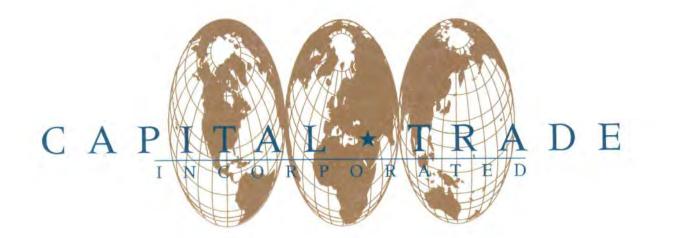
Passenger Vehicle and Light Truck Tires from China

Inv. No. 701-TA-522 and 731-TA-1258 (Final)

June 9, 2015 Presentation at the USITC



Dr. Seth T. Kaplan skaplan@captrade.com 202-955-6814

Overview

Performance of the Domestic Industry

Conditions of Competition

Import Prices and Quantities

Threat

Performance of the Domestic Industry

Conditions of Competition

Import Prices and Quantities

Threat

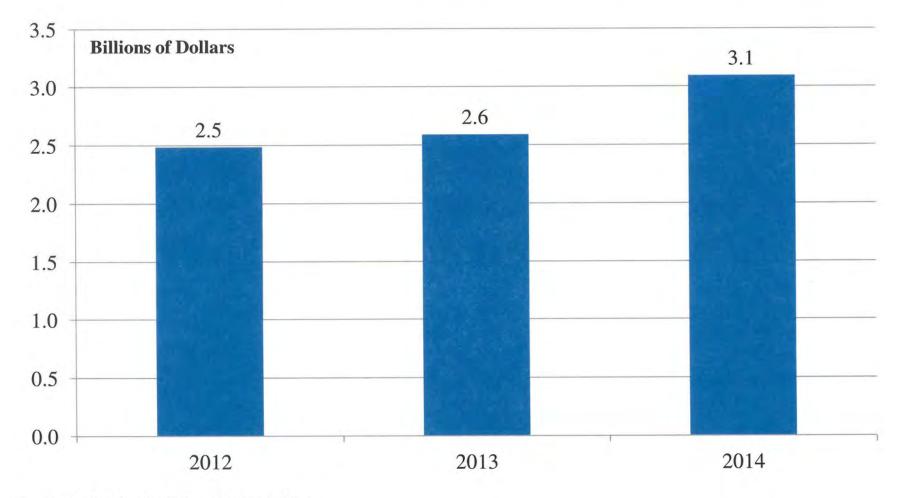


Summary

- Financial, employment, trade, and investment performance indicators either increased or remained high throughout the POI.
- Production and shipments remained stable while inventories fell.



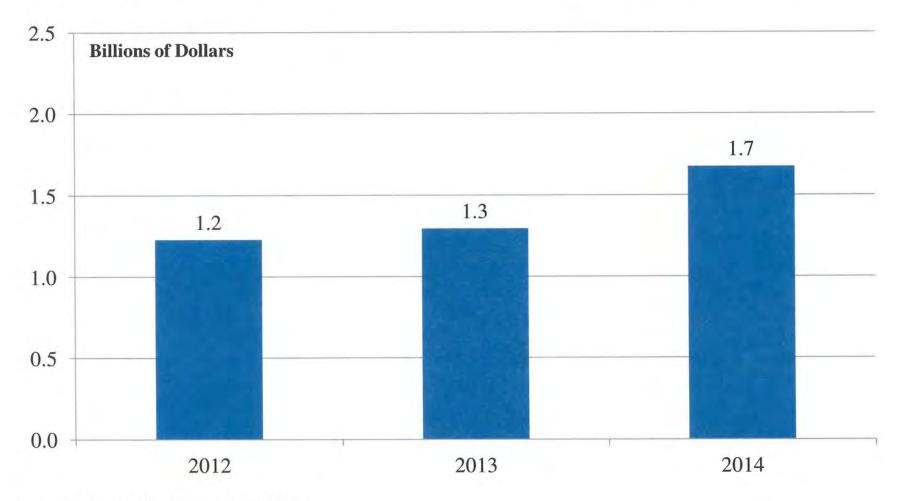
Gross Profit Increased Over the POI



Source: Prehearing Staff Report at Table VI-1



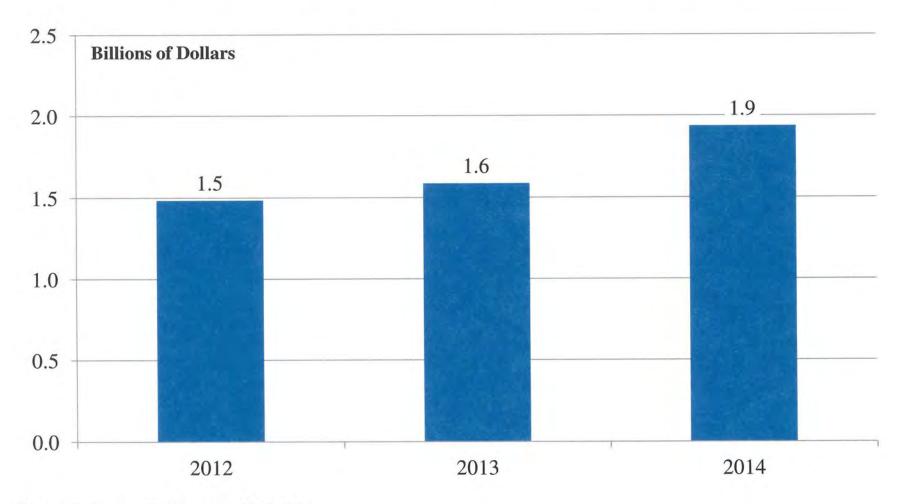
Operating Income Increased Over the POI



Source: Prehearing Staff Report at Table VI-1



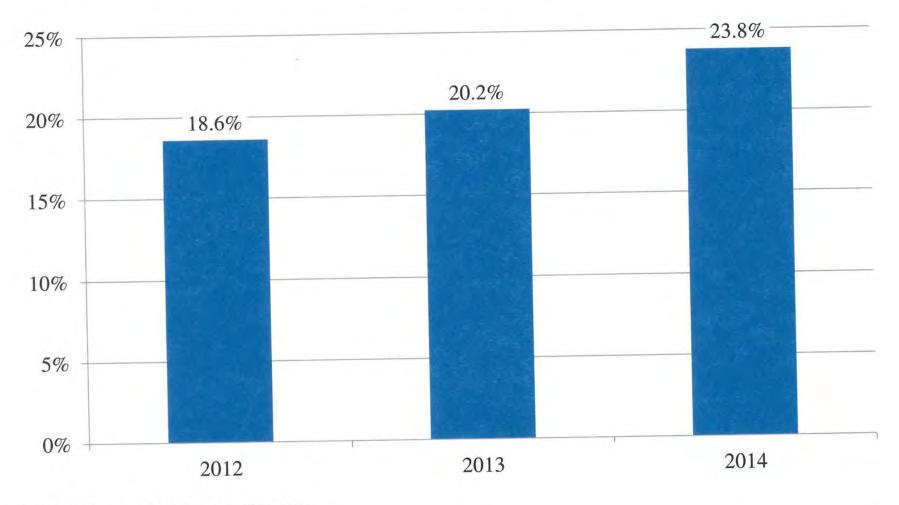
Cash Flow Increased Over the POI



Source: Prehearing Staff Report at Table VI-1



Gross Profit Margin Increased Over the POI

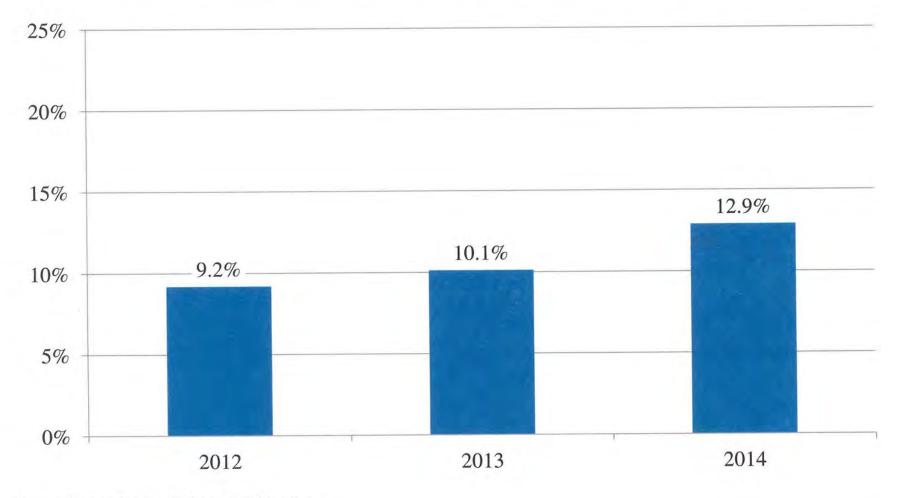


Source: Prehearing Staff Report at Table VI-1

8



Operating Margin Increased Over the POI

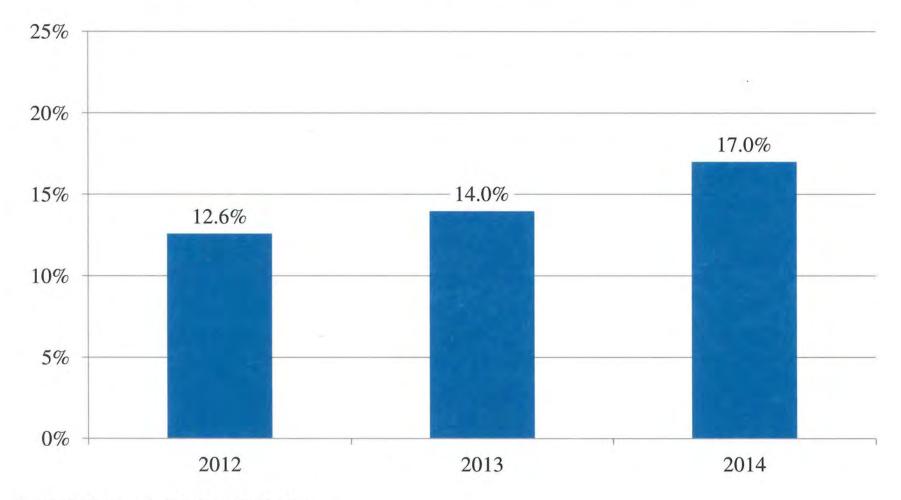


Source: Prehearing Staff Report at Table VI-1

9



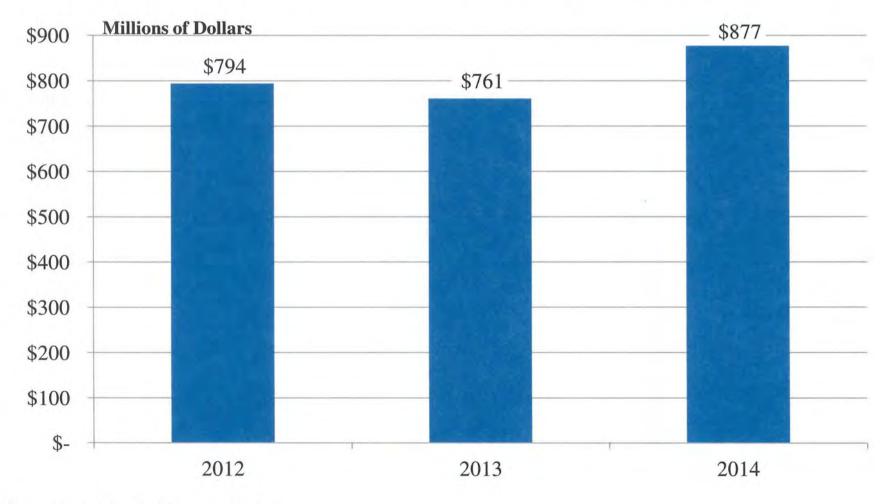
EBITDA Margin Increased Over the POI



Source: Prehearing Staff Report at Table VI-1



Capital Expenditures Increased Over the POI



Source: Prehearing Staff Report at Table C-1.

Performance

Financials

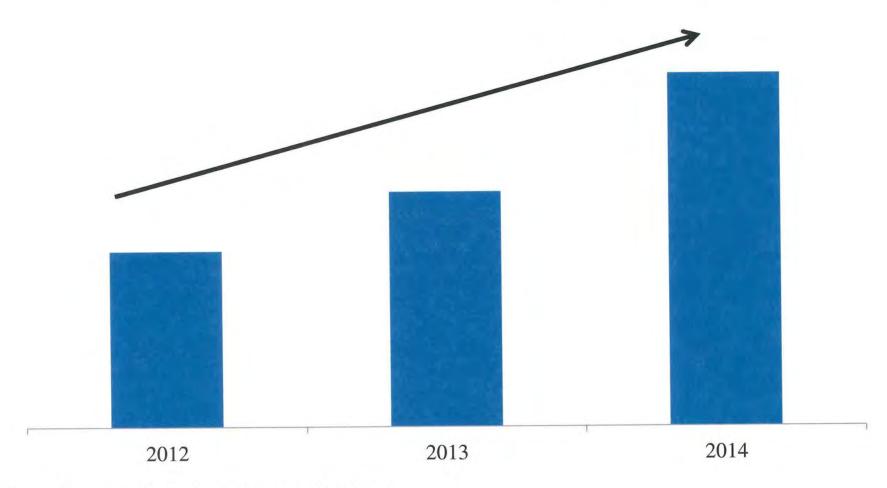
The Domestic Industry Made Significant Investments Since 2012

Company	Investment	Location
Goodyear	Upgrade & Capacity Expansion	Lawton, Oklahoma Fayetteville, North Carolina
Michelin	Employment Increases	Fort Wayne, Indiana
	Added Tire Variety	Tuscaloosa, Alabama
Continental	Capacity Expansion & Employment Increases	Mt. Vernon, Illinois
	Capacity Expansion & Employment Increases	Tupelo, Mississippi
Cooper	Upgrade	Tupelo, Mississippi
	R&D Center	Findlay, Ohio
Тоуо	Expansion	White, Georgia



Financials

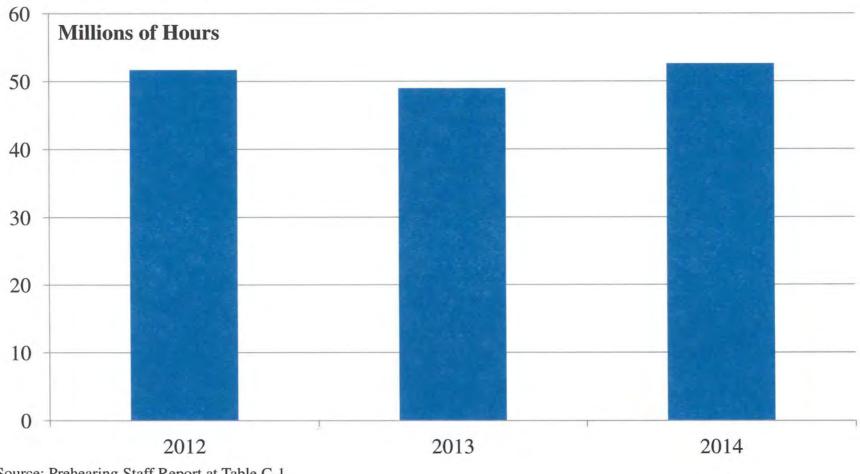
Return on Assets Increased Throughout the POI



Source: Confidential Prehearing Staff Report at Page VI-17.



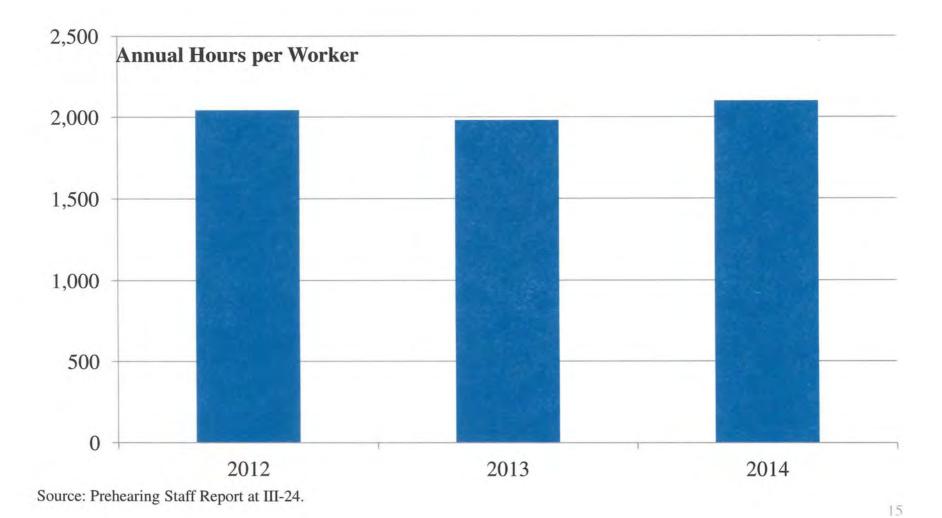
Total Hours Worked Increased Over the POI



Source: Prehearing Staff Report at Table C-1.

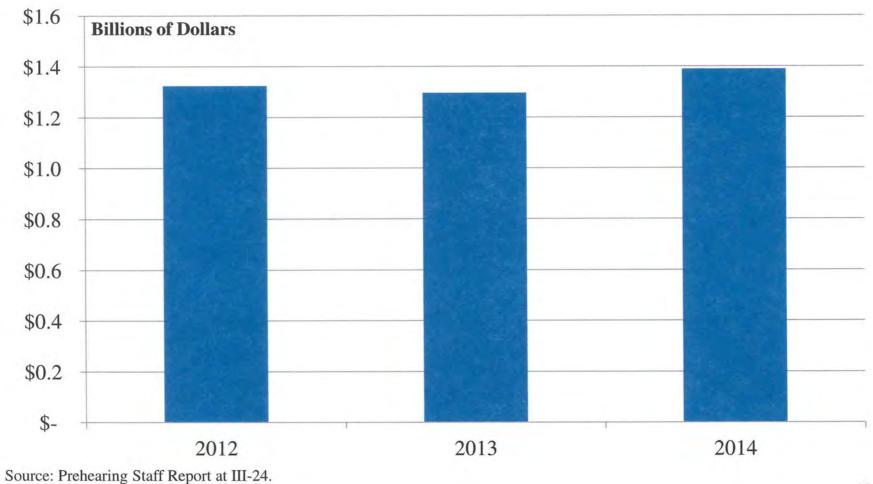


Annual Hours per Production Worker Increased





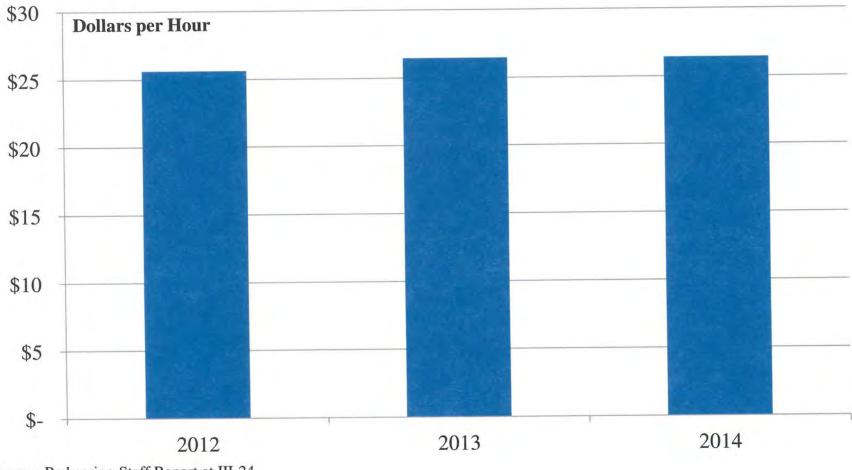
Overall Wages Increased



16



Hourly Wages Increased

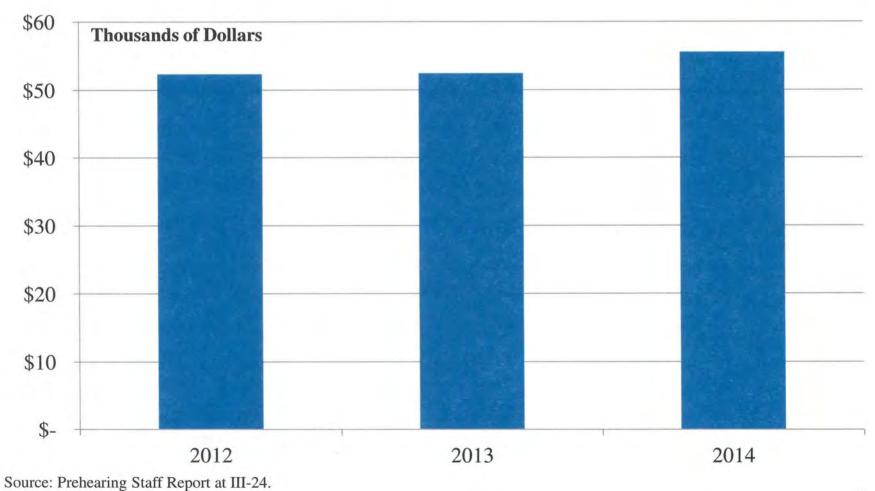


Source: Prehearing Staff Report at III-24.

17

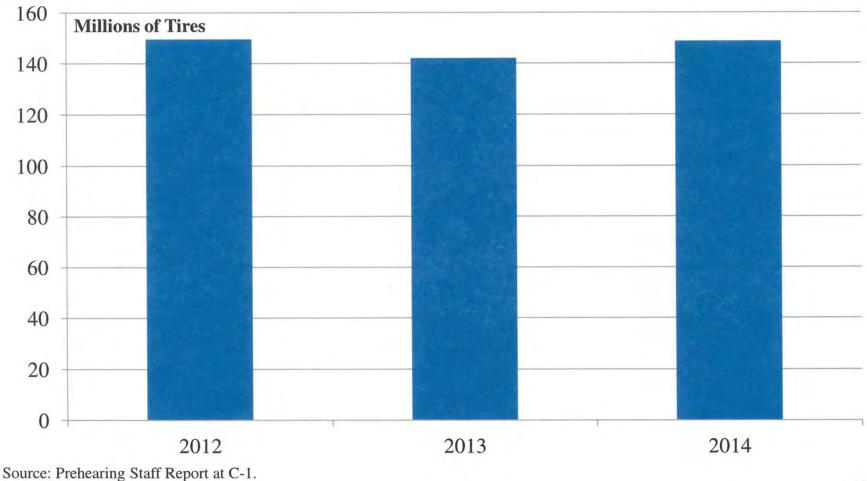


Labor Income per Worker Increased



Performance Trade

Production Quantities Remained Stable

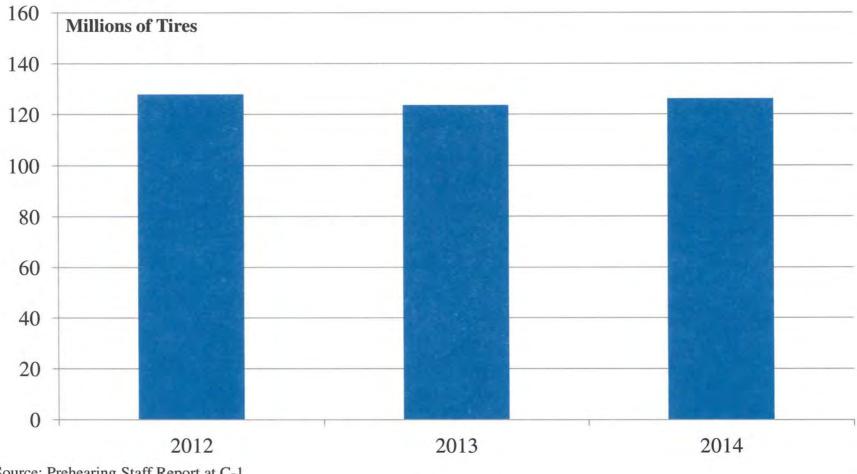


19

Performance

Trade

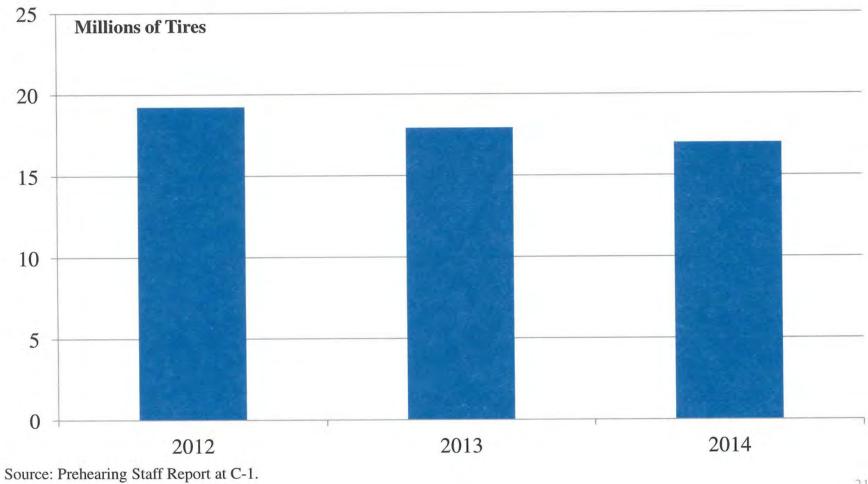
U.S. Shipment Quantities Remained Stable



Source: Prehearing Staff Report at C-1.

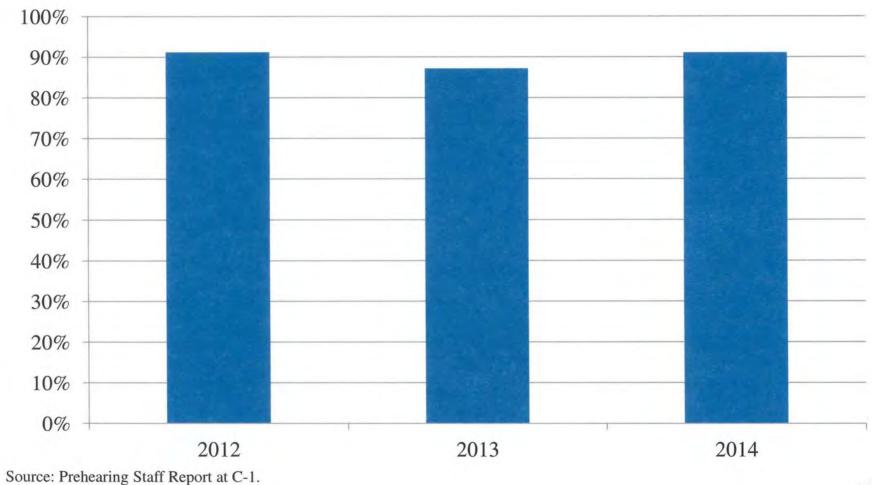


Inventories Fell During the POI



Performance Trade

Capacity Utilization Remained Stable



Performance of the Domestic Industry

Conditions of Competition

Import Prices and Quantities

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Summary

- The U.S. PVLT tire industry is operating at or near full capacity.
- Domestically produced and subject imported tires are differentiated by branding, performance, and pricing.
 - The business strategy of major U.S. producers is based upon branding and production differentiation.
 - Product differentiation and attenuated competition is recognized by independent authorities, such as Consumer Reports and the tire trade press.
- The U.S. PVLT tire industry has successfully restructured.

Capacity

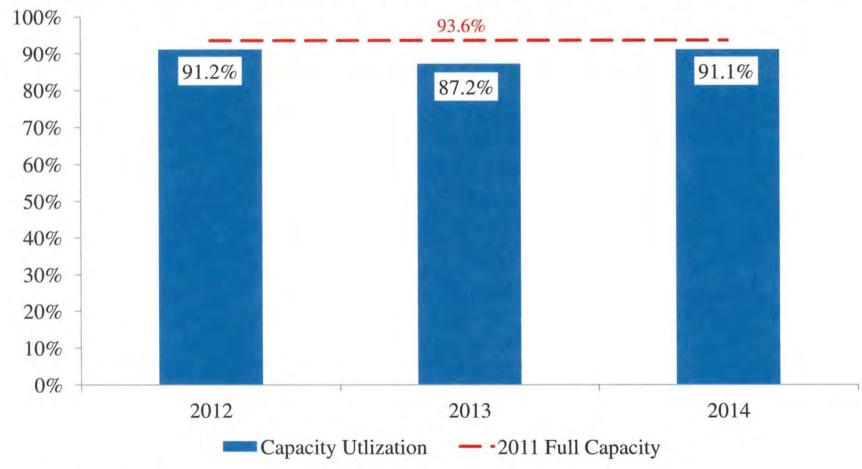
The U.S. Industry and Many Individual Firms Are Operating at or Near Effective Capacity

- Statements by U.S. Producers indicate they are operating at or near full effective capacity.
- In 2011 capacity utilization was <u>93.6</u> percent but U.S. producers were operating at full capacity.
 - "We have been bombarded from every side for additional tires, and we can't keep up...We are at maximum capacity, and all shifts are maxed out." David O'Connell, Continental's VP of OE in the Americas
 - Michelin was also running at full capacity. Autoweek (June 2011)

Source: U.S. Producer Questionnaires at III-3; : David Sedgwick and Mike Colias, "The Scramble for Scarce Tires." Autoweek. June 26, 2011; Preliminary Prehearing Staff Report at C-1.

Capacity

U.S. Industry is Operating at Levels Consistent With Historical Levels of Full Effective Capacity



Source: Prehearing Staff Report at C-1; Preliminary Prehearing Staff Report at C-1.

Capacity

Utilization of Practical Capacity Will Be Less than 100 Percent: Recurring Unplanned Events

- Weather-related disruptions.
- Unplanned machine downtime and maintenance.
- Disputes between labor and management.
- Holidays.

Capacity

Utilization of Practical Capacity Will Be Less than 100 Percent: Change in Product Mix

- Practical capacity is based on tire throughput which can vary due to:
 - Larger tires require larger molds and longer curing times.
 - Increased variety of tires require frequent mold changes. The number of tire sizes has doubled since early 2000s.
 - Shorter run times require more downtime to change molds between varieties.

Attenuation: OEM

The OEM Market is Overwhelmingly Dominated by Domestic Producers

• <u>"Ford contends that the market for OEM tires is distinct from</u> <u>the replacement market and that subject imports do not</u> <u>compete in the OEM market</u> because they are unable to meet the technological and service demands of U.S. car producers." – 2014 *Preliminary Decision.*

U.S. Producers' Questionnaire - PVLT lines

Page 14

II-8. <u>Channels of distribution</u>.-- Report your firm's commercial U.S. shipments by channel of distribution.

Quant	ity (in 1,000 tires)	and the second second second	
	Calendar years		
Item	2012	2013	2014
Channels of distribution: Commercial U.S. shipments: To OEMs (quantity) (M)			
To replacement market (quantity) (N)			1
To all other ¹ (quantity) (O)			

Source: Preliminary Commission Opinion at Footnote 131, page 20; U.S. Producers' Questionnaires at p 14.

Attenuation: Branding

Domestic Producers Differentiate Their Brands



Attenuation: Branding

Domestic Producers Differentiate Their Brands



Source: Michelin 2012 Annual Report at 28.

Attenuation: Branding

Domestic Producers Acknowledge Price Premiums Based on Brand

- "The Michelin brand is our premium brand. ...So if you want the best tire, you buy Michelin. You'll pay a premium. About 10% to 15%. We also have BFGoodrich, which is the next tier down, a little bit less expensive...We also have another brand called Uniroyal...and Uniroyal is also a lower-priced tier brand." Pete Selleck, Chairman and President of Michelin North America
- "We're building a <u>branded business</u> and <u>we're competing in the</u> <u>most profitable segments in the market.</u>" – Steve McClellan, President of Goodyear North America

Source: Maria Bartiromo, "Bartiromo talks tires with USA's Michelin man." Usatoday.com. (June 17, 2014); and "Goodyear Reinstates Dividend." Tire Business. (October 14, 2013).

Attenuation: Branding

Domestic Producers Discuss Branding

 "For this year, Goodyear launched an entirely unique line of tires for the Kelly brand to match its current offerings of Goodyear light truck and passenger vehicle tires. <u>The innovative Kelly tires were</u> <u>developed by Goodyear in response to its customers' rising need</u> <u>for the branded products superior to private label or Asian</u> <u>imported tires</u>." – *Guru Focus*

Source: "Goodyear Tire & Rubber's New Products Will Drive Growth." Guru Focus. (May 6, 2015).

Attenuation: Branding

Premium Brands Sell at Higher Prices

Parent Company	Brand	% Above or Below Mean Price
	Michelin	29.50%
Michelin Group	BFGoodrich	11.30%
	Uniroyal	-6.90%
	Bridgestone	12.40%
Bridgestone Group	Firestone	-11.30%
	Fuzion	-20.90%
Carlina Time 0	Goodyear	16.80%
Goodyear Tire &	Dunlop	5.00%
Rubber Co.	Kelly	-22.70%
Continental AC	Continental	17.60%
Continental AG	General	-5.70%

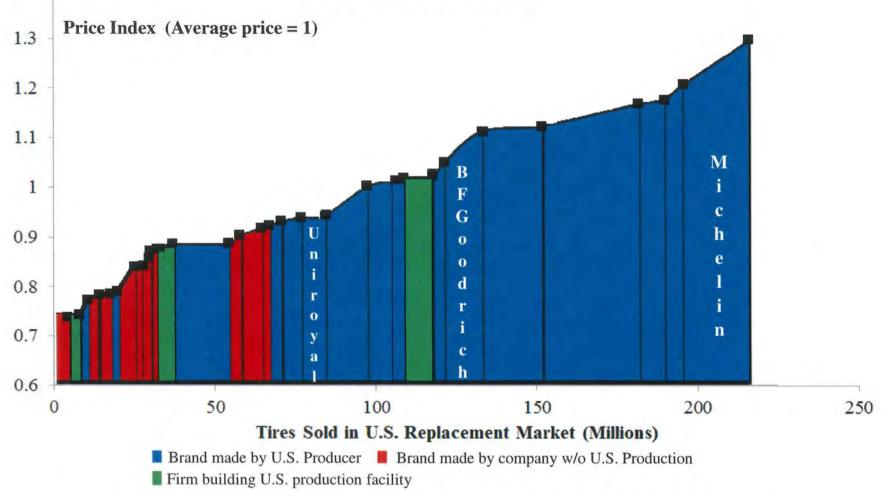
Note: Each online offer measured as a percentage of the mean price for its type, as defined by USITC Pricing product definitions. Minimum and maximum observation for each brand were removed (except for Fuzion and Kelly, due to limited observations).

Source: Prices from online retailers Tire Rack, Discount Tire, Sears, and Simple Tire. See CapTrade Report, Exhibit 3.

Attenuation: Pricing

1.4

U.S. and Subject Tires Compete at Different Price Points



Source: 2014 sales quantity from Modern Tire Dealer, Facts Issue 2015. Prices from online offers on Tire Rack, Simple Tire, Discount Tire, and Sears. See CapTrade Report, Exhibit 3. Brands classified based on questionnaire responses.

Attenuation: Performance

The HVA Segment Dominated by U.S. Producers Have Better Performance

Allow me to expand. A high-value-added tire is more complex to manufacture than a low-valueadded tire. There's no accepted definition for a high-value-added tire, but The Goodyear Tire & Rubber Company defines it as having additional tread compounds (silica), reduced sidewall height, premium speed ratings, diameters greater than 17 inches, and several more attributes.



Image source: Deutsche Bank Leveraged Finance Conference presentation

Source: Maxx Chatsko. "5 Things the Goodyear Tire & Rubber Company Wants You to Know." The Motley Fool. (November 24, 2014).

Attenuation: Performance

Consumer Reports Prefers U.S. Tire Makers

What brands make the best tires? Consumer Reports rank the top tire maker

Published: March 13, 2015 03:00 PM

1. Michelin

Across the board. Michelin offers nearly a perfect blend of grip. handling, low rolling resistance for good fuel economy, and long tread life. In many instances, tread wear is class-leading. and Michelin has tread wear warranties on all replacement fires, including winter and summer tires. (Most competitors do not.) However, Michelin tires can be pricey and that holds back a lot of potential buyers. It's too bad because if you factor in the outstanding tread wear, the Michelins might be a bargain compared to other tires with a lower price.

Top models

All-season: Michelin Defender

3. Goodvear

Not every model is a hit, but in the last two years Goodyear has come on strong with some recommended truck and ultra-high performance tires. All-season car tires are a bit long in the tooth; still the Goodyear Assurance TripleTread All-Season car. tire is impressive. If you need an all-season tire with great snow traction, the Goodyear Assurance ComfortTred Touring is it.

Top models

All-season: Goodyear Assurance TripleTread All-Season

Ultra-high performance: Goodyear Eagle F1 Asymmetric All Season, Eagle F1 Asymmetric 2 (summer)





Goodyear Eagle F1 Asymmetric

5. Hankook, Cooper, Nokian, Yokohama This final ranking is a tough spot to call, as there are many fine

brands vying for the title. Rather than make a single selection. we consider this a four-way tie. Here's the rundown

Hankook has the top-rated Dynapro AT-M in the all-terrain category, and it has a couple impressive ultra-high performance tires: the Hankook Ventus S1 noble 2 (allseason) and Ventus V12 evo2 (summer). The Winter I'cept evo has been around for a number of years and still impresses with its well-balanced grip on cleared and snow-covered roads. Absent are all-season tire models that the company is now updating.

Conner is strong in buch tree. The Discourses AITIA's as all

2. Continental

Nipping at the heels, if not looking back at Michelin at times, Continental consistently offers high-scoring tires. Handling and impressive stopping grip on dry and wet roads are typical of this brand. As a bonus, they are attractively priced

Top models

All-season: Continental ProContact EcoPlus (discontinued model in limited supply). The new TrueContact is being tested right now

Performance all-season: Continental PureContact

Ultra-high performance: Continental ExtremeContact DW



4. Pirelli

Known for ultra-high performance tires, Pirelli supplies original equipment rubber for many prestigious sports cars. Pirelli also offers some solid models for less exotic vehicles, too. Tread life is not always a strong point, but in recent years there have been updates with a 'Plus' added to existing models, some of which we are testing now

Top models All-season: Pirelli P4 Four Seasons. We are testing Pirelli P4 Seasons Plus

Performance all-season: Pirelli P7 Cinturato A/S is big on dry and wet grip, and handling, though tread life and stopping on



Pirelli Scorpian Verde



Source: "What Brands Make the Best Tires?" Consumer Reports. (March 13, 2015).

Attenuation: Performance

In 9 Tire Segments, CR Recommended U.S. Producers 34 out of 44 times

Туре	Brand	U.S. Producer?	Туре	Brand	U.S. Producer?
Performance All Season	Michelin	Yes	All Season Truck	Michelin	Yes
	Continental	Yes		Goodyear	Yes
	Michelin	Yes		Michelin	Yes
	Continental	Yes		Pirelli	Yes
	Michelin	Yes		Continental	Yes
	Continental	Yes		Cooper	Yes
All Season	Goodyear	Yes		Hankook	2016
	Pirelli	Yes		Goodyear	Yes
	Yokohama	Yes		Michelin	Yes
	Michelin	Yes		Cooper	Yes
UHP All Season	Goodyear	Yes		Falken	No
	Hankook	2016		Michelin	Yes
	Pirelli	Yes	Winter	Hankook	2016
	Cooper	Yes		Pirrelli	Yes
	Pirelli	Yes		Uniroyal	Yes
	Michelin	Yes		Bridgestone	Yes
	Yokohama	Yes		Nokian	
LUID Comment	Nokian		Performance Winte	r Michelin	Yes
UHP Summer	Continental	Yes		Nokian	
	Goodyear	Yes		Michelin	Yes
	Hankook	2016	Winter Truck	Continental	Yes
	Vredestein			Nokian	

Source: "Recommend Tire Guide." Consumer Reports. Retrieved June 6, 2015.

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Attenuation: Performance

CR Recognizes U.S. Tires Have Better Performance

- "Chinese tire brands don't have that oversight, and some <u>may not</u> <u>have the marketing foresight to design products well-suited to</u> <u>the specific requirements of the U.S. consumer.</u>"
- Consumer Reports reviewed 2 Chinese-branded tires out of 167 tires in 9 market segments – these brands were not ranked highly.

Source: Consumer Reports website at "Ratings." Retrieved June 8, 2015; "Consumer Reports Finds Chinese Tires are No Bargain." Consumer Reports. (September 29, 2014)

Attenuation: Performance

The OEM Market is Supplied Near Exclusively by Domestic Producers Due to Better Performance

"Ford contends that the market for OEM tires is distinct from the replacement market and that subject imports do not compete in the OEM market because they are unable to meet the technological and service demands of U.S. car producers." – 2014 *Preliminary Decision.*

Restructuring

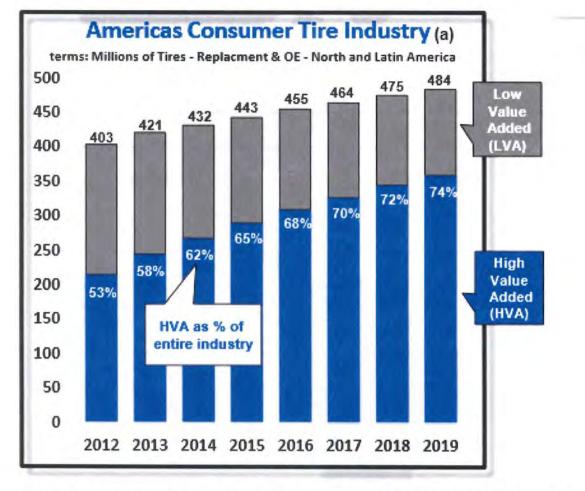
Domestic Producers Converted to HVA Tires

- "Goodyear is spending \$150 million at Lawton [Oklahoma] to convert 5 million units of annual capacity for low value-added tires to HVA products." *Tire Business, March 2011.*
- "Our recent strategy has been to make sure that we do not produce tires that destroyed value." *Michelin CEO Jean-Dominique Senard, January 2015.*

Source: "Michelin Aims to Fight Off Chinese Rivals on 2 Fronts." Automotive News. (January 12, 2015); and "Goodyear Investing in High Value-Added Tires." Tire Business. (March 28, 2011).

Restructuring

The Industry Has Restructured: The Move Toward High Value Added Tires

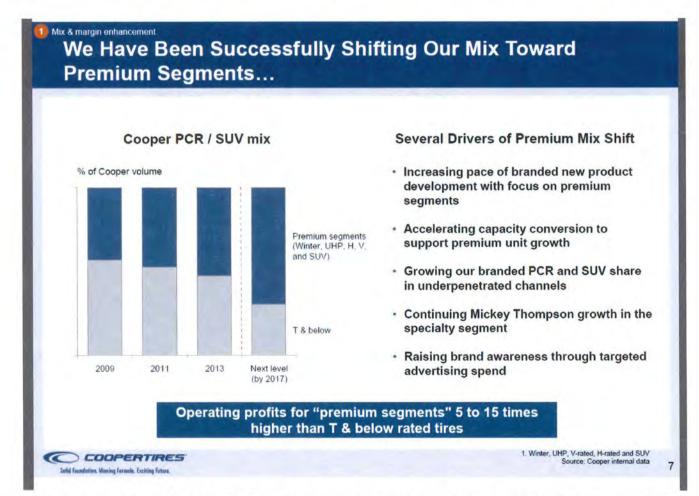




Source: Goodyear, slideshow for First Quarter 2015 Conference Call (April 29, 2015), slide 5.

Restructuring

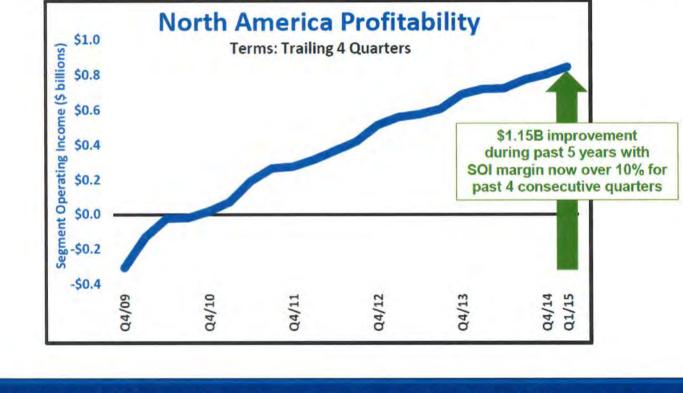
Cooper's Product Mix Is Moving To HVA Tires



Source: Cooper Tires Presentation at Deutsche Bank Global Auto Industry Conference. (January 13, 2015) at slide 7.

Restructuring

The Industry Has Restructured: Goodyear's North American Profitability

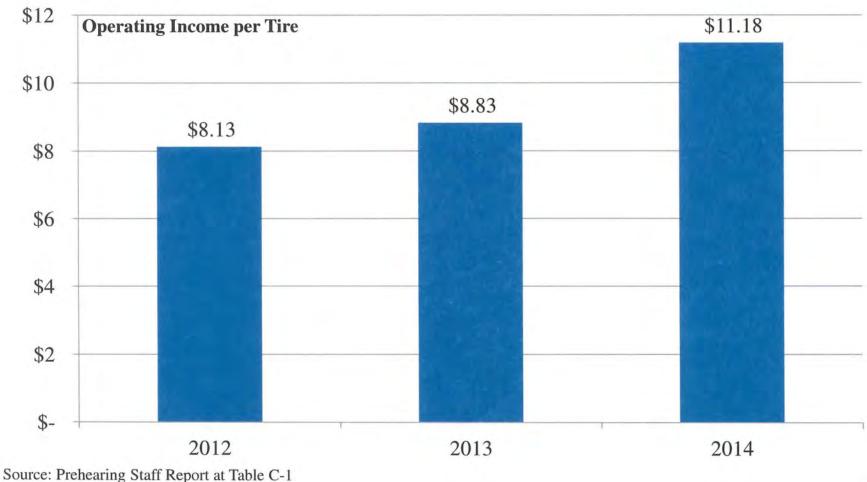


Consistent and dramatic performance has turned North America from a "turnaround story" into a "momentum story"

Source: Goodyear Tire & Rubber Co., slideshow for First Quarter 2015 Conference Call (April 29, 2015), slide 5.

Restructuring

Unit Operating Income Demonstrates the Benefits of Restructuring



Restructuring

Domestic Producers Have Expanded Significantly Since 2012

Expansions Since 2012

Year	Firm	Plant Location		
2012	Michelin	Lexington, South Carolina		
	Coodypar	Lawton, Oklahoma		
2013	Goodyear	Fayetteville, North Carolina		
2015	Continental	Mt. Vernon, Illinois		
	Giti Tire USA	Chester County, South Carolina		
2014 2015	Cooper	Tupelo, Mississippi		
	Hankook Tire America Corp	Clarksville, Tennessee		
	Тоуо	White, Georgia		
	Michelin	Fort Wayne, Indiana		
	Kumho Tire	Macon, Georgia		

Source: CapTrade report at pp 20-24 and 32 - 33.

Performance of the Domestic Industry

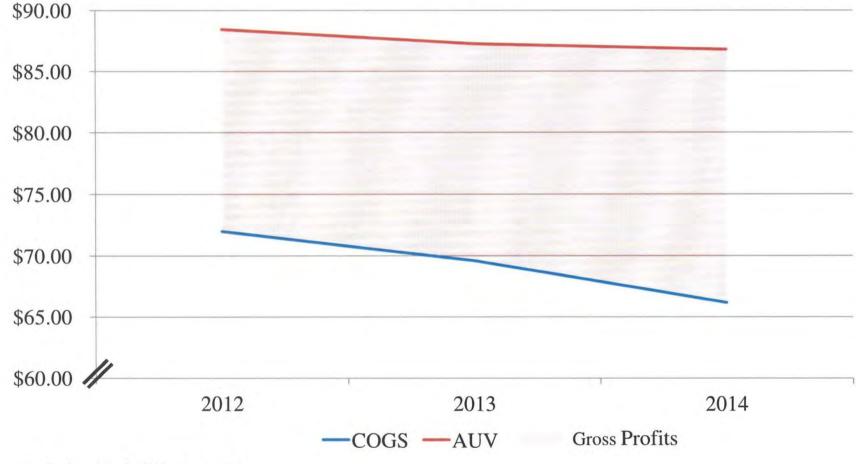
Conditions of Competition

Import Prices and Quantities

Threat

Import Prices and Quantities

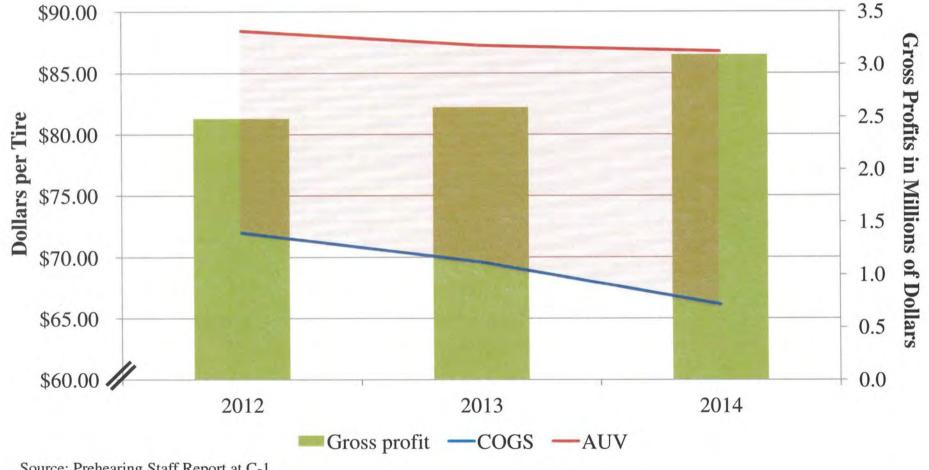
No Price Suppression or Depression: Domestic Industry is Experiencing the Opposite of a Cost-Price Squeeze



Source: Prehearing Staff Report at C-1

Import Prices and Quantities

No Price Suppression or Depression: Profits Are Rising Over the POI



Source: Prehearing Staff Report at C-1

Import Prices and Quantities

Investments and New Facilities are Consistent with Operating at Full Capacity with No Quantity Effects

New Facilities Opening in 2016

Company Giti Tire USA Kumho Tire Hankook Tire America

Location Chester County, South Carolina Macon, Georgia Clarksville, Tennessee

Investments Since 2012

	Company	Location		
	Michelin	Lexington, South Carolina		
Goodyan	Goodyear	Lawton, Oklahoma		
	Goodyear	Fayetteville, North Carolina		
	Continental	Mt. Vernon, Illinois		
	Giti Tire USA	Chester County, South Carolina		
	Cooper	Tupelo, Mississippi		
	Hankook Tire America Corp	Clarksville, Tennessee		
	Тоуо	White, Georgia		
	Michelin	Fort Wayne, Indiana		
	Kumho Tire	Macon, Georgia		

Performance of the Domestic Industry

Conditions of Competition

Import Prices and Quantities

Threat



U.S. Producers Are Not Threatened by Subject Imports

- The domestic industry is not vulnerable.
- Actions and statements by the domestic industry demonstrate a lack of threat.
- Raw material costs are projected to remain low.
- Chinese demand for OEM and replacement tires is expected to increase.

Threat Vulnerability

The Domestic Industry is Not Vulnerable

Performance Indicator	Increase over POI?	Performance Indicator	Increase over POI?	
Gross Profits		Total Hours Worked		
Operating Income	\checkmark	Annual Hours per PRW		
Net Income		Overall Wages		
Cash Flows		Hourly Wages		
Gross Profit Margin		Labor Income per Worker		
Operating Margin				
Net Income Margin				
EBITDA Margin				
Capital Expenditures				
Unit Operating Income	\checkmark			
Return on Assets			52	

Threat Vulnerability

The Domestic Industry is Not Vulnerable: U.S. Producers' Expansions Over the POI

• Major U.S. producers have expanded production.

Company	Amount of Investment (Millions)	Annual Tire Output (Millions of Tires)	Jobs Created
Bridgestone	\$346	4.6	300
Continental	\$500	8	1, 600
Cooper	\$140	n/a	n/a
Michelin	\$200	n/a	270
Тоуо	\$371	3.8	650
Total	\$1,557	16.4	2,820

Threat

U.S. Demand

Increased Investment in the U.S. PVLT Industry: New Plant Openings

• 3 PVLT producers are opening facilities in the U.S. in 2016

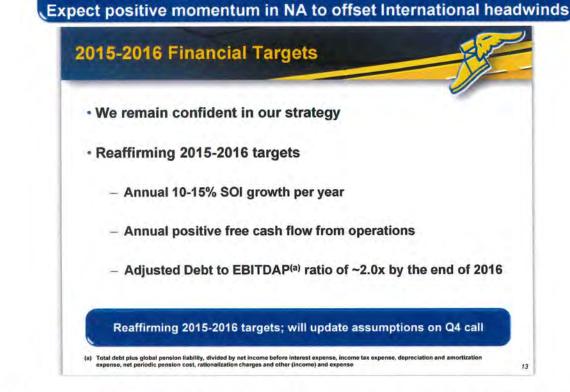
Company	Location	Investment (Millions)	Planned Capacity (Million Tires)	Employees
Giti Tire USA	Chester County, South Carolina	\$560	5.0	1,700
Kumho Tire	Macon, Georgia	\$413	4.0	450
Hankook Tire America	Clarksville, Tennessee	\$800	12.0	1,800
Total		\$1,773	21.0	3,950

Source: "2015 Facts Issue." Modern Tire Dealer. (January 2015); "\$560M tire plant breaks ground in Chester County". WSOC TV. (February 12, 2015); and ITG Voma's Pre-Hearing Brief at 61.



The Domestic Industry is Not Threatened by SI: Views of U.S. Producers

 Goodyear reaffirmed its financial targets in its January 2015 Presentation.
 Continue to reaffirm 10-15% SOI growth target for 2015;



Source: Goodyear Presentation at the Deutsche Bank Global Auto Industry Conference. (January 13, 2015) at slides 10 and 13.

Threat U.S. Demand

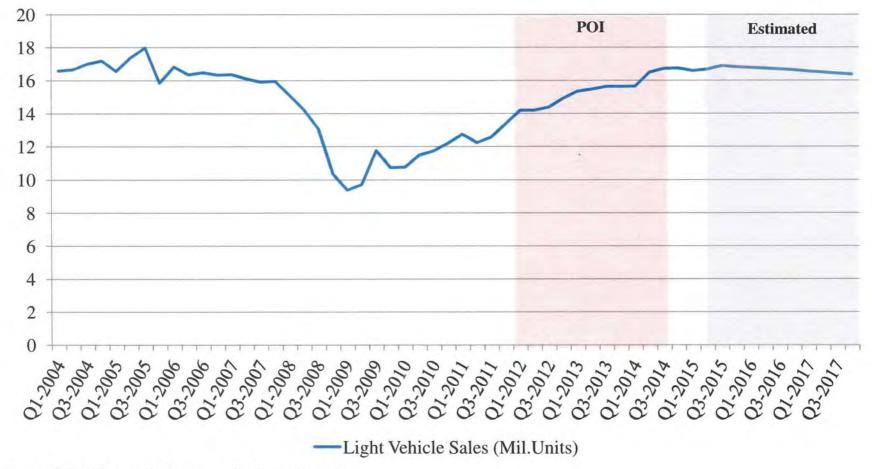
The Domestic Industry is Not Threatened by SI: Views of U.S. Producers

- Toyo predicts growth in the North American market:
 - "Toyo Tire & Rubber Co. Ltd. raised its forecast for fiscal 2014 tire division operating income 16 percent higher than the February projection and expects record sales of about \$3.2 billion. <u>North</u>
 <u>America will account for all of the projected growth</u>, Toyo said." *Rubber News*
- Michelin expects its higher operating margins in the Americas in FY2015. The U.S. is Bridgestone's largest market in the Americas.

Threat

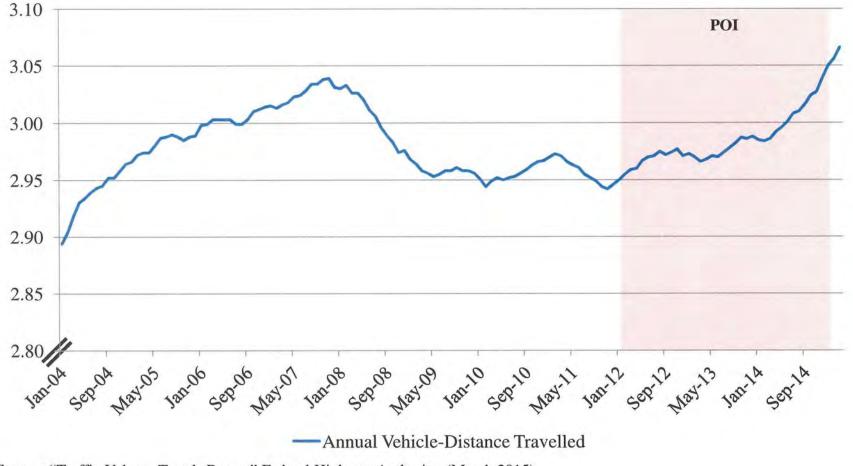
U.S. Demand

U.S. OEM Demand for PVLT Tires Will Remain High



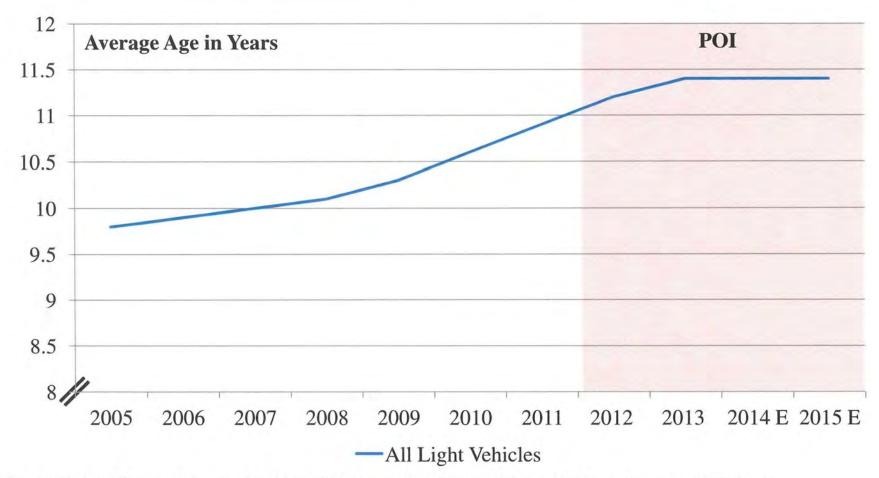
Source: Macroeconomic Advisers via Haver Analytics.

Threat U.S. Demand U.S. Replacement Demand for PVLT Tires Is Expected to Increase



Source: "Traffic Volume Trends Report" Federal Highway Authority. (March 2015)

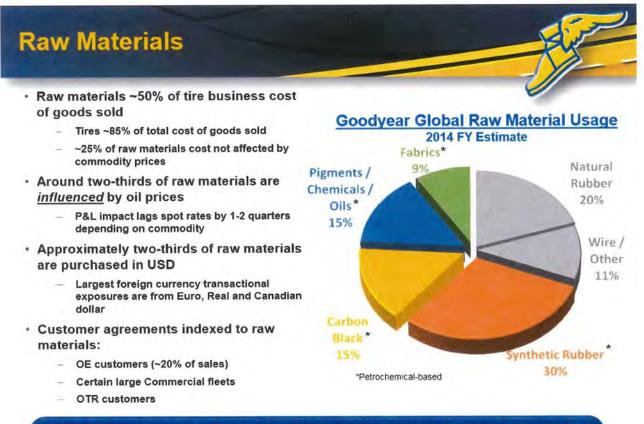




Source: National Transportation Service Table I-26: Average Age of Automobiles and Trucks in Operation I (Updated January 2014); "Average Age of Light Vehicles on U.S. Roads Stayed Flat, IHS Says." Automotive News (June 9, 2014)

Threat U.S. Costs

Raw Material Costs Are Likely to Remain Low



Based on current commodity spot rates, we expect raw material costs to be down ~10% for the full year

Source: Goodyear slideshow 2014 Q4 Conference Call (Feb 17, 2015) at 20.

20



Raw Material Costs Are Likely to Remain Low: Oil

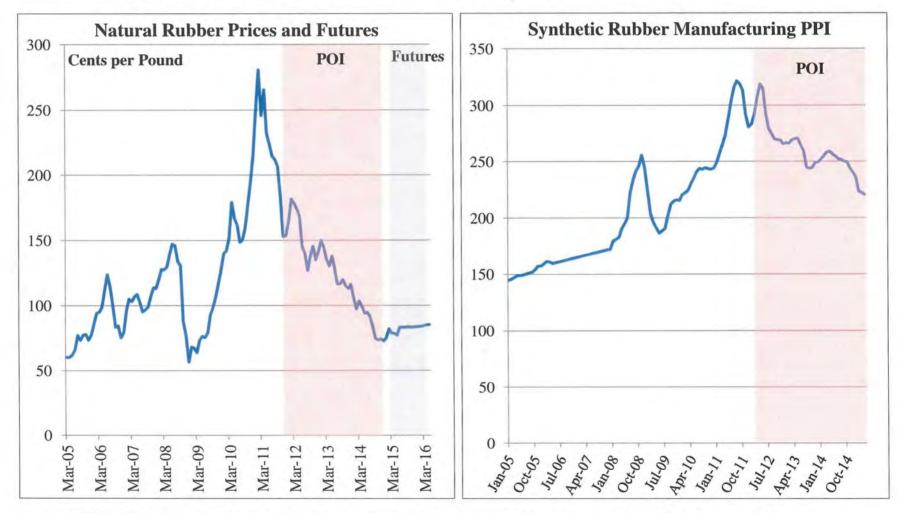


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Source: "Crude Oil - Petroleum." Dated Brent Monthly Price via Index Mundi.



Rubber Costs Are Likely to Remain Low



Source: SICOM RSS3 Rubber Futures." Singapore Commodity Exchange via Quandl and Rubber, No. 3 Smoked Sheet (RSS3), 1st Contract." Singapore Commodity Exchange via Index Mundi; Bureau of Labor Statistics.



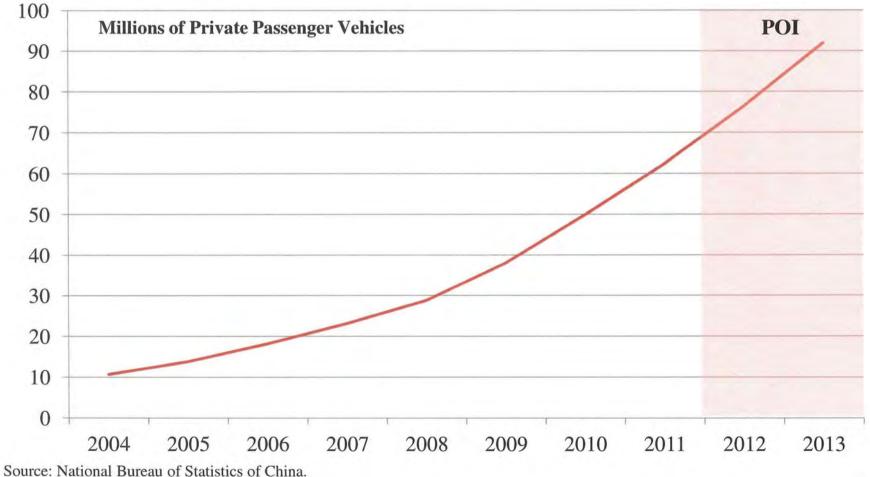
Raw Material Costs Are Likely to Remain Low

• "Based on current raw material spot prices, for the full year of 2015, we expect our raw material costs will be approximately 14% lower than 2014, and we expect the benefit of lower raw material costs to more than offset declines in price and product mix." – *Goodyear 2014 Annual Report*

Threat

China

The Number of Chinese Passenger Vehicles Has Increased Significantly from 2004 - 2013



Threat China

U.S. Producers Recognize Demand in China is Increasing

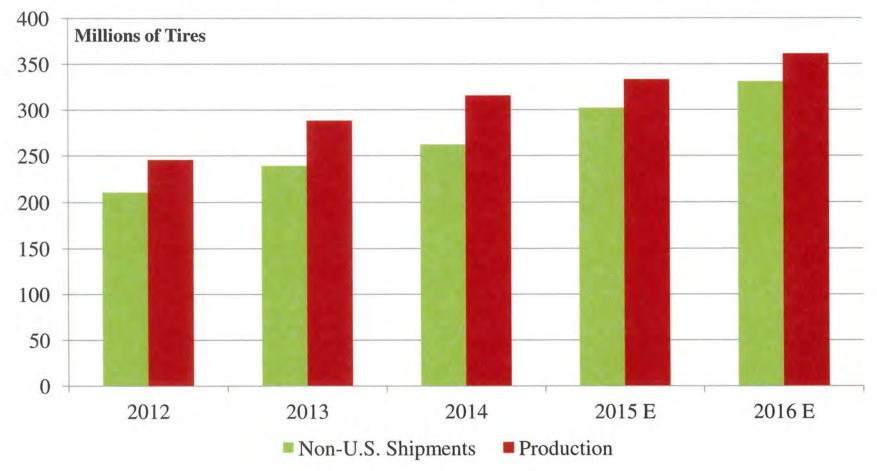
- "China is the world's largest and fastest-growing market for passenger cars and commercial trucks, and <u>critical</u> to Goodyear's growth strategy." *Rich Kramer, Chairman and CEO of Goodyear.*
- "We expect our business to speed up by <u>two to three times</u> over the coming years, as the Chinese tire industry will maintain booming momentum, boosted by rapid growth of auto sales in recent years." *Philippe Verneuil, President of Michelin China.*
- Michelin's 2014 Annual Report noted "continued robust growth" in China and projected continued growth for 2015.

Source: "Goodyear Talks Strategy for New China R&D Center." Tire Review. (March 26, 2015) and Michelin's 2014 Annual Report at 2. (February 10, 2015); "Michelin Opens \$1.5 B Factory in Shengyang." China Daily. (January 29 2013)

Threat

China

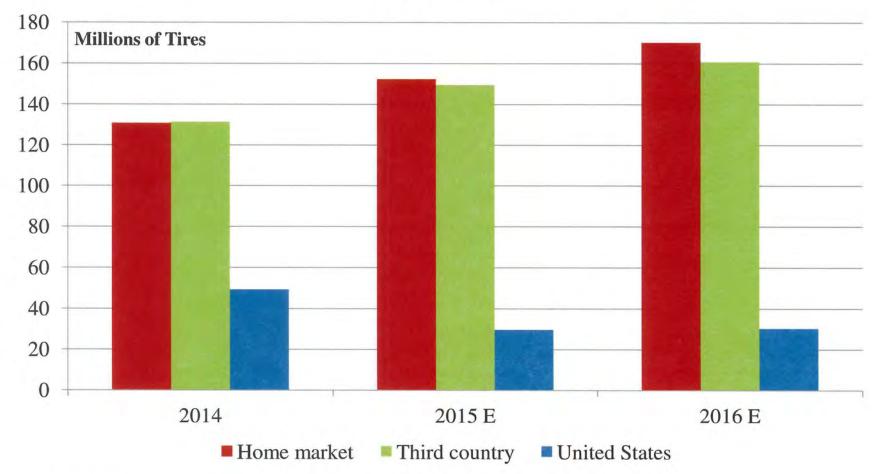
China's Non-U.S. Shipments are Expected to Rise Faster than Chinese Production



Source: Prehearing Staff Report at Table VII-4 at page VII-18.

ThreatChina Chinese Exports to the U.S. are Expected to

Decrease



Source: Prehearing Staff Report at Table VII-4 at page VII-18.