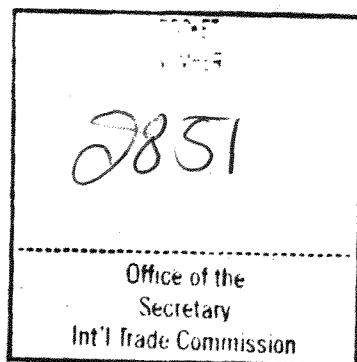


ORIGINAL

CBI 12040

October 26, 2011



DOC Inv. Nos. A-533-852, A-523-801, A-552-809,
A-520-805 and C-533-853, C-523-802, C-552-810,
C-520-806

USITC Inv. Nos. 701-TA-____ and 731-TA-____

Investigation

Total Pages: 2188

Proprietary Information Deleted in Petitions at Vol.
I Pages I-2, I-13, and I-25 and Exhibits I-2, I-4, I-6,
I-7; Vol. II Pages II-1-4, II-6, and II-10-14 and
Exhibits II-A-1, II-A-2, II-B-1, II-I-1, II-1-3-A, II-1-
4, II-O-1, II-O-3-A, II-O-4, II-U-1, II-U-4, II-V-2,
II-V-3-A, II-V-4, and II-V-A

PUBLIC VERSION

The Honorable John Bryson
Secretary of Commerce
Attn: Import Administration
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Mr. James R. Holbein
Secretary
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: Petitions for the Imposition of Antidumping and Countervailing Duties:
Circular Welded Carbon-Quality Steel Pipe from India, Oman, United
Arab Emirates, and Vietnam

Dear Secretary Bryson and Secretary Holbein:

On behalf of Allied Tube and Conduit, JMC Steel Group, Wheatland Tube and United States Steel Corporation (collectively, "Petitioners"), we hereby submit to the U.S. Department of Commerce ("the Department") Petitions for the imposition of antidumping duties and countervailing duties on Circular Welded Carbon-Quality Steel Pipe from India, Oman, United Arab Emirates and Vietnam (the "Petitions") pursuant to sections 701, 702(b), 731, and 732(b) of the Tariff Act of 1930, as amended (19 U.S.C. §§ 1671, 1671a(b), 1673 and 1673a9b)). Pursuant to the Department's regulations

codified at 19 C.F.R. § 351.202(c), we hereby certify that the Petitions and required copies are being simultaneously filed today with the Department and International Trade Commission ("the Commission").

At the Department, in the antidumping cases, we are filing Volume I, Common and Injury Issues of the Petition, matched with Volume II, a single volume that contains information on sales at less-than-fair value for all four countries. In the countervailing duty cases, we are filing Volume I, Common and Injury Issues of the Petition, matched with Volume III, information on the subsidy programs, in each of the four countries. Each country has its own Volume III. India is contained in Volume III-A, Oman is contained in Volume III-B, United Arab Emirates is contained in Volume III-C, and Vietnam is contained in Volume III-D. All proprietary and public filings are on the IA Access filing system.

At the Commission, pursuant to instructions from Secretary James Holbein, we are filing an original and 14 copies of the proprietary version of Volume I, an original of the proprietary version of Volume II, five copies of the public version of Volume I, and one copy of the public versions of Volume II and Volume III as well as each proprietary and public version of each volume on separate CD-ROMs.

On behalf of Petitioners, we hereby request proprietary treatment for information designated as proprietary in these Petitions pursuant to the Department's regulations codified at 19 C.F.R. § 351.202(d) and 351.304 and the Commission's rules codified at 19 C.F.R. § 201.6(b). Such information is enclosed in single brackets ("[]").

The information in Volume I of these Petitions for which Petitioners request proprietary treatment, and the location of same, is as follows:

Proprietary information on sales volume and value, employment, capacity, production, shipments, and profits: Pages I-2, I-13, and I-25 and Exhibits I-2, I-6 and I-7.

The information in Volume II of these Petitions for which Petitioners request proprietary treatment, and the location of same, is as follows:

Business or trade secrets concerning the nature of a product or production process, production data, costs of production, consumption rates, trade secrets, information regarding the domestic producers' proprietary manufacturing processes, including the types of raw material used and their quantities, and distribution costs; and data on the terms of individual sales or offers for sale, including sales dates, sales prices, product characteristics, destinations, payment terms, names of particular customers, distributors, or suppliers, and other sale-related business secrets: Pages II-1-4, II-6, II-10-14, and II-A-I, II-A-2, II-B-I, II-I-I, II-1-3-A, II-1-4, II-O-I, II-O-3-A, II-O-4, II-U-I, II-U-4, II-V-2, II-V-3-A, II-V-4, and II-V-A.

The business proprietary information in Volumes I and II identified above is entitled to proprietary treatment in accordance with the Department's regulations codified at 19 C.F.R. § 351.304(a) and the Commission's rules codified at 19 C.F.R. §201.6(b). Information for which proprietary treatment is requested is not available to the public. Public disclosure of this information would result in serious and substantial harm to the competitive position of the source of the information. The requisite certifications that substantially identical information is not available to the public are set forth as attachments to this letter, in accordance with the Commission's rules codified at 19 C.F.R. § 201.6(b). In accordance with the Department's interim final rule amending 19 C.F.R. § 351.303(g) (see 76 FR 7491 February 10, 2011, the appropriate certifications from counsel and Petitioners are attached to this transmittal letter.

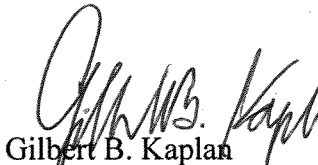
Pursuant to the Department's regulations codified at 19 C.F.R. § 351.304(b), Petitioners agree in principle to permit disclosure of business proprietary information contained in these Petitions under an appropriately drafted administrative protective order ("APO"). Petitioners, however, reserve the right to comment on all APO applications prior to disclosure.

Should you have any questions regarding these Petitions, please contact the undersigned.

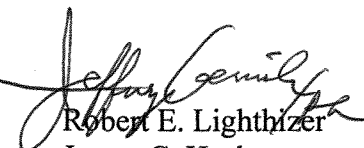
Respectfully submitted,



Roger B. Schagrin
Schagrin Associates
900 7th Street, N.W.,
Suite 500
Washington, D.C. 20001
(202) 223-1700



Gilbert B. Kaplan
King & Spalding
1700 Pennsylvania Ave,
N.W.
Washington, D.C. 20001
(202)737-0500



Robert E. Lighthizer
James C. Hecht
Jeffrey D. Gerrish
**Skadden, Arps, Slate,
Meagher & Flom LLP**
1440 New York
Avenue, N.W.
Washington, DC 20005
(202) 371-7000

Counsel to Allied Tube
and Conduit And JMC
Steel Group

Counsel to Wheatland
Tube

Counsel to United States
Steel Corporation

CERTIFICATIONS

City of Washington)
) ss
District of Colombia)

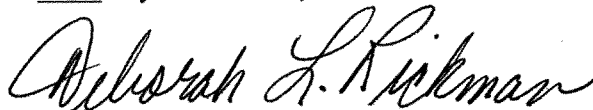
In accordance with section 201.6(b)(3)(iii) of the rules of the U.S. International Trade Commission ("the Commission") (19 C.F.R. § 201.6(b)(3)(iii)), I, ROGER B. SCHAGRIN, counsel to Allied Tube and Conduit and JMC Steel Group, hereby certify on this 24 day of October, 2011, that I have read the information contained in the Petition in *Circular Welded Non-Alloy Steel Pipe from India, Oman, Vietnam and the United Arab Emirates*, and that information substantially identical to that for which proprietary treatment has been requested in this Petition is not available to the general public.

In accordance with section 207.3(a) of the Commission's rules (19 C.F.R. § 207.3(a)), I hereby also certify that the information contained in the Petition is accurate and complete to the best of my knowledge.



ROGER B. SCHAGRIN

Subscribed and sworn to before me on this 24 day of October, 2011.



Notary Public

DEBORAH L. RICKMAN, NOTARY PUBLIC
IN AND FOR THE DISTRICT OF COLUMBIA
My Commission Expires August 14, 2013

CERTIFICATIONS

City of Washington)
)
District of Columbia) ss

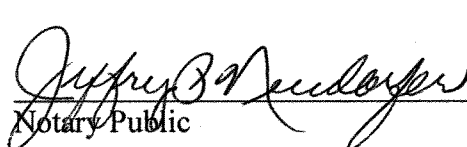
In accordance with section 201.6(b)(3)(iii) of the rules of the U.S. International Trade Commission ("the Commission") (19 C.F.R. § 201.6(b)(3)(iii)), I, STEPHEN P. VAUGHN, counsel to United States Steel Corporation, hereby certify on this 26th day of October, 2011, that I have read the information contained in the Petition in *Circular Welded Non-Alloy Steel Pipe from India, Oman, Vietnam and the United Arab Emirates*, and that information substantially identical to that for which proprietary treatment has been requested in this Petition is not available to the general public.

In accordance with section 207.3(a) of the Commission's rules (19 C.F.R. § 207.3(a)), I hereby also certify that the information contained in this Petition is accurate and complete to the best of my knowledge.



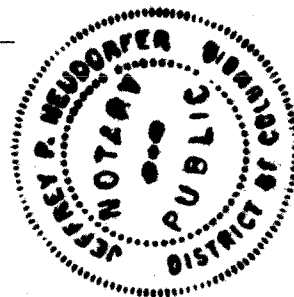
STEPHEN P. VAUGHN

Subscribed and sworn to before me on this 26th day of October, 2011.



Notary Public

Jeffrey P. Neudorfer
Notary Public District of Columbia
My Commission Expires
October 14, 2014

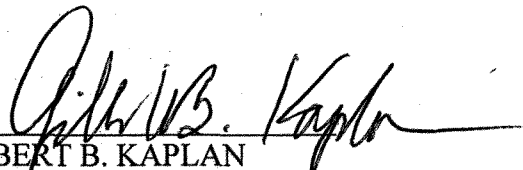


CERTIFICATION

City of Washington)
)
District of Columbia) ss

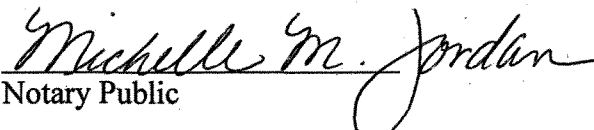
In accordance with section 201.6(b)(3)(iii) of the rules of the U.S. International Trade Commission ("the Commission") (19 C.F.R § 201.6(b)(3)(iii) (2008)), I, GILBERT B. KAPLAN, of King & Spalding LLP, counsel to Wheatland Tube, hereby certify on this 25th day of October, 2011, that information substantially identical to that for which proprietary treatment has been requested in the attached submission is not available to the general public.

In accordance with section 207.3(a) of the Commission's rules (19 C.F.R. § 207.3(a) (2008)), I hereby also certify that the information contained in the attached submission is accurate and complete to the best of my knowledge.



GILBERT B. KAPLAN

Subscribed and sworn to before me on this 25 day of October, 2011.



Notary Public

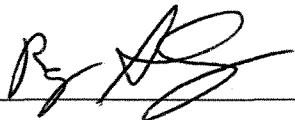
MICHELLE M. JORDAN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2015

Counsel Certification

I, Roger B. Schagrin, with Schagrin Associates, counsel or representative to Allied Tube and Conduit and JMC Steel Group, certify that I have read the attached Petition for antidumping and countervailing duties on Circular Welded Non-Alloy Steel Pipe from India, Oman, Vietnam and the United Arab Emirates.

In my capacity as an adviser, counsel, preparer or reviewer of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature: _____



Date: _____

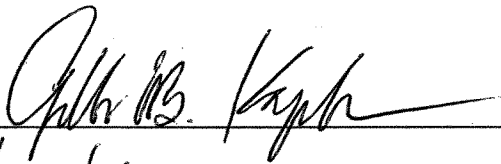
10/24/11

Counsel Certification

I, Gilbert B. Kaplan, with King & Spalding, LLP, counsel or representative to Wheatland Tube, certify that I have read the attached Petition for antidumping and countervailing duties on Circular Welded Carbon-Quality Steel Pipe from India, Oman, Vietnam and the United Arab Emirates.

In my capacity as an adviser, counsel, preparer or reviewer of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature: _____



Date: _____

10/25/11

CERTIFICATION

I, Jeffrey D. Gerrish, with Skadden, Arps, Slate, Meagher & Flom LLP, counsel or representative to United States Steel Corporation, certify that I have read the attached Petition for antidumping and countervailing duties on Circular Welded Non-Alloy Steel Pipe from India, Oman, Vietnam, and the United Arab Emirates. In my capacity as an adviser, counsel, preparer or reviewer of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature: _____

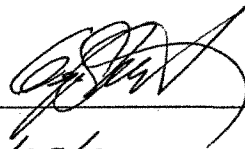
Date: _____

CERTIFICATION

I, George J. Stewart, Assistant General Counsel, currently employed by United States Steel Corporation, certify that I prepared or otherwise supervised the preparation of the attached Petition for antidumping and countervailing duties on Circular Welded Non-Alloy Steel Pipe from India, Oman, Vietnam, and the United Arab Emirates. I certify that the information 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature: _____

Date: _____

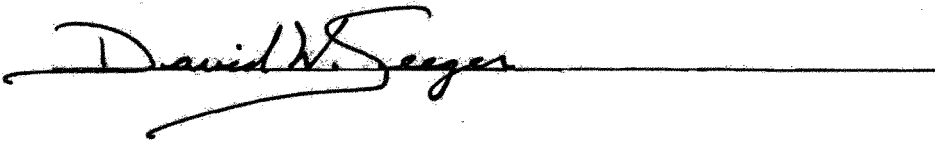

10/25/2011

Company Certification

I, David Seeger, President of Wheatland Tube and the JMC Steel Group, certify that I prepared or otherwise supervised the preparation of the attached Petition for antidumping and countervailing duties on Circular Welded Non-alloy Steel Pipe from India, Oman, Vietnam, and the United Arab Emirates. I certify that the information 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature:



Date:

10-18-11

I, Edward Kurasz, President of the Pipe, Tube and Conduit Group of Allied Tube and Conduit, certify that I prepared or otherwise supervised the preparation of the attached Petition for antidumping and countervailing duties on Circular Welded Non-alloy Steel Pipe from India, Oman, Vietnam, and the United Arab Emirates. I certify that the information 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 I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature:

_____

Date:

10/18/11

ORIGINAL

Inv. Nos. A-533-852, A-523-801,
A-552-809, A-520-805 and C-533-853,
C-523-802, C-552-810, C-520-806

Total No. of Pages: 143

Investigation

Proprietary Information Deleted at

Vol. I Pages I-2, I-13, and I-25 and Exhibits
I-2, I-4, I-6, I-7; Vol. II Pages II-1-4, II-6,
and II-10-14 and Exhibits II-A-I, II-A-2, II-
B-I, II-I-I, II-1-3-A, II-1-4, II-O-I, II-O-3-A,
II-O-4, II-U-I, II-U-4, II-V-2, II-V-3-A, II-
V-4, and II-V-A

PUBLIC VERSION

BEFORE THE UNITED STATES DEPARTMENT OF COMMERCE
UNITED STATES INTERNATIONAL TRADE COMMISSION

CIRCULAR WELDED CARBON-QUALITY STEEL PIPE
FROM INDIA, OMAN, THE UNITED ARAB EMIRATES
AND VIETNAM

ANTIDUMPING AND COUNTERVAILING DUTY PETITIONS
VOLUME 1 - GENERAL INFORMATION AND INJURY

Roger B. Schagrin
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(202) 223-1700

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and Conduit
And JMC Steel Group

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(202)737-0500

Counsel to Wheatland
Tube

Robert E. Lighthizer
James C. Hecht
Jeffrey D. Gerrish
**Skadden, Arps, Slate,
Meagher & Flom LLP**
1440 New York Avenue,
N.W.
Washington, DC 20005
(202) 371-7000
Counsel to United States
Steel Corporation

**PETITION FOR THE IMPOSITION OF ANTIDUMPING AND COUNTERVAILING
DUTIES ON CIRCULAR WELDED CARBON-QUALITY STEEL PIPE
FROM INDIA, OMAN, THE UNITED ARAB EMIRATES, AND VIETNAM**

This petition before the International Trade Administration of the U.S. Department of Commerce (the “Department”) and the U.S. International Trade Commission (the “ITC” or the “Commission”) is filed on behalf of the U.S. industry producing welded standard and structural pipe, which is more fully described as certain circular welded carbon-quality steel pipe (hereafter referred to as “CWP”). Petitioners allege that subject merchandise from India, Oman, the United Arab Emirates (“UAE”), and Vietnam is being, or is likely to be, sold in the United States at less-than-fair-value (“LTFV”) and that such merchandise benefits from government subsidies within the meaning of Sections 701 and 731 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1673. Petitioners further allege that the U.S. industry producing the domestic like product is being materially injured and is also threatened with material injury by reason of such less-than-fair-value imports. This petition sets forth the information reasonably available to Petitioners in support of these allegations and contains the relevant general information, less-than-fair-value sales information, information on subsidies, and the information relating to material injury and threat of injury.

I. GENERAL INFORMATION

A. Petitioner (19 C.F.R. §§ 207.11(a) & 351.202(b)(1))

This petition is filed on behalf of the domestic circular welded carbon-quality steel pipe industry by the following circular welded carbon-quality steel pipe producers:

Allied Tube and Conduit
Atkore Int’l
16100 South Lathrop Avenue
Harvey, IL 60426
(708)339-1610

JMC Steel Group
227 W. Monroe Street
26th Floor
Chicago, IL 60606
(312)275-1600

Wheatland Tube
700 Dock Street
Sharon, PA 16146
(856)854-5400

United States Steel Corporation
600 Grant Street
Pittsburgh, PA 15219
(412)433-1121

**B. Description of the Domestic Industry
(19 C.F.R. §§ 207.11(b)(2)(ii) & 351.202(b)(2))**

Exhibit I-1 provides a list of all known additional U.S. circular welded carbon-quality steel pipe producers, including addresses, telephone numbers, and fax numbers.

C. Industry Support for the Petition (19 C.F.R. § 351.202(b)(3))

Petitioners are filing this petition on behalf of the domestic industry producing CWP. Information regarding the total value of U.S. production of the domestic like product is not reasonably available to Petitioners. Exhibit I-2 contains information regarding: (i) the total volume of U.S. production of the domestic like product, and (ii) the volume of the domestic like product made by the Petitioners (who are the only domestic producers for which Petitioners have such data). As shown by Exhibit I-2, Petitioners, to the best of their knowledge, accounted for [] percent of the volume of welded standard pipe produced by the domestic industry during 2010. Thus, Petitioners account for a substantial majority of total U.S. production of CWP. Furthermore, Petitioners are not aware of any domestic producer that opposes this petition.

D. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

Petitioners do not presently receive relief from imports of the subject merchandise under Section 337 of the Tariff Act of 1930 (19 U.S.C. §§ 1337), Sections 201 or 301 of the Trade Act of 1974 (19 U.S.C. § 2411), or Section 232 of the Trade Expansion Act of 1962 (19 U.S.C. § 1862).

Certain circular carbon-quality welded steel pipe of the type subject to these petitions have been the subject of numerous antidumping and countervailing duty proceedings. An antidumping duty order on subject merchandise from India is currently in place, but the order does not cover two Indian producers, Zenith Steel Pipes and Industries Ltd. (“Zenith”) and Gujarat Steel Tubes Ltd. (“Gujerat”), which received *de minimis* margins in the LTFV investigation. *See Certain Welded Carbon Steel Pipe and Tube from India*, Final Determination of Sales at Less Than Fair Value, 51 Fed. Reg 9089 (March 17, 1986).

E. Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))

1. Physical Characteristics

This petition covers welded carbon-quality steel pipe and tube, of circular cross-section, with an outside diameter not more than 16 inches (406.4 mm), regardless of wall thickness, surface finish (black, galvanized, or painted), end finish (plain end, beveled end, threaded, or threaded and coupled), or industry specification (e.g. ASTM, proprietary, or other) generally known as standard pipe, fence pipe and tube, sprinkler pipe, and structural pipe (although they may also be referred to as mechanical tubing).

2. Specifications, Characteristics, and Uses

Subject pipe and tube are intended for the low-pressure conveyance of water, steam, natural gas, air and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Subject pipe may carry liquids at elevated temperatures but may not be subject to the application of external heat. It may also be used for light load-bearing and mechanical applications, such as for fence tubing, and as an intermediate product for protection of electric wiring, such as conduit shells.

Subject pipe used in the United States is most commonly produced to the American Society for Testing and Materials International (ASTM) standard A53, although it may also be produced to the ASTM A135 standard and ASTM A795 standards. (Some imported subject pipe may also be produced to the ASTM A120 standard, a now defunct specification that was nearly identical to the A53 standard.) Subject pipe products may also be produced to proprietary specifications rather than to an industry-wide standard. This is often the case with fence tubing, for example.

Subject pipe may be sold with a plain or threaded end and with or without a coupling. It may also be sold with “black” or “galvanized” surface. Black pipe is frequently coated with an oil lacquer or finish to inhibit corrosion, and it may also be painted. Galvanized pipe is coated with a protective layer of zinc to prevent corrosion.

3. Production Methods

Welded pipe is produced by forming flat-rolled steel into a tubular configuration and welding it along the joint. The subject pipe is most commonly produced either by the electric resistance weld (ERW) method, the continuous weld (CW) method or the stretch reduction

method. Under the ERW and CW methods of production, flat-rolled steel sheet or plate is slit to the exact width necessary to produce the desired diameter of pipe.

In the CW method, the slit steel sheet is heated in a furnace to approximately 2,600° Fahrenheit and is hot-formed through a series of rollers into a cylindrical configuration until the edges meet. The temperature of the sheet and the pressure of the rollers weld the edge. The pipe is then cut to length, cooled, straightened, and surface and/or end finished as appropriate. The CW method can only be used to produce pipe up to 4.5 inches (114.3mm) in outside diameter.

For pipe produced by the ERW method the slit steel is cold-formed using a series of tapered rolls until it achieves the desired tubular shape. The edges are forced together under pressure and welded by heating to 2,600° Fahrenheit using a high voltage carbon electrode. The ridge formed by the welding process may be removed, depending on the pipe's intended use. The pipe is then end or surface finished in the same manner as CW pipe. The ERW method can be used to produce the full size range of pipe products covered by this petition.

Subject pipe may also be produced by the stretch reduction method. A stretch reduction mill heats and stretches large "mother" tubes produced on an ERW or CW mill to create pipes and tubes of various smaller diameters and thinner wall thicknesses. The advantage of a stretch reduction mill is that it allows the company to produce a single diameter and wall thickness of mother tube on its ERW or CW mill, allowing those operations to run more efficiently and reducing the variety of steel inventory that must be purchased and stored. That single size mother tube can then be stretched into any smaller diameter and wall thickness of pipe desired.

4. Scope of Petition

This petition covers welded carbon-quality steel pipes and tube, of circular cross-section, with an outside diameter ("O.D.") not more than 16 inches (406.4mm), regardless of wall thickness, surface finish (e.g. black, galvanized, or painted), end finish (plain end, beveled end, grooved, threaded, or threaded and coupled), or industry specification (e.g. American Society for Testing and Materials International ("ASTM"), proprietary, or other) generally known as standard pipe, fence pipe and tube, sprinkler pipe, and structural pipe (although subject product also be referred to as mechanical tubing). Specifically, the term, "carbon quality" includes products in which: (a) iron predominates, by weight, over each of the other contained elements; (b) the carbon content is 2 percent or less, by weight; and (c) none of the elements listed below exceeds the quantity, by weight, as indicated:

- (i) 1.80 percent of manganese;
- (ii) 2.25 percent of silicon;
- (iii) 1.00 percent of copper;
- (iv) 0.50 percent of aluminum;
- (v) 1.25 percent of chromium;
- (vi) 0.30 percent of cobalt;
- (vii) 0.40 percent of lead;
- (viii) 1.25 percent of nickel;
- (ix) 0.30 percent of tungsten;
- (x) 0.15 percent of molybdenum;
- (xi) 0.10 percent of niobium;

- (xii) 0.41 percent of titanium;
- (xiii) 0.15 percent of vanadium;
- (xiv) 0.15 percent of zirconium;

Subject pipe is ordinarily made to ASTM specifications A53, A135, and A795, but can also be made to other specifications. Structural pipe is made primarily to ASTM specifications A252 and A500. Standard and structural pipe may also be produced to proprietary specifications rather than to industry specifications. Fence tubing is included in the scope regardless of certification to a specification listed in the exclusions below, and can also be made to the ASTM A513 specification. Sprinkler pipe is designed for sprinkler fire suppression systems and may be made to industry specifications such as A53 or to proprietary specifications. These products are generally made to standard O.D. and wall thickness combinations. Pipe multi-stenciled to a standard and/or structural specification and to other specifications, such as American Petroleum Institute ("API") API-5L specification, is also covered by the scope of this investigation when it meets the physical description set forth above, and also has one or more of the following characteristics: is 32 feet in length or less; is less than 2.0 inches (50mm) in outside diameter; has a galvanized and/or painted (e.g. polyester coated) surface finish; or has a threaded and/or coupled end finish.

The scope of this investigation does not include: (a) pipe suitable for use in boilers, superheaters, heat exchangers, refining furnaces and feedwater heaters, whether or not cold drawn; (b) mechanical tubing, whether or not cold-drawn. However, products certified to ASTM mechanical tubing specifications are not excluded as mechanical tubing if they

otherwise meet the standard sizes (e.g. outside diameter and wall thickness) of standard, structural, fence and sprinkler;¹ (c) finished scaffolding;² (d) tube and pipe hollows for redrawing; (e) oil country tubular goods produced to API specifications; and (f) line pipe produced to only API specifications.

The pipe subject to this investigation are currently classifiable in HTSUS statistical reporting number 7306.19.1010, 7306.19.1050, 7306.19.5110, 7306.19.5150, 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090, 7306.50.1000, 7306.50.5050, and 7306.50.5070. However, the product description, and not the Harmonized Tariff Schedule of the United States (“HTSUS”) classification, is dispositive of whether the merchandise imported into the United States falls within the scope of the investigation.

F. Country of Exportation (19 C.F.R. § 353.12(b)(5))

The product that is the subject of these petitions is being produced in Oman, India, UAE, and Vietnam. Petitioners have no direct knowledge that the subject pipe produced in these countries is being transshipped through any third country to the United States, however, it is possible. The volume of imports for the most recent three years is provided in Exhibit I-3.

G. Producers and Exporters of Subject Merchandise 19 C.F.R. § 351.202(b)(7)(i)(A))

Based on a review of publicly-available sources reasonably available to them, Petitioners have identified, at Exhibit I-4, companies that appear to produce subject pipe in

¹ In addition to the standard sizes in the ASTM specifications, Exhibit 2A contains the industry standard fence O.D. and gage combinations.

² Finished scaffolding is defined as component parts of a final, finished scaffolding that enters the United States unassembled as a “kit.” A “kit” is understood to mean a packaged combination of component parts that contain, at the time of importation, all the necessary component parts to fully assemble a final, finished scaffolding.

Oman, India, UAE, and Vietnam or companies from these countries that export subject pipe to the United States.

H. Names and Addresses of Importers (19 C.F.R. §§ 207.11(b)(2)(iii) & 351.202(b)(9))

Based on a review of publicly available sources reasonably available to them, Petitioners have identified, at Exhibit I-5, companies that appear to import subject pipe into the United States.

To the extent reasonably available, Petitioners have provided addresses and telephone and fax numbers for these importers.³ Further information that might identify additional importers is available to the Commission from import documents filed with the U.S. Customs Service.

I. For the Preliminary Investigation, Petitioners Request that the Commission Obtain Pricing Information on the Following Products:

- Product 1: ASTM A-53 schedule 40 black plain-end pipe, with nominal outside diameter of 2-4 inches inclusive.
- Product 2: ASTM A-53 schedule 40 galvanized plain-end pipe, with nominal outside diameter of 2-4 inches inclusive.
- Product 3: ASTM A-53 schedule 40 black plain-end pipe, with nominal outside diameter of 6-8 inches inclusive.
- Product 4: Galvanized fence tube, with nominal outside diameter of 1-3/8 to 2-3/8 inches inclusive, and wall thickness of 0.055-0.075 inch.

³ Petitioners acknowledge that some listed importers may not actually import subject products. This information was gathered from public data that identify importers of pipe, not all of which may necessarily be subject pipe products imported from the subject countries.

II. Injury and Threat of Injury

A. The Like Product is Circular Welded Carbon-Quality Steel Pipe

Petitioners believe that the domestic like product in this investigation is coextensive with the scope of the investigation. Circular welded carbon-quality steel pipe is a like product with which the Commission has significant experience. The scope of the subject investigation is virtually identical to the scope of the Commission's investigation of circular welded carbon-quality steel pipe from China (investigation numbers 701-TA-447 and 731-TA-1116, Final Publication 4019, July 2008).⁴ Circular welded pipe is normally sold through distributors, maybe sold directly to certain end users such as sprinkler system manufacturers or scaffolding producers, or to large retail chains.

B. Subject Imports Have Increased Substantially

Imports of CWP from India, Vietnam, Oman, and UAE have increased in an absolute sense as well as with respect to domestic consumption and U.S. production.

As the data in Exhibit I-3 shows, imports of CWP from subject countries were 142,336 net tons ("NT") in 2008, and increased by 23.9 percent (nearly 34,000 NT) to 176,314 NT in

⁴ Petitioners have slightly modified the scope language from the orders on CWP from China in two respects. The first change was made in order to prevent evasion discovered in numerous other circular welded pipe orders where foreign producers and U.S. importers are producing, exporting, and importing galvanized fence tubing and providing mill test reports for ASTM A-513 and claiming that these products fall under the exemption from the scope of mechanical tubing. It is Petitioners' view that the scope definitions of prior orders have always included all fence tubing and that this ruse does not in any way prevent the Customs service from properly collecting prevailing antidumping and countervailing duties on subject fence tubing. This does not change the domestic like product as to the best of Petitioner's knowledge; no U.S. producer of galvanized fence tubing has ever provided mill test reports for galvanized fence tubing showing that the product met ASTM A513 specification. The second minor modification was to add a footnote with a clearer definition of the term "finished scaffolding." Again to the best of Petitioner's knowledge, while Petitioners and others in the domestic industry produce scaffolding pipe, none of the Petitioners produce finished scaffolding. Pipe that is not irrevocably dedicated to scaffolding production is not excluded even if imported as part of a scaffolding kit.

2010. From the first half of 2010 to the first half of 2011, subject imports again increased rapidly, from 85,711 NT in the first half of 2010 to 110,440 NT in the first half of 2011, an increase of almost 25,000 NT and 29 percent.

Subject imports also increased their domestic market share significantly.⁵ The market share held by subject imports in 2008, based upon total estimated U.S. consumption of approximately 1.8 million NT, was 7.9 percent. Demand for CWP shrunk significantly between 2008 and 2010, with both domestic shipments and imports from non-subject countries falling significantly. Subject import market share increased to approximately 11.9 percent in 2010 in a market estimated to be slightly less than 1.5 million NT. With only a slight increase in apparent consumption in the first half of 2011, subject imports again significantly increased their market share. There is little doubt that the Commission will also find that subject imports increased very significantly over the POI as a ratio of domestic production. Thus, on both an absolute basis and as a share of both consumption and as a ratio of domestic production, the Commission should find that the volume of subject imports and the increase in subject imports are significant.

C. Subject Imports Have Caused Material Injury to the Domestic Industry

1. Subject Imports are a Commodity and are Fungible with Domestic Production

Subject imports from India, Oman, UAE and Vietnam are made to the same specifications, sold through the same channels of distribution, and are used for the same uses as domestically produced CWP. The Commission has found in the past that imported CWP and

⁵ For estimated domestic shipments, petitioners used the ratio of petitioner's shipments to total domestic shipments in 2010, used in the standing section of the petition, and applied the same ratio to the other four time periods.

domestically produced CWP are fungible commodity products. These products are sold on the basis of price.

While Petitioners do not have information for the pricing products contained in section I-I above for imported products and domestic products, it is clear from AUV data that imported average unit values (“AUVs”) are significantly less than domestic AUVs. Petitioners believe that the information gathered by the Commission during its investigation will demonstrate significant price underselling by subject imports and price suppression and depression to the domestic industry’s pricing.

2. Domestic Industry Shipments, Production, and Capacity Utilization Indicate Material Injury Caused by Subject Imports

Aggregate data for domestic industry capacity, production, shipments and employment are contained in Exhibit I-6. Domestic production declined by approximately 15 percent between 2008 and 2010, and declined slightly between first half 2010 and first half 2011. Commercial shipments fell by a similar amount between 2008 and 2010, but increased slightly between first half 2010 and first half 2011. Exports fell significantly between 2008 and 2010, before rebounding between the first half of 2010 and the first half of 2011. Capacity utilization also declined over the POI. The number of employees, hours worked, and wages paid all declined significantly between 2008 and 2010, before increasing slightly during the interim periods. (See Exhibit I-6).

3. Domestic Industry Financial Data Indicate Material Injury Caused by Subject Imports

Data on domestic industry financial performance is contained in Exhibit I-7. Between 2008 and 2010, industry sales revenues plummeted, average unit values fell significantly along

with decreased quantities of sales, and both profits and profit margins plummeted. Operating profits fell by [] percent between 2008 and 2010, and were stagnant at dismal levels in the two interim periods. Operating margins fell from [] percent in 2008 to [] percent in 2010. Operating margins fell further in the interim periods, from [] percent in interim 2010 to [] percent in interim 2011. The volume and price effects of subject imports have had a materially negative impact on the financial condition of the industry.

4. Subject Imports have Resulted in Lost Sales and Lost Revenues

The Commission has recognized in the past that CWP is a highly commoditized fungible product. Subject imports, whether A53 for plumbing applications, sprinkler pipe, or fence pipe and tube, are sold through trading companies or importers to the same pipe, valves, and fittings distributors, sprinkler contractors and fencing contractors that are the domestic industry's customers or competitors of the domestic industry's customers. Unfortunately, although all domestic producers are aware that sales volumes with customers have been reduced by these customers or their competitors purchasing lower-priced subject imports, they cannot directly identify the exact dates, tonnages, and source of subject import by customer. It is clear that major pipe, valves and fittings distributors, such as McJunkin Red Man and Ferguson Enterprises, and major fence contractors, such as Stephens Pipe and Merchants Metals, have purchased subject imports instead of domestic producer's products. The domestic industry had significant excess capacity throughout the entire period that will be investigated by the Commission. One need venture no further than to local a Home Depot in the Washington area to see Zenith Pipe from India or pipe from the UAE in the plumbing sections, or fence tubing from Vietnam in the garden section. This is true even though both Petitioners Allied and

Wheatland Tube have plants within 100 to 200 miles of the Washington area. This also occurs in spite of the fact that Home Depot does carry finished conduit, a non-subject product, from Petitioners with SKU tags, which demonstrates that Petitioners are able to service big-box retailers. This leads to the inevitable conclusion that big-box retailers buy subject imports because their prices are lower than domestic producer's prices.

D. THE DOMESTIC INDUSTRY IS THREATENED WITH MATERIAL INJURY BY REASON OF SUBJECT IMPORTS

1. Introduction

While the factors normally considered by the Commission support a preliminary affirmative determination that the U.S. industry producing CWP is suffering present material injury by reason of subsidized and/or LTFV imports from India, Oman, UAE and Vietnam, if the Commission does not make a preliminary determination based on present material injury, then the Commission should find that the domestic industry is threatened with material injury by reason of subject imports. Imports are rapidly increasing, and the import trends indicate that this growth is continuing. Further growth in subject imports is also likely because of the significant export-orientation of the subject producers, the focus of these producers on the U.S. market, and the substantial available and growing capacity of producers in the subject countries. Shipments to the U.S. market are also facilitated by subsidies received by subject exporters.

In addition to negative volume effects, subject imports are likely to depress and suppress U.S producers' prices for the domestic like product. The adverse volume and price effects of increasing dumped and subsidized imports will cause the domestic industry to suffer further declines in production, capacity utilization, employment, market share, prices, operating

income, return on investment, and other performance indicators. The threat of material injury in the imminent future is the more likely given the highly vulnerable state of the domestic industry.

2. The Commission Should Cumulate Subject Imports

The Commission should exercise its discretion to cumulate subject imports which compete with each other and the domestic like product in the U.S. market. The record will show that there is a reasonable overlap in competition between subject imports from each country and between subject imports and the domestic like product.⁶ There is no meaningful distinction among the subject imports with respect to (1) the degree of fungibility, (2) geographic presence in the U.S. market, (3) channels of distribution, and (4) simultaneous presence in the market. Any price differences among the subject imports are outweighed by that all subject imports from all subject countries undersell the domestic like product, and underselling is the primary reason subject imports obtain sales in the U.S. market.

There are no differences in the conditions of competition among subject imports that warrant exercise of the Commission's discretion to exclude any subject imports from cumulation. The subject producers in all four subject countries exhibit similar trends in exports to the U.S. market, have a similar export orientation and focus on the U.S. market, and all have substantial and growing capacity. Moreover, subject producers in all four subject countries benefit from countervailable subsidies.

A small portion of the total volume of imports from India are exported subject to the discipline of an existing antidumping order that dates to 1986, which covers Indian CWP

⁶ These petitions were filed on the same day and subject imports compete with each other and with the domestic like product in the U.S. market. 19 U.S.C. § 1677(7)(H).

exports with the exception of those from Zenith and Gujarat.⁷ These imports would be nonsubject imports but for inclusion in the countervailing duty investigation of imports from India. The statute requires that the Commission make its threat determination in consideration of the impact of subject merchandise.⁸ Because all imports from India are subject merchandise under the countervailing duty petition they are subject merchandise and should be cumulated with other subject merchandise in the Commission's investigations.

3. The Significant Rate of Increase In Subject Imports Indicates The Likelihood of Substantially Increased Imports

The volume of subject imports increased by 23.9 percent from 2008 to 2010, and were significant in 2010 representing 36.4 percent of total imports and 11.9 percent of estimated U.S. apparent consumption. Moreover, from January-June 2010 to January-June 2011, subject imports increased by 29 percent. Thus, in 2011, subject imports represented 44 percent of total imports. (See Exhibit I-3). The trend in subject imports over the POI, and the significant rate of increase strongly indicate the likelihood of substantially increased imports from the subject countries. For the reasons explained in the subsequent section of these petitions, subject imports are certain to continue their rapid increase in the absence of relief to the domestic industry from these unfair imports.

4. Subject Producers Are Export-Oriented And Focused On The U.S. Market

Official import data for 2011 indicate that UAE is the largest supplier to the U.S. market, India is the second largest supplier, Vietnam is the fourth largest supplier, and Oman is

⁷ See Certain Welded Carbon Steel Pipe and Tube from India, Antidumping Duty Order, 51 Fed. Reg. 17384 (May 12, 1986).

⁸ 19 U.S.C. § 1677(7)(F). Subject merchandise means the class or kind of merchandise found to be within the scope of investigations as determined by the Department of Commerce. See 19 U.S.C. § 1677(25).

the seventh largest supplier.⁹ Available information indicates that producers in the subject countries are increasingly export-oriented, and that the United States is the principal market for their exports. For example, in Vietnam, steel pipe accounted for half of all steel export revenue from shipments to the United States in the first half of 2010. Producers who are well established in domestic markets are now focusing their attention on exporting larger and larger percentages of their output. One producer noted that its export target was 20-30 percent of total output, with about 70 percent of those exports going to the United States.¹⁰

Subject producers are also focused on the U.S. market because they can exploit the market opportunity created by antidumping and countervailing duties imposed on other countries. For example, the chief executive officer of Gulf Industrial Pipe Industries (GIPI) in Oman publically stated that his company hoped to take advantage of the greater demands for his company's product in the United States now that Chinese pipe imports are subject to antidumping duties.¹¹

In sum, the United States will remain a vital export market for producers from the subject countries.

E. Available Information Indicates Subject Producers Have Substantial Underutilized Capacity And That Capacity Continues To Grow

Available data indicate that there is substantial excess capacity in the subject countries, and that, notwithstanding current excess capacity, producers in the subject countries continue to add capacity.

⁹ Petitioners believe that substantially all subject imports from India are from Zenith, which is not subject to the discipline of the antidumping duty order on CWP from India, see Exhibit I-3.

¹⁰ Ngoc Lan, Tempering Steel Pipe Export with Caution, The Saigon Times, Aug. 15, 2010, provided as Exhibit I-8.

¹¹ Special Advertising Section: Celebrating a 40 Year Legacy, N.Y. Times Magazine, Nov. 28, 2010, at 4, provided as Exhibit I-9

1. India

India has been adding massive new steelmaking capacity, and plans to build more capacity in the imminent future. It may soon produce 10 percent of all the world's steel.¹² Indian producers have firm plans to add 37.3 million metric tons of steel capacity by 2012, a 51.3 percent increase from 2009.¹³ Published information on 30 CWP manufacturers in India indicates that capacity or annual production data are available for 19 producers, totaling almost 3.7 million short tons. Indian producers are actively taking step to expand their available capacity. For example, APL Apollo prominently advertises that over the last three years, it has increased its capacity more than six times.¹⁴ Despite this expansion, some experts estimate that Indian pipe producers have capacity utilization rates of only 40-60 percent. Reports attribute the low rates to diminished infrastructure spending and lower oil prices.¹⁵

2. Oman

Oman has added capacity to its CWP industry in the last two years even though much of its existing capacity is underutilized. For example, producer Al Jazeera Steel Products Co. (AJS) admitted in its annual report that it operated its pipe mill at only 49 percent of its capacity in 2010. AJS attributed this to "severe market conditions."¹⁶ Yet during the same time period in Oman, additional CWP producers and facilities opened for business.¹⁷ Producers have continued to expand despite the underutilization of capacity in the CWP industry.

¹² *Global Steel Capacity Update* at 2, 5, provided as **Exhibit I-10**.

¹³ *Steelmaking Capacity* at 147, provided as **Exhibit I-11**.

¹⁴ *APL Apollo Corporate Presentation*, at 19, provided as **Exhibit I-12**.

¹⁵ Adarsh Gopalakrishnan, *Costs, Competition to Restrict Profits for PSL*, Business Line (The Hindu), June 16, 2011, provided at **Exhibit I-13**.

¹⁶ *Al Jazeera Steel Products Co. SAOG 13 Annual Report (2010)*, at 9-10, provided as **Exhibit I-14**.

¹⁷ See *GIPI's Sohar Pipe Plant Commissioned*, (announcing the March 2010 opening of a pipe facility capable of producing 250,000 tons per year), provided at **Exhibit I-15**.

3. UAE

Two major CWP exporters, SeAH Steel UAE and Universal Tube and Plastic Industries Ltd., have opened new steel pipe facilities since July 2010.¹⁸ Established producers of other steel products have also expressed serious interest in producing pipe.¹⁹

4. Vietnam

Vietnam has rapidly expanded its CWP capacity in the last two years. Three steel pipe mills went into operation in 2009 and the first half of 2010, increasing total steel pipe production to 47,368 tons in July 2010.²⁰ Yet in the steel industry as a whole, supply already outpaced demand before these new production facilities opened their doors. Market analysts are indicate that producers will have no choice but to reduce their output or more aggressively compete with rival companies which also have excess capacity.²¹ These circumstances strongly encourage the continued sharp increase in exports from Vietnam to the United States.

F. Subject Producers Receive Significant Countervailable Subsidies

The governments of each of the subject countries have spurred the creation and expansion of CWP production capacity in their respective countries. These inducements to increased capacity and production encourage exports to the U.S. market. Moreover, each of the subject countries provides subsidies described in Article 3 of the Agreement on Subsidies and Countervailing Measures, including prohibited export subsidies.

¹⁸ Universal Tube and Pipe in the Process of Certification for 4-12 Inch Steel Pipes, Steel Mills of the World, Aug. 10, 2011, **Exhibit I-16**; Rak Ruler Inaugurates \$70m SeAH Steel UAE LLC Plant, AME Info, Apr. 5, 2011, available at **Exhibit I-17**.

¹⁹ See Himendra Mohan Kumar, GHC Sets \$10b for Expansion, Gulf News, May 10, 2010, provided at **Exhibit I-18** (announcing plans for Abu Dhabi Basic Industries Corporation to invest \$1.5 billion in steel pipes and aluminum rolling mills in the coming years).

²⁰ Vietnam's Steel Pipe Production Increases 34.91 Pct in July, *Vietbiz24*, provided at **Exhibit I-19**.

²¹ Van Nam, Surplus Capacity Heralds Stiffer Competition, Saigon Times Online, July 28, 2010, provided at **Exhibit I-20**.

1. India

The Indian government provides the following countervailable subsidies:

- 1) duty-free import of all types of goods, including capital goods and raw materials;
- 2) reimbursement of central sales tax paid on goods manufactured in India;
- 3) duty drawback on fuel procured from domestic oil companies;
- 4) exemption from income tax under Section 10A and 10B of Income Tax Act;
- 5) exemption from payment of central excise duty on goods manufactured in India and procured from a domestic tariff area;
- 6) reimbursement of central sale tax on goods manufactured in India and procured from a domestic tariff area;
- 7) export promotion capital goods scheme;
- 8) duty exemption or remission under the Advance License Program;
- 9) duty exemption or remission under the Duty Free Import Authorisation Scheme;
- 10) duty exemption or remission under the Duty Entitlement Passbook Scheme;
- 11) pre-shipment and post-shipment export financing;
- 12) grants for market development;
- 13) grants under the Market Access Initiative;
- 14) loan guarantees from the Government of India;
- 15) Status Certificate Program;
- 16) loans from the Steel Development Fund;
- 17) grants and loans for research and development from the Steel Development Fund;
- 18) duty-free importation of capital goods and other materials in Special Economic Zones
- 19) exemption from payment of central sales tax on purchases of capital goods other materials in Special Economic Zones;
- 20) exemption from electricity duties in Special Economic Zones;

- 21) income tax exemptions in Special Economic Zones;
- 22) discounted land and related fees in Special Economic Zones;
- 23) government-provided captive mining rights for iron ore and other minerals;
- 24) government-provided captive mining rights for coal;
- 25) government-provided ore for less than adequate remuneration;
- 26) sales tax program in the State of Maharashtra;
- 27) value-added tax refunds in the State of Maharashtra;
- 28) tax exemption on electricity charges in the State of Maharashtra;
- 29) Octroi duty refunds in Maharashtra;
- 30) Octroi loan guarantees in Maharashtra;
- 31) infrastructure assistance for mega projects in Maharashtra; and
- 32) investment subsidies in Maharashtra.

For more information on these programs see Petition on CWP from India at Volume III-A.

2. Oman

The Oman government provides the following countervailable subsidies:

- 1) income tax exemptions;
- 2) tariff exemptions on imported equipment, machinery, raw materials and packaging materials;
- 3) government provision of land and buildings for less than adequate remuneration;
- 4) provision of utilities for less than adequate remuneration;
- 5) soft loans for industrial projects;
- 6) post-shipment financing loans; and
- 7) pre-shipment export credit guarantees; and 8) export credit insurance.

For more information on these programs see Petition on CWP from Oman at Volume III-B.

3. UAE

The UAE government provides the following countervailable subsidies:

- 1) tax exemptions on profits;
- 2) tariff exemptions on imported equipment, spare parts, and building materials;
- 3) provision of gas for less than adequate remuneration;
- 4) provision of electricity for less than adequate remuneration;
- 5) provision of water for less than adequate remuneration;
- 6) provision of land and/or buildings for less than adequate remuneration;
- 7) preferential lending; and
- 8) Dubai Commodity Receipts;

For more information on these programs see Petition on CWP from the UAE at Volume III-C.

4. Vietnam

The Vietnamese government provides the following countervailable subsidies:

- 1) preferential lending to exporters;
- 2) preferential lending to the steel industry;
- 3) land rent reductions or exemptions for exporters;
- 4) land rent reductions or exemptions for foreign invested enterprises (“FIEs”);
- 5) land preferences for enterprises in encouraged industries or industrial zones;
- 6) provision of water for less than adequate remuneration in industrial zones;
- 7) export promotion grants;
- 8) grants for new product development;
- 9) import duty exemptions for imported raw materials for exported goods;

- 10) Income tax preferences for encouraged industries;
- 11) income tax preferences for FIEs;
- 12) exemption of import duties on imports of fixed assets, spare parts and accessories for industrial zone enterprises;
- 13) income tax preferences for enterprises in industrial zones;
- 14) tax refund for reinvestment by FIEs;
- 15) import duty preferences for FIEs, and
- 16) exemption of import duties on imports of goods for encouraged projects.

For more information on these programs see Petition on CWP from Vietnam at Volume III-D.

These countervailable subsidies create a significant likelihood that low-priced, subsidized imports from the subject countries will continue their rapid penetration of the U.S. market. Export subsidies directly encourage greater exports. Domestic subsidies encourage increased in production capacity and the export of CWP to the United States at prices far lower than otherwise would be the case in the absence of subsidies.

G. Subject Imports Are Likely To Depress Or Suppress U.S. Prices For The Domestic Like Product

CWP is a highly fungible product that is considered a commodity in the marketplace, which is sold largely on the basis of price. New entrants gain market share by offering lower prices. Notably, exports of CWP are not inhibited by any certification process such as that for API pipe. Rather, all subject pipe production is “self-certified” to ASTM or other specifications.

The AUV of CWP imports from the subject countries indicates that the prices of the product from these countries are lower than the price from other countries. In 2010, the AUV

of CWP imports from India was \$870.93 per short ton, while the AUV of imports from Vietnam was \$856.60 per short ton. Subject imports from Oman had an AUV of \$814.70 per short ton, which was the second lowest AUV from any country importing the subject product. CWP from the UAE had an AUV of \$834.64 per short ton. In contrast, even after being depressed by subject import prices, domestic AUVs remained above \$1,000 per short ton in 2010.

Subject imports are entering the U.S. market at prices that undersell the domestic like product, and that are likely to depress or suppress domestic prices. The likely increase in subject import volume will lead to further underselling and adverse price effects for domestic producers.

H. Available Information Indicates Subject Producers' Inventories Are Substantial And Growing

Steel producers in the subject countries have increased capacity while facing lower demand for their product, which has resulted in large inventories of unsold product. It is especially pronounced in Vietnam, where steel producers are currently struggling with a large surplus in production capacity. The Vietnamese steel industry had 430,000 tons of steel products in stockpiles as of August 2011. This is the largest stockpile the industry has ever held.²² Although total steel pipe production by members of the Vietnam Steel Association was 303,705 tons in the first seven months of 2010, producers managed to sell only 299,224 tons.²³

I. The Domestic Industry Is Vulnerable To Subject Imports

The weakened condition of the domestic industry makes it especially vulnerable to material injury from dumped and subsidized imports. Since January 2008, the domestic

²² Ngan Anh, Rising Stockpiles Threaten Growth Prospects, Thanh Nien Daily, Aug. 22, 2011, provided at **Exhibit I-21**.

²³ Vietnam's Steel Pipe Production Increases 34.91 Pct in July, *Vietbiz24*, provided at **Exhibit I-19**.

industry has lost substantial market share to subject imports, and has been forced to reduce capacity and employment. The petitioning producers were able to maintain operating income levels only by reducing production, laying off employees, and rationalizing capacity. Even so, the aggregate operating income margin for the petitioning producers was only [] percent in 2010.

The petitioning producers' operating income, net income before tax, and cash flow all dropped sharply during the latter portion of the POI. Higher costs for hot-rolled steel, zinc, and energy, and low capacity utilization rates require that U.S. producers raise prices to maintain margins. They are unable to do so, however, without losing more market share to subject imports.

The continuing low demand environment also makes the domestic industry vulnerable to subject imports. Demand has declined since 2008, with minimal recovery in early 2011. The main demand drivers for CWP – commercial and residential construction – continue to be depressed, and are likely to remain depressed in 2011 and 2012.

III. Conclusion

For the reasons stated above and herein, the Department of Commerce should initiate antidumping and countervailing duty investigations and the Commission should make preliminary affirmative determinations that subject imports have caused or threaten to cause material injury.

Volume I- General Information and Injury

List of Exhibits

- I-1: U.S. Producer Names and Addresses
- I-2: U.S. Petitioner and U.S. Industry Production
- I-2A: Common Fence Pipe and Tube Sizes
- I-3: Imports of Subject Merchandise
- I-4: Foreign Producer and Exporter Names and Addresses
- I-5: U.S. Importer Names and Addresses
- I-6: Aggregate Industry Production and Employment Data
- I-7: Aggregate Industry Financial Data
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- I-11: Steelmaking Capacity
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- I-18: Himendra Mohan Kumar, GHC Sets \$10b for Expansion, Gulf News, May 10, 2010
- I-19: Vietnam's Steel Pipe Production Increases 34.91 Pct in July, Vietbiz24
- I-20: Van Nam, Surplus Capacity Heralds Stiffer Competition, Saigon Times Online, July 28, 2010
- I-21: Ngan Anh, Rising Stockpiles Threaten Growth Prospects, Thanh Nien Daily, Aug. 22, 2011

Exhibit I-1

U.S. Producer Names and Addresses

I. NAMES AND ADDRESSES OF DOMESTIC PRODUCERS

American Tubular Products

141 So. Western Coil Road

Lindon, UT 84042

Website: www.amertube.com

Phone: 801-785-8600 ext. 616

Fax: 801-785-4146

Email: atpsales@sisteel.com

Bull Moose Tube Company

1819 Clarkson Road, Suite 100

Chesterfield, MO 63017

Website: www.bullmoosetube.com

Contact:

Michael Dustmann

Chief Operating Officer, CAPARO West

Phone: 636-537-2600 x216

Email: mdustmann@caparowest.com

California Steel and Tube

16059 Stephens Street

City of Industry, CA 91745

Website: www.californiasteelandtube.com

Contact:

Rick Hirsch

President

Phone: 626-968-5511

Fax: 626-333-8032

Email: rhirsch@macsteelusa.com

California Steel Industries

P.O. Box 5080

1 California Steel Way

Fontana, CA 92335

Website: www.californiasteel.com

Contact:

Vicente Wright

President and CEO

Phone: 909-350-6300

Fax: 909-350-6398

Hannibal Industries, Inc.

3851 Santa Fe Avenue
Los Angeles, CA 90058

Website: www.e-hii.com

Contact:

Blanton Bartlett

President and CFO

Phone: 323-513-1216

Fax: 323-589-5640

Email: bbartlett@e-hii.com

Hickman Pipe and Tube

828 Catlett Street

Hickman, KY 42050

Phone: 270-236-3933

Leavitt Tube Company

1717 West 115th Street

Chicago, IL 60643

Website: www.leavitt-tube.com

Contact:

Mr. David J. Klima

Vice President- Finance

Phone: 773-239-7700

Fax: 773-239-1023

Email: dlklima@leavitt-tube.com

Maruichi American Corporation

11529 South Greenstone Avenue

Santa Fe Springs, CA 90670

Website: www.macsfs.com

Contact:

Sho Morita

President

Phone: 562-903-8600

Fax: 562-903-8601

Email: morita@macsfs.com

Northwest Pipe Company

5721 S.E. Columbia Way, Suite 200

Vancouver, WA 98661

Website: www.nwpipe.com

Contact:

Mr. Charles Sutton

Financial Planning & Analysis Manager

Phone: 360-397-6268

Fax: 360-397-6256

Email: csutton@nwpipe.com

Tenaris USA- Maverick Tube, LLC

2200 West Loop South, Suite 800

Houston, TX 77027

Website: www.tenaris.com

Contact:

German Cura

North American Area Manager

Phone: 713-767-4400

Fax: 713-167-4444

Tex-Tube

1503 North Post Oak Road

Houston, TX 77255

Website: www.tex-tube.com

Contact:

Raymond Davila

Vice President Sales

Phone: 713-686-4351

Fax: 713-681-5256

Email: rdavila@tex-tube.com

TMK IPSCO Tubulars

2650 Warrenville Road, Suite 700

Downers Grove, IL 60515

Website: www.ipsco.com

Contact:

Mr. Scott Barnes

Vice President and Chief Commercial Officer

Phone: 630-874-0078

Fax: 630-874-6431

Email: sbarnes@tmk-ipsco.com

Western Tube and Conduit

P.O. Box 2720

2001 East Dominguez Street

Long Beach, CA 90801

Website: www.westerntube.com

Contact:

Don Finn

Vice President of Sales

Phone: 310-669-2205

Fax: 310-604-9785

Email: dfinn@westerntube.com

Exhibit I-2

U.S. Petitioner and U.S. Industry Production

NOT SUSCEPTIBLE TO PUBLIC SUMMARIZATION

Exhibit I-2A

Common Fence Pipe and Tube Sizes

[illegible]

Exhibit I-3

Imports of Subject Merchandise

Quantity (Short Tons)

	2008	2009	2010	January-June 2010	January-June 2011
India	69,620	47,654	74,006	38,832	34,110
Oman	24,404	18,888	33,442	15,253	21,010
UAE	18,579	17,460	33,188	11,598	35,860
Vietnam	29,733	22,417	35,678	20,028	19,460
Subtotal	142,336	106,419	176,314	85,711	110,440
All Other	546,509	249,238	307,502	138,424	156,622
Total	688,845	355,657	483,816	224,135	267,062

Value (\$1,000)

	2008	2009	2010	January-June 2010	January-June 2011
India	75,327	38,430	64,454	32,123	32,693
Oman	24,125	15,834	27,245	11,600	18,526
UAE	20,965	14,632	27,700	8,696	31,043
Vietnam	33,460	17,747	30,562	16,357	17,321
Subtotal	153,877	86,643	149,961	68,776	99,583
All Other	612,592	249,579	298,563	130,495	164,241
Total	766,469	336,222	448,524	199,271	263,824

Exhibit I-4

Foreign Producer and Exporter Names and Addresses

I. NAMES AND ADDRESSES OF FOREIGN PRODUCERS, INDIA

Advance Steel Tubes (ASTL)

81, Functional Industrial Estate, Patpargang

Delhi 110092

India

Phone: 91 11 2214 5760

Fax: 91 11 2214 5978

Asian Mills

104 Sakar – III

Near Income Tax Circle

Ahmedabad 380014

Gujarat, India

Phone: 91 79 2758 2515

Fax: 91 79 2754 6320

Asian Tubes

101 Sakar – III

Near Income Tax Circle

Ahmedabad 380014

Gujarat, India

Phone: 91 79 2758 2515

Fax: 91 79 2754 6320

Bihar Tubes (BTL)

37, Hargovind Enclave, Vikas Marg

Delhi- 110092

India

Phone: 91 11 2237 3437

Fax: 91 11 2237 3537

BMW Industries Steel Service Center

12/2 Park Mansion, 3rd Floor

57A Park Street, Kolkata- 700016

India

Phone: 91 33 2229 5631

Fax: 91 33 2229 4629

Gemini Steel Tubes

605, 6th Floor, North Block
Manipal Center
47, Dickenson Road
Bangalore- 560042
India
Phone: 91 5583788
Fax: 91 5586948

Good Luck Steel Tube (GTC)

5/102, Sikka Complex
Community Center
Preet Vihar, Vikas Marg
New Delhi- 110092
India
Phone: 91 11 2246 5439
Fax: 91 11 2221 4254

Jagan Tubes

SCO-18-10, Sector-28C
Chandigarh- 160002
India
Phone: 91 172 466 8000
Fax: 91 172 466-7111

Jindal Pipes

Plot No. 30, Institutional Sector-44
Gurgaon- 122002
Haryana, India
Phone: 91 124 257 4325
Fax: 91 124 257 4327

Laxmi Pipes

4/5 B, IInd Floor Asaf Ali Road
New Delhi- 110002
India
Phone: 91 11 23274215
Tax: 91 11 23267139

Lloyds Line Pipes

Trade World, C Wing
16th Floor, Kamala City
Lower Parel, Mumbai- 400013
Phone: 91 22 3041 8111
Fax: 91 22 3041 8260

Maharashtra Seamless

Pipe Nagar, Village Sukeli
N.H.-17, B.K.G. Road
Distt. Raigad- 402126
Maharashtra, India
Phone: 91 219 423 8511

Metalex Pipes

B-23, Mayapuri Industrial Area
Phase 1, New Delhi- 110064
India
Phone: 91 011 28115967

Metalman Industries

JANAK", 11 New Palasia
Indore- 4520001
India
Phone: 91 73 14025522
Fax: 91 73 14025555

New Hindustan Tubes

Plot NO. 91, Sector-6
Faridabad- 121006
Haryana, India
Phone: 91 129 224 6610

Nezone Tube

Ashoka House
3A Hare Street, 5th Floor
Kolkata 700001
West Bengal, India
Phone: 91 33 2231 7280
Fax: 91 33 2231 7286

Shakti Tubes

Garesh Darshan, 28/42, A Wing, Office No. 112, Shant Shena Maharaj Marg
2nd Kumbharwada
Mumbai- 400004
Phone: 91 61 2222 2737
Fax: 91 61 2223 2386

Siddhartha Tubes

Londhiya, A.B. Road
Dist. Shajapur- 456001
India
Phone: 91 73 6422 6606
Fax: 91 7 37123059

Sri Sarbati Steel Tubes (SSST)

163/1 Prakasam Salai, 2nd Floor
Broadway
Chennai- 600108
India
Phone: 91 44 25240559
Fax: 91 44 2522 2938

Steel Authority of India

Rourkela Steel Plant
Rourkela 769011
India
Phone: 91 661 251 0641
Fax: 91 661 251 0085

Surindra/Mukat Group of Co.

Surindra House
M.V. Road, Safaid Pool
P.O. Box No. 8939
Mumbai 400072

Surya Steel Pipe

Padma Tower 1, Rajendra Place
New Delhi 110008
India
Phone: 91 11 25852094
Fax: 91 11 25853997

Tata Steel

Bombay House

24 Homi Mody Street

Mumbai- 400001

India

Phone: 91 22 6665 8282

Fax: 91 332886996

Technocraft Pipes

A-25, M.I.D.C., Marol Industrial Area

Road No. 3

Andheri (East), Mumbai- 400093

India

Phone: 91 22 40982222

Fax: 91 22 28356559

Welspun Corp.

Welspun House, 5th Floor

Kamala Mills Compound, Senapati Bapat Marg,

Lower Parel

Mumbai- 400013

India

Phone: 91 22 6613 6000

Fax: 91 22 2490 8020

Zenith Steel Pipes

Vedant Commercial Complex, Bldg. No. S-2, 2nd Floor

Vartak Nagar, Pokhran Road No. 1, Thane- 400606

Mumbai (Maharashtra), India

Phone: 91 22 6793 3000

Fax: 91 22 6793 3111

II. NAMES AND ADDRESSES OF FOREIGN PRODUCERS, UAE

ADPICO

2001 Twin Towers

P.O. Box 62361

Dubai, UAE

Phone: 971 4 222 2970

Fax: 971 4 222 3307

Global Steel Industries

17306 Jebel Ali

Dubai, UAE

Phone: 971 4 883 2665

Fax: 971 4 883 2667

Link Middle East

P.O. Box 16846

Dubai, UAE

Phone: 971 4 881 6750

Fax: 971 4 881 6250

Three Star Metal

P.O. Box 24799

Dubai, UAE

Phone: 971 4 340 0683

Fax: 971 4 240 0684

Universal Tube and Plastics Industries

P.O. Box 16879

Jabel-Ali, Dubai, UAE

Phone: 971 4 883 5966

Fax: 971 4 883 5675

III. NAMES AND ADDRESSES OF FOREIGN PRODUCERS, OMAN

Al Jazeera Steel Products

P.O. Box 40, Postal Code 327

Sohar Industrial Estate

Sohar, Oman

Phone: 968 2675 1763

Fax: 968 2675 1766

Gulf International Pipe Industry

PO Box 1831

Azaiba

Postal Code 130

Sultanate of Oman

Phone: 968 24601400

Fax: 969 24691117

IV. NAMES AND ADDRESSES OF FOREIGN PRODUCERS, VIETNAM

Asia Huu Lien Joint Stock Co., Ltd.

KE A2/7 Tan Kien Binh Loi (Tran Dai Nghia) St.

Tan Tao A Ward, Binh Tan District

Ho Chi Minh City, Vietnam

Phone: 08.3.877.0755-08.3.877.0062

Fax: 84.3.877.0093

Daiwa Lance International Company, Ltd.

Road 20, Tan Thuan Export Processing Zones, District 7

Ho Chi Minh City, Vietnam

Phone: 84-8-770-1858

Fax: 84-4-770-1857

Hoa Phat Steel Pipe Co.

34- Dai Co Viet Street

Hai Ba Trung District

Hanoi, Vietnam

Phone: 04.6282011

Fax: 04.6282016

Hoa Sen Group

No. 9 Thong Nai Boulevard

Song Than 2 IP, Di An District

Binh Dong Province, Vietnam

Phone: 0850 3790 955

Fax: 0850 3791 792

Hyundai- Huy Hoang Pipe

KM 38- Highway 51, Slope 47

Tam-Phuoc Village, Long Thanh District

Dong Nai Province, Vietnam

Phone: 84 61 511419

Fax: 84 61 511411

SeAH Steel Vina Corporation

No. 7, 3A Road

Bien Hoa II Industrial Zone

Dong Nai, Vietnam

Phone: (84 61) 3833 733

Fax: (84 61) 3833 734

Tianjin Lida Steel Pipe Group
Hall F5 192 Nguyen Van Tuoi Street
Ben Luc Town, Ben Luc District
Long An Province, Vietnam
Phone: 84 22 8396 6777

Vietnam Germany Steel Pipe JSC ("VG-Pipe")
Binh Xuyen Industry Zone
Vinh Phuc Province
Vietnam
Phone: (84 211) 3 887 863
Fax: (84 211) 3 887 912

Vinapipe
Km 9, Quan Toan Precinct
Hong Bang District
Hai Phong City, Vietnam
Phone: 84 313 749490
Fax: 84 313 534508

Vingal Industries Co., Ltd.
No. 4, 2A Street
Bien Hoa Industrial Zone 2
Dong Nai Province, Vietnam
Phone: (84 61) 83 661
Fax: (84 61) 83 6726

Exhibit I-5

U.S. Importer Names and Addresses

I. NAMES AND ADDRESSES OF IMPORTERS, INDIA

IMCO Services Inc.

29 Broadway
Suite 1000
New York, NY
Phone: 212-509-4266

Barthco International Inc.

A Division of OHL 3838
N. Sam Houston Parkway East
Suite 550
Houston, TX
281-590-2315

Oxbow Steel International LLC

3478 Buskirk Avenue
Suite 346
Pleasant Hill, CA 94523
Phone: 925-932-1051

Coutinho and Ferrostall Inc.

16510 Northchase Drive
Houston, TX

Cressman Tubular Products Corp

3939 Beltline Road
Suite 460
Addison,
Phone: 214-352-5252

Shamrock Building Materials Inc.

90422 Highway 99N
Eugene, OR 97402

UTI United States Inc.

2975 Kennedy Boulevard
Jersey City,
Phone: 732-339-6710

Zenith USA Inc.

4950 34th Street N.
Arlington, VA
Phone: 703-538-5346

M.G. Maher Co.
801 Travis Street
Suite 1450
Houston, TX
Phone: 713-759-9500

Sunset Forest Products Inc.
309 SW 6th Avenue
Suite 400
Portland, OR
Phone: 503-629-8301

Sunbelt Group L.P.
1990 Post Oak Boulevard
No. 950
Houston, TX

Aruvil International Inc.
185 Madison Avenue
Suite 1600
New York, NY
Phone: 212-447-5020

Empire Resources Inc.
1 Parker Plaza
14th Floor
Fort Lee, NJ 07024
Phone: 201-944-2200

Western International Forest
14795 SW Murray Scholls Drive
Suite 210
Beaverton, OR 97007

Sonco Worldwide Inc.
5000 Windom Road
Bladensburg, MD 20710

James Steel Inc.
1025 W 190th Street
Suite 165
Gardena, CA 90248
Phone: 310-327-9333

Bri-Chem Steel Corporation
84 Village Hill Drive
Conroe, TX 77304
Phone: 936-828-2453

IML Industries Inc.
775 Mountain Boulevard
Watchung, NJ 07069
Phone: 973-883-9108

II. NAMES AND ADDRESSES OF IMPORTERS, UAE

Commercial Metal

6565 N. Macarthur
Irving, TX 75039
Phone: 214-589-2748

RB International Finance

1133 Avenue of the Americas
16th Floor
New York, NY 10036
Phone: 312-226-5548

Ferrum Interntional Ltd.

Empire State Building
350 Fifth Avenue
Suite 4622
New York, NY 10118
Phone: 212-279-6600

Merfish Pipe and Supply LP

1211 Kress Street
Houston, TX 77020
Phone: 713-867-0700

Western International Forest

14795 SW Murray Scholls Drive
Suite 210
Beaverton, OR 97007

Maurice Pincoffs Company Inc.

1235 N Loop West
Suite 510
Houston, TX 77008
Phone: 713-681-5461

Sunbelt Group L.P.

1990 Post Oak Boulevard
No. 950
Houston, TX 77056
Phone: 713-840-0550

III. NAMES AND ADDRESSES OF IMPORTERS, OMAN

Ferrum International Ltd.

Empire State Building
350 Fifth Avenue
Suite 4622
New York, NY 10118
Phone: 212-279-6600

Merfish Pipe and Supply LP

1211 Kress Street
Houston, TX 77020
Phone: 713-867-0700

Couttnho-I-Ferrostaal Inc.

333 E. Ocean Boulevard
Suite 630
Long Beach, CA 90802
Phone: 562-980-2127

Maurice Pincoffs Company Inc.

1235 N Loop West
Suite 510
Houston, TX 77008
Phone: 713-681-5461

R.D.J. International

63 Flushing Avenue
Brooklyn Navy Yard
Brooklyn, NY 11205

Prime Metals Corporation

653 Route 52
Walden, NY 12586

IV. NAMES AND ADDRESSES OF IMPORTERS, VIETNAM

Oxbow Steel International LLC

3478 Buskirk Avenue
Suite 346
Pleasant Hill, CA 94523
Phone: 925-932-1051

Union Logistics Inc.

15245 Don Julian Road
City of Industry, CA 91745

Sunbelt Group L.P.

1990 Post Oak Boulevard
No. 950
Houston, TX 77056
Phone: 713-840-0550

NMI Steel Co. LLC

1601 East Orangethorpe Avenue
Fullerton, CA 92831
Phone: 714-622-0124

SeAH Steel America Inc.

9615 S Norwalk Boulevard
Suite B
Santa Fe Springs, CA 90670

Bri-Chem Steel Corporation

84 Village Hill Drive
Conroe, TX 77304
Phone: 936-828-2453

Toyota Tsusho

1300 Post Oak Boulevard
Suite 1850
Houston, TX 77056
Phone: 713-963-4500

Midwest Air Technologies Inc.

6700 Wildlife Way
Long Grove, IL 60047

Exhibit I-6

Aggregate Industry Production and Employment Data

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Exhibit I-7

Aggregate Industry Financial Data

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EXHIBIT I- 8

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Friday, September 16, 2011, 02:25 (GMT+7)

Other News

Tempering Steel Pipe Export With Caution

Sunday, August 15, 2010, 01:15 (GMT+7)

By Ngoc Lan

Vietnam's producers of steel pipes are beefing up the export of such products to the U.S. However, prudence should be practiced if this activity comes without restraint.

Hoa Phat Steel Pipe Co., which captures a steadily rising share of the local market, has recently planned to export more pipes to the U.S., the world's biggest market for this product. The company has pushed up volumes of export from 200 tons in the first half of 2010 to 1,000 tons in July 2010 worth over US\$1 million. In the remaining months of the year, its export target is US\$800,000-1,000,000 per month.

Steel pipe producers which have entered the U.S. market since 2007-2008 such as SeAH Co. (wholly Korean-owned), Sun Steel Co. (wholly Taiwanese-owned) and Viet Duc Steel Pipe Joint Stock Co. posted shipments of 13,920 tons, 6,492 tons and 2,890 tons respectively in the first six months.

Customs figures indicate that the export revenue from steel pipes surpassed US\$33 million in the first half, averaging US\$1,370 per ton. Such earnings accounted for half of the turnover from steel products.

The latest report by the Ministry of Industry and Trade shows that steel pipe sales in the first six months soared, pushing up the export turnover from steel products by 243%. Granted, the earnings of US\$33 million generated still paled in comparison with the total revenue of US\$6.3 billion which Vietnam's products reaped in the U.S. market in the first half.

However, the recent inclusion of steel pipes in Vietnam's export profile reflects the thorough preparation and investment which Vietnamese producers of these items have embarked on. The opportunities which these enterprises currently enjoy are abundant as demand for these products hovered around US\$3 billion per annum in the U.S. Notably China, which is the world's biggest producer of steel pipes and boasts a 95% share of the U.S. import market for such products, has been subject to an anti-dumping tariff of 17.7-39.2% since October 2009 (the tax is applicable for five years).

"Our export target accounts for merely 20-30% of the expected output, and 70% of the export is bound for the U.S. Outbound shipments may bring both foreign currencies and profits to the company," Nguyen Phan Duc, deputy general director of Viet Duc Steel Pipe Joint Stock Co., says. Many other companies also aim to enhance export for the same reason, especially after they have secured a strong hold of the local market.

Sales not the leading target

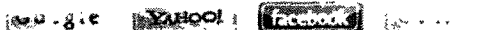
Despite their initial success, Vietnamese exporters of steel pipes have not let complacency set in, but are exerting utmost efforts to sustain their excellent performance in the long run. Except for SeAH and Sun Steel, whose distribution channels in the U.S. and Europe are well-established, local companies such as Hoa Phat, Viet Duc and Huu Lien A Chau are moving forward with caution.

Just as SeAH is preparing to invest in its third plant in Vietnam, Hoa Phat's second factory, based in Binh Duong Province with an investment of US\$10 million, has been operational since late 2009. Viet Duc is trying to maintain both production schedule and product quality and bolster distribution networks to retain customers in the U.S. "Last year we signed many contracts, so workers had to work over time to meet orders. This year we no longer focus on quantity, but go for quality and conformity to schedule instead," Duc says.

"Order volumes are not our utmost concern," says Do Hai Yen, head of import-export at Hoa Phat Steel Pipe Co. In previous years, Hoa Phat turned down some export orders whose prices trailed behind those in the local market. Since Chinese steel pipes were first subject to anti-dumping tax in the U.S. and punitive tax in the European Union and some other markets, Vietnamese enterprises have paid more attention to export channels which can come with rising prices. Vietnam's steel pipes can be some 20% more expensive than their Chinese counterparts. Of course, the higher prices are ascribable to Vietnamese producers' reliance on imported input, which accounts for 80% of the materials used. Price-based competition is therefore inadvisable.

The stringent standards imposed in the U.S. (API and ASTM) have also provided Vietnamese enterprises with an opportunity to improve quality and modernize production. Consequently, these businesses can better cater to customers in both local and foreign markets. Hoa Phat and Viet Duc are actively cashing in on this approach to "kill two birds with one stone" — enhancing quality and paving the way for sustainable export growth. At present, whereas Vietnamese enterprises are eyeing the market for galvanized steel pipes, foreign-invested enterprises with factories in Vietnam are focusing on high-quality steel pipes for oil refineries. Vietnamese businesses may shift to the latter segment in the future.

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Giấy phép Báo điện tử số: 321/GP-BTTTT, cấp ngày 26/10/2007

EXHIBIT I- 9

The New York Times Magazine

the best-kept secret



A gateway to investment in the Middle East, this smart desert kingdom is leading the way in eye-opening banking technology

With just a blink of an eye, clients of the Cairo Amman Bank in Jordan can withdraw cash from their accounts. They don't need to use a pen or a card — just a flash of their eyelid to expose the iris.

The Cairo Amman Bank was the first bank in the world to implement this ground breaking and locally produced security technology.

"It's probably surprising, for readers of The New York Times, that such a technology was first introduced in Jordan," said Karim Kwar, the chairman of IrisGuard, the Jordan-based company that developed the system. Called Software Suite®, the system was deployed throughout Cairo Amman Bank's ATM network and its customer service and teller positions.

IrisGuard has become an indicator of Jordan's emerging status as a strategic and stable hub for innovative business in the eastern Mediterranean and Persian Gulf region. This innovation is especially apparent in the information and communications technology, sustainability and education sectors.

"A decade ago no one wanted to come to Jordan because of the small market," said Dr. Abu-Hammour, the Jordanian Minister of Finance. "Since then we have signed a series of bilateral and multilateral agreements that has made Jordan much more attractive for investors. An investor has access now not only to more than six million Jordanians, but to millions more in the region."

Mr. Kwar, a former ambassador to Washington, is president of the Kwar group of companies that range from information technology to clean-energy development. There are lots of things that most people don't know about Jordan, he said. "Our country is an oasis of peace in a desert of turmoil. It has a free trade agreement with the U.S., a peace treaty with Israel, a lot of innovation and — above all — human capital."

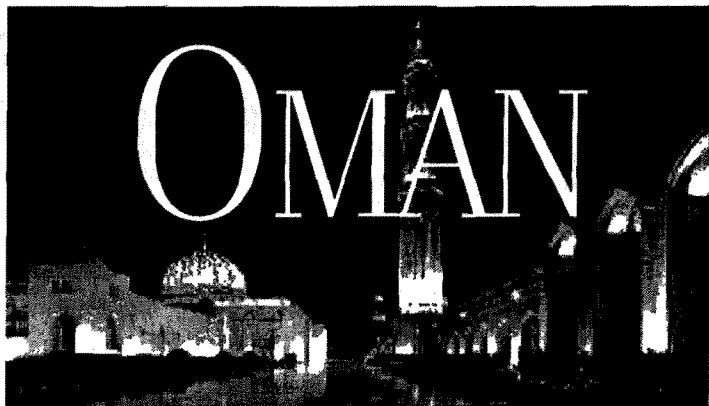
With a population of 5.9 million, 70 percent of whom are under 30, education has long been a top priority. In the past 20 years, 14 private universities have been established alongside the ten public ones, enabling Jordan to lay claim to being the best-educated country in the Middle East.

There is a strict system of quality assurance in place, says Dr. Marwan R. Kamal, president of the Philadelphia University which was founded in Jordan in 1990 as a science-oriented establishment. It now has eight faculties devoted to engineering, nursing, information and communications technology (ICT), pharmaceuticals, business administration and management, law, and arts and science.

"Of our graduates, 80 percent are employed within six months," said

Continued on the next page

celebrating a 40-year legacy



A leading reformer in health, education and women's rights, the Sultanate is opening its doors to the West and powering ahead with export products from energy to perfume

The Sultanate of Oman is enjoying something of an economic boom this year as it marks the 40th anniversary of what it calls its renaissance period.

Oil production in the sultanate is increasing and the price earned per barrel is 30 percent higher than anticipated.

Taking advantage of this situation, the government in the capital of Muscat is pushing ahead with a range of infrastructure and energy-production projects aimed at diversifying and modernizing the economy before the relatively modest oil and natural gas resources run out.

What Omanis call the renaissance period began in 1970, when Sultan Qaboos bin Said al-Said took over from his father as ruler of this ancient, rugged desert land, perched on the toe of the Arabian Peninsula.

Since then, Qaboos has overseen a prodigious economic and social transformation of his domain, opening up the sultanate to Western business and introducing the radical reform of health, education and women's rights for the 3.4 million Omanis.

Today, the sultanate wears its Islamic traditions lightly. It enjoys a peaceful, internal stability, has a free trade agreement with the U.S., and with its neighbors, welcomes Western tourists.

The changes that have taken place over the past four decades are most striking in the field of education. In 1970, Oman had only three formal schools; today there are more than a thousand.

One of the first additional schools to be established by the new sultan was built at Nizwa, in the heart of Oman, about 100 miles from Muscat, to educate children from remote mountain villages.

"About 300 children from the mountain villages were brought by helicopter and taken back once a month to their families," said Dr. Ahmad Bin Khalfan Al-Rawahi, the chancellor of what is now the non profit University of Nizwa.

Today, 5,500 students attend Nizwa and a new campus is being created that will have facilities for 20,000. Academic instruction is in English, making it a fully bilingual institution. Programs for international accreditation in engineering, nursing and pharmacy are already being set.

Eighteen of Nizwa's pharmacy students have undertaken U.S. internships comprised of two semesters in Wisconsin with a similar number of students going from Wisconsin to Oman.

"It is going both ways, so we feel that is a nice bridging system and

Continued on page 4

Excellence in Knowledge



Philadelphia University commits itself to becoming a full partner in the development of Jordanian society and other societies at the regional and global levels. We are proud of our contribution to the role of science, technology, information and means of communication, vital to the well-being of humanity. In the coming years, this role is bound to become a decisive engine of growth and Philadelphia is ready to play its part by providing high-quality education by problem-oriented, inter-disciplinary and inter-institutional research. Philadelphia is among the main players in the development of Jordan and its graduates represent Jordanian skills and knowledge in the entire Middle Eastern region. Philadelphia University is committed to moving forward along the information highway through the twin engines of quality and modernity. In aspiring to make a strong bond between knowledge, learning and modern civilization, Philadelphia University and its sister institutions will be instrumental in the development of Jordan's human capacity. www.philadelphia.edu.jo

2 - JORDAN

SPECIAL ADVERTISING SECTION

Dr. Kamal. "We send people with master's and bachelor's degrees to do their Ph.D.s in the U.S. and the U.K."

IrisGuard's co-founder and chief executive, Imad Malhas, says his company's next challenge is to revolutionize the way citizens interact with government. "On that note, IrisGuard has developed the eGovernment Kiosk® which allows any citizen to interact directly with government agencies, whether it is to pay a driving license fee, pay taxes or any of those other mundane tasks," he said.

Last year, foreign investment in Jordan was worth \$2.38 billion, an increase of more than 115 percent over the previous year, despite the global economic downturn.

"We were not as affected by the liquidity crisis and other problems that have affected the rest of the world," said Abdel Hamid Shoman, executive chairman of the Arab Bank, the oldest private financial institution in the Middle East. "We have actually done better business during the crisis because people looked for a stable place, like the Arab Bank."

Mr. Shoman is the grandson of the founder of the Arab Bank who established it in 1930 "as a true Arab bank." Throughout the past 80 years, the bank has branched out beyond serving the local community by expanding abroad into North Africa and the Arab Gulf states.

The bank's growth has been mostly organic but occasionally it has expanded through acquisitions. "Liquidity has always been the bank's priority," said Mr. Shoman, even if it had to forgo some profitability.

"We were not as affected by the liquidity crisis and other problems that have affected the rest of the world."

Abdel Hamid Shoman,
Executive Chairman
Arab Bank

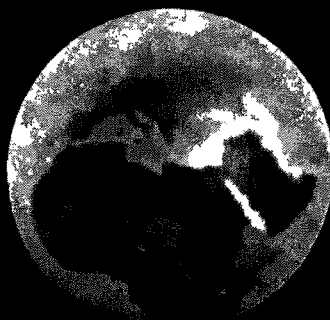
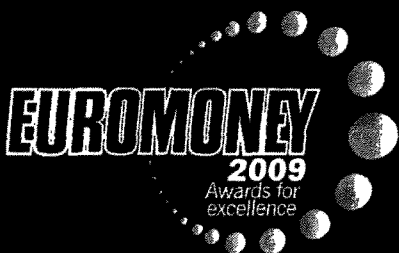


This year it has won awards for its outstanding contribution to financial services in the Middle East and in recognition as the best bank in Jordan. During the 1960s and 1970s, however, the bank lost 25 of its branches in Egypt, Syria, Sudan, Iraq and Yemen because of nationalizations, wars and other conflicts. "But we have always kept our obligations to our customers," said Mr. Shoman. "We may not pay interest rates as high as others but our customers sleep well at night knowing that their money is with a safe bank."

He expressed pride at the bank's contribution to the development of the Middle East. "We are in the U.S., Europe [as the Europe Arab Bank], the Far East, Australia and Africa. Arab Bank is the leading bank in the region and has established itself as the bridge between the Middle East and North Africa and the rest of the world."

Commercial banking provides 68 percent of the bank's business. It has more than \$50 billion in deposits, 30 percent of its balance sheet is in cash with central banks or other financial institutions, and

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it has \$8 billion in capital equity and 17.9 percent capitalization.

Another of Jordan's leading financial institutions, the Housing Bank for Trade & Finance (HBTF), has ambitions to establish itself as the biggest and best bank in the Levant.

Established in 1973 to serve the real estate sector, the HBTF was converted in 1997 to a comprehensive bank providing full commercial and investment banking services. It now claims the most extensive branch network in the country and the highest number of clients at close to a million.

"Last year we made only \$140 million profit compared to previous years but, for us, 2010 looks like a good year," said Dr. Michel Marto, chairman and chief executive. "We will have between 30 percent and 40 percent more profit."

Dr. Marto said the HBTF is building its regional strength. "We are in Syria, Algeria and Pakistan - where we are expanding with more clients and branches - and we would like to be in Iraq. We are also buying a consortium in England because we need a place in London."

He said the bank's progress in Syria is an example of the resilience and professionalism of Jordanian companies. "Other banks thought they would

slaughter us, but among the 16 banks there, the reality is that our bank in Syria is the number one foreign bank in everything."

In Jordan, the HBTF has had similar success, he said. "We have beaten every bank in profitability because we run the bank in the right way. We have 16 percent of the market, 18 percent of the deposit base. But our important differentiation is our profitability: We have put the money where it has to go to make us the most profitable bank in the region."

To signify its status, HBTF has commissioned the construction of a new headquarters in Amman. "It will be an iconic building that will show that we are not a small bank," added Dr. Marto. "We are flexing our muscles."

Meanwhile, the Cairo Amman Bank, having pioneered the use of IrisGuard security-access technology, is pressing on with innovative measures to attract a wider market and younger consumers.

As an alternative to opening branches in remote areas, it has established 90 points-of-sale within Jordanian post offices, said Kamal Al-Bakri, the bank's general manager.

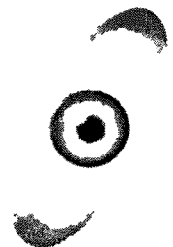
"Another idea, called Cash on Wheels, is to deliver money to customers' homes. We are equipped with GPS and mobile phones and customers can use our bank's card or other cards and put them in our mobile ATMs to withdraw money. Even if they want to do a Western Union transfer, they can do it from home. We try to think outside the box," he explained. ♦

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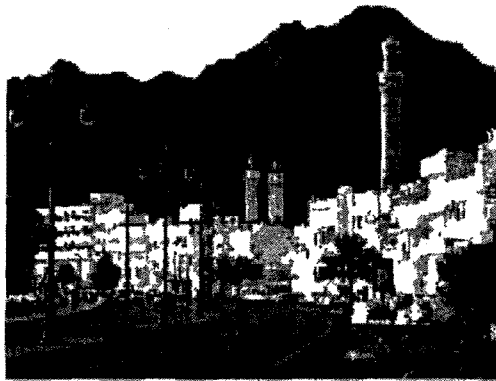
hbtf.com
Jordan

 **The Housing Bank**

Gulf Industrial Pipe Industries (GIPI)

Established in 2007, Gulf Industrial Pipe Industries has given rise to the first high-pressure steel pipe and casing mill in the Sultanate of Oman, the first mill in the Middle East and Indian sub-continent to produce 24" ERW high pressure pipes. Construction of GIPI's plant, where production first took place in January 2010, is harmonious with the Government's plan to reduce dependency on the import of finished products needed to service the Omani oil and gas sector. The strategic location of the plant in Sohar Industrial Area provides excellent port options for the import of raw materials and the export of finished products. Mr Hamdan Al Shaqsy, C.E.O. of GIPI, explains that a part of the company's future plans is to work with the U.S., exporting pipes to fuel growing demand since antidumping laws have restricted Chinese imports: "Our products are not subject to anti-dumping. We can freely export to the U.S. and we offer a very competitive rate." Responding to this opportunity, stockists and big distributors of pipes in America have started to look at GIPI's facilities. Another immediate facet of GIPI's expansion plans is to produce pipes of all sizes.

Continued from page 1



an important aspect of the scheme," added Dr. Al-Rawahi. "And we are expecting around 15 American students to join us for a special course in Arabic as a second language."

Arrangements are being made with 13 other campuses for similar exchanges.

Although Oman's economic well-being owes a lot to its modern oil and gas industries, the sultanate has not abandoned the resources of its ancient past.

Amouage is a luxury perfume house whose fragrances call to mind Oman's role as the original source of frankincense and myrrh in biblical times.

The company still uses these traditional ingredients but its products are delicately developed by

perfumers from the major international fragrance and flavor producers, and geared towards an international, modern clientele.

Owned by the Omani royal family, this year Amouage celebrates its 25th anniversary and has plans to grow its brand globally. It has appointed a design company, JHP, to create a new store concept that will position Amouage as the first international Arabic luxury brand.

"Amouage has huge potential to be the first internationally distributed luxury brand which originates out of the Gulf region," noted David Crickmore, the company's chief executive.

Let's do business

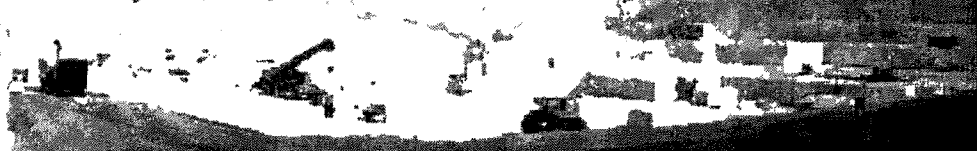
Oman's western-style business outlook is exemplified by the Oman-based Mohsin Haider Darwish Group, one of the leading business houses in the Middle East, representing scores of world-class brands in sectors ranging from automobiles and computers to building materials and medical equipment.

In the past two years, the group has diversified and expanded into the manufacture of gases as well as established a new information technology company called Infotech.

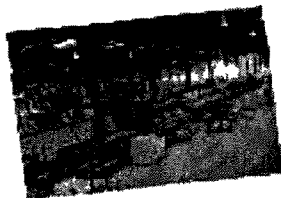
Despite its success in representing the cream of American brands, Mohsin Haider Darwish, the managing director, would like to see an increase in business between Oman and the U.S.

"The main problem is that we do not have many

The Largest Quarry Owners, Processors and Exporters of Omani Marble



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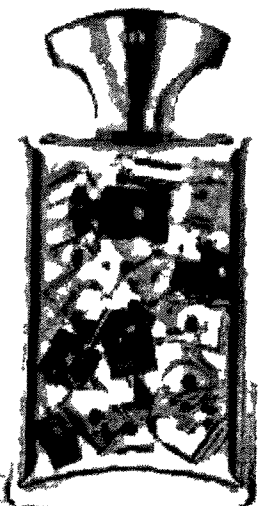
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Ali Bin Hamed Al Kalbani,
Chairman, IMC

American visitors coming to Oman," he said. "A lot of countries send delegations - Japan, China and India all come here and show their products at exhibitions."

The U.S. could send more people to Oman and invite more Omanis to the U.S., said Mr. Darwish. Comparing the U.S. to China, he added: "China has four large exhibitions every year. I had never seen exhibitions like these before."

Mr. Darwish, like other Omani businessmen, emphasizes the stability and peacefulness that Oman enjoys.

Another enterprise keen to enhance its business with the U.S. is the International Marble Company (IMC).

"We are reaching most of the main markets in the world but, at present, no more than 2 percent of our production is exported to America," said Ali Bin Hamed Al Kalbani, IMC chairman.

This, he explained, is because IMC has few agents in the U.S. but it is in the process of recruiting more. "We are reaching most of the main markets in the world and would like to enter more fully into the U.S. market."

Marble quarried and polished by IMC is world-class in terms of its spectacular desert colors, its consistency, water absorption and strength. It has

been used in the palace of Sultan Qaboos and is being exported to more than 50 countries around the world.

IMC has huge quarries that it works around the clock using the most modern high-tech machines from Italy. The company's factory is one of the biggest in the world and utilizes support equipment from Europe, Japan and the U.S. to optimize efficiency and meet stringent deadlines.

IMC exports 95 percent of its production and was rated Oman's third-highest exporter in terms of number of containers last year.

In the gas and oil sector, although Oman's oil and gas resources are more limited than those of its mega-producing neighbors, the sultanate has pioneered innovative enhanced-recovery techniques that have bolstered production and spawned ancillary services that have become export earners.

One spin-off is the Gulf International Pipe Industry (GIPI) company, which is meeting a demand for high-pressure steel pipes previously supplied by foreign manufacturers.

Growth looks promising. Hamdan Al Shaqsy, GIPI's chief executive, says oil and gas exploration and production companies will be drilling at least 400 wells a year. In addition, around 16,000 pipes laid during the past 40 years will need to be renewed.

"We can serve the local industry while at the same time realize the export opportunities," he said. "The demand in the Gulf States is huge and so is the demand in America."

University of Nizwa

Opened in 2004, the University of Nizwa is the only non profit university in the Sultanate of Oman. Hemmed by oases of date palms and studded with impressive castles, the region is famed as a bastion of Omani arts and culture; yet as Chancellor Ahmed Khalfan Al-Rawahi points out, this historical capital has long been a beacon of scholarship and learning, educating many of Oman's illustrious leaders. Inspired by this estimable heritage, Dr. Ahmed envisions the university as a 21st century research institution that will fulfill the region's "ancient tradition of excellence and knowledge acquisition."

Composed of four colleges, the University of Nizwa offers a wide array of undergraduate and graduate programs conducted in English and designed according to international standards. In 2010 the DARIS Research Center in the biological and chemical sciences was completed, paving the way for collaborative research among students, faculty and leaders in industry. In addition to supporting burgeoning sectors of the regional economy, Chancellor Ahmed adds that the university promotes the values of "academic excellence, leadership through research and technology, quality management and sustainable development."

For more than two centuries, Oman and the United States have maintained excellent relations; similarly, Chancellor Ahmed, who completed his doctorate in the U.S., has demonstrated international vision, forming partnerships and exchanging resources with American and international institutions. The university recently inaugurated U.S.-Oman study abroad programs by hosting Arabic language students from American universities for six weeks in Nizwa, and sending Omani pharmacy students to the University of Wisconsin.

Inspired by the pioneering vision of His Majesty Sultan Qaboos, and indefatigable efforts of Minister of Higher Education Dr. Rawya Saud al-Busaidia's, Oman has achieved remarkable advances in higher education, extending opportunities to more and more of its citizenry. At present, over 80 percent the University of Nizwa's 6,000 students are young women, paving the way for a new generation of Omani leaders. In 2009, the university began construction of a larger campus intended to accommodate expansion to 12,000 students, ensuring that Nizwa will continue to attract the nation's brightest minds.



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MHD LLC, established over eight decades ago in 1921, is one of the largest business conglomerates in Oman. The group has diverse trading interests, ranging from Automotive Products to Consumer Electronics, from Building Materials to Engineering Products, from Office Automation to Telecommunications products, from Industrial Gases to Projects and more. We bring the best of international brands to Oman and have been recognized for our efforts.

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As we celebrate this great landmark year of the 40th Renaissance, we pledge to walk alongside our beloved Oman into its glorious future.

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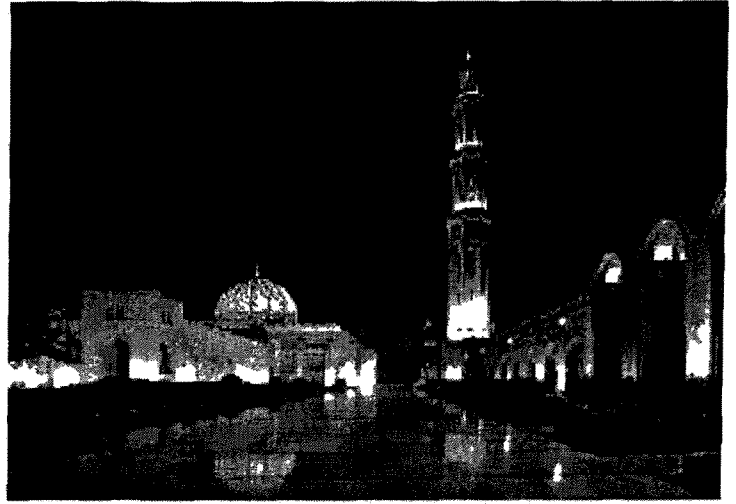
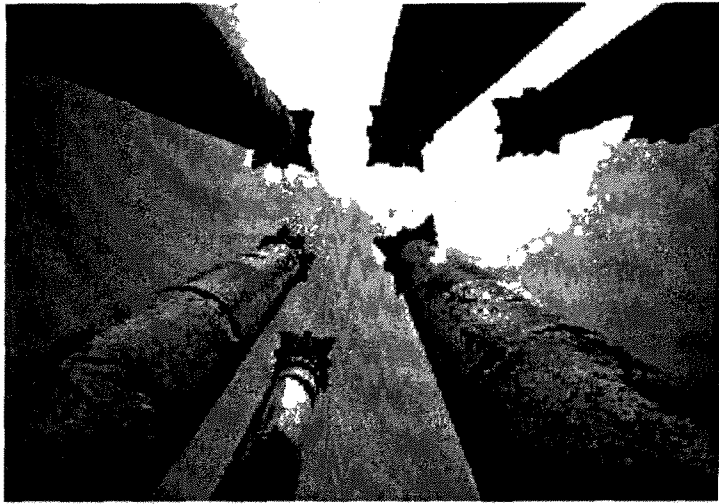
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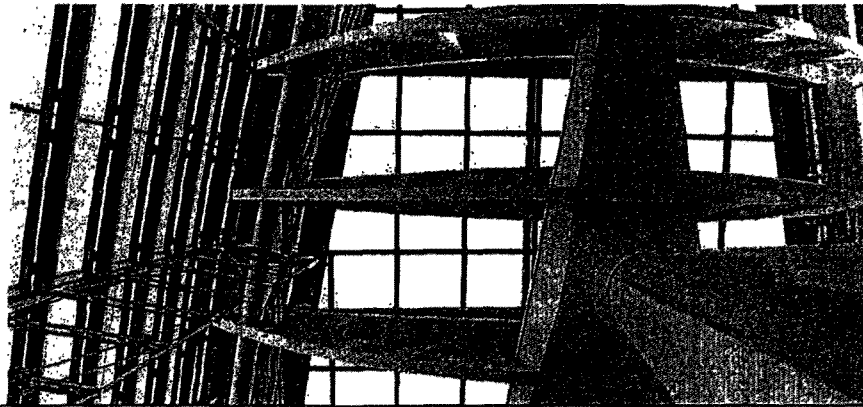


Global Steel Capacity Development

September 2010 Update

Presentation to the OECD Steel Committee, Dec 2, 2010

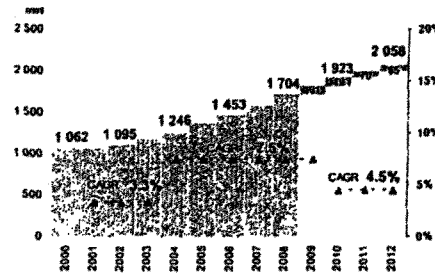
Ian Christmas/Director General



September 2010 update

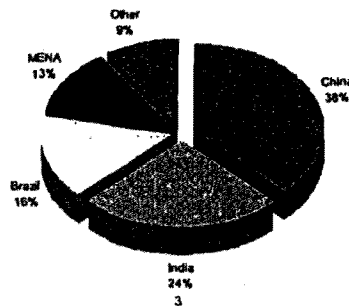
- 2001~2009: global crude steel capacity up by 742 mmt to 1,804 mmt, 2000~2003 CAGR 3.3%, 2004~2009 CAGR 7.5%
- 2010~2012: global crude steel capacity to up 254 mmt to 2,058 mmt, CAGR 4.5%

Global Crude Steel Capacity 2000-2012



Since last update...

- Historical numbers for a few countries slightly revised
- Global economy on recovery path, but prospect for steel demand remains cautious
- Most of postponed projects still on hold, a few back on schedule
- Some closures are postponed as well due to cost concerns
- However, new projects are still being planned
- 57 mmt of additional expansion plans announced for completion during 2012-2020

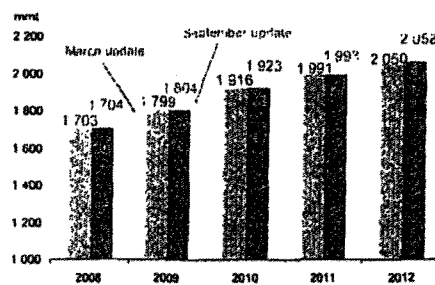


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Adjustment from last update by year

- +5 mmt for 2009
- +8 mmt for 2010
- +2 mmt for 2011
- +8 mmt for 2012

Global Capacity: September vs March 2010

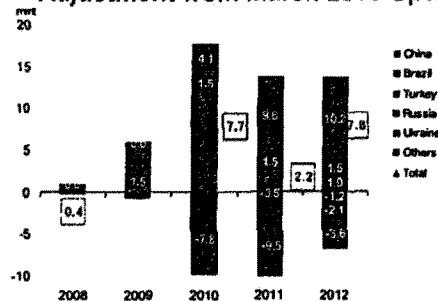


worldsteel

Adjustment from Last Update by Country

- Upward adjustment of 10.2 mmt for Russia, 1.5 mmt for Ukraine
- Downward adjustment of -3.6 mmt for China, -2.1 mmt for Brazil

Adjustment from March 2010 Update



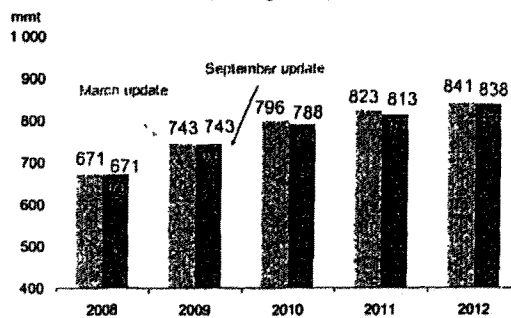
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Adjustment on China

- Historical numbers unchanged
- -7.8 mmt for 2010, -9.5 mmt for 2011, -3.6 mmt for 2012

Chinese Steel Capacity: September vs March



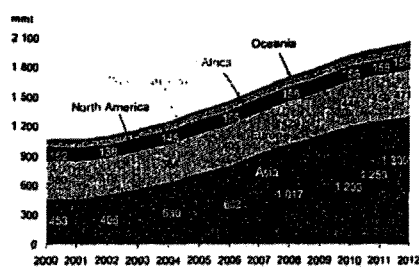
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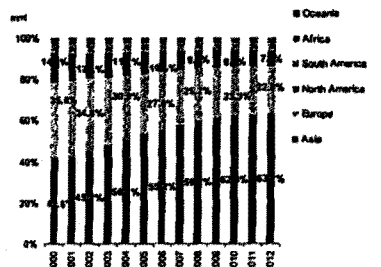
Global Capacity by Region

- Asian dominance to increase to 63% in 2012 from 43% in 2000
- Europe's share to fall to 23% from 36%
- North America's share to be nearly halved by 2012

Global Capacity by Region (mmt)



Global Capacity by Region (share)

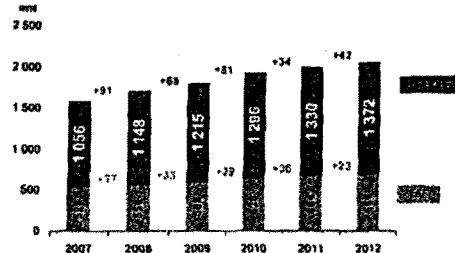


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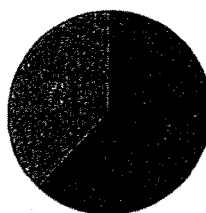
Capacity Additions by Process

- BOF/OHF capacity to $\Delta 157$ mmt, 4.1% CAGR in 2010-2012
- EAF capacity to $\Delta 97$ mmt, 5.2% CAGR in 2010-2012
- EAF share in total capacity to remain at ~33%

World Crude Steel Capacity by Process



Additions by Process 2010-2012

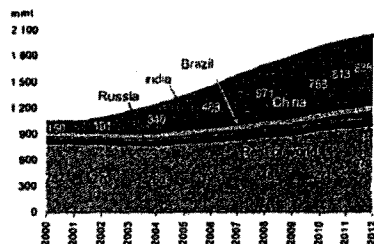


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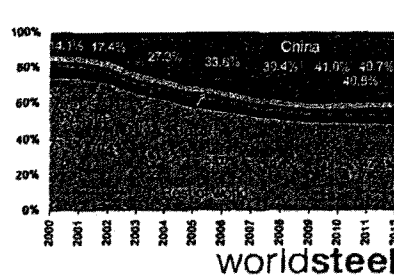
BRIC in Focus – Total Capacity

- BRIC countries' to double its share in global capacity to 52% in 2012
- China's share to rise to 41% in 2012 from 14% in 2000.
- Russia's share to decline to 4.9% from 6.3%
- Minor change on Indian and Brazil

BRIC in Global Steel Capacity



BRIC Share in Global Capacity

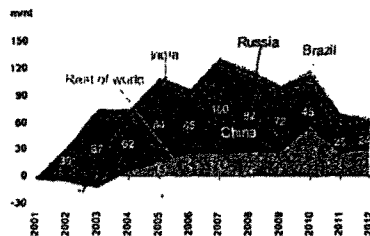


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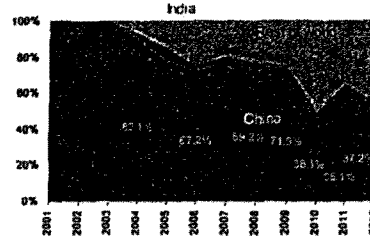
BRIC in Focus – Additions

- BRIC countries to share 58% in global capacity additions in 2010-2012, compared to 88% in 2001-2009
- China's share to fall to 38% while India's share may increase to 10%
- 2010-2012: Additions in the "Rest of World" mainly from Korea (17), Iran (11), Vietnam (9), Turkey (9)

Total Capacity Additions



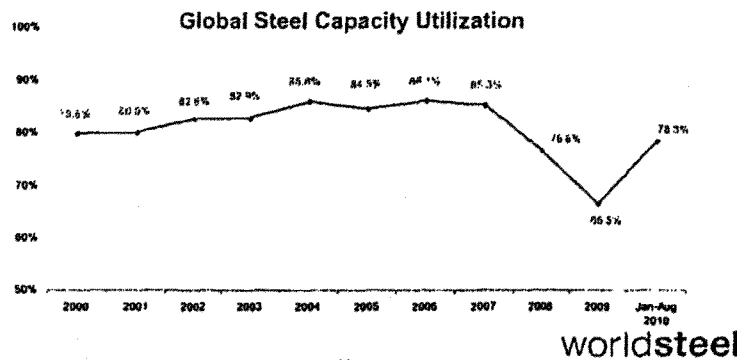
Share in Capacity Additions



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Capacity Utilization – Annual

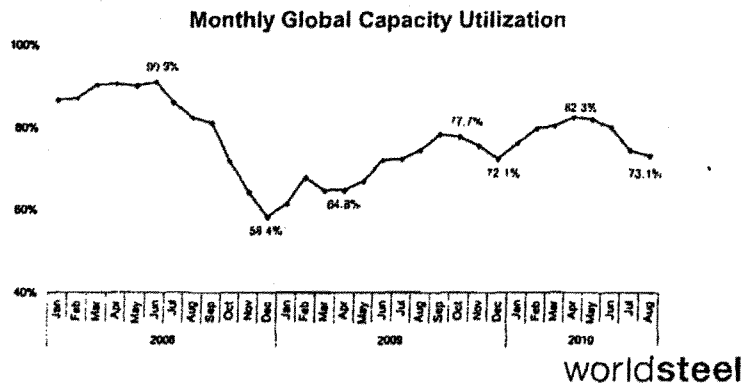
- Steel capacity utilization dropped to 67% in 2009 compared to average of 83% in 2001-2007
- The ratio rebounded to 78% in Jan-Aug 2010, thanks mainly to the Asian countries



11

Capacity utilization – monthly

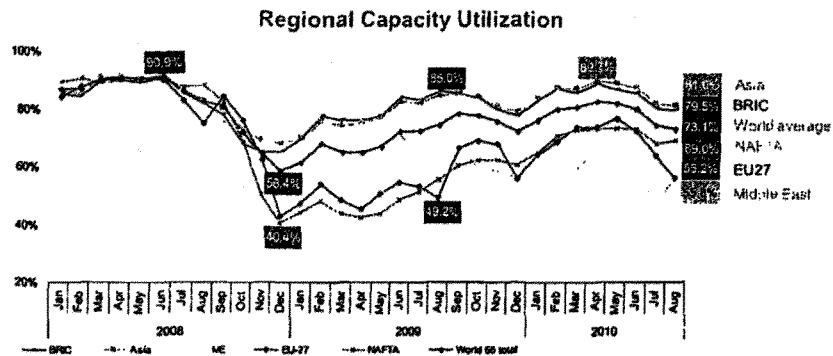
- The utilization ratio recovered to a 20-month high of 82.3% in April 2010, then declined to a year-low level in August



12

Capacity Utilization – Regional Highlight

- Asia and BRIC outperformed the rest of the world
- EU and NAFTA below world average, but catching up
- Middle East still at the bottom



worldsteel

13

worldsteel
ASSOCIATION

worldsteel.org

Cover picture by Aurelio Aslan

EXHIBIT I- 11

80% 1 / 282

ASIA

Unit: thousand tonnes per year

Economy	Nominal capacity							Crude steel production 2009	Apparent consumption 2008
	Exist 2009	Increase to 2012			Capacity in 2012				
		Firm	Possible	Unlikely	Mean	Low	High		
CHINA	725 000	64 876	50 250	25 500	815 000	759 876	840 125	567 842	452 850
OTHER ASIA	145 687	51 585	11 758	258 630	203 151	197 272	209 030	95 086	135 522
CHINESE TAIPEI	22 751	6 250	0	8 100	29 001	29 001	29 001	16 850	20 090
INDIA	72 763	37 335	8 258	189 650	114 227	110 088	118 356	60 213	53 630
INDONESIA	7 961	700	1 000	3 550	9 181	8 661	9 561	3 500	12 056
MALAYSIA	10 020	1 150	0	4 800	11 170	11 170	11 170	8 000	9 485
PAKISTAN	3 870	1 000	0	2 750	4 870	4 870	4 870	800	2 305
PHILIPPINES	1 912	300	0	3 600	2 212	2 212	2 212	700	4 441
THAILAND	8 534	700	0	12 350	9 334	9 334	9 334	5 000	16 265
VIETNAM	4 410	3 600	2 500	28 300	9 280	8 010	10 510	2 000	8 560
OTHERS	13 366	550	0	3 500	13 916	13 916	13 916	1 003	8 590
TOTAL	570 557	116 460	62 008	282 130	1 015 151	957 147	1 049 155	662 908	585 372

Note: Apparent consumption is in terms of crude steel.

Source: Capacity - OECD secretariat. Production and apparent consumption - worldsteel.

Country	Company	Plant or project	Existing capacity	Existing equipment	Increase capacity	Additional equipment	Ownership	Start-up date	Comments	Unit: thousand tonnes per year	Source
CHINA	Anhui Jinguang Steel Works	Bangbu, Anhui province	40	(40) BF (200) STR							
	ANSCO-TKS Gaoventang Co Ltd (Tagan)	Datan			(Possible)	(250) EOL		2011	ThyssenKrupp Steel is planning to add a 250,000 tpy hot-rolled coil (HRC) line at its Tagan facility in northern China by 2011. Tagan-ANSCO-TKS Gaoventang Co. is a 50:50 joint venture between ThyssenKrupp and Anshan Iron & Steel.	145	14-May-08
	Anshan & Linyuan HRC project JV	Chengyang, Liaoning			2050 (Firm)			2010	Anshan Iron & Steel-Group and Linyuan Iron & Steel-Group expect to commission their 2.	NET	145

Developments in Steelmaking Capacity of Non-OECD Economies 2010 - Asia

DOI: [10.1787/steel_non-oecd-2010-6-en-fr](http://dx.doi.org/10.1787/steel_non-oecd-2010-6-en-fr)Share this **Free Preview**<http://www.keepeek.com/Digital-Asset-Management>Share this **Free Preview** with your network

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OECD publishing


<http://www.keepeek.com/Digital-Asset-Management/oecd/industry-and-services/developments-in-steel-making-capacity-of-non-oecd-economies-2010-asia>

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EXHIBIT I- 12



APL Apollo Tubes Ltd.

BSE code: 590059

Corporate Presentation
June 2011



Contents

- The story till now
- Poised for growth
- The future is promising
- Detailed financials

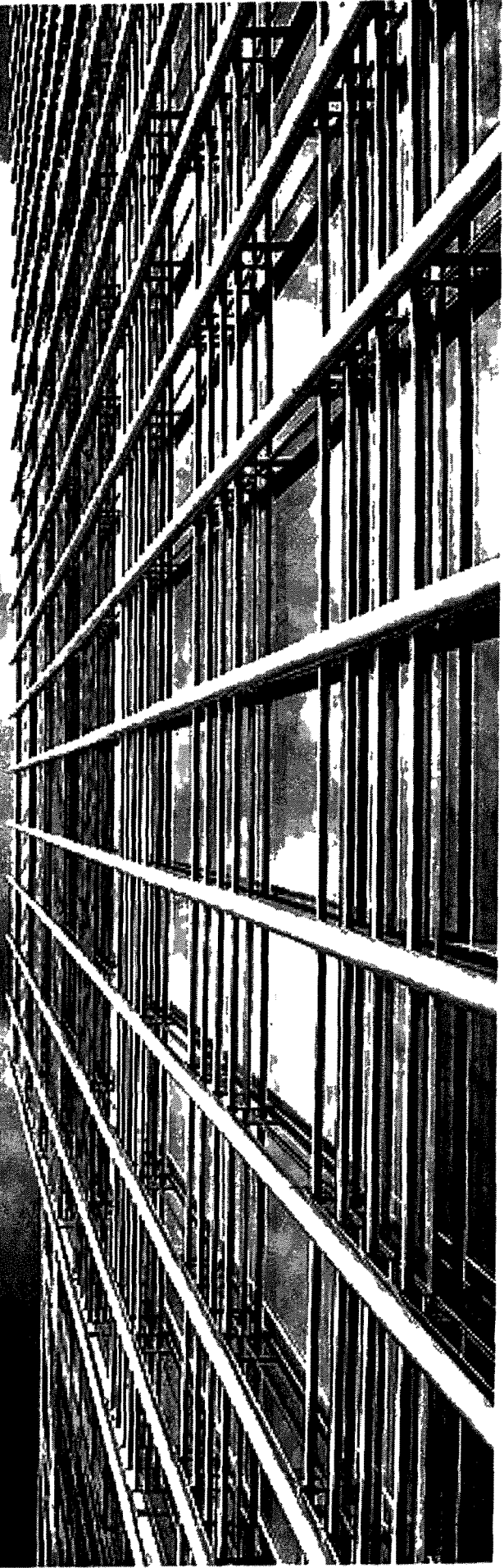
An abstract black and white graphic. A solid black vertical rectangle is positioned in the center. To its left, a thin horizontal line extends from the left edge of the frame. To its right, a large, dark, textured area with horizontal wavy lines occupies the right half of the image. The background is white with some faint, dark, irregular shapes. The text "The story till now" is written vertically in a bold, sans-serif font within the black rectangle.

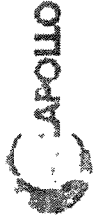
The story till now



ESTABLISHED OUR CREDENTIALS

**We are among the top 3 manufacturers of steel
tubes, pipes and hollow sections in India.**





CONQUERED MILESTONES

1986 - Founded by the late Mr. Sudesh Gupta as Bihar Tubes (P) Limited

1987 - Sikandrabad facility started producing 6,000 MT of ERW black pipes.

1989 - Capacity was raised to 24,000 MT annually.

1994 - New galvanising plant was commissioned and operations commenced

1995 - Issued an IPO of 2.19 mn shares of Rs. 10 each at a premium of Rs. 20 with detachable tradable warrants

1986-1995

- Invested in new technology and value-added products

- Cutting-edge technology from Kusakabe, Japan, was installed across three tube mills

- Forayed into new segments and diversified into structural pipes, Hollow Sections and pre-galvanised pipes

- Received ISO 9001:2000 certification from DNV, Netherlands and various other approvals and certifications

1996-2005

2007 - Acquired Apollo Metalex as a 100% subsidiary

2008 - Acquired Shri Lakshmi Metal Udyog Ltd, as other 100% subsidiary

2009 - Initiated establishment of Unit II at Hosur, TN

2009 - Received UL, CE & SGF France certifications with other approvals

2010 - Name changed to **APL Apollo Tubes Limited**

- Acquired Lloyds Line Pipes as another 100% subsidiary

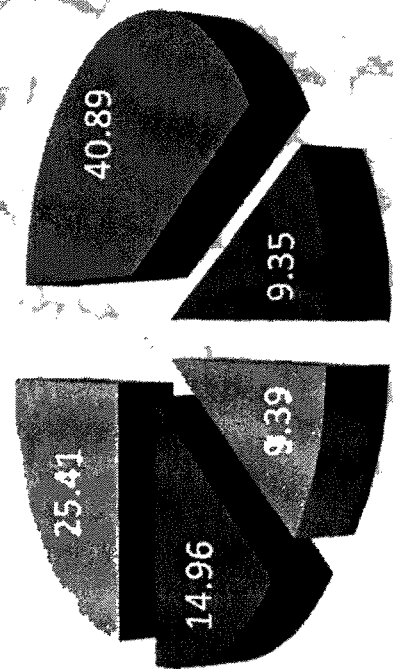
2011 - Completed successfully Hosur Project

2005-2011

CREATED A REPUTED COMPANY

- Established player in hollow sections and pioneer in pre-galvanised steel tubes, hollow sections
- Headquartered in NCR Delhi and having 5 manufacturing locations in four states
- An established customer base both in India and abroad
- Close proximity to the major raw material and consumption centers
- Exports to over 35 countries across all continents
- Direct marketing presence in over 15 states and vast distributor-network comprising ~ 300 Dealers across India

OWNERSHIP DETAILS as at June 30, 2011



- Promoters
- Mutual Fund
- FIs/FCBs
- Bodies Corporate
- Public

Gross Sales of
Rs. 9840.5 mn*

EBIDTA of
Rs. 887.4 mn *

PAT of
Rs. 430.75 mn*

EPS of
Rs. 21.22*

Market cap of
Rs. 3000 mn*

* FY 2011-12, Standalone



CREATED A REPUTED COMPANY

only player having

Nationwide Distribution Network

supported by multi-location manufacturing facilities



We are poised for growth



ONWARDS... TO BECOME THE LARGEST INDUSTRY PLAYER BY 2014

by 2015, we are aiming at a topline of US\$1bn

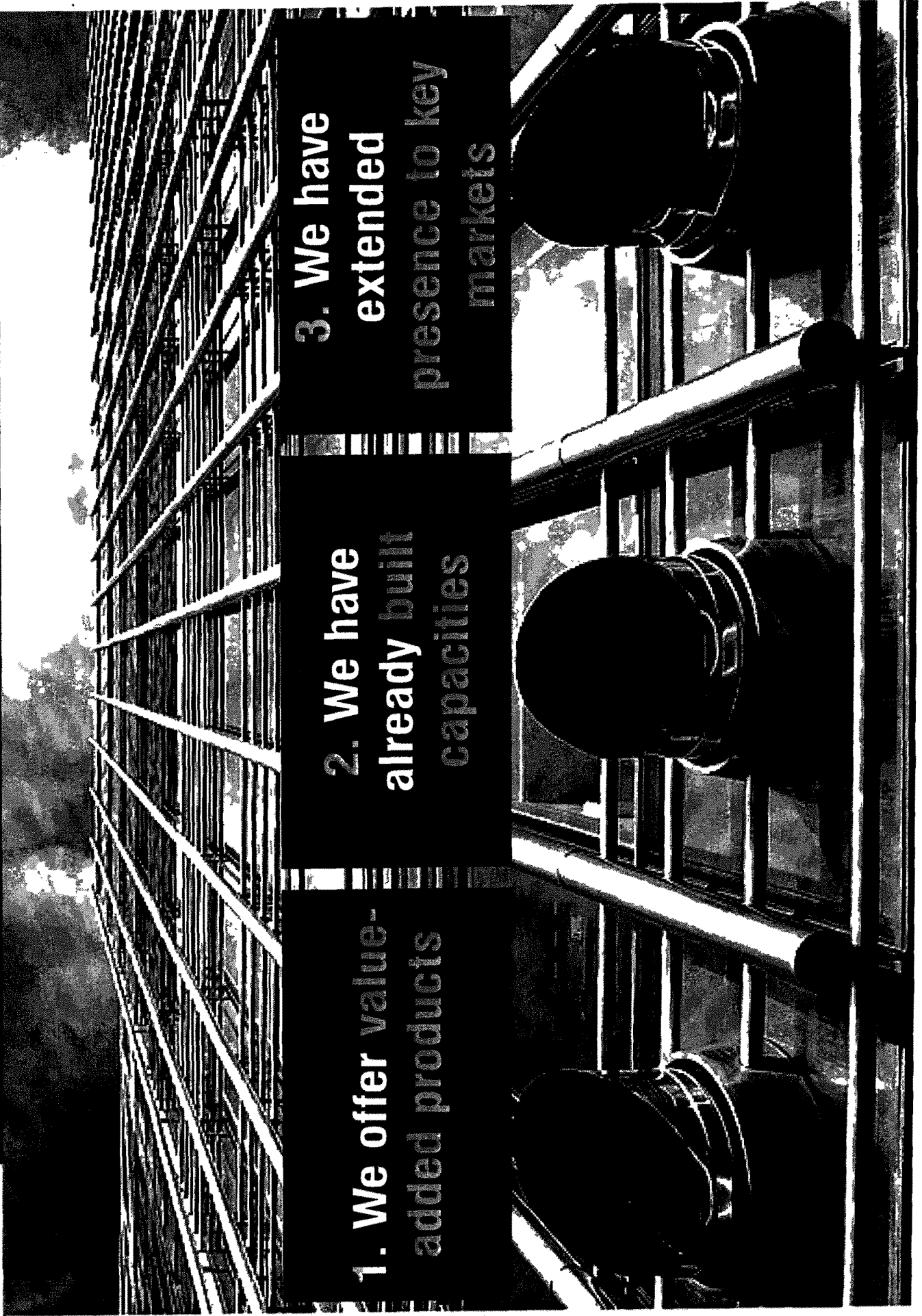


HOW WOULD WE GET THERE?

1. We offer value-added products

2. We have already built capacities

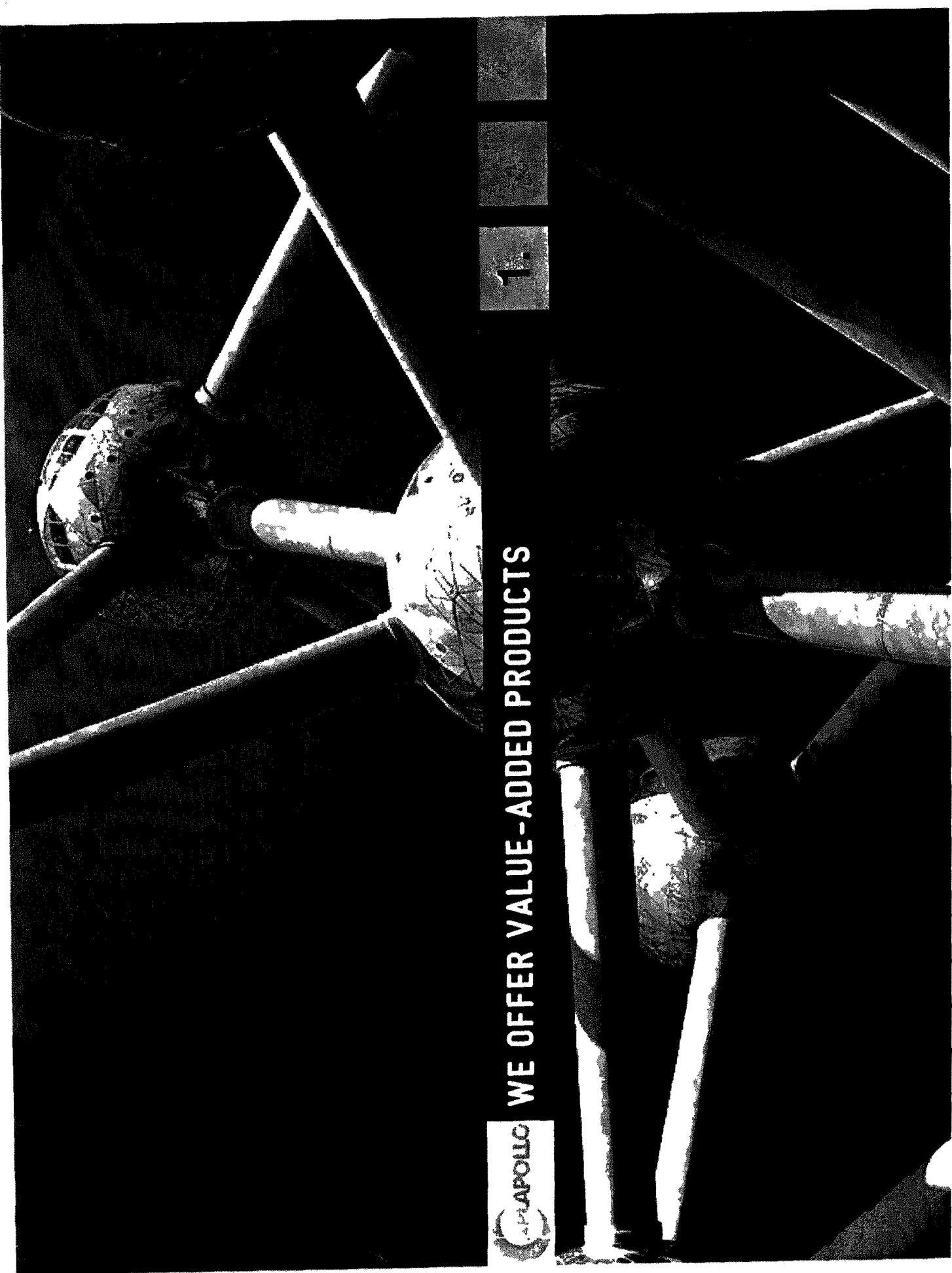
3. We have extended presence to key markets





WE OFFER VALUE-ADDED PRODUCTS

1.



Traditionally, steel tubes and pipes were used mainly for water infrastructure, construction and management.

In the recent years, it has evolved into a full-fledged infrastructure material with diverse applications across industries.

Irrigation & Plumbing

- Water infrastructure systems
- Buildings and high-rises
- Fencing
- Engineering Application

Traditional uses

New age uses

- Bus bodies - structures for low floor buses
- Telecommunication towers
- Oil, Gas and Sewage transportation
- Wind Mills
- Fire-fighting
- Pre-fabrication
- Walkways
- Hotels
- Malls
- Greenhouses
- Metro rail stations
- Bus terminals
- Ports
- Bridges
- Airport terminals

Manufacturing

Architecture and construction



WE OFFER A WIDE PRODUCT PORTFOLIO

1.

PRODUCT	RANGE	END USER / USE
Hot dipped Galvanized	21.03 mm to 273 mm Outer Diameter	Water, Gas, Oil transportation & Fire Fighting
Pre Galvanized	19 mm to 114.3 mm Outside Diameter	Fencing, Cabling and Ducting, Automotive (Bus body) & Greenhouses
ERW Black	21.03 mm to 355 mm Outer Diameter	Fire fighting, conveyor systems, scaffolding, transmission towers, power projects and industrial uses
Hollow Section	19X19 - 250X250 mm Square 40X20 - 300X200 mm rectangular	Infrastructure, Metro, Airports, Stadiums, Prefab, Walkways, Malls and industrial applications

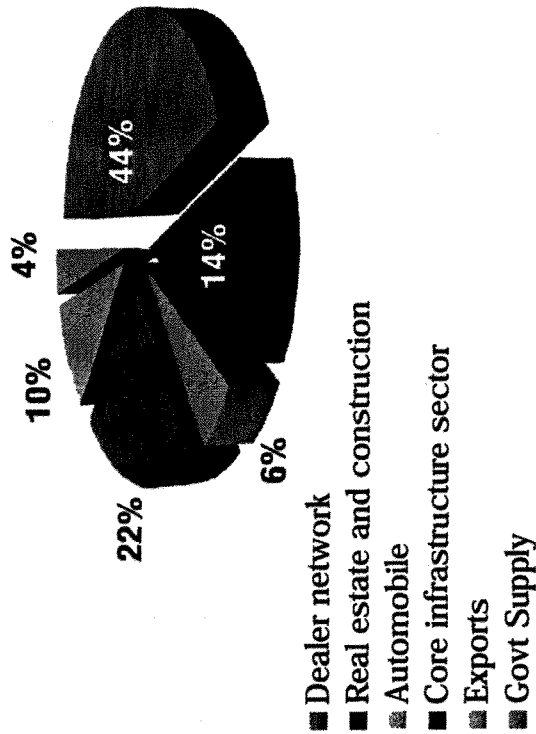
- We manufacture 250 + varieties of steel tubes in the size range of 1/2" to 14" outer diameter
- Over 13 production lines; ability to produce the largest range of hollow sections in all variants (black, galvanized and pre-galvanized), in a shorter time for specialised needs



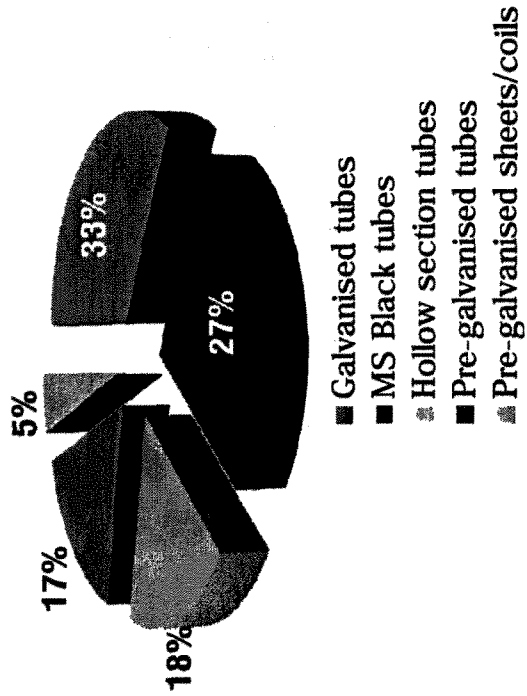
COMMAND PRESENCE ACROSS INDUSTRIES

1.

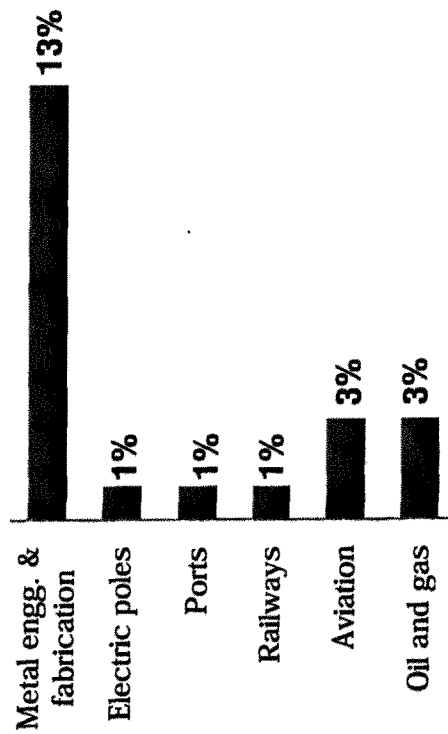
Industrywise revenue break-up



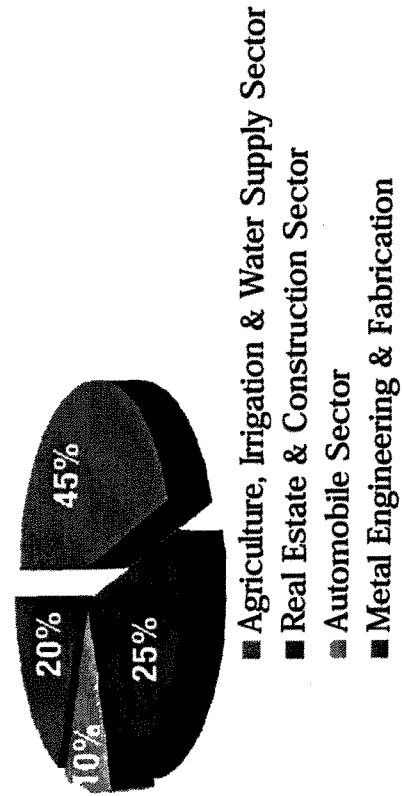
Productwise revenue break-up



Core industries' break-up



Dealer network's break-up





CONFORMING TO GLOBAL QUALITY STANDARDS

1.

PRODUCT CERTIFICATIONS

- IS 1239 : Water, Oil and Gas Lines
- IS 1161 : Construction
- IS 3601 : General Engineering
- IS 3589 : Casing Pipes, Boring applications
- IS 4270 : Deep Boring Belt Systems
- IS 4923 : Structural Tubes for Infra purpose
- IS 9295 : Idlers Conveyors

ISO 9001 : 2008

Quality Management System

ISO 14001 : 2004

Environmental Management System

OHSAS 18001 : 2007

Occupational Health & Safety Standards

INTERNATIONAL CERTIFYING AGENCIES



WHEN YOU NEED TO BE SURE

SGS



CONSULTANTS' CERTIFICATIONS



Delivering Excellence through People



BUYERS' APPROVALS



Airports Authority of India



LARSEN & TOUBRO
It's all about engineering

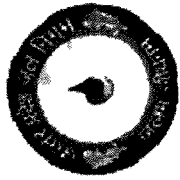


A PREFERRED PARTNER TO OUR CLIENTS

1.



Unicef



igl



Bharat Petroleum



Ashok Leyland



JAIN Irrigation Inc
WE BUILD YOUR WATER DREAMS



ADANI



LARSEN & TOUBRO
It's all about Imaginering



GAMMON



B L HASHYAP
WE BUILD YOUR WORLD

AFCONS

TURBO



NAVAYUGA



muserbaer



GUJARAT GAS



erg

ENGINEERING INNOVATIONS



CONCLUSION

1.

our ability to extend value-added products and solutions would not only strengthen our realizations but also would result in higher margins going forward.

WE HAVE ALREADY BUILT CAPACITIES

2.



2007: Total capacity of 80,000 TPA

2010: Total capacity of 490,000 TPA

- In the last three years, we have increased our capacities by > six times
- We added 165,000 TPA capacity through inorganic expansion and the remaining capacity through organic initiatives
- During 2010, we commissioned operations at the state-of-the-art Hosur plant and doubled our installed capacity and thereafter acquired ready to use API Certified manufacturing facilities at Murbad (Maharashtra)
- The capacities would enable us to cater to robust demand across key sectors and enable us to improve margins due to economies of scale



APL Apollo Tubes

APL Apollo Tubes				100% subsidiaries	
Unit 1	Unit 2	Apollo Metalex	SLMUL	Lloyds Linepipes	
Sikandarabad Uttar Pradesh	Hosur Tamil Nadu	Sikandarabad Uttar Pradesh	Bangalore Karnataka	Mumbai Maharashtra	
125,000	200,000	25,000	50,000	90,000	
MTPA	MTPA	MTPA	MTPA	MTPA	
ERW Black, Hot-dipped Galvanized, Pre Galvanized Tubes and Hollow Sections	ERW Black, Hot-dipped Galvanized, Pre Galvanized Tubes and Hollow Sections	Coil Galvanizing Facility, Pre Galvanized Tubes and Pre Galvanized Hollow Sections	Coil Galvanizing Facility, Pre Galvanized, Hot-dipped Galvanized & ERW Black Tubes and Hollow Sections	ERW Black, Hot-dipped Galvanized, API Certified Line Pipes	

Manufacturing units

leveraging our economies of scale and efficient utilisation of the present capacities would easily enable us exceed topline of Rs. 15 bn by FY12, without incurring any additional capex



WE HAVE EXTENDED PRESENCE TO KEY MARKETS

3.

