July 9, 2024.

¹⁵ See GOC’s Letter, “Comments on Countervailing Duty Petition on Certain Brake Drums from the People’s Republic of China (C-570-175),” dated July 8, 2024.

the same statutory definition regarding the domestic like product,¹⁶ they do so for different purposes and pursuant to a separate and distinct authority. In addition, Commerce's determination is subject to limitations of time and information. Although this may result in different definitions of the like product, such differences do not render the decision of either agency contrary to law.¹⁷

Section 771(10) of the Act defines the domestic like product as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this title.” Thus, the reference point from which the domestic like product analysis begins is “the article subject to an investigation” (*i.e.*, the class or kind of merchandise to be investigated, which normally will be the scope as defined in the petition).

With regard to the domestic like product, the petitioner does not offer a definition of the domestic like product distinct from the scope of the investigations.¹⁸ Based on our analysis of the information submitted on the record, we have determined that brake drums, as defined in the scope, constitute a single domestic like product, and we have analyzed industry support in terms of that domestic like product.¹⁹

In determining whether the petitioner has standing under section 702(c)(4)(A) of the Act, we considered the industry support data contained in the Petitions with reference to the domestic

¹⁶ See section 771(10) of the Act.

¹⁷ See *USEC, Inc. v. United States*, 132 F. Supp. 2d 1, 8 (CIT 2001) (citing *Algoma Steel Corp., Ltd. v. United States*, 688 F. Supp. 639, 644 (CIT 1988), *aff'd Algoma Steel Corp., Ltd. v. United States*, 865 F.2d 240 (Fed. Cir. 1989)).

¹⁸ See Petitions at Volume I (pages I-9 through I-13 and Exhibits I-2 through I-4 and I-7); see also First General Issues Supplement at 4-7 and Exhibits I-SI-5 through I-SI-7); and Industry Support Supplement at 1.

¹⁹ For a discussion of the domestic like product analysis as applied to these cases and information regarding industry support, see Checklists, “Countervailing Duty Investigation Initiation Checklists: Certain Brake Drums from the People’s Republic of China and the Republic of Türkiye,” dated concurrently with, and hereby adopted by, this notice (Country-Specific CVD Initiation Checklists), at Attachment II, Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People’s Republic of China and the Republic of Türkiye (Attachment II). These checklists are on file electronically via ACCESS.

like product as defined in the “Scope of the Investigations,” in the appendix to this notice. The petitioner estimated the 2023 production of the domestic like product for the only other known producer of brake drums in the United States.²⁰ The petitioner compared its production to the estimated total 2023 production of the domestic like product for the entire domestic industry.²¹ We relied on data provided by the petitioner for purposes of measuring industry support.²²

Our review of the data provided in the Petitions, the First General Issues Supplement, the Industry Support Supplement, and other information readily available to Commerce indicates that the petitioner has established industry support for the Petitions.²³ First, the Petitions established support from domestic producers (or workers) accounting for more than 50 percent of the total production of the domestic like product and, as such, Commerce is not required to take further action to evaluate industry support (*e.g.*, polling).²⁴ Second, the domestic producers (or workers) have met the statutory criteria for industry support under section 702(c)(4)(A)(i) of the Act because the domestic producers (or workers) who support the Petitions account for at least 25 percent of the total production of the domestic like product.²⁵ Finally, the domestic producers (or workers) have met the statutory criteria for industry support under section 702(c)(4)(A)(ii) of the Act because the domestic producers (or workers) who support the Petitions account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the Petitions.²⁶

²⁰ See Petitions at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-3 and Exhibits I-S1-1 and I-S1-2.

²¹ See Petitions at Volume I (pages I-2 and I-3 and Exhibit I-1); *see also* First General Issues Supplement at 3 and Exhibit I-S1-2.

²² See Petition at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-4 and Exhibits I-S1-1, I-S1-2, and I-S4; and Industry Support Supplement at 1-3. For further discussion, *see* Attachment II of the Country-Specific CVD Initiation Checklists.

²³ See Attachment II of the Country-Specific CVD Initiation Checklists.

²⁴ *Id.*; *see also* section 702(c)(4)(D) of the Act.

²⁵ See Attachment II of the Country-Specific CVD Initiation Checklists.

²⁶ *Id.*

Accordingly, Commerce determines that the Petitions were filed on behalf of the domestic industry within the meaning of section 702(b)(1) of the Act.²⁷

Injury Test

Because China and Türkiye are “Subsidies Agreement Countries” within the meaning of section 701(b) of the Act, section 701(a)(2) of the Act applies to these investigations.

Accordingly, the ITC must determine whether imports of the subject merchandise from China and/or Türkiye materially injure, or threaten material injury to, a U.S. industry.

Allegations and Evidence of Material Injury and Causation

The petitioner alleges that imports of the subject merchandise are benefiting from countervailable subsidies and that such imports are causing, or threaten to cause, material injury to the U.S. industry producing the domestic like product. In addition, the petitioner alleges that subject imports from China and Türkiye individually exceed the negligibility threshold provided for under section 771(24)(A) of the Act.²⁸

The petitioner contends that the industry’s injured condition is illustrated by the significant and increasing volume of subject imports; decreased market share; underselling and price depression and/or suppression; lost sales and revenues; decline in capacity utilization, production, and U.S. sales quantity; decline in production-related workers; and decline in operating margins.²⁹ We assessed the allegations and supporting evidence regarding material injury, threat of material injury, causation, cumulation, as well as negligibility, and we have

²⁷ *Id.*

²⁸ *See* Petitions at Volume I (pages I-13 and I-14 and Exhibit I-8).

²⁹ *Id.* at I-13 through I-36 and Exhibits I-7 through I-25; *see also* First General Issues Supplement at 7 and Exhibits I-S1-8 and I-S1-9.

determined that these allegations are properly supported by adequate evidence and meet the statutory requirements for initiation.³⁰

Initiation of CVD Investigations

Based upon our examination of the Petitions and supplemental responses, we find that they meet the requirements of section 702 of the Act. Therefore, we are initiating CVD investigations to determine whether imports of brake drums from China and Türkiye benefit from countervailable subsidies conferred by the GOC and the GOT, respectively. In accordance with section 703(b)(1) of the Act and 19 CFR 351.205(b)(1), unless postponed, we will make our preliminary determinations no later than 65 days after the date of these initiations.

China

Based on our review of the Petitions, we find that there is sufficient information to initiate a CVD investigation on 17 of the 18 programs alleged by the petitioner. For a full discussion of the basis of our initiation decision for each program, *see* the China CVD Initiation Checklist. A public version of the initiation checklist for this investigation is available on ACCESS.

Türkiye

Based on our review of the Petitions, we find that there is sufficient information to initiate a CVD investigation on 44 of the 47 of the programs alleged by the petitioner. For a full discussion of the basis of our initiation decision for each program, *see* the Türkiye CVD Initiation Checklist. A public version of the initiation checklist for this investigation is available on ACCESS.

³⁰ *See* Country-Specific CVD Initiation Checklists at Attachment III, Analysis of Allegations and Evidence of Material Injury and Causation for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People's Republic of China and the Republic of Türkiye.

Respondent Selection

In the Petitions, the petitioner identified 54 companies in China, and 19 companies in Türkiye, as producers or exporters of brake drums.³¹ Commerce intends to follow its standard practice in CVD investigations and calculate company-specific subsidy rates in these investigations.

In the event that Commerce determines that the number of companies is large and it cannot individually examine each company based on Commerce's resources, Commerce normally selects mandatory respondents in CVD investigations using U.S. Customs and Border Protection (CBP) entry data for U.S. imports under the appropriate Harmonized Tariff Schedule of the United States (HTSUS) subheading(s) listed in the "Scope of the Investigations" in the appendix. However, for these investigations, the main HTSUS subheading under which the subject merchandise would enter (8708.30.5020) is a basket category under which non-subject merchandise may also enter. Therefore, we cannot rely on CBP entry data in selecting respondents. Notwithstanding the decision to rely on Q&V questionnaires for respondent selection, due to the number of producers and/or exporters identified in the Petitions, Commerce has determined to limit the number of Q&V questionnaires that it will issue to producers and/or exporters based on CBP data for brake drums from China and Türkiye during the POI under the appropriate HTSUS subheading listed in the "Scope of the Investigations," in the appendix. Accordingly, for China and Türkiye, Commerce will send Q&V questionnaires to the largest producers and/or exporters that are identified in the CBP entry data for which there is complete address information on the record.

³¹ See Petitions at Volume I (Exhibit I-5).

Commerce will also post the Q&V questionnaires along with filing instructions on Commerce's website at <https://www.trade.gov/ec-adcvd-case-announcements>.

Exporters/producers of brake drums from China and Türkiye that do not receive Q&V questionnaires may still submit a response to the Q&V questionnaire and can obtain a copy of the Q&V questionnaire from Commerce's website. Responses to the Q&V questionnaire must be submitted by the relevant producers/exporters no later than 5:00 p.m. on July 24, 2024, which is two weeks from the signature date of this notice. An electronically filed document must be received successfully, in its entirety, by ACCESS no later than 5:00 p.m. ET on the deadline noted above. Commerce intends to finalize its decision regarding respondent selection within 20 days of publication of this notice.

Distribution of Copies of the Petitions

In accordance with section 702(b)(4)(A) of the Act and 19 CFR 351.202(f), a copy of the public version of the Petitions has been provided to the GOC and GOT via ACCESS. To the extent practicable, we will attempt to provide a copy of the public version of the Petitions to each exporter named in the Petitions, as provided under 19 CFR 351.203(c)(2).

ITC Notification

Commerce will notify the ITC of its initiation, as required by section 702(d) of the Act.

Preliminary Determinations by the ITC

The ITC will preliminarily determine, within 45 days after the date on which the Petitions were filed, whether there is a reasonable indication that imports of brake drums from China and/or Türkiye are materially injuring, or threatening material injury to, a U.S. industry.³² A negative ITC determination for any country will result in the investigation being terminated with

³² See section 703(a)(1) of the Act.

respect to that country.³³ Otherwise, these CVD investigations will proceed according to statutory and regulatory time limits.

Submission of Factual Information

Factual information is defined in 19 CFR 351.102(b)(21) as: (i) evidence submitted in response to questionnaires; (ii) evidence submitted in support of allegations; (iii) publicly available information to value factors of production under 19 CFR 351.408(c) or to measure the adequacy of remuneration under 19 CFR 351.511(a)(2); (iv) evidence placed on the record by Commerce; and (v) evidence other than factual information described in (i)-(iv). Section 351.301(b) of Commerce's regulations requires any party, when submitting factual information, to specify under which subsection of 19 CFR 351.102(b)(21) the information is being submitted³⁴ and, if the information is submitted to rebut, clarify, or correct factual information already on the record, to provide an explanation identifying the information already on the record that the factual information seeks to rebut, clarify, or correct.³⁵ Time limits for the submission of factual information are addressed in 19 CFR 351.301, which provides specific time limits based on the type of factual information being submitted. Interested parties should review the regulations prior to submitting factual information in these investigations.

Extensions of Time Limits

Parties may request an extension of time limits before the expiration of a time limit established under 19 CFR 351.301, or as otherwise specified by Commerce. In general, an extension request will be considered untimely if it is filed after the expiration of the time limit established under 19 CFR 351.301, or as otherwise specified by Commerce.³⁶ For submissions

³³ *Id.*

³⁴ *See* 19 CFR 351.301(b).

³⁵ *See* 19 CFR 351.301(b)(2).

³⁶ *See* 19 CFR 351.302.

that are due from multiple parties simultaneously, an extension request will be considered untimely if it is filed after 10:00 a.m. ET on the due date. Under certain circumstances, Commerce may elect to specify a different time limit by which extension requests will be considered untimely for submissions which are due from multiple parties simultaneously. In such a case, we will inform parties in a letter or memorandum of the deadline (including a specified time) by which extension requests must be filed to be considered timely. An extension request must be made in a separate, standalone submission; under limited circumstances we will grant untimely filed requests for the extension of time limits, where we determine, based on 19 CFR 351.302, that extraordinary circumstances exist. Parties should review Commerce's regulations concerning the extension of time limits and the *Time Limits Final Rule* prior to submitting factual information in these investigations.³⁷

Certification Requirements

Any party submitting factual information in an AD or CVD proceeding must certify to the accuracy and completeness of that information.³⁸ Parties must use the certification formats provided in 19 CFR 351.303(g).³⁹ Commerce intends to reject factual submissions if the submitting party does not comply with the applicable certification requirements.

Notification to Interested Parties

Interested parties must submit applications for disclosure under APO in accordance with 19 CFR 351.305. Parties wishing to participate in these investigations should ensure that they meet the requirements of 19 CFR 351.103(d) (e.g., by filing the required letters of appearance).

³⁷ See 19 CFR 351.301; see also *Extension of Time Limits; Final Rule*, 78 FR 57790 (September 20, 2013) (*Time Limits Final Rule*), available at <https://www.gpo.gov/fdsys/pkg/FR-2013-09-20/html/2013-22853.htm>.

³⁸ See section 782(b) of the Act.

³⁹ See *Certification of Factual Information to Import Administration During Antidumping and Countervailing Duty Proceedings*, 78 FR 42678 (July 17, 2013) (*Final Rule*); see also frequently asked questions regarding the *Final Rule*, available at https://enforcement.trade.gov/tlei/notices/factual_info_final_rule_FAQ_07172013.pdf.

Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).⁴⁰

This notice is issued and published pursuant to sections 702 and 777(i) of the Act, and 19 CFR 351.203(c).

Dated: July 10, 2024.

/S/ Abdelali Elouaradia

Abdelali Elouaradia,
Deputy Assistant Secretary
for Enforcement and Compliance

⁴⁰ See *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069 (September 29, 2023).

Appendix

Scope of the Investigations

The merchandise covered by these investigations 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. Specifically excluded is merchandise covered by the scope of the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China. See *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Antidumping Duty Order*, 86 FR 36093 (July 8, 2021) and *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 FR 24844 (May 10, 2021).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight.

The merchandise covered by these investigations is classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheading 8708.30.5020. The merchandise covered by these investigations may be classifiable under HTSUS subheading 8708.30.5090 when entered as part of an assembly. Subject merchandise may also enter under HTSUS subheading 8716.90.5060. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise covered by these investigations is dispositive.