

Aluminum Extrusion Scope - Summary

This is a summary of the AE scope with exclusion which does not contain full detail of the scope nor exclusion. For more details please see Dept of Commerce AE Preliminary Scop Memo.

Material:

aluminum extrusions, regardless of form, finishing, or fabrication, whether assembled with other parts or unassembled, whether coated, painted, anodized, or thermally improved.

Aluminum extrusions are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by the Aluminum Association commencing with the **numbers 1, 3, and 6** (or proprietary equivalents or other certifying body equivalents). Specifically, subject aluminum extrusions made from: an aluminum alloy with an Aluminum Association series designation commencing with

- number 1 contain not less than 99 percent aluminum by weight.
- number 3 contain manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight.
- number 6 contain magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight.
- The scope also includes merchandise made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) that have a magnesium content accounting for up to but not more than 2.0 percent of total materials by weight.

The following aluminum extrusion products are **excluded**: aluminum extrusions made from an aluminum alloy with an Aluminum Association series designations commencing with the

- number 2 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 1.5 percent copper by weight;
- number 5 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent magnesium by weight; and
- number 7 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent zinc by weight.
- The scope also excludes aluminum alloy sheet or plates produced by means other than the extrusion process, such as aluminum products produced by a method of continuous casting or rolling. Cast aluminum products are also excluded. The scope also excludes unwrought aluminum in any form.

The scope **also excludes**

- collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association (not including proprietary equivalents or other certifying body equivalents) where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) length of 37 millimeters (mm) or 62

mm; (2) outer diameter of 11.0 mm or 12.7 mm; and (3) wall thickness not exceeding 0.13 mm.

- extruded drawn **solid profiles** made from an aluminum alloy with the Aluminum Association series designation commencing with the number 1, 3, or 6 (or proprietary equivalents or other certifying body equivalents). Also **excluded** from the scope are **extruded tubing and drawn over a ID plug and through a OD die** made from an aluminum alloy with the Aluminum Association series designation commencing with the number 3, 5, or 6 (or proprietary equivalents or other certifying body equivalents) ((**** PGAE 33 - more detail))
- fully and permanently assembled glass refrigerator shelves with decorative aluminum trim meeting the following characteristics: (1) aluminum trim meeting Aluminum Association series 6063-T5 designation that is anodized; (2) aluminum trim length of not more than 800mm, and (3) aluminum trim width of not more than 40mm. Such fully and permanently assembled glass refrigerator shelves include other components in addition to the aluminum trim, including, but not limited to, glass, steel, and plastic. Only fully and permanently assembled glass refrigerator shelves that require no further processing, fabrication, finishing, assembly, or the addition of any parts or material are excluded. Imports of glass refrigerator shelves are classified under HTSUS 8418.99.8050, which is being included for convenience ((***PAGE 34))
- certain rectangular wire, imported in bulk rolls or precut strips and produced from continuously cast rolled aluminum wire rod, which is subsequently extruded to dimension to form rectangular wire with or without rounded edges.
- aluminum extrusions from the People's Republic of China are all products covered by the scope of the antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China.

The country of origin of the aluminum extrusion is determined by where the metal is extruded (i.e., pressed through a die). Subject aluminum extrusions may also be fabricated, i.e., prepared for assembly, or thermally improved. Performing such operations in third countries does not otherwise remove the merchandise from the scope of the investigations.

Merchandise covered by the scope:

- A. Merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled, **is covered by the scope** in its entirety.
- B. Aluminum Extrusions and Fasteners (a fastener is a part that attaches or fastens two or more components, e.g., screws, nuts, bolts, etc.)
 - Merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled.
- C. Aluminum extrusions contained in merchandise that is **a part or subassembly of a larger whole**, whether or not the merchandise also contains a component other than aluminum

extrusions that is beyond a fastener. Such merchandise may be either assembled or unassembled at the time of importation.

- **Only the aluminum extrusion portion of the merchandise described in this paragraph, whether assembled or unassembled, is subject merchandise included in the scope and subject to duties.** (page 30)

Parts or subassemblies described by this paragraph that are subject to duties in their entirety pursuant to existing antidumping and countervailing duty are excluded from the scope of these investigations. (page 31)

The scope excludes:

- A. Products Not Containing Aluminum Extrusions or Covered Aluminum Association Series
- B. **Fully and Permanently Assembled Merchandise (not a part or subassembly)**, Containing Components other than Aluminum Extrusions, and Without Further Processing or Addition of Parts or Materials, But Not Requiring Assembly. if the assembled merchandise is not a part or subassembly of a larger whole.
 - To be excluded under this paragraph, the assembled merchandise
 - Must also contain a component other than aluminum extrusions, beyond fasteners.
 - Must be ready for use as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling)
- C. **Unassembled Merchandise (not a part or subassembly)**, Containing Components that are not Aluminum Extrusions, Without Further Processing or Addition of Parts or Materials, Packaged Combination of Parts, Requiring Assembly. also excludes aluminum extrusions contained in unassembled merchandise, if the unassembled merchandise is not a part or subassembly of a larger whole.
 - To be excluded under this paragraph, the unassembled merchandise
 - Must also contain a component other than aluminum extrusions, beyond fasteners.
 - Must be a packaged combination of parts that is ready to be assembled as imported, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling).
 - Must be sold and enter as a discrete kit on one Customs entry form.
- D. Multiple Subassemblies of a Larger Whole with Components that are not Aluminum Extrusions, Beyond Fasteners, and **Fully & Permanently Assembled with at Least One Different Subassembly, and Meets Three-Part Test** :
 - (1) at least one of the subassemblies, if entered individually, would not itself be subject to the scope;
 - (2) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the actual weight of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations); and

(3) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the number of pieces of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations).

E. Glass Refrigerator Shelves with Glass Decorative Aluminum Trim & Certain Other characteristics. fully and permanently assembled glass refrigerator shelves with decorative aluminum trim meeting the following characteristics:

- (1) aluminum trim meeting Aluminum Association series 6063-T5 designation that is anodized;
- (2) aluminum trim length of not more than 800mm; and
- (3) aluminum trim width of not more than 40mm. Such fully and permanently assembled glass refrigerator shelves include other components in addition to the aluminum trim, including, but not limited to, glass, steel, and plastic. Only fully and permanently assembled glass refrigerator shelves that require no further processing, fabrication, finishing, assembly, or the addition of any parts or material are excluded.

List of Products covered by the scope

A. Products Listed in the Scope Language

We preliminarily find that the products under this section are covered by the scope of the investigations because they are specifically identified as covered merchandise in the scope language, as proposed by the petitioner, see Appendix I.

- Door Sills (door unit parts or subassemblies; includes horizontal beams, plastic caps, polystyrene, used to “prevent the door from swinging through and {to} help keep the elements out”);
- Heat Sinks (appliance parts or subassemblies; not meeting the heat sinks exclusion; includes a small CNC-machined heat sink for electronics, and fan, no product dimensions provided, imported as a part or subassembly in downstream products, used to dissipate heat and maintaining safe temperature limits in computers);
- Actuators for Solar Modules (part of solar panel mounting systems or solar tracker assemblies with gears; includes a motor, retractable arm, and outer tube made of aluminum, no product dimensions provided, used “to angle solar panels into positions that maximize the ability to collect solar energy”);
- Bearings for Solar Modules & Actuators (part of solar panel mounting systems or solar tracker assemblies with gears; includes plastic wheel, no product dimensions provided, “used in conjunction with GameChange’s solar modules and actuator);
- Deck Railing Kits (railing or deck system parts or subassemblies; includes aluminum casting base skirt, and aluminum casting top cap, no product dimensions provided, imported as an unassembled kit, used as a safety device to prevent a fall);
- Fence Kits (fence system parts or subassemblies; includes fabricated extrusions, and steel screws, no product dimensions provided, imported as an unassembled kit, used to construct fencing);

- Screen Door Kits (fenestration system parts or subassemblies; includes fabricated extrusions and steel screws, no product dimensions provided, imported as an unassembled kit, used to construct a screen door);
- Screen Enclosure Angle Clips (parts and subassemblies for screen enclosures (fenestration system parts), includes hole-punches, and powder coating, no product dimensions provided, “used to connect, and hold together various aluminum members in the screen enclosure”);
- Bug sweep for Screen Door (parts and subassemblies for screen enclosures (fenestration system parts), including rubber strips, no product dimensions provided, “used as a seal between the door and concrete”);
- Screen Door Hinges (parts and subassemblies for screen enclosures (fenestration system parts), including aluminum profiles, stainless steel pin, and powder coating, no product dimensions provided, “used to connect screen door to aluminum frame and assist the door in swinging open and closed”);
- Stainless Steel Cable Tie Assembly (parts and subassemblies for screen enclosures; (fenestration system parts) includes stainless steel cable, stainless eyebolts and nuts, no product dimensions provided, “used to connect enclosure to concrete desk so as to keep the enclosure stable and secure”);
- Automotive Grade Bumper Beams (motor vehicle parts or subassemblies, such as bumpers for motor vehicles);
- Automotive Grade Structural Components (motor vehicle parts or subassemblies, e.g., cross members, support beams, and carriers designed to retain their shape and protect the occupants in the case of a crash
- Automotive Grade Crash Relevant Extrusions (motor vehicle parts or subassemblies, e.g., crush cans and side sills designed to crumple and dissipate energy in the event of a crash);
- Sun/Moon Roof Framing (includes guide rails, tubes, roller blinds, crossbars, tension bows, seal holders, and window deflector beams made from an aluminum alloy, with a wall thickness less than 25 mm and a length between 500 mm and 1400 mm, used in automotive applications);
- Convertible Product Framing (part of sun/moon roof framing; includes guide rails, tubes roller blinds, crossbars, tension bows, seal holders, and window deflector beams, with a wall thickness less than 25 mm, and a length between 500 mm and 1400 mm, imported as a part, used automotive applications);
- Window Wall Units (window wall fenestration system parts or subassemblies which are installed in the structure of a building, including parts or subassemblies of storefronts; includes inter alia, glass, non-extruded aluminum, sill and jamb receptors, and slab covers, no product dimensions provided, imported as a kit, used as a building installation of component);
- Curtain Walls (curtain wall fenestration system parts or subassemblies which are fully installed separate from a building structure and attached like a “curtain” to the building; includes inter alia, glass, non-extruded aluminum, sill and jamb receptors, and slab covers, no product dimensions provided, imported as a kit, used as a building installation of component);

- Astragals (door unit parts or subassemblies; includes plastic, wood, steel, and other metals, no product dimensions provided, “used to secure double-door (i.e., “French door”) units”);
- Shock Absorbers (motor vehicle parts or subassemblies; includes hydraulic fluid and gas, and other components, no product dimensions provided, imported as a complete car part, “used to absorb and dump shocks or impulses to the vehicle, control the impact and rebound movement of the vehicle’s springs and suspension, and keep the vehicle’s tires or tracks in contact with the ground to ensure that the vehicle’s ability to drive, steer, and brake is not compromised.”);
- Suspension Damper (motor vehicle parts or subassemblies; includes oil and nitrogen gas, no product dimensions provided, imported as completed car part, “used to control vehicle body movement during dynamic road situations.”);
- Exhaust Mount (motor vehicle parts or subassemblies; includes welded brackets, no product dimensions provided, imported as a completed car part, “used to attach the exhaust system to the chassis of an off-road vehicle”);

B. Aluminum Extrusions and Fasteners (a fastener is a part that attaches or fastens two or more components, e.g., screws, nuts, bolts, etc.)

We preliminarily find that the products under this section are “merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled.” Therefore, we preliminarily find that the following products are covered by the scope of the investigations.

- Stand-Alone Planks (including plastic and rubber elements, no product dimensions provided, used to be “capable of being fully functional as a plank any time it is able to rest on two secure, weight-bearing points of contact.”);
- Tub Grips (including rubber anti-slip pads, 16.5” (L) by 3.75” – 5.75” (W) by 19.5” (H) imported as assembled merchandise, used to ensure an individual can safely enter and exit a tub);
- Guide Rails (including an edge protector, high friction strips, and rubber strips, no product dimensions provided, imported as assembled merchandise, used as a safety mechanism to obtain a clean cut with a variety of materials);
- Closet Aluminum Poles (solely alloy series 6 aluminum extrusions, round 1-5/16” diameter, extruded and anodized, varying lengths, no fasteners, imported in assembled form, unspecified usage);
- Shoe Fences (solely alloy series 6 aluminum extrusions, 8 FT, for ¾” boards, extruded and anodized, easy installation cut to fit H1-3/4 W1, no fasteners, imported in assembled form, used to hold shoes);
- Aluminum U-Channel (solely alloy series 6 aluminum extrusions, 8ft, H7/8 W15/16, no fasteners, imported in assembled form, used as a closet accessory);

C. Aluminum Extrusions Contained in Merchandise that is a Part or Subassembly of a Larger Whole, With or Without Non-Aluminum Extrusions Components, Beyond a Fastener

We preliminarily find that the products under this section are covered by the following scope language: “aluminum extrusions contained in merchandise that is a part or subassembly of a larger whole, whether or not the merchandise also contains a component other than aluminum extrusions that is beyond a fastener. Such merchandise may be either assembled or unassembled at the time of importation.”

- Lacrosse Stick Handles (includes aluminum tubes with rubber endcaps, no product dimensions provided, enters as a lacrosse-stick handle to be attached to a lacrosse stick with basket, used to play lacrosse sport);
- Boat Ladders (includes two 36-inch stainless steel cables with stainless-steel eyelet swedged ends, two plastic latches, two polypropylene and Kevlar strips, stainless steel springs, ultra-high molecular weight, polyethylene spacers, stainless steel hardware, aluminum pulleys, labels, and hinge plates, no product dimensions provided, ready for use as imported, used to give “access to a human on or off a boat through the use of tension and a combination of non-aluminum parts,” i.e., boat is the larger whole);
- Boat Hull (including aluminum sheet, formed aluminum, and PVC pipe, no product dimensions provided, imported as complete part to be used in further assembly of boats, used as bottom of a boat);
- Flagpoles and Grill Posts (flagpoles; wind sign frames; includes protective base, stamped aluminum plate, and stainless-steel hardware, no product dimensions provided, imported as a kit designed to be attached to a boat, used to support a grill, i.e., boat is the larger whole);
- Light Poles (includes plastic or glass covers, copper wires, stainless-steel hardware, with brass terminals and light bases made of materials such as nylon, brass and stainless-steel, 24” to 54” long, imported as product or in discrete kits, used to mount lights for boats, i.e., boat is the larger whole);
- RV Ladders (includes plastic, product dimensions vary, used to “climb to the top of your RV with enhanced stability, safety, and control,” i.e., RV is the larger whole);
- Boat Cover Extension Poles/Telescopic Poles (includes plastic sleeves, liners, rings, and stainless-steel buttons, screws, and hardware, dimensions vary, ready for use as imported or imported as discrete kits, used “between the boat deck and the under-side of the boat cover to prevent sagging,” i.e., boat is the larger whole);
- Automotive Heating System Mounting Brackets (automotive heating and cooling system components; a bracket that has a wall thickness of 2 to 4 mm, connecting block fittings, and receiver driers or manifolds used on automotive heat exchangers, dimensions vary, imported as a part or subassembly, “used on automotive heat exchangers”);
- T-Top Kits (includes a metal frame, canvas or hard top, 73in (L) by 60in (W) by 83in (H), imported as an unassembled kit, used to “provide standing height shade while giving boat drivers an unobstructed area for movement and casting lines,” attached to boats i.e., a larger whole);
- Backrest Kits (includes aluminum arms, padded cushions and ergonomic design, and folding arms, no product dimensions provided, imported as unassembled kit

- product, used to provide back support for a user, attached to boats i.e., a larger whole);
- Fishing Rod Holders/Racks ((1) Fishing Rod Holders; (2) Fishing Rod Racks; includes a stainless-steel thumb screw, weld covers, and spline caps, product dimensions vary, used as storage for fishing rods, attached to boats i.e., a larger whole);
 - Sport Fishing Aluminum Outrigger Poles (includes gold or silver rings and tips, and a locking pin, product dimensions vary, imported as a kit, “used to provide stability for fishing boat and a platform from which to fish,” attached to boats i.e., a larger whole);
 - Marine Rod Holders (includes plastic liners, stainless-steel screws, plastic sleeves, and fabric strips, no product dimensions provided, used to hold rods on boats i.e., a larger whole);
 - Electronic Hydrofoils Imported With or Without Batteries (includes a board, mast, and wing, primarily built of fiberglass and/or carbon fiber, no product dimensions provided, imported as separate parts, and then packaged for sale in United States, used to “allow users to fly over the water” for marine products i.e., a larger whole);
 - Microchannel Heat Exchangers (includes end plates, copper tube, plastic cap, manifold, no product dimensions provided, imported as a subassembly for downstream products, used as a part in “residential and commercial air conditioning systems as well as refrigeration equipment driven by energy efficiency and reduction of the refrigerant charge”);
 - Scene Lighting LED Head Subassembly (a diagram was included as a description for this product. The LED head subassembly is imported with 6 LED lights, and is used as part of a lighting system);
 - Headboards with LED Housings (includes wood headboards, cables, and LED lights, no product dimensions provided, used as part of a bed assembly i.e., a larger whole);
 - Tunnel Rack (including aluminum tubes, and aluminum brackets, product dimensions provided in diagram, “half of its parts are aluminum extrusions,” used to provide a structure to load with cargo and robustly secure to the full vehicle i.e., a larger whole);
 - Hood Rack (including powder-coated tube steel, product dimensions in diagram, “one small part of 14 parts is an aluminum extrusion,” used to increase the load-carrying capability and to protect the vehicle from brush and debris, vehicle is the larger whole);
 - Snowboard Rack (includes rubber straps and ultra-high molecular weight polyethylene inserts, no product dimensions provided, “installed on an off-road vehicle to enable it to carry skis and snowboards,” off-road vehicle is the larger whole);
 - Solid Step® Premium RV Steps (includes manual steel and aluminum steps, aluminum anti-slip treads, product dimensions vary, imported unassembled, “the Solid Step gets you in and out of your RV with peace of mind,” the RV is the larger whole);

- Slide Toppers (includes cold-rack-tested 13.5oz. vinyl with leak-proof, welded seams, product dimensions vary, imported unassembled, used to “give your RV slide-out an extra layer of protection from dirt, debris and the outdoor elements,” the RV is the larger whole);
- Assembled Motors for Furniture (includes a motor, plastic, and wiring, no product dimensions provided, part or subassembly of furniture, “used in Ashley’s motion furniture,” motion furniture is the larger whole);
- Anti-tip Furniture Systems (includes interlock modules, spacers, plastic blocks, end caps, slides, springs, and spring blocks, no product dimensions provided, imported unassembled, part or subassembly of furniture systems, “serves as locking mechanisms for the drawers of file cabinets, credenzas, dressers, and other furniture”);
- Boat Fences (includes vinyl inserts and stainless-steel light housings, no product dimensions provided, assembled merchandise at time of importation, used exclusively on boats, i.e., a larger whole);
- Multiple Automatic Door Assembly Types Without Glass ((1) Slide Door; (2) Swing Door; and (3) Revolving Door; includes decals, sensors, hardware and instructions, product dimensions provided, enter as product with all parts except glass, function as a barrier to entry and exit to a building, i.e., the larger whole);
- Boat Chairs (chairs specific to boats which may include an aluminum or plastic frame, foam, and upholstered vinyl, or molded foam, and a gas or hydraulic cylinder, product dimensions vary, imported as fully assembled or partially assembled, used as seating on boats i.e., a larger whole);
- AC Condensers (includes non-extruded components, no product dimensions provided, used in a vehicle to cool down a refrigerant by transferring its heat to the flow of ambient air passing through it, the vehicle is the larger whole);
- Wakeboard Towers (includes non-aluminum parts such as rubber inserts, no product dimensions provided, imported ready for installation onto a boat, used to make towing higher in boats, i.e., a larger whole);
- Boat Cover Support System (includes two or three extension poles with locking mechanisms composed of rubber or plastic, poly-web straps and bow spreaders, no product dimensions provided, entered as fully assembled merchandise or as a discrete kit, used in further assembly of boats to help support boat covers, the boat is the larger whole);
- Boat Diving Boards (includes stainless steel, rubber, plastic, urethane, and labels, 10.5” W x 38.5” H x 24” D, imported unassembled, used as a subassembly attachment to a boat to dive into a body of water);
- Pontoon Chassis (includes aluminum sheet, formed aluminum, and PVC pipe, no product dimensions provided, imported as a part to be used in further assembly of boats, used as the bottom of a boat);
- Bed Rack (includes steel parts, no product dimensions provided, imported as unassembled merchandise, ready to be installed onto an off-road vehicle i.e., a larger whole, used “to provide a platform for other attachments and enable the user to stack more cargo in the tonneau”);

- Boat Pedestals ((1) removeable pedestals; (2) fixed pedestals; (3) table pedestals; includes a gas or hydraulic cylinder, mount made of cast and rolled metal, no product dimensions provided, multiple types listed, imported as a subassembly of a boat, used to support boat seats, i.e., a larger whole);
- Canvas Boat Shades (includes injection-molded nylon components, stainless-steel fasteners, and fabric, product dimensions vary, imported as an unassembled kit, ready to be used for further assembly onto boats, used “to be mounted on boat to provide shade protection that can withstand the harsh marine environment,” the boat is the larger whole).

The aluminum extrusion portions of the following products are **included** in the scope of these investigations on aluminum extrusions from the People’s Republic of China, whether assembled or unassembled: heat sinks as described above; cleaning system components like mops and poles; banner stands/back walls; fabric wall systems; drapery rails; side mount valve controls; water heater anodes; solar panel mounting systems; automotive heating and cooling system components; assembled motor cases with stators; louver assemblies; event décor; window wall units and parts; trade booths; micro channel heat exchangers; telescoping poles, pole handles, and pole attachments; flagpoles; wind sign frames; foreline hose assembly; electronics enclosures; parts and subassemblies for storefronts, including portal sets; light poles; air duct registers; outdoor sporting goods parts and subassemblies; glass refrigerator shelves; aluminum ramps; handicap ramp system parts and subassemblies; frames and parts for tents and clear span structures; parts and subassemblies for screen enclosures, patios, and sunrooms; parts and subassemblies for walkways and walkway covers; aluminum extrusions for Light Emitting Diode (LED) lights; parts and subassemblies for screen, storm, and patio doors; pontoon boat parts and subassemblies, including rub rails, flooring, decking, transom structures, canopy systems, seating; boat hulls, framing, ladders, and transom structures; parts and subassemblies for docks, piers, boat lifts and mounting; recreational and boat trailer parts and subassemblies, including subframes, crossmembers, and gates; solar tracker assemblies with gears; garage door framing systems; door threshold and sill assemblies; highway and bridge signs; bridge, street, and highway rails; scaffolding, including planks and struts; railing and support systems; parts and subassemblies for exercise equipment; weatherstripping; door bottom and sweeps; door seals; floor transitions and trims; parts and subassemblies for modular walls and office furniture; truck trailer parts and subassemblies; boat cover poles, outrigger poles, and rod holders; bleachers and benches; parts and subassemblies for elevators, lifts, and dumbwaiters; parts and subassemblies for mirror and framing systems; window treatments; parts and subassemblies for air foils and fans; bus and Recreational Vehicle (RV) window frames; sliding door rails; dock ladders; parts and subassemblies for RV frames and trailers; awning, canopy, and sunshade structures and their parts and subassemblies; marine motor mounts; linear lighting housings; and cluster mailbox systems.

List of excluded merchandise

A. Products Not Containing Aluminum Extrusions or Covered Aluminum Association Series

- Aluminum Scrap (scrap that previously underwent an aluminum extrusion process that requires remelting into aluminum feedstock);
- Aluminum Insert Bracket (includes aluminum sheet, not aluminum extrusions, no product dimensions provided, “used to mount aluminum structural posts to the concrete floor”);
- Bar Plate Oil Cooler (including long bar and short bar aluminum items, no product dimensions provided, imported as part to be used in cars, used to “keep engine oil cool.”);
- Water Heater Anodes (aluminum alloy used to produce this product is designated with the Aluminum Association series leading with “8” (not a series covered by the scope language), includes stainless steel or carbon steel core with a carbon steel cap, “inserted into a water heater tank in order to prevent the water heater tank from corroding”);

B. Fully and Permanently Assembled Merchandise (not a part or subassembly), Containing Components other than Aluminum Extrusions, and Without Further Processing or Addition of Parts or Materials, But Not Requiring Assembly

The scope excludes aluminum extrusions contained in fully and permanently assembled merchandise, if the assembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the assembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the assembled merchandise must be ready for use as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling).

following products to be **excluded** from the scope of the investigations.

- Baseball Bats (includes aluminum with coatings, decals, non-subject aluminum grip and polyurethane grip tape, with polycarbonate end caps, no product dimensions provided, ready for use as imported, used to hit baseballs);
- Valet Rods (“including the ball head and plastic bush” which are made from non-extruded materials, no product dimensions provided, ready for use as imported, used as a closet accessory);
- Belt Racks (includes hooks and finger pull made from non-extruded materials, dimensions vary, ready for use as imported, used as a closet accessory to hang belts);
- Tie Racks (includes hooks and finger pull made from non-extruded materials, dimensions vary, ready for use as imported, used as a closet accessory to hang ties);
- Banner Stands (includes a plastic core, plastic fin, steel locking pin clip, cast pole and nylon bag, no product dimensions provided, ready for use as imported, used to display material or advertisements.);
- Handheld Flashlights with Battery (includes steel tensions springs, steel, brass, bronze, plastic, and rubber components, and battery, no product dimensions provided, ready for use as imported, used as a handheld device to provide lighting);
- Hanging Closet Organizers (includes fabric shelving made of a canvas and polyester blend, no product dimensions provided, ready for use as imported, used to store items in a closet);

- Assembled Step Stools (Parties have submitted exclusion requests for several variations of this assembled step stool; each ready for use as imported);
- Assembled Ladders (Parties have submitted exclusion requests for several variations of this product; each ready for use as imported);
- Box and Magnetic Levels (includes rubber grips and ends, plastic, and liquid, no product dimensions provided, ready for use as imported, used to ensure construction projects are level).
- Assembled Window/Door Units (includes glass, no product dimensions provided, fully assembled and ready for use as imported, used to install a door or window);
- Medicine Cabinets (includes plastic, carbon steel, particleboard, MDF, stainless steel and aluminum, no product dimensions provided, ready for use as imported, used for the storage of medicine);
- Full Extension Mirror (includes plastic bushings, packaging and hardware, glass mirror, steel pivot arm, a steel mounting plate, steel slides mounting plate, steel slide assemblies, and a steel frame corner bracket, no product dimensions provided, ready for use as imported, used as a reflective surface);
- Chillers ((1) Chillers; (2) Screw Chillers; (3) Scroll Chillers are large units that often sit on the rooftops of commercial buildings. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations. Ready for use as imported, used as part of a heating/cooling system);
- Fuel Funnels (includes a stainless-steel ball, valve, screen, and stainless steel or PVC hose, no product dimensions provided, ready for use as imported, used “to control and safely transfer fuel from a cannister to the boat engine without spillage.”);
- Paddles (including plastic handles, shafts, grips, and blades, 7’ 2” long, ready for use as imported, used to move kayaks.);
- Oars (including plastic connectors, grips, and blades, no product dimensions provided, ready for use as imported, used to move kayaks.);
- Light Bar (includes LED lights, cast aluminum panels and mounts, poly lens, wiring and reflector cones, no product dimensions provided, imported as a standalone product, used as an additional off road light source);
- Assembled Boat Hooks (includes vinyl handles and glass-reinforced nylon, dimensions vary, ready for use as imported, used to pull, or put covers on boats.);
- Assembled Brush Kits (includes nylon hook and a plastic brush attachment, no product dimensions provided, ready for use as imported, used to clean boats.);
- Work Platforms (includes handles, lever, spacer, mechanical guides, protective guards, and labels made of plastic, locking pins, fasteners, springs, hinges, and support made of steel, rubber feet, and resins, product dimensions vary, ready for use as imported, used in various locations around the home or construction site);
- Picture Frames with Glass Included (includes tempered glass, aluminum, mat board and backing board, no product dimensions provided, ready for use as imported, used to display, and protect photographs or artwork.);
- Hand Trucks (includes steel, plastics and wheels, no product dimensions provided, ready for use as imported, used to move heavy items);

- Light Commercial HVAC Unit (includes sheet metal, motors or PCBs, valves, and control panels, no product dimensions provided, ready for use as imported, used in heating and cooling systems.);
- Toilet Safety Bar (includes a steel hook, supporting bar, and a polyethylene armrest (non-aluminum extrusion), 18.25” by 23.25” by 9.00”, ready for use as imported, provides armrest and gripping point for toilet use);

C. Unassembled Merchandise (not a part or subassembly), Containing Components that are not Aluminum Extrusions, Without Further Processing or Addition of Parts or Materials, Packaged Combination of Parts, Requiring Assembly

The scope also excludes aluminum extrusions contained in unassembled merchandise, if the unassembled merchandise is not a part or subassembly of a larger whole. To be excluded under this paragraph, the unassembled merchandise must also contain a component other than aluminum extrusions, beyond fasteners. In addition, to be excluded under this paragraph, the unassembled merchandise must be a packaged combination of parts that is ready to be assembled as imported, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material (with the exception of consumable parts or material or interchangeable media or tooling). To be excluded under this paragraph, the unassembled merchandise must be sold and enter as a discrete kit on one Customs entry form.

following products to be **excluded** from the scope of the investigations:

- Unassembled Ladders (Parties have submitted exclusion requests for several variations of this product. These ladders are imported as an unassembled kit; ready to be assembled as imported.);
- Unassembled Step Stools (Parties submitted exclusion requests for several variations of this unassembled step stool. These step stools are imported as an unassembled kit; ready to be assembled as imported.);
- Unassembled Chairs (Parties submitted exclusion requests for several variations of this product that include aluminum extrusions. These chairs are imported as an unassembled kit; ready to be assembled as imported.);
- Tables (With Non-Aluminum Extrusions Tops and Aluminum Extrusions Legs) (includes tops made of aluminum sheet, stainless-steel hardware, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to provide an elevated surface);
- Fire Pit Tables (tops and sides made of aluminum sheet, glass beads, batteries, stainless-steel hardware, and a cover, no product dimensions provided, contains stainless-steel hardware, enters as an unassembled kit, ready to be assembled as imported, table that can be used as a firepit);
- Wood-Mounted Wall Hook Rails (includes a wood base, faux marble faces, screws, anchors, and a hook, “18 Inches (L), 3 Inches (W), 2.75 Inches thick,” imported as a discrete kit, ready to be assembled as imported, used as an accessory to hold clothing);

- Outdoor Wicker Furniture with Aluminum Extrusion Frames or Legs (includes wicker, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture.);
- Daybeds (includes fabric coverings and cushions and cast aluminum, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture.);
- Couches (includes fabric coverings and cushions and cast aluminum, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture);
- Patio Dining and Conversation Sets (includes fabric coverings and cushions, cast aluminum, and wicker, no product dimensions provided, imported as an unassembled kit, ready to be assembled as imported, used to make patio furniture);
- Wall-Mounted Toilet Paper Holder (includes plastic hardware, steel hardware, steel and zinc posts, steel rods, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold toilet paper);
- Towel Bar (includes steel finials, plastic and steel hardware, and steel and zinc posts, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold a towel);
- Towel Ring (includes plastic, steel and zinc posts, plastic and steel hardware, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a bathroom fixture to hold a towel);
- Air Handlers (includes sheet metal, motors or PCBs, and valves, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to “condition and circulate large volumes of air throughout a space via ductwork”);
- Work Benches (includes work bench body, drawers, locks, side handles, and pegboards made of stainless steel, tops made of rubberwood, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as elevated surface and storage);
- Tool Chest (includes a top lid, drawers, locks, side handles, and body made of stainless steel, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used for tool storage);
- Garage Cabinets (includes a steel body, no product dimensions provided, imported “as a set, but in folded form,” used for storage);
- Slide Glass Window (includes window frames, a railing that can be made of plastic, glass panels, handles, and locking mechanisms made of steel or plastic, no product dimensions provided, imported “into the United States in a condition that is suitable for retail sale and “ready to install” into a building by the end user,” installed in buildings to keep the elements out);
- Unassembled Window/Door Units (includes glass, no product dimensions provided, imported as a discrete kit, ready to be assembled as imported, used to install a door or window);

- Unassembled Marine Interior Products (includes a fiberglass console with stainless-steel cup holders and an ethylene-vinyl acetate pad, and furniture with plastic, vinyl, and stainless-steel cupholders, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit. The fiberglass console is used as “a helmstand that serves as a base upon which all the electronics and controls for both surf boats and pontoons are built,” and the furniture forms an interior seating in boats);
- Unassembled Shower Rods (Parties submitted exclusion requests for several variations of this product that include aluminum extrusions (unlike those made of cast aluminum mentioned above). These shower rods are imported as an unassembled kit; ready to be assembled as imported.);
- Shower Caddies (includes cast aluminum supports, trays, hooks, and plastic rod, product dimensions not provided, ready to be assembled as imported, enters as a discrete kit, used to hold shower items such as soap);
- Storage Baskets (includes plastic, carbon steel, aluminum, and stainless steel, no products provided, ready to be assembled as imported, enters as a discrete kit used to hold shower items such as shampoo and conditioner);
- Laundry Organizer (includes a top cap, plastic side clip and locking clip, steel slide assembly, fabric laundry assembly, and steel handle, and a zinc end cap, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to hold, and organize laundry);
- Jewelry Drawer (includes a plastic front cap, a plastic back cap, a wrapped wood MDF base plank assembly, packaging and hardware, a fabric watch pillow, steel slide assemblies, a glass front, a wrapped insert, and a fabric ring holder insert, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to hold, and store jewelry);
- Symphony (includes PVC horizontal gaskets, packaging and hardware, a PVC horizontal wrap, a steel channel plate, a steel mounting post, a zinc side cap, a zinc top and bottom cap, and a zinc mounting standoff, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used as a wall hanging storage device);
- Divided Basket (includes basket clips, plastic front caps, plastic back caps, fabric divide assembly, divider brackets, slide snaps, protective packaging, steel side bar, plastic rods, fabric and hardboard basket assembly, drawer front, and slide assemblies, ready to be assembled as imported, enters as a discrete kit, used for clothing storage);
- Shoe Organizer (includes plastic mounting brackets, plastic slide clips, plastic locking clips, packaging and hardware, steel slide assemblies, steel shoe hoops, and zinc end caps, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used for shoe storage);
- Unassembled Shower Door Kits with Glass Included (includes glass, frame, handles, hardware, fasteners, gaskets, threshold, and other components, dimensions vary, ready to be assembled as imported, enters as a discrete kit, used to provide access to shower);

- Saw Stand (includes rubber feet, soft-grip handles, wheels, axles leg supports, beams, brackets, locking levers, and other components based on model, dimensions vary, imported as an unassembled kit, ready to be assembled as imported, used to secure the mounting of saws);
- Privacy Booths, also known as “PODS” (includes steel frame, PET panels, glass, plywood panels, rubber, foam, steel parts, LED lights, cables, and wiring system, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to create an enclosed space for privacy in busy areas);
- Panel Kits with Glass and Wood Panels (includes glass and wood panels, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to put panels in rooms);
- Monitor Arms (includes plastic wire managers and grommets, single model 16.22” W x 16.3” H, double model 27.76”W x 9.45”D x 5.91”H, ready to be assembled as imported, enters as a discrete kit, “intended purpose to hold monitors”);
- Unassembled Boat Hooks (includes vinyl handles and glass-reinforced nylon, 3.5’ x 5.5’ or 3.5’ x 8,’ ready to be assembled as imported, enters as a discrete kit, used to pull, or put covers on boats.);
- Unassembled Brush Kits (includes nylon hook and a plastic brush attachment, no product dimensions provided, imported as a discrete kit, used to clean boats.);
- Inflatable Kayak Set (includes varying plastic materials and a set of oars/paddles, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to make an inflatable kayak.);
- Inflatable Boat Set (includes varying plastic materials and a set of oars/paddles, no product dimensions provided, ready to be assembled as imported, enters as a discrete kit, used to make an inflatable boat.);

D. Multiple Subassemblies of a Larger Whole with Components that are not Aluminum Extrusions, Beyond Fasteners, and Fully & Permanently Assembled with at Least One Different Subassembly, and Meets Three-Part Test

We preliminarily find the products under this section to be a list of products containing multiple subassemblies of a larger whole with non-extruded components beyond fasteners and that are fully and permanently assembled with at least one other different subassembly, **and:** (1) at least one of the subassemblies, if entered individually, would not itself be subject to the scope; (2) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the actual weight of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations); and (3) the aluminum extrusions within the merchandise collectively account for 50 percent or less of the number of pieces of the combined multiple subassemblies (without including any non-extruded aluminum fasteners in the calculations).

We preliminarily find the following products to be **excluded** from the scope of the investigations:

- Complete Boats Without Engines (a boat structure containing all components and parts, except for an engine. While no product dimensions were provided, the

petitioner agrees that this product is excluded from the scope of the investigations. Complete boats without engines are imported fully assembled, and are used as a mode of transportation within a large body of water);

- Chart Plotter (includes LCD screens, software, plastics, copper wires, and batteries. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations. Chart plotters are used to enhance boat experiences.);
- Multi-functional Marine Displays (e.g., fish finders; an electronic display, with components like the chart plotter described above. While no product dimensions were provided, the petitioner agrees that this product is excluded from the scope of the investigations.
- Multi-functional Marine Displays are used to “assist with charting plots and depth finding”);

E. Glass Refrigerator Shelves with Glass Decorative Aluminum Trim & Certain Other Characteristics

We preliminarily find the products under this section to meet the criteria under the following scope paragraph:

The scope also excludes fully and permanently assembled glass refrigerator shelves with decorative aluminum trim meeting the following characteristics: (1) aluminum trim meeting Aluminum Association series 6063-T5 designation that is anodized; (2) aluminum trim length of not more than 800mm; and (3) aluminum trim width of not more than 40mm. Such fully and permanently assembled glass refrigerator shelves include other components in addition to the aluminum trim, including, but not limited to, glass, steel, and plastic. Only fully and permanently assembled glass refrigerator shelves that require no further processing, fabrication, finishing, assembly, or the addition of any parts or material are excluded.

We preliminarily find the following products to be excluded from the scope of the investigations:

- Refrigeration Glass Shelves (includes glass, steel and plastic components, no product dimensions provided, imported fully and permanently assembled, used to provide shelving in refrigerators).