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April 13, 2026

Inv. No. TA-201-79 (Remedy)
Pages: 41

PUBLIC DOCUMENT

VIA ELECTRONIC FILING (EDIS)

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: Quartz Surface Products Global Safeguard Investigation: Witness Testimony

Dear Secretary Barton:

On behalf of our clients, Elite Quartz Manufacturing (“Elite Quartz”), Arizona Tile LLC (“Arizona Tile”), and M S International, Inc. (“MSI”), American producers and distributors of the subject merchandise, we respectfully submit the enclosed witness testimony and slides in relation to the Remedy Phase of the above captioned investigation. This submission is in accordance with the United States International Trade Commission’s schedule for the investigation. 1/

This submission includes testimony of:

- Rich Katzmann, Co-Founder and Chief Commercial Officer, Thryve Innovations
- Tony Kilic, President, Classic Granite & Marble

1/ *Quartz Surface Products; Institution of Investigation, Scheduling of Public Hearings, and Determination That the Investigation Is Extraordinarily Complicated*, 90 Fed. Reg. 55165 (Int’l Trade Comm’n Dec. 1, 2025).

The Honorable Lisa R. Barton

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- Brad Rush, Executive Director, Granite South Inc.
- Michael G. Jacobson, Partner, Hogan Lovells US LLP
- Ken Gear, Chief Executive Officer, Leading Builders of America
- Ron Mosberg, General Counsel & Corporate Secretary, Caesarstone Ltd.
- Darrell Turbeville, General Manager, Elite Quartz Manufacturing

This submission also includes slides for the testimony of:

- Travis Pope, Principal, Capital Trade Inc.

This submission also includes a video, which is available at the following Box link:
<https://hoganlovells.box.com/s/wjeh63sgu6qfllbaxbutss076ew3w8vz>.

* * *

Service has been effectuated as required by 19 C.F.R. §§ 201.16 and 207.3(b). In accordance with 19 C.F.R. § 207.15 and the Handbook on Filing Procedures, we hereby file this submission electronically on EDIS.

Please contact the undersigned if there are any questions concerning this request.

Respectfully submitted,

HOGAN LOVELLS US LLP

/s/ Jonathan T. Stoel

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*Counsel to Elite Quartz Manufacturing, Arizona
Tile LLC, and M S International, Inc.*

**PUBLIC
CERTIFICATE OF SERVICE**

**Quartz Surface Products
Investigation No. TA-201-79 (Remedy)**

I, Katherine Huckaby, hereby certify that on April 13, 2026, a copy of the attached submission was served via email on the following parties:

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/s/ Katherine Huckaby
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HOGAN LOVELLS US LLP

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)
TESTIMONY OF RICH KATZMANN
CO-FOUNDER AND CCO OF THRYVE INNOVATIONS AND
FORMER EXECUTIVE DIRECTOR OF THE ROCKHEADS GROUP USA

1. My name is Rich Katzmann. I have spent the latter part of my career working with quartz and natural stone fabricators across the United States. I recently started a business called Thryve Innovations, which helps fabricators use AI to improve their operations. Prior to starting Thryve, I served as the Executive Director of The Rockheads Group, a national association of approximately 120 of the largest fabricators in the country. In that role, I ran industry benchmarking reports, supported best practices, and worked directly with businesses employing around ten thousand American manufacturing workers. I testified at the injury hearing last month. Thank you for having me back.

2. As I said at the injury hearing, fabricators are the heart of the domestic quartz industry, employing about one hundred thousand Americans across the country. I was disappointed that Petitioner has continued to **disrespect** these fabricators and their workers. They are not brownie cutters, as Petitioner's counsel claimed at the last hearing. Unless cutting brownies involves complex machinery, laser measurements, software, AI, and highly skilled craftsmanship. And

Petitioner’s claim that fabricators that oppose a safeguard remedy are not “savvy,” is even more **insulting**. I talk to fabricators all the time. These are hard-working, skilled American workers that have invested substantial funds in sophisticated manufacturing operations. Believe me, they are savvy. Saying that these fabricators don’t know what is best for their business is not only careless—it is just plain wrong.

3. It was also strange to see Petitioner’s brief pick out one statement from Reddit to represent the views of the fabricator community. I could give you thousands of Reddit posts, message boards, and texts from fabricators strongly opposed to this case. Indeed, I understand over one thousand fabricators filed declarations opposing trade restrictions. Several of them are here today.

4. I’ll let the fabricators before you today speak for themselves. What I’ll say is from my experience working with hundreds of fabricators through the years, if quartz becomes less available or more expensive, fabricators will either have to reduce operations or fabricate more granite and other materials. These other materials are harder to work with, less efficient, less profitable, and not what the customers actually want. But this is what fabricators will have to do in order to meet their customers’ needs. Consumers will have less options. Fabricators will lose money. American jobs will be lost.

5. I respectfully urge the Commission to limit any recommended remedy to avoid causing significant harm to these U.S. fabricator manufacturers. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Rich Katzmann

April 13, 2026

Rich Katzmann

Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)
TESTIMONY OF TONY KILIC
PRESIDENT AND CO-FOUNDER OF CLASSIC GRANITE & MARBLE

1. My name is Tony Kilic. I am the president of Classic Granite & Marble, located in Richmond, Virginia. I co-founded this company 20 years ago, and I am proud that we have built it into a successful and profitable business now employing 150 Americans.

2. If Cambria and Dal-Tile's proposal to impose new 50% tariffs and restrictive quotas goes forward, our business will suffer. And so will the businesses of many fabricators like us nationwide. I am here to ask that you think about my business and thousands of other fabricators like me when making your recommendation.

3. At Classic Granite & Marble, we sell to all sorts of customers such as custom builders, tract builders, designers, kitchen and bath dealers, and direct sales. We also service 16 Home Depots in our area. So we have good visibility into lots of different parts of the market. We fabricate some domestic product, but it is a very small percentage of what we do, because most of our customers do not want it.

4. We serve customers that rarely buy high-end domestic quartz products. They want nice looking countertops and vanities that are reasonably priced. The

idea that our customers will pay double or triple for Cambria quartz or other domestic made quartz is absurd and out of touch with reality. Cambria is telling you that everyone should buy a Ferrari. But in reality, not everyone can afford a Ferrari. Most people need to drive a Toyota or a Chevy. And there's nothing wrong with that. We should not put 50% tariffs on regular cars to try to get more Americans to buy luxury cars. Nor should we tariff more economical quartz imports to benefit Cambria. They already sell by far the highest priced product in the market and keeps increasing its prices every year.

5. I saw that Cambria and the other domestic slab producers basically called fabricators like me stupid because I don't want tariffs or quotas on quartz slab imports. This is disappointing, and frankly offensive. As I mentioned, I built my business from the ground up, and I have 20 years of experience in this field. I have grown a profitable business fabricating quartz and other surface products and serving thousands of customers over the years. We may not be a multi-billion dollar public company like Dal-Tile's parent Mohawk, and I may not be a billionaire like Marty Davis, but my company and others like us matter. This case could cause huge negative impacts in our local market which could hurt good American manufacturing and installation jobs. We are going to lose a lot of business if there are no longer economical quartz options due to trade restrictions. Fewer homes will be built or renovated. There may also be a shift to other cheaper surface options

such as solid surface and laminate which we do not fabricate. Our finance department projects that we will lose about 37% of our business as a result of a 50% tariff.

6. The last thing I'll say is that we do a lot more actual manufacturing than slab producers. I've been to slab factories. They are highly automated. There were very few people working on the factory floor. We have more people manufacturing quartz than they do.

7. On behalf of our 150 employees, their families, and our local community, I urge the Commission to consider the impact of any remedy on fabricator businesses and our workers.

8. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Tony Kilic

April 13, 2026

Tony Kilic

Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)
TESTIMONY OF BRAD RUSH
CHIEF EXECUTIVE OFFICER AND PRESIDENT OF GRANITE SOUTH

1. My name is Brad Rush. I am the CEO and President of Granite South, a small, family-run fabricator in Georgia. We are a small business and employ ten people directly. We are proud of the work that we do for homeowners, local business, and smaller builders. We are all victims of the threatened quotas and tariffs.

2. I am here today because yet again the U.S. Government is about to impose economic harm on small businesses such as ours. Let me be clear about who will really get hurt by a tariff or quota on imported quartz—the little guy. The national brands, like the companies you heard from this morning, offer the most expensive quartz products to their customers, delivered in fleets of expensive trucks, and they employ many high-paid executives and attorneys. They are all doing great as your record shows.

3. Small businesses like mine – especially manufacturers like the many fabricators testifying before you today – and everyday consumers in America are the ones suffering most due to high inflation and especially punitive tariffs. We are the ones who will bear the burden of tariffs or quotas. When quartz slab pricing jumps

from \$45 per-square-foot to something like \$65 per-square-foot, it will be the little guys – small businesses, younger consumers, and families – who will carry the load. Regular families and small businesses simply cannot absorb price hikes designed exclusively to support the megacompanies you heard from this morning.

4. A 50% tariff or a restrictive quota on quartz will not level the playing field—far from it. This Commission will be pricing working families completely out of the market. These everyday customers that my business serves will not spend \$7500 on a quartz kitchen top – they can't afford it! Instead, they will return to lower-end stone product – like granite – not because they want to, but because the U.S. Government will be forcing them to do so. Alternatively, they may not renovate their kitchen or bathroom at all.

5. This case is about greed from corporate elites and at least one multi-billionaire. We have watched Cambria, Dal-Tile, and others raise their prices year-over-year while telling us, the little guys, to just “pay up.” It's hard for small businesses like mine to accept their narrative that only a punitive trade measure will fix their problems when they are making so much money, and their proposal will cause so much harm to us and the customers we serve. On top of that, my customers usually won't buy their quartz anyway because their product lines are overpriced.

6. So, I will leave the Commission with this point—is granting Petitioner's proposal really the American way? To let heavy-handed corporate elites

push policies that price out small businesses like ours and shift the bill to everyday working Americans? If the Government gives in to the greed of the big boys you heard from this morning, that's exactly what happens. Quartz will become a luxury product for elite corporate entities and the mansion crowd. Little guys like me and my customers shouldn't be made to pay the price.

7. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Brad Rush

April 13, 2026

Brad Rush

Date

**BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)**

**TESTIMONY OF MIKE JACOBSON
PARTNER, HOGAN LOVELLS US LLP**

1. My name is Mike Jacobson, counsel to respondents in opposition to a safeguard remedy. I will address our proposed safeguard remedy.

2. At the outset, our position remains that no trade-restrictive safeguard remedy is warranted. Trade restrictions would impose greater costs than economic and social benefits, and thus would be contrary to the governing statute. The domestic industry is highly successful, whether it is measured solely by the roughly 2,000 slab production workers or whether it also includes the approximately 100,000 fabrication workers. The overwhelming majority of the domestic industry does not want tariffs or quotas on quartz slabs. This includes two slab producers, Elite Quartz and Caesarstone, and the more than one-thousand fabricators who submitted confidential declarations to the Commission. In fact, fabricators representing nearly 9,000 fabrication workers submitted new declarations in the handful of days following the injury vote.

3. You will also hear from our industry witnesses that tariffs or quotas of any kind would also cause significant harm to the downstream building sector.

4. Our economist Mr. Pope of Capital Trade will speak in more detail about the inadequacies of Petitioner’s remedy proposal, and we are also happy to discuss in more detail in Q&A. I will focus now on our proposal, in the case that the Commission decides to recommend a safeguard remedy that restricts trade:

- First of all, we propose a tariff-rate quota (“TRQ”), with zero tariffs up to the quota level, and a moderate tariff above the quota level. The quota level should be 193 million square feet, which is the gap between average apparent consumption over the past three full years and the most recent reported practical capacity of the domestic slab producers.
- Our remedy recommendation is rooted in the governing safeguard statute. Specifically, Section 203(e)(4) of the Trade Act of 1974 provides that any safeguard remedy:

shall permit the importation of a quantity or value of the article which is not less than *the average quantity or value of such article entered into the United States in the most recent 3 years* that are representative of imports of such article and for which data are available (emphasis added).

- Our remedy recommendation is also framed around the market reality that domestic slab makers can only supply a small fraction of the market. Domestic production cannot even account for 20% of U.S. demand, even if running full-out.

- In terms of timing, we propose a two-year safeguard remedy consistent with the statutory objective of ensuring that “the cumulative impact of such action does not exceed the amount *necessary* to prevent or remedy the serious injury” (emphasis added). 19 U.S.C § 2253(e)(2). Specifically, a shorter timeline will blunt quartz demand destruction by reducing switching to other surface products.
- We also propose exclusion of crushed glass products. Petitioning companies do not make these products, and so there is no basis for including them in any remedy.
- We oppose any country-based exclusion not grounded in the law, in particular for Spain. We do not oppose exemptions for FTA countries or de minimis developing countries, which as a factual matter comprise a very small part of U.S. demand.
- I’d also like to make clear that we implore the Commission *not* to recommend a hard quota of any kind. This would cause severe demand destruction for quartz, which would mostly harm fabricators who would lose large portions of their business.
- There is plenty of disagreement, as you already heard today. In the spirit of finding common ground and assisting in the development of a reasonable remedy recommendation by the Commission, I would like to highlight areas

of agreement between us and Petitioner regarding prudent, non-trade restrictive remedy recommendations:

- First, we support trade adjustment assistance (TAA) or other financial support for workers. Any such assistance must include fabrication workers who will be most negatively impacted by a trade-restrictive remedy and are the lifeblood of this industry.
- We also support enforcement against evasion. Our clients have worked hand-in-hand with Cambria to identify criminals in the past, and we will continue to do so.
- Finally, we take no position on the best safeguard remedy on cut-to-size or prefabricated products.

5. I'll now turn it over to our industry witnesses. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Michael Jacobson

April 13, 2026

Michael Jacobson

Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)
TESTIMONY OF KEN GEAR
CHIEF EXECUTIVE OFFICER OF LEADING BUILDERS OF AMERICA

1. My name is Ken Gear. I am the Chief Executive Officer of Leading Builders of America. LBA represents 22 of the largest production homebuilders in the United States, who build more than half of all new single-family homes in this country, most of which are entry level homes and homes for working families. I testified before you at the injury hearing last month. I appreciate the opportunity to testify again.

2. LBA members employ hundreds of thousands of employees directly and indirectly and generate over 2 million more jobs through our construction trade partners. These jobs are what is at stake here today. It was frankly insulting to hear that Petitioners say that this case will have no impact on homebuilders or home buyers. Petitioner doesn't seem to understand anything about today's housing market.

3. The homebuilding industry is facing a crisis, with affordability at its lowest level since the 1980s. As I explained in my testimony in the injury phase of this investigation, home prices are up nearly 80 percent over roughly the last decade, while household income has increased by less than half that amount over the same

period. As noted by the National Association of Home Builders, a \$1,000 increase in the price of a new home will price over 150,000 U.S. households out of the market. Excessive regulation, high mortgage rates, and price appreciation, coupled with trade measures, have pushed home ownership out of reach for many Americans. Additional trade measures, such as the tariffs and quotas proposed by Petitioner, will add insult to injury.

4. I understand that Petitioner has claimed that the proposed tariffs will not materially affect the “typical consumer,” calculating that the tariff cost will only amount to a fraction of a percent of the total cost of a home. This calculation is out of touch with market reality. First of all, I’ve reviewed their numbers, and they overestimate the typical cost of the homes that my members are building, and they underestimate the amount and importance of quartz used in those homes. Their analysis incorrectly assumes pricing passes through to consumers cleanly with no margin expansion, full cost visibility and no friction in the system—none of which is true in our experience. Builders look for opportunities to control home prices on every input while building quality and affordable homes. What may seem like a small increase to Petitioner is significant to builders and our customers, particularly when those builders are already facing increased costs in flooring, cabinets, lighting, steel, and other inputs that all have to fit within the specified budget for a project. This is not, as Petitioners claim, “hyperbole.” The affordability crisis is very real,

and Petitioner's failure to understand that is exactly why our home builder members almost never buy luxury quartz products like Cambria. Petitioners' proposed 50% tariffs and quotas will drive up home prices at a time when virtually every elected official in America is searching for ways to lower home prices. This would be a terrible result.

5. It will also cause decreased demand for quartz. I explained previously that granite is used in only about 10 percent of new home builds today, with quartz now the preferred option. That was not always the case. If quartz becomes more expensive or less available due to restrictive safeguard remedies, we will see a reversal of this trend, with builders switching back to granite, or to solid surface or laminate. New tariffs or quotas will not redirect demand for quartz to expensive domestic products. It will destroy demand.

6. As I mentioned at the Commission's injury hearing, I have spent substantial time on Capitol Hill and at the White House over the last year. My discussions in those forums have made clear that policy makers at all levels of government, from all parts of the political spectrum, are united on the need to make housing more affordable. Just last month, President Trump issued an executive order instructing federal agencies to find ways to lower housing construction costs, stating: "It is the policy of my Administration to reduce regulatory barriers to building homes

and to steward taxpayer dollars in a manner that promotes housing affordability.”

We hope that you see it the same way.

7. On behalf of LBA, homebuyers across the country, and the millions of families we serve, I respectfully urge the Commission **not** to recommend a remedy that restricts trade.

8. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Ken Gear

April 13, 2026

Ken Gear

Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
QUARTZ SURFACE PRODUCTS
INV. No. 201-79 (REMEDY)
TESTIMONY OF RON MOSBERG
GENERAL COUNSEL & CORPORATE SECRETARY OF
CAESARSTONE LTD.

1. My name is Ron Mosberg. I am the General Counsel and Corporate Secretary of Caesarstone, Ltd. As the Commission will recall, Caesarstone was a longstanding producer of quartz surface products here in the United States.

2. My mission today is to explain why investing ‘new money’ in a U.S. quartz manufacturing plant is not a rational decision, as obtaining financing is simply not feasible. Caesarstone operated a quartz production facility in the United States until 2023. Starting then we began a multi-year strategic reorganization, shifting away from complex and capital expenditure-dependent production to focusing on sales and marketing and on research and development to deliver product innovation. My CEO Mr. Shiran explained that three factors drove this decision: *first*, reducing the need to make capital expenditures to maintain and upgrade production facilities; *second*, eliminating the need for engineering teams dedicated to design, production, maintenance, and equipment procurement; and *third*, procuring uniform raw materials globally, and securing their transportation, storage and testing. Petitioner’s claims to the contrary are baseless.

3. Let me now turn to why investment in a new U.S. manufacturing plant is not rational at this time: Caesarstone, along with all its industry peers, are subject to unjust mass tort litigation threatening to eliminate all the value in the quartz countertop sector. This fact has long been reflected in our financial reports as a material risk that has already impacted Caesarstone. I want to focus on two specific adverse effects of this mass tort litigation.

4. First, Caesarstone has not been able to sell its Richmond Hill facility. This is despite the fact that (A) we have invested \$150 million in this facility; (B) marketed it at a huge discount; and (C) engaged seasoned investment bankers who approached potential strategic buyers. All to no avail. Our transition to sell the property to buyers who do not produce quartz will allow us to realize only a fraction of our substantial investment. This example highlights the challenges confronting the industry in securing the additional capital required to open new production facilities or to expand existing facilities.

5. Second, the mass tort litigation has created an insurance unavailability crisis for the entire quartz industry. Our financial disclosures emphasize that silicosis litigation is uniquely destabilizing, because quartz manufacturing is no longer insurable in key jurisdictions. This converts litigation exposure into a direct and potentially unlimited financial threat. Specifically, we have been unable to obtain insurance coverage for future claims relating to silicosis in most jurisdictions

where we operate. If firms cannot insure their operations, then they cannot secure financing for new equipment or expansions. Moreover, when coverage is unavailable or too expensive, investors will not invest.

6. These two examples underscore that silicosis litigation is not an ordinary business risk to the quartz manufacturing industry. Rather, it is a structural constraint on continued operations, independent of pricing, sales, or import volumes. It fundamentally deters future investment in quartz manufacturing in the United States, and indeed everywhere.

7. As a consequence, the imposition of a safeguard remedy predicated on rapid investment and expansion in U.S. domestic manufacturing will be unsuccessful since the industry cannot obtain adequate levels of investment and insurance. A broad safeguard action like the one proposed by the Petitioner will not create domestic capacity. It will instead just raise costs for our customers.

8. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Ron Mosberg

April 13, 2026

Ron Mosberg

Date

**BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**QUARTZ SURFACE PRODUCTS
INV. NO. TA-201-79 (REMEDY)**

**TESTIMONY OF DARRELL TURBEVILLE
GENERAL MANAGER
ELITE QUARTZ MANUFACTURING LLC**

1. Good afternoon. My name is Darrell Turbeville. I am the General Manager of Elite Quartz Manufacturing LLC, a U.S. producer of quartz slabs operating a manufacturing facility in Latta, South Carolina. I was here at the injury hearing. Thank you for this opportunity to testify again.

2. As I explained before, we built our operation at Elite from the ground up starting in 2019. We learned quickly, adapted our processes, and focused relentlessly on improving efficiency and reliability. This wasn't an easy process, but our planning and execution paid off. Elite has been profitable every year since 2022. My point here is that the U.S. slab manufacturers can be successful, and we don't need tariffs or quotas to do so.

3. In fact, tariffs and quotas will actually hurt the U.S. quartz manufacturing industry. Fabricators are our core customer base. When fabricators succeed, we succeed. We want fabricators to purchase our domestically made product. But we also understand that the production capacity of Elite and other

American slab producers is just a fraction of what is required by all fabricators. And we understand that our price point is often much higher than what many end users can afford. If tariffs or quotas are imposed, many of these fabricators will be unable to sustain their operations, because they will be cut off from a significant source of supply. In fact, sadly, it is likely that some of them will go out of business. What hurts our customers hurts us.

4. Finally, we are skeptical about any claims that tariffs or quotas will lead to major investments in expansions of existing quartz manufacturing plants. We have scaled production quickly and regularly sell out of our most popular colors at a good profit. But we have no near term plans to expand our existing capacity, no matter what happens with this safeguard case. Let's be frank about why. We have been targeted with more than 400 unjust mass tort suits. Petitioners are in the same boat. There is just too much risk in the medium and long term quartz market in the United States to make additional major investments at this time.

5. We are proof that American manufacturers can thrive and innovate without trade barriers. For all of these reasons, Elite Quartz respectfully requests that the Commission recommend a remedy that does not include trade restrictions on imported quartz.

6. Thank you.

* * *

I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

/s/ Darrell Turbeville

April 13, 2026

Darrell Turbeville

Date

Quartz Surface Products Inv. No. TA-201-79 (Remedy Phase)

April 14, 2026

Presentation Accompanying Written Testimony at the United States International Trade Commission



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Overview

Conditions of Competition

Effects of Petitioner's Proposed Remedy

Economic Modeling

Conditions of Competition

- Demand is elastic.
- Imports account for the large majority of U.S. slab supply.
- Fabrication accounts for majority of U.S. value-added.

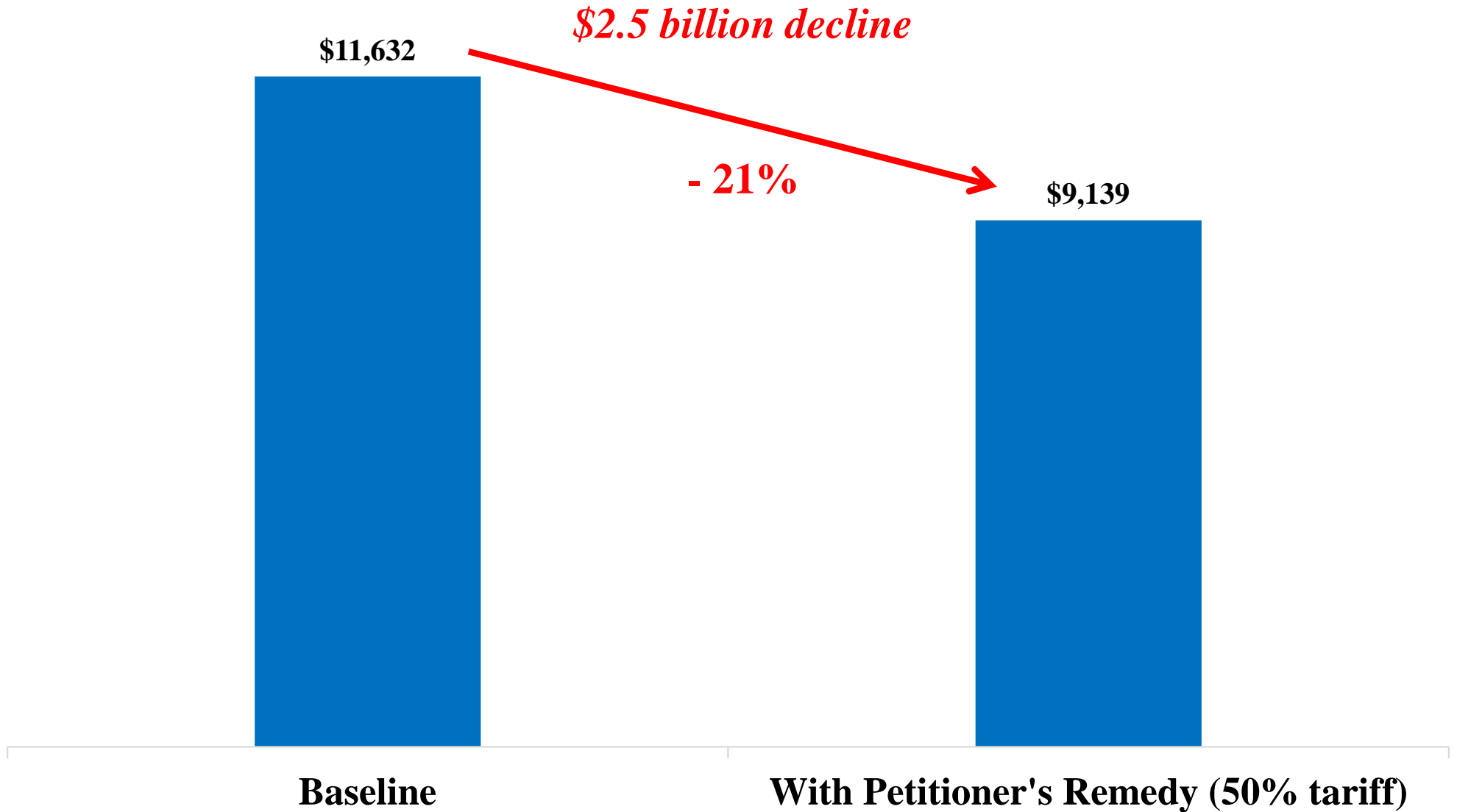
These three facts mean that any tariff on imported slab will be especially disruptive.

Petitioner's Proposed Remedy Harms the Domestic Industry

- Petitioner proposes an ad valorem tariff of 50% and a hard quota of 155 million pounds of imports.
- Modeling results show large losses to domestic:
 - Revenue
 - Employment
 - Net welfare
- Demand destruction causes large contraction in U.S. consumption.

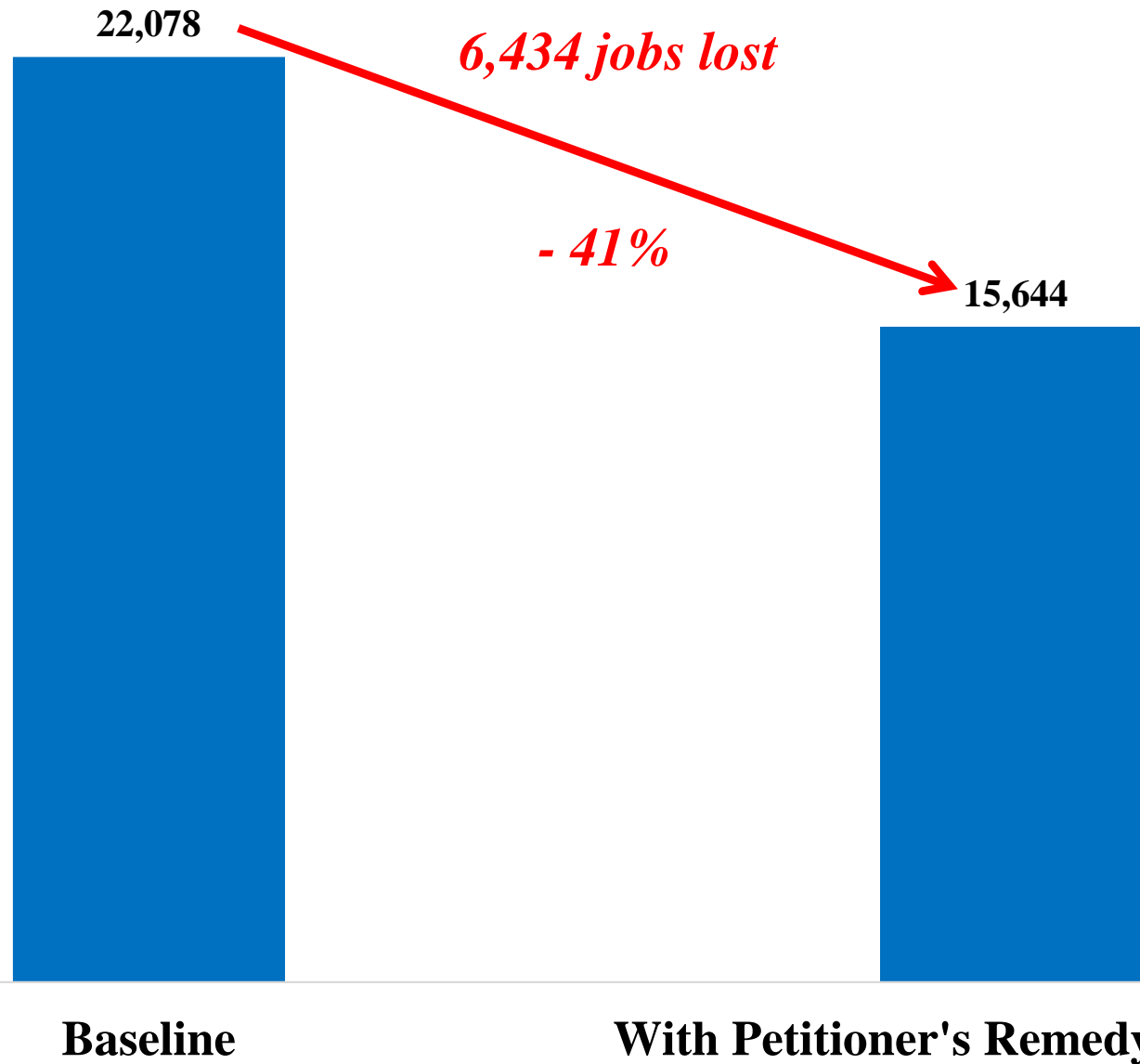
Domestic Industry Revenue Declines

\$ millions



Domestic Industry Loses Jobs under Proposed Remedy

of production workers



Petitioner's Estimated Effect on Domestic Industry Welfare

\$ millions

\$74

\$614 million loss

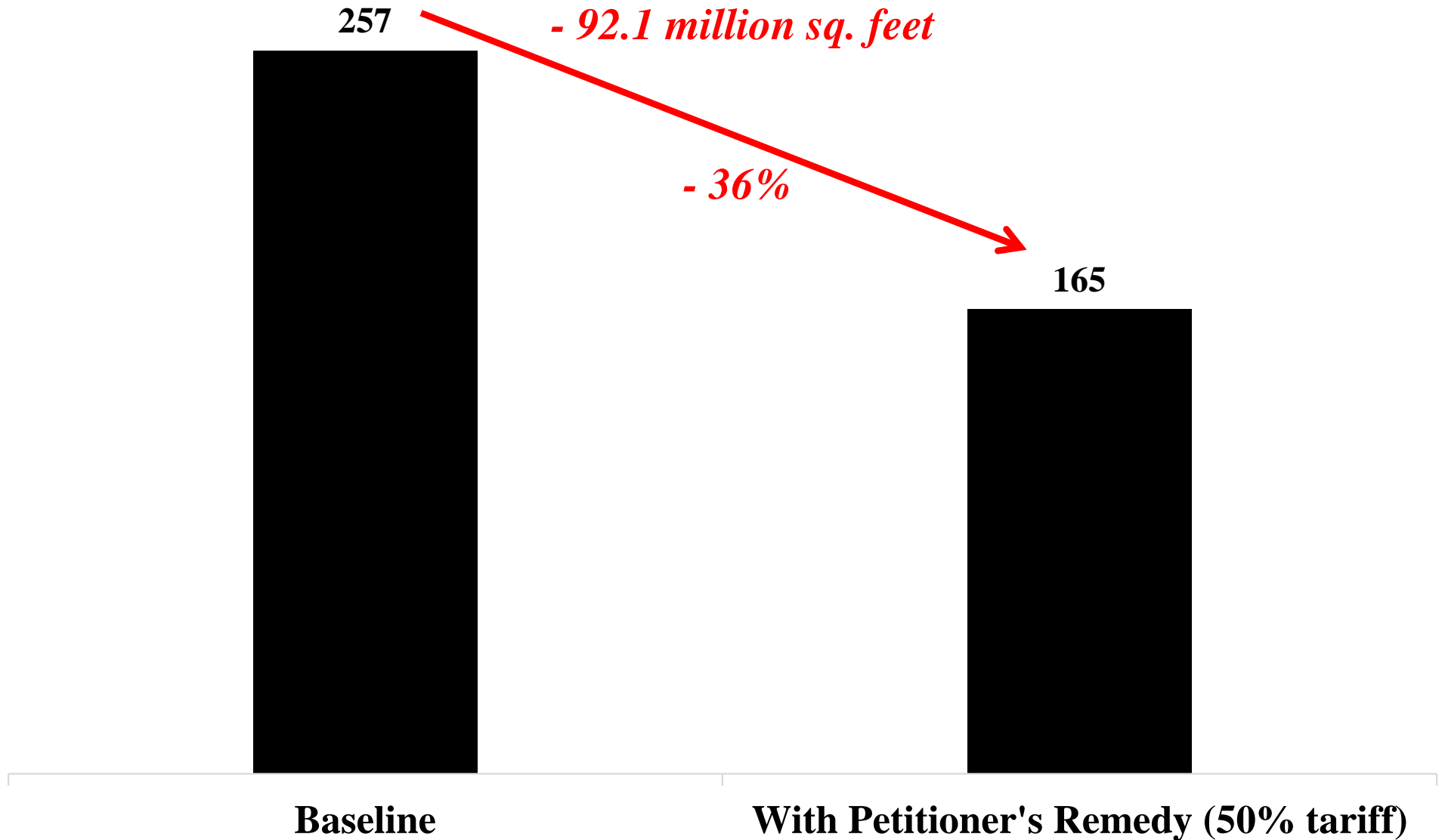
-\$688

Gain to slab producers

Cost to fabricators and consumers

The Proposed Remedy Would Reduce Consumption by 92 Million Square Feet

Million Sq. Ft

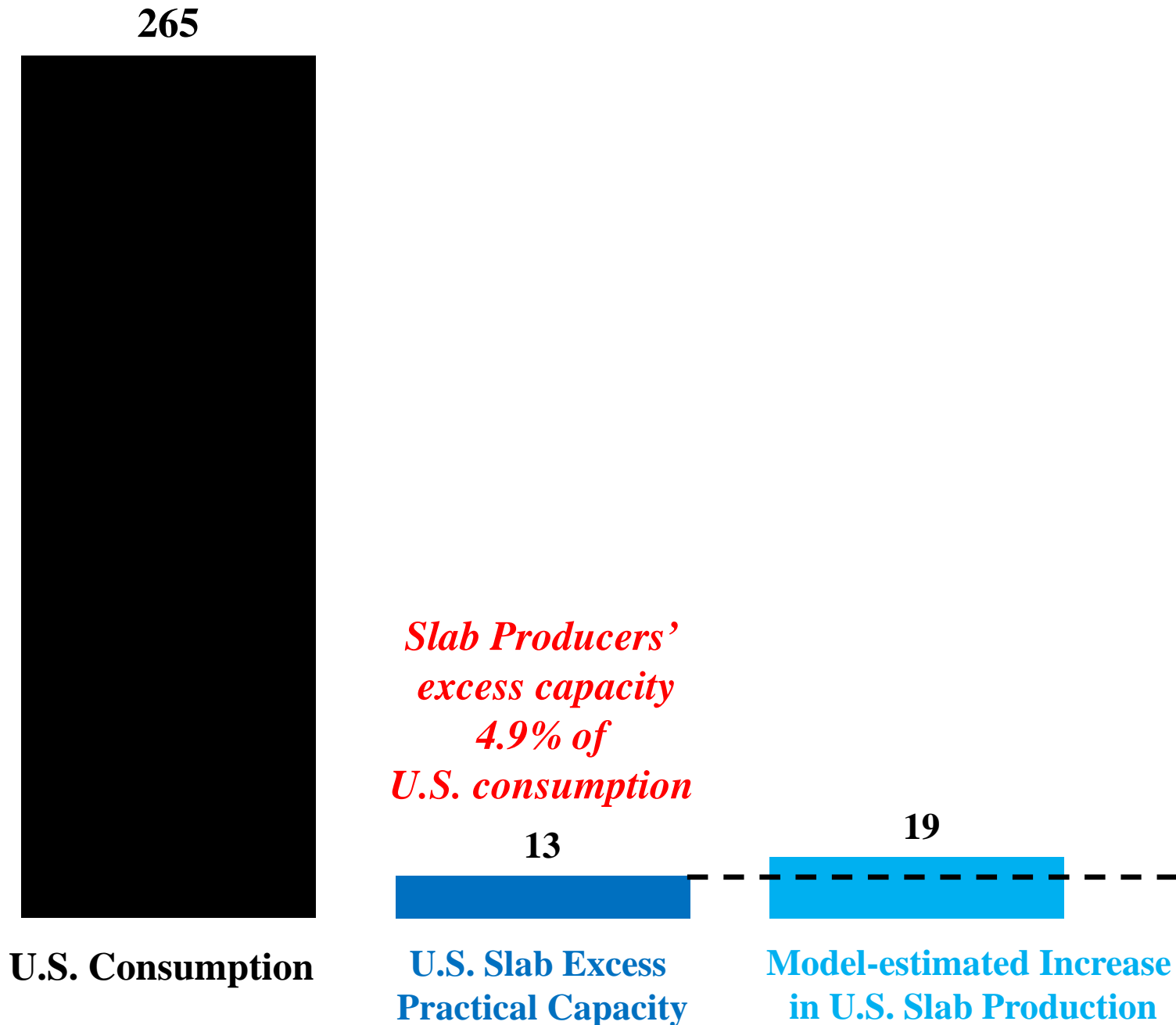


COMPAS Modeling

- Petitioner and CapTrade use the same economic model and elasticity estimates to assess the effects of the proposed remedy.
- However, Petitioner does not consider the impact on fabricators, ignoring the majority of domestic value-added and U.S. jobs.
- COMPAS advantage: Based on empirical analysis by Staff.
- COMPAS limitation: Constant elasticities
 - Projects growth in U.S. production that exceeds capacity.

U.S. Slab Producers Do Not Have the Capacity to Meet Production

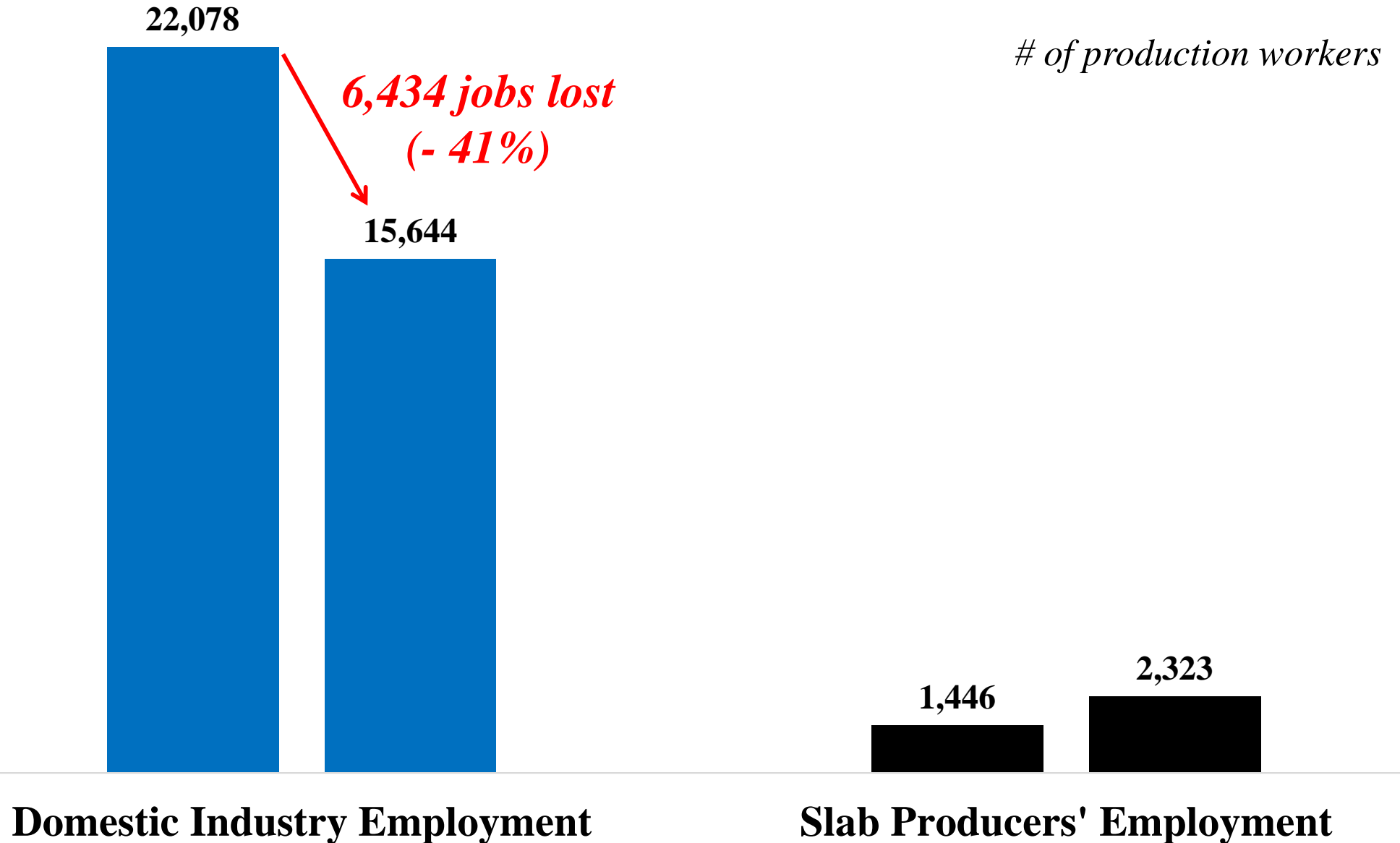
Million sq. feet



Petitioner's Arguments Are Flawed

- Prefabricated imports
 - Are of a small volume and a fraction of the volume of slab imports.
 - Any remedy on prefabricated imports would not offset the harm to U.S. fabricators caused by the proposed remedy.
- Net effect of the proposed remedy
 - Effective Rate of Protection confirms a large negative net effect on the domestic industry
 - Also confirmed by Petitioner's economic modeling.

The Net Effect on the Domestic Industry Is Negative



Rising Inflation Expected to Affect QSP Supply and Demand

YoY % Change

