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November 20, 2023

Case Nos.: A-570-158, A-301-806, A-247-004,  
A-331-804, A-533-920, A-560-840, A-475-846,  
A-580-918, A-557-826, A-201-860, A-583-874,  
A-549-847, A-489-850, A-520-810, A-552-837,  
C-570-159, C-560-841, C-201-861, and C-489-851

No. of Pages: 20

Investigation

ITA/E&C/Offices I, II, III, IV, V, VI, VII

**PUBLIC DOCUMENT**

**VIA ELECTRONIC FILING**

The Honorable Gina Raimondo  
Secretary of Commerce  
International Trade Administration  
Enforcement & Compliance  
APO/Dockets Unit, Room 18022  
14th Street & Constitution Avenue, NW  
Washington, DC 20230

**Re: *Aluminum Extrusions from the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam – Scope Comments***

Dear Secretary Raimondo:

On behalf of the Solar Energy Industries Association (“SEIA”), a trade association representing consumers and industrial users of products that could be categorized as subject merchandise, we hereby submit scope comments in the above-referenced investigations.



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Even at this early stage, the investigations have disrupted the solar industry, because the inconsistent and contradictory scope language makes it difficult for our members to determine whether and how the investigations will affect their businesses. As an initial matter, SEIA observes that these investigations cover several aluminum products critical for widespread solar development, including the aluminum mounting systems (i.e., the racking rails) that are critical to residential solar installation and the aluminum frames that surround the solar panels themselves. If these products could be procured domestically, there are incentives in the Inflation Reduction Act for doing so, but it is our understanding that these products are not available from domestic producers. As such, imposing duties on these products would be unnecessary and harmful to clean energy production in the United States. This would run counter to the goals of the Inflation Reduction Act championed by the Biden Administration, which has encouraged unprecedented investment in expansion of solar power throughout the United States. By potentially subjecting products critical to solar infrastructure to duties, these investigations serve as a barrier to achieving these important goals.

SEIA also requests that Commerce confirm that finished solar panels imported into the United States fall outside of the scope of the above-referenced investigations. The scope expressly “excludes assembled merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger product or system and that is used as imported, without undergoing after importation any processing fabrication, finishing, or assembly or the addition of parts or material, regardless of whether the additional parts or

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material are interchangeable”<sup>1</sup> In the petition, Petitioners listed as examples of such merchandise “windows with glass, door units with door panel and glass, motor vehicles, trailers, furniture, appliances and *solar panels*.”<sup>2</sup>

Despite the description of excluded merchandise remaining unchanged, the revised scope proposed by Petitioners, and the scope of the investigation in the *Initiation Notice*, omits solar panels as an example of excluded merchandise, while keeping the other examples unchanged.<sup>3</sup> However, without revising the merchandise excluded from the investigation, there is no reason for Commerce to treat solar panels as subject to the investigation, while excluding the other merchandise described by Petitioners. Like completed windows, doors, and appliances, solar panels are imported into the United States in their final form and then installed in a larger structure (like a home, commercial building, or utility-scale solar installation), with parts or materials to affix the panels to a structure. Moreover, like the illustrative examples in the scope, solar panels keep their fundamental function following installation: just as a window remains a window after it is installed in a structure, solar panels remain solar panels after installation.

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<sup>1</sup> See *Aluminum Extrusions From the People’s Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations (“Initiation Notice”)*, 88 Fed. Reg. 74,421, 74,429 (Oct. 31, 2023).

<sup>2</sup> Petition for Imposition of Antidumping Duties on Aluminum Extrusions from the People’s Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam (Oct. 4, 2023), Vol I at 9 (“Petition Vol. I”) (emphasis added).

<sup>3</sup> *Initiation Notice*, 88 Fed. Reg. at 74,429; Petitioners’ Response to Commerce’s Second Supplemental Scope Questions Regarding Common Issues and Injury Petition (Oct. 20, 2023), Exhibit I-Second Scope Supp-1.



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Because solar panels are installed “as-is,” they are categorically different from the subassemblies covered by the scope, like “water heater anodes, side mount valve controls, automotive heating and cooling system components, screen printing frames, and micro channel heat exchangers,”<sup>4</sup> all of which must be further assembled or manufactured into a finished product (e.g., water heaters or automobiles).

Petitioners have described the language for excluded assembled merchandise as “a reformulation of the scope of the {existing} orders {on aluminum extrusions from China} and the Department’s scope rulings interpreting such orders.” In these orders, Commerce has specifically listed solar panels as an example of excluded “finished merchandise containing aluminum extrusions as parts that are *fully and permanently assembled and completed* at the time of entry.”<sup>5</sup> Moreover, in the petitions, Petitioners stated that “the scope of these petitions covers products that Petitioners believe were improperly excluded from the scope of the existing antidumping/countervailing duty order{s} on Aluminum Extrusions from China,”<sup>6</sup> indicating that they did not intend to extend the scope to products that the existing orders expressly excluded, like solar panels. Because the scope as written in the *Initiation Notice* is a

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<sup>4</sup> Response of the Petitioners to Commerce’s First Supplemental Scope Questions Regarding Common Issues and Injury Petition Volume I of the Petition (Oct. 13, 2023) at 17.

<sup>5</sup> *Aluminum Extrusions from the People’s Republic of China: Antidumping Duty Order*, 76 Fed. Reg. 30,650, 30,651 (May 26, 2011) (emphasis added).

<sup>6</sup> Petition Vol. I at 12.



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reformulation of the scope of the existing orders on aluminum extrusions from China, solar panels should not fall under the scope of the investigations.

If Commerce finds that solar panels fall under the scope of these investigations (despite the clear reasons that they do not, discussed above), the finding would render the scope utterly inadministrable. There is no logical reason that finished windows, doors, and appliances, which are imported fully assembled and later installed in a structure, should be treated differently from solar panels, which are likewise imported fully assembled and affixed to homes, commercial real estate, or utility-scale solar developments. Moreover, nothing in the description of excluded merchandise in the scope provides a basis for these products to be treated differently. Accordingly, U.S. Customs and Border Protection, and importers themselves, would have no meaningful way to distinguish between finished products incorporating extrusions that fall within the scope and outside of the scope.

For these reasons, Commerce should clarify the definition of assembled merchandise not covered by the investigations, confirming that the scope of the investigations does not cover solar panels.

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In accordance with Commerce's regulations at 19 C.F.R. § 351.303(f)(1), we are filing this submission electronically via ACCESS at <http://access.trade.gov> and are serving copies today on parties as indicated in the attached certificate of service. If Commerce has any questions regarding this submission or requires additional information, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Matthew R. Nicely  
Matthew R. Nicely  
Daniel M. Witkowski  
Julia K. Eppard  
Sydney L. Stringer

*Counsel to the Solar Energy Industries Association*

**COMPANY CERTIFICATION**

I, Stacy J. Ettinger, currently employed by the Solar Energy Industries Association, certify that I prepared or otherwise supervised the preparation of the attached scope comments, dated November 20, 2023, pursuant to the antidumping and countervailing duty investigations into *Aluminum Extrusions from the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam* (A-570-158, A-301-806, A-247-004, A-331-804, A-533-920, A-560-840, A-475-846, A-580-918, A-557-826, A-201-860, A-583-874, A-549-847, A-489-850, A-520-810, A-552-837, C-570-159, C-560-841, C 201 861, and C-489-851). I certify that the public information and any business proprietary information of the Solar Energy Industries Association contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the Department may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature:



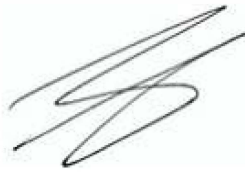
Date:

Nov. 20, 2023

## COUNSEL CERTIFICATION

I, Matthew R. Nicely, counsel to the Solar Energy Industries Association, certify that I have read the attached scope comments, dated November 20, 2023, pursuant to the antidumping and countervailing duty investigations into *Aluminum Extrusions from the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam* (A-570-158, A-301-806, A-247-004, A-331-804, A-533-920, A-560-840, A-475-846, A-580-918, A-557-826, A-201-860, A-583-874, A-549-847, A-489-850, A-520-810, A-552-837, C-570-159, C-560-841, C 201 861, and C-489-851). In my capacity as counsel of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the Department may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: \_\_\_\_\_



Date: **November 20, 2023**



**PUBLIC CERTIFICATE OF SERVICE**

**Aluminum Extrusions from the People’s Republic of China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, Taiwan, Thailand, Turkey, United Arab Emirates, Vietnam**

**A-570-158, A-301-806, A-247-004, A-331-804, A-533-920, A-560-840, A-475-846, A-557-826, A-201-860, A-583-874, A-549-847, A-489-850, A-520-810, A-580-918, A-552-837, C-570-159, C-560-841, C-201-861, C-489-851**

**Investigation**

I, Matthew R. Nicely, hereby certify that, on this day, a copy of this submission was served upon the following parties by email delivery:

<p><b><u>On Behalf of U.S. Aluminum Extruders Coalition and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union:</u></b> Robert E DeFrancesco III, Esq. Wiley Rein LLP 2050 M Street, NW Washington, DC 20036 rdefrancesco@wiley.law wileytrade@wiley.law</p>	<p><b><u>On Behalf of Hydro Precision Tubing USA, LLC:</u></b> Daniel Pickard, Esq. Buchanan Ingersoll &amp; Rooney PC 1700 K Street NW Suite 300 Washington DC 20006 daniel.pickard@bipc.com</p>
<p><b><u>On Behalf of Ashley Furniture Industries, LLC and Kimball International Inc. , JA Solar Vietnam Company Limited, LONGI MALAYSIA SDN. BHD., Vietnam Sunergy Joint Stock Company, LONGi Solar Technology (H.K.) Limited, The Home Depot USA, Inc.; Target General Merchandise, Inc. (“Target”), Vikram Solar Limited:</u></b> Kristin H. Mowry, Esq. Mowry &amp; Grimson PLLC 5335 Wisconsin Avenue, NW Suite 810 Washington, DC 20015 khm@mowrygrimson.com</p>	<p><b><u>On Behalf of Larkcop International Co., Ltd.; NingBo Xingfu Tools Co. Ltd.; LSF Logistics LLC (“LSF”); Top Knobs USA, Inc.; and Hardware Resources, Inc.:</u></b> Jeffrey S. Neeley, Esq. Husch Blackwell LLP 1801 Pennsylvania Avenue, NW Suite 1000 Washington, DC 20006 jeffrey.neeley@huschblackwell.com</p>

<p><b><u>On Behalf of Unirac, Inc.:</u></b>  Kristen Smith, Esq.  Sandler, Travis &amp; Rosenberg, P.A.  1300 Pennsylvania Avenue, NW  Suite 400  Washington, DC 20004-3002  ksmith@strtrade.com</p>	<p><b><u>On Behalf of Guangdong XinWei Aluminum Products Co., Ltd.:</u></b>  Shanshan Liang, Esq.  The Mooney Law Firm  2104 Delta Way, Unit 1  Tallahassee, FL 32303  sliang@customscourt.com</p>
<p><b><u>On Behalf of Mercury Marine Technology Suzhou Company Ltd.; Bracalente Metal Products (Suzhou) Co., Ltd.; Wuxi Huaguang Automotive Technology Co., Ltd.; Daikin Air Conditioning (SH) Co., Ltd.; Danfoss (Jiaxing) Co., Ltd.; Modine Thermal Systems (Changzhou) Company Ltd.; ACP (Changzhou) Heat Exchanger Co. Ltd.; Ampco Products LTD:</u></b>  Carolyn Connolly, Esq  Faegre Drinker Biddle &amp; Reath LLP  1500 K St NW  Washington, DC 20005  carolyn.bethea@faegredrinker.com</p>	<p><b><u>On Behalf of Contemporary Amperex Technology Co., Ltd., Contemporary Amperex Technology (Hong Kong) Limited, Contemporary Amperex Technology Co., Limited Hong Kong Branch; Xiamen Ampace Technology Limited, Sistem Alüminyum Sanayi ve Ticaret A.S:</u></b>  Brady W. Mills, Esq.  Morris, Manning &amp; Martin, LLP  1401 I Street, NW  Suite 600  Washington, DC 20005  bmills@mmmlaw.com</p>
<p><b><u>On Behalf of Trina Solar Energy Development Company, Trina Solar (Vietnam) Science &amp; Technology Co., Ltd., and Trina Solar Science &amp; Technology (Thailand) Ltd.:</u></b>  Jonathan M. Freed, Esq.  Trade Pacific PLLC  700 Pennsylvania Avenue, SE, Suite 500  Washington, DC 20003  jfreed@tradepacificlaw.com</p>	<p><b><u>On Behalf of Jinko Solar Technology Sdn. Bhd.:</u></b>  Brandon Petelin, Esq.  Grunfeld Desiderio Lebowitz Silverman Klestadt, LLP  1201 New York Ave NW  Suite 650  Washington DC 20005  bpetelin@gdlsk.com</p>
<p><b><u>On Behalf of Ningbo Innopower Tengda Machinery Co., Ltd, Yuyao Beilv Sanitary Ware Co.,Ltd, Dongguan City Hongcheng Household Articles Co.,Ltd, Wang Mao Homeware Co., Limited, and Hao Mei Aluminium Products Company Limited:</u></b>  David Craven, Esq.  Craven Trade Law LLC  3744 N Ashland  Chicago, IL 60613  david.craven@tradelaw.com</p>	<p><b><u>On Behalf of the Shandong Huajian Aluminum Group Co., Ltd.; Tung Shin Industrial Co., Ltd.:</u></b>  Adams Lee, Esq.  Harris Bricken Sliwoski, LLP  600 Stewart Street, Suite 1200  Seattle, WA 98101  adams@harrisbricken.com</p>

<p><b><u>On Behalf of the Deller Industry Co. Ltd.:</u></b>  Heather Jacobson, Esq.  Nakachi Eckhardt &amp; Jacobson, P.C.  2815 Elliott Avenue  Suite 100  Seattle, WA 98121-2991  hjacobson@tradelawcounsel.com</p>	<p><b><u>On Behalf of Risen Solar Technology Sdn. Bhd.:</u></b>  Gregory S. Menegaz, Esq.  deKieffer &amp; Horgan  1156 15th Street, NW  Suite 1101  Washington, DC 20005  gmenegaz@dhlaw.com</p>
<p><b><u>On Behalf of A. O. Smith Corporation and MCS Industries, Inc.:</u></b>  Matthew Kanna, Esq.  Greenberg Traurig, LLP  2101 L Street NW  Washington, D.C. 20037  kannam@gtlaw.com</p>	<p><b><u>On Behalf of Hanwha Solutions Corporation, Marine Accessories Corporation, TACO Metals, Inc., Hanwha Q CELLS USA, Inc.:</u></b>  John M. Gurley  ArentFox Schiff LLP  1717 K Street  Washington DC 20006  john.gurley@afslaw.com</p>
<p><b><u>On Behalf of Valeo North America, Inc.:</u></b>  Daniel Cannistra  Crowell &amp; Moring LLP  1001 Pennsylvania Avenue, NW  Washington, DC 20004-2595  dcannistra@crowell.com</p>	<p><b><u>On Behalf of Guangdong Yongfeng Lihua Shading Technology Co., Ltd.:</u></b>  SI LI  Zhonglun Law Firm  20 Jin He East Avenue  Chaoyang District  Beijing 100020, P. R. China  lisi@zhonglun.com</p>
<p><b><u>On Behalf of Peloton Interactive Inc., SunPower Corporation Mexico S. de R.L. de C.V.:</u></b>  John R. Magnus  Tradewins LLC  1330 Connecticut Ave. NW  Washington, DC 20036  john.magnus@starpower.net</p>	<p><b><u>On Behalf of MAHLE Behr USA Inc.; MAHLE Behr Charleston Inc.; MAHLE Behr Dayton L.L.C.; MAHLE Behr Service America L.L.C.; MAHLE Behr Manufacturing Management, Inc.; MAHLE Behr Mt. Sterling, Inc. (collectively, "MAHLE"); Tung Kuang Industrial Joint Stock Company, Bien Hoa Industrial Zone ("Bien Hoa"); Nhon Trach Branch of Tung Kuang Industrial Joint Stock Company ("Nhon Trach"):</u></b>  Mark Ludwikowski  Clark Hill PLC  1001 Pennsylvania Ave., NW  Suite 1300 South  Washington, DC 20004  mludwikowski@clarkhill.com</p>

<p><b><u>On Behalf of Central Purchasing, LLC, Harbor Freight Tools USA, Inc.:</u></b>  Richard Mojica  Miller &amp; Chevalier Chartered  900 16th Street NW  Washington, DC 20006  rmojica@milchev.com</p>	<p><b><u>On Behalf of Zhejiang Guoyao Aluminum Products Co., Ltd.:</u></b>  Xiaohua Hou  Commerce &amp; Finance Law Offices  12-14th Floor, China World Office 2, No. 1  Jianguomenwai Avenue, Beijing 100004,  China  xiaohuahou@tongshang.com</p>
<p><b><u>On Behalf of Tecnoglass S.A.S.; HTM MBS LLC:</u></b>  Daniel L. Porter, Esq.  Curtis, Mallet-Prevost, Colt &amp; Mosle LLP  1717 Pennsylvania Avenue, NW  Washington, DC 20006  dporter@curtis.com</p>	<p><b><u>On Behalf of Aluminio Nacional S.A. en Reorganizacion a.k.a. Aluminio Nacional S.A.:</u></b>  Rosa S. Jeong, Esq.  Greenberg Traurig, LLP  2101 L Street NW  Suite 1000  Washington DC 20037  jeongr@gtlaw.com</p>
<p><b><u>On Behalf of Kingtom Aluminio SLC; Canadian Solar U.S. Module Manufacturing Corporation:</u></b>  Jonathan Thomas Stoel, Esq.  Hogan Lovells US LLP  555 Thirteenth Street, NW  Washington, DC 20004  jonathan.stoel@hoganlovells.com</p>	<p><b><u>On Behalf of Schimmer Metal Standard Company Limited:</u></b>  Carolyn Connolly, Esq.  Faegre Drinker Biddle &amp; Reath LLP  1500 K St NW  Washington, DC 20005  carolyn.bethea@faegredrinker.com</p>
<p><b><u>On Behalf of P.T. Interbrucke Perkasa:</u></b>  Jeffrey S. Neeley, Esq.  Husch Blackwell LLP  1801 Pennsylvania Avenue, NW  Suite 1000  Washington, DC 20006  jeffrey.neeley@huschblackwell.com</p>	<p><b><u>On Behalf of FISA, Fundiciones Industriales S. A.:</u></b>  Jarrod M. Goldfeder, Esq.  Trade Pacific PLLC  700 Pennsylvania Avenue, SE  Suite 500  Washington, DC 20003  jgoldfeder@tradepacificlaw.com</p>

<p><b><u>On Behalf of Corporacion Ecuatoriana de Aluminio S.A.; CEDAL Duran S.A.; Estructuras de Aluminio S.A. ESTRUSA; and Estructuras de Aluminio S.A. ESTRUSA Guayaquil:</u></b>  Richard P Ferrin, Esq.  Faegre Drinker Biddle &amp; Reath LLP  1500 K Street, N.W.  Washington, DC 20005  richard.ferrin@faegredrinker.com</p>	<p><b><u>On Behalf of of Vietnam Sunergy Joint Stock Company (“VSUN”):</u></b>  Jeffrey S. Grimson, Esq.  Mowry &amp; Grimson PLLC  5335 Wisconsin Avenue, NW  Suite 810  Washington, DC 20015  jsg@mowrygrimson.com</p>
<p><b><u>On Behalf of GameChange Solar:</u></b>  Kavita Mohan, Esq.  Grinfeld Desiderio Lebowitz Silverman Klestadt, LLP  1201 New York Ave NW  # 650  Washington, DC 20005  kmohan@gdlsl.com</p>	<p><b><u>On Behalf of the Embassy of the Peoples Republic of China:</u></b>  Yangfan Xie  Economic and Commercial Office  2133 Wisconsin Ave, NW  Washington, DC 20007  myjjjcky@mofcom.gov.cn</p>
<p><b><u>On Behalf of the Embassy of Indonesia:</u></b>  Wijayanto  2020 Massachusetts Avenue, NW  Washington, DC 20036  wijayanto@embassyofindonesia.org</p>	<p><b><u>On Behalf of Hindalco Industries Limited:</u></b>  Atul Sharma  Sarvada Legal  C-564, Defence Colony,  New Delhi - 110024, INDIA  atul@sarvada.co.in</p>
<p><b><u>On Behalf of AEE Solar Inc., a subsidiary of Sunrun Inc.:</u></b>  Bernd G. Janzen, Esq.  Akin Gump Strauss Hauer &amp; Feld LLP  2001 K Street NW  Washington, DC 20006  bjanzen@akingump.com</p>	<p><b><u>On Behalf of ZMC Window Covering Supplies:</u></b>  Camelia C. Mazard, Esq., Esq.  Doyle, Barlow &amp; Mazard, PLLC  1776 K St., NW  Suite 200  Washington, DC 20006  cmazard@dbmlawgroup.com</p>
<p><b><u>On Behalf of PT INDAL ALUMINIUM INDUSTRY TBK.:</u></b>  Peter J. Koenig, Esq.  Squire Patton Boggs (US) LLP  2550 M Street, NW  Suite 300  Washington, DC 20036  peter.koenig@squirepb.com</p>	<p><b><u>On Behalf of PT Alfo Citra Abadi:</u></b>  Sukanto Lukman  Jl. Mesjid Raya No. 14, Medan 20151,  Sumatera Utara - Indonesia  lukman@aluminiumalca.com</p>

<p><b><u>On Behalf of PT. HANJAYAPERKASA METALS INDONESIA:</u></b>  Maxie Wang  NGORO INDUSTRI PERSADA BLOK K-2,  NGORO, MOJOKERTO, EAST JAVA,  INDONESIA  info@hpmindonesia.co.id</p>	<p><b><u>On Behalf of PT. ALUMINIUM COMPANY EXTRUSION INDONESIA (ALCOMEX INDO):</u></b>  Sukri Hasyim  Aluminium Company Extrusion Indonesia (ALCOMEXINDO)  Kp. Mariuk RT.004 RW.002 Gandamekar,  Cikarang Barat, Bekasi, 17530, Indonesia  sukri.exim@alcomexindo.com</p>
<p><b><u>On Behalf of PT. ALUMINIUM EXTRUSION INDONESIA / ALEXINDO:</u></b>  Martinus Saputra  Aluminium Extrusion Indonesia (ALEXINDO)  Jl. Raya Bekasi KM 28,7 Bekasi Utara 17124  Indonesia  martin@alexindo.com</p>	<p><b><u>On Behalf of Metra S.p.A.:</u></b>  Luca Bertazzo, Esq.  White &amp; Case LLP  701 Thirteenth Street, NW Washington, DC  20005-3807  lbartazzo@whitecase.com</p>
<p><b><u>On Behalf of the European Commission:</u></b>  Caitlin Hickey  Delegation of the European Union  2175 K St NW  Washington DC 20037  caitlin.hickey@eeas.europa.eu</p>	<p><b><u>On Behalf of the Embassy of Italy:</u></b>  Emanuele di Lorenzo Badia  3000 Whitehaven St. NW  Washington, DC 20008  econ.washington@esteri.it</p>
<p><b><u>On Behalf of PrimeSource Building Products, Inc., and its affiliated companies Top Knobs USA, Inc., Hardware Resources, Inc., Nationwide Industries, Inc., NWEnterprises, Inc., and LockeyUSA, LLC:</u></b>  Nithya Nagarajan  Husch Blackwell LLP  1801 Pennsylvania Avenue, NW  Suite 1000  Washington, DC 20006  nithya.nagarajan@huschblackwell.com</p>	<p><b><u>On Behalf of New Hudson Facades LLC:</u></b>  Kelly Alice Slater  Appleton Luff Pte Ltd  1025 Connecticut Avenue, NW  Suite 1000  Washington, DC 20036  slater@appletonluff.com</p>

<p><b><u>On Behalf of PMB Aluminium Sdn Bhd, Gulf Extrusions LLC and Automotive Precision Technology (APT) Sole Proprietorship LLC:</u></b>  Michael Holton, Esq.  Grunfeld Desiderio Lebowitz Silverman Klestadt, LLP  1201 New York Ave, NW  Suite 650  Washington, DC 20005  mholton@gdlsk.com</p>	<p><b><u>On Behalf of Tong Heer Aluminium Industries Sdn. Bhd. and Superb Aluminium Industries Sdn. Bhd.:</u></b>  Kelly Alice Slater, Esq.  Appleton Luff Pte Ltd  1025 Connecticut Avenue, NW  Suite 1000  Washington, DC 20036  slater@appletonluff.com</p>
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<p><b><u>On Behalf of Director of Trade Practices Section, Ministry of Investment, Trade and Industry, Government of Malaysia:</u></b>  Nurul Syuhada Abd Hamid  Ministry of International Trade &amp; Industry  Malaysia  Trade Practices Section, Level 9, MITI Tower, No.7, Jalan Sultan Haji Ahmad Shah, 50480 Kuala Lumpur  Malaysia  syuhada@miti.gov.my</p>	<p><b><u>On Behalf of ELALUMINIUM BILLET (M) SDN BHD:</u></b>  Low De Zheng  NO.22, JALAN TTC 30, TAMAN TEKNOLOGI CHENG, 75250, MELAKA, MALAYSIA  sales@elaluminium.com.my</p>
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11/20/2023

Date

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