

1200 New Hampshire Avenue, NW  
Suite 725-B  
Washington, DC 20036

Tel: 202 483-0070  
Fax: 202 483-0092  
www.barnesrichardson.com

100 William Street, Suite 305  
New York, NY 10038  
Tel: 212 725-0200  
Fax: 212 889-4135

303 East Wacker Drive  
Suite 1020  
Chicago, IL 60601  
Tel: 312 565-2000  
Fax: 312 565-1782

July 30, 2020

## **Petitions Summary – Chassis and Subassemblies Thereof from the People’s Republic of China**

### **I. INTRODUCTION**

This memorandum summarizes the Petitions by Coalition of American Chassis Manufacturers, filed on July 30, 2020, with the U.S. Department of Commerce and the U.S. International Trade Commission, for the Imposition of Antidumping and Countervailing Duties on Chassis and Subassemblies Thereof from the People’s Republic of China.

### **II. SCOPE OF THE INVESTIGATION**

The physical characteristics of the covered products, which define the scope, are as follows:

The merchandise covered by this investigation are chassis and subassemblies thereof, whether finished or unfinished, whether assembled or unassembled, whether coated or uncoated, regardless of the number of axles, designed primarily for use in the carriage of containers, or other payloads (including self-supporting payloads) that can be attached by twistlocks, slide pins or similar attachment devices, for road, marine roll-on/roll-off (RORO) and/or rail transport. Chassis are typically, but are not limited to, rectangular framed trailers with a suspension and axle system, wheels and tires, brakes, a lighting and electrical system, a coupling for towing behind a truck tractor, and a locking system or systems to secure the shipping container or containers attached to the chassis.

Subject merchandise includes, but is not limited to, the following subassemblies:

- Chassis frames, or sections of chassis frames, including kingpins or kingpin assemblies, bolsters consisting of transverse beams with locking or support mechanisms, goosenecks, drop assemblies, extension mechanisms and/or rear impact guards;

- Running gear assemblies or axle assemblies for connection to the chassis frame, whether fixed in nature or capable of sliding fore and aft or lifting up and lowering down, which may or may not include suspension(s) (mechanical or pneumatic), wheel end components, slack adjusters, axles, brake chambers, locking pins, and tires and wheels;
- Landing gear (legs) or landing gear assemblies, for connection to the chassis frame, capable of supporting the chassis when it is not engaged to a tractor; and
- Assemblies and/or components that connect to the chassis frame or a section of the chassis frame, such as, but not limited to, pintle hooks or B-trains (which include a fifth wheel), which are capable of connecting a chassis to a converter dolly or another chassis.

Importation of any of these subassemblies, whether assembled or unassembled, constitutes an unfinished chassis for purposes of this investigation.

Subject merchandise also includes chassis, whether finished or unfinished, entered with or for further assembly with components such as, but not limited to: hub and drum assemblies, brake assemblies (either drum or disc), axles, brake chambers, suspensions and suspension components, wheel end components, landing gear legs, spoke or disc wheels, tires, brake control systems, electrical harnesses and lighting systems.

Processing of finished and unfinished chassis and components such as trimming, cutting, grinding, notching, punching, drilling, painting, coating, staining, finishing, assembly, or any other processing either in the country of manufacture of the in-scope product or in a third-country does not remove the product from the scope. Inclusion of other components not identified as comprising the finished or unfinished chassis does not remove the product from the scope.

This scope excludes dry van trailers, refrigerated trailers and flatbed trailers.

### **III. U.S. TARIFF CLASSIFICATION**

The finished and unfinished chassis subject to this investigation are typically classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings: 8716.39.0090 and 8716.90.5060. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise under investigation is dispositive.

Imports of subject merchandise are classified under HTSUS statistical number 8716.39.0090. Major component parts (i.e., subject subassemblies) of chassis may be entered into the United States under that HTSUS number, or under HTSUS statistical number 8716.90.5060. The most-favored nation duty rate for imports under these HTS numbers is zero percent for 8716.39.0090 and 3.1 % for 8716.90.5060.

#### **IV. PETITIONER**

The members of the Coalition of American Chassis Manufacturers include the following:

1. Cheetah Chassis Corporation  
225 Lincoln Highway, Suite 202  
Fairless Hills, PA 19030
2. Hercules Enterprises, LLC  
321 Valley Rd.  
Hillsborough, NJ 08844
3. Pitts Enterprises, Inc.  
5734 Pittsview Hwy  
Pittsview, AL 36871
4. Pratt Industries, Inc.  
11365 Red Arrow Hwy  
Bridgman, MI 49106
5. Stoughton Trailers, LLC  
416 S. Academy Street  
Stoughton, WI 53589

The members of the Coalition of American Chassis Manufacturers are producers in the United States of a domestic like product and are thus interested parties within the meaning of 19 U.S.C. § 1677(9)(C).

#### **V. NAMED PRODUCERS/EXPORTERS**

Please contact our office for a list of Foreign Producers of subject chassis.

#### **VI. NAMED IMPORTERS**

Please contact our office for a list of U.S. Importers of subject chassis.

#### **VII. ALLEGED DUMPING MARGIN**

211.49%

#### **VIII. ALLEGED SUBSIDIES**

CIMC Vehicles (Group)