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July 23, 2025

**BY ELECTRONIC FILING**

The Honorable Howard Lutnick  
Secretary of Commerce  
International Trade Administration  
Attn: Enforcement and Compliance  
APO/Dockets Unit, Room 18022  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

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

**PUBLIC VERSION**

DOC Investigation Nos. A-851-806; A-533-940; C-533-941  
USITC Investigation Nos. 701-TA-\_\_\_\_ and 731-TA-\_\_\_\_  
Total Pages: 8796  
Investigation  
AD/CVD Operations

Petitioner's Business Proprietary Information is Removed from BRACKETS in the Attached:

**Volume I:** Pages 1-3, 15, 19, 21, 22, 24-26 Exhibit List, and at Exhibits I-3-I-5, I-16, and I-18

**Volume II:** Pages 1-5, 7, 8, 12, 13, Exhibit List, and at Exhibits II-1-3, II-5-7, and II-16

**Volume III:** Pages 2-5, 7-9, 12-13, Exhibit List, and at Exhibits III-1-4, III-7-9, III-16

**RE: Certain Freight Rail Couplers and Parts Thereof from the Czech Republic and the Republic of India:**

Petitions for the Imposition of Antidumping and Countervailing Duty Orders

Dear Secretary Lutnick and Secretary Barton:

On behalf of the Coalition of Freight Coupler Producers ("CFCP" or "Petitioner"), we hereby submit to the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission (the "Commission") petitions for the imposition of antidumping and countervailing duties on U.S. imports of freight rail couplers from Czechia and India, pursuant to

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sections 701, 702(b), 731, and 732(b) of the Tariff Act of 1930, as amended (the “Act”) (19 U.S.C. §§ 1671, 1671a(b), 1673, and 1673a(b)). CFCP is an association, whose members are comprised of (1) a manufacturer of in the United States of the domestic like product,<sup>1</sup> and (2) a certified union or group of workers that is representative of an industry engaged in the manufacture in the United States of a domestic like product.<sup>2</sup> Accordingly, CFCP is an interested party within the meaning of 19 U.S.C. § 1677(9)(F) and 19 C.F.R. § 351.102(b)(29)(viii).

Volume I of the petitions contains general information and the allegations of injury, along with associated exhibits. Volumes II and III contain the antidumping allegations and associated exhibits. Volume IV contains the countervailing duty allegations and associated exhibits. There are business proprietary and public versions of Volumes I, II and III. Volume IV does not contain any business proprietary information and is being submitted as a public document.

Pursuant to section 351.202(c) of Commerce’s regulations, we certify that the petitions and all required copies were filed today with both Commerce and the Commission. These petitions are being filed through Commerce’s ACCESS electronic filing system and through the Commission’s EDIS electronic filing system.

Pursuant to 19 C.F.R. §§ 351.202(d) and 351.304 of Commerce’s regulations and 19 C.F.R. § 201.6(b) of the Commission’s rules, we request business proprietary treatment for the bracketed information in the narratives and exhibits in these Petitions as detailed above. Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of the submitter and would impair the ability of Commerce and the Commission to obtain information in the future necessary to fulfill their statutory functions.

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<sup>1</sup> 19 U.S.C. § 1677(9)(C); 19 C.F.R. § 351.102(b)(29)(v).

<sup>2</sup> 19 U.S.C. § 1677(9)(D); 19 C.F.R. § 351.102(b)(29)(vi).

### **Volume I (Common Issues and Injury)**

- (1) **Exhibit I-3:** *Business or trade secrets concerning the nature of a product or production process* (19 C.F.R. § 351.105(c)(1)).
- (2) **Pages 22, 26 and Exhibit I-5:** *Production costs (but not the identity of the production components unless a particular component is a trade secret)* (19 C.F.R. § 351.105(c)(2)).
- (3) **Exhibit I-18:** *Names of particular customers, distributors, or suppliers (but not destination of sale or designation of type of customer, distributor, or supplier; unless the destination or designation would reveal the name)* (19 C.F.R. § 351.105(c)(6)).
- (4) **Pages 3, 15, Exhibit List and Exhibit I-4:** *The names of particular persons from whom business proprietary information was obtained* (19 C.F.R. § 351.105(c)(9)).
- (5) **Exhibits I-4:** *The position of a domestic producer or workers regarding a petition* (19 C.F.R. § 351.105(c)(10)).
- (6) **Pages 1-3, 15, 19, 24, 21, 22, 24-26 and Exhibits I-3, I-4, I-5, I-16, I-18:** *Any other business information the release of which to the public would cause substantial harm to the competitive position of the submitter* (19 C.F.R. § 351.105(c)(11)).

### **Volume II (Czechia AD Allegation)**

- (1) **Pages 5, 7 and Exhibits II-3, II-5, II-6, II-7:** *Business or trade secrets concerning the nature of a product or production process* (19 C.F.R. § 351.105(c)(1)).
- (2) **Page 8 and Exhibits II-5, II-6, II-7:** *Production costs (but not the identity of the production components unless a particular component is a trade secret)* (19 C.F.R. § 351.105(c)(2)).
- (3) **Pages 1, 3, 4 and Exhibit II-1:** *Terms of sale (but not terms of sale offered to the public)* (19 C.F.R. § 351.105(c)(4)).
- (4) **Pages 3, 12, 13 and Exhibit II-1:** *Prices of individual sales, likely sales, or other offers (but not components of prices, such as transportation, if based on public schedules, dates of sale, product descriptions (other than business or trade secrets described in paragraph (c)(1) of this section), or order numbers)* (19 C.F.R. § 351.105(c)(5)).
- (5) **Pages 3, 4, 12 13 and Exhibit II-1:** *Names of particular customers, distributors, or suppliers (but not destination of sale or designation of type of customer, distributor, or supplier; unless the destination or designation would reveal the name)* (19 C.F.R. § 351.105(c)(6)).

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- (6) **Page 13 and Exhibit II-16:** *In an antidumping proceeding, the exact amount of the dumping margin on individual sales* (19 C.F.R. § 351.105(c)(7)).
- (7) **Pages 2, 5, Exhibit List and Exhibits II-1, II-3:** *The names of particular persons from whom business proprietary information was obtained* (19 C.F.R. § 351.105(c)(9)).
- (8) **Pages 1-5, 7, 8, 12, 13 Exhibit List and Exhibits II-1-3, II-5-7, II-16:** *Any other business information the release of which to the public would cause substantial harm to the competitive position of the submitter* (19 C.F.R. § 351.105(c)(11)).

### **Volume III (India AD Allegation)**

- (1) **Pages 5, 7, 8, Exhibit List, and Exhibits III-2, III-7, III-8, III-9:** *Business or trade secrets concerning the nature of a product or production process* (19 C.F.R. § 351.105(c)(1)).
- (2) **Exhibit III-3, III-7, III-8:** *Production costs (but not the identity of the production components unless a particular component is a trade secret)* (19 C.F.R. § 351.105(c)(2)).
- (3) **Pages 3, 4 and Exhibits III-1, III-2:** *Terms of sale (but not terms of sale offered to the public)* (19 C.F.R. § 351.105(c)(4)).
- (4) **Pages 3, 4 and Exhibits III-1, III-16:** *Prices of individual sales, likely sales, or other offers (but not components of prices, such as transportation, if based on public schedules, dates of sale, product descriptions (other than business or trade secrets described in paragraph (c)(1) of this section), or order numbers)* (19 C.F.R. § 351.105(c)(5)).
- (5) **Exhibit III-1:** *Names of particular customers, distributors, or suppliers (but not destination of sale or designation of type of customer, distributor, or supplier, unless the destination or designation would reveal the name)* (19 C.F.R. § 351.105(c)(6)).
- (6) **Pages 12, 13 and Exhibit III-16:** *In an antidumping proceeding, the exact amount of the dumping margin on individual sales* (19 C.F.R. § 351.105(c)(7)).
- (7) **Pages 2-5, 7, Exhibit List and Exhibits III-1, III-2:** *The names of particular persons from whom business proprietary information was obtained* (19 C.F.R. § 351.105(c)(9)).
- (8) **Pages 3-5, 7-9, 12, 13, Exhibit List and Exhibits III-1, III-2, III-3, III-4, III-7, III-8, III-16:** *Any other business information the release of which to the public would cause substantial harm to the competitive position of the submitter* (19 C.F.R. § 351.105(c)(11)).

The requisite certification that substantially identical information is not available to the public is attached to this letter, in accordance with section 201.6(b)(3)(iii) of the Commission's

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regulations. Also attached are the requisite company and counsel certifications regarding the completeness and accuracy of the information contained in the petitions.

Pursuant to section 351.304(b)(1) of Commerce's regulations, Petitioner agrees in principle to permit disclosure of business proprietary information contained in these petitions under an appropriately drawn administrative protective order ("APO"). Petitioner respectfully reserves the right, however, to comment on all APO applications prior to disclosure. A public version of these petitions has been prepared and is being filed simultaneously with this submission pursuant to Commerce's regulations, 19 C.F.R. § 351.304(c)(1), and the Commission's rules, 19 C.F.R. § 201.8(d).

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

Respectfully submitted,

/s/ Daniel B. Pickard

Daniel B. Pickard, Esq.

Milton I. Koch, CPA\*

Claire M. Webster, Esq.

Natan P.L. Tubman, Esq.

Brandon J. Custard, Esq.

Carson Easterling, Esq.

**BUCHANAN INGERSOLL & ROONEY PC**

*Counsel to the Coalition of Freight Coupler  
Producers*

*\*Not licensed to practice law*

### **REPRESENTATIVE CERTIFICATION**

I, Daniel B. Pickard, with Buchanan Ingersoll & Rooney PC, counsel to the Coalition of Freight Coupler Producers, certify that I have read the attached submissions of *Petitions for the Imposition of Antidumping and Countervailing Duties Pursuant to Sections 701 and 703 of the Tariff Act of 1930, As Amended*, In the Matter of Certain Freight Rail Couplers and Parts Thereof from the Czech Republic and the Republic of India (Investigations Nos.: A-851-806, A-533-940, and C-533-941), filed on July 23, 2025.

In my capacity as counsel of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am 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 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.

/s/ Daniel B. Pickard  
Daniel B. Pickard

Dated: July 23, 2025

**CERTIFICATION OF COUNSEL**

In accordance with Section 201.6(b)(3)(iii) of the Commission's regulations, 19 C.F.R. §201.6(b)(3)(iii), I, Daniel B. Pickard, of Buchanan Ingersoll & Rooney PC, hereby certify that information substantially identical to the information for which business proprietary treatment has been requested in this submission is not available to the general public.

In accordance with Section 207.3(a) of the Commission's regulations, 19 C.F.R. §207.3(a), I further certify that the information contained in this submission is accurate and complete to the best of my knowledge.

This certification is made in accordance with 28 U.S.C. §1746. I declare under penalty of perjury of the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.

/s/ Daniel B. Pickard

Daniel B. Pickard, Esq.

Dated: July 23, 2025

## **COMPANY CERTIFICATION**

I, Scott Mautino, Chief Operating Officer of FerroWorks, parent company of McConway & Torley LLC, certify that I prepared or otherwise supervised the preparation of the attached submissions of *Petitions for the Imposition of Antidumping and Countervailing Duties Pursuant to Sections 701 and 703 of the Tariff Act of 1930, As Amended*, In the Matter of Freight Rail Couplers and Parts Thereof from Czechia and India (Investigation Nos. A-851-806, A-533-940, and C-533-941), filed on July 23, 2025.

I certify that the public information and any business proprietary information of the Coalition of Freight Coupler Producers 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 U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for the purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.



Scott Mautino  
FerroWorks  
109 48<sup>th</sup> Street  
Pittsburgh, PA 15201

Date: July 23, 2025



## **UNION CERTIFICATION**

I, Roy Houseman, currently employed by United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers Union (USW), certify that I prepared or otherwise supervised the preparation of the attached submissions of *Petitions for the Imposition of Antidumping and Countervailing Duties Pursuant to Sections 701 and 703 of the Tariff Act of 1930, As Amended*, In the Matter of Freight Rail Couplers and Parts Thereof from Czechia and India (Investigation Nos. A-851-806, A-533-940, and C-533-941), filed on July 23, 2025.

I certify that the public information and any business proprietary information of the Coalition of Freight Coupler Producers 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 U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for the purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

A handwritten signature in black ink, appearing to read "Houseman f.", written in a cursive style.

Roy Houseman

Date: July 23, 2025