

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN ANODE MATERIALS FOR
USE IN BATTERY CELLS AND
BATTERIES**

DOCKET NO. 3916

**NON-PARTY GROUP14 TECHNOLOGY INC.’S RESPONSE TO THE
COMMISSION’S SOLICITATION OF COMMENTS RELATING TO THE PUBLIC
INTEREST**

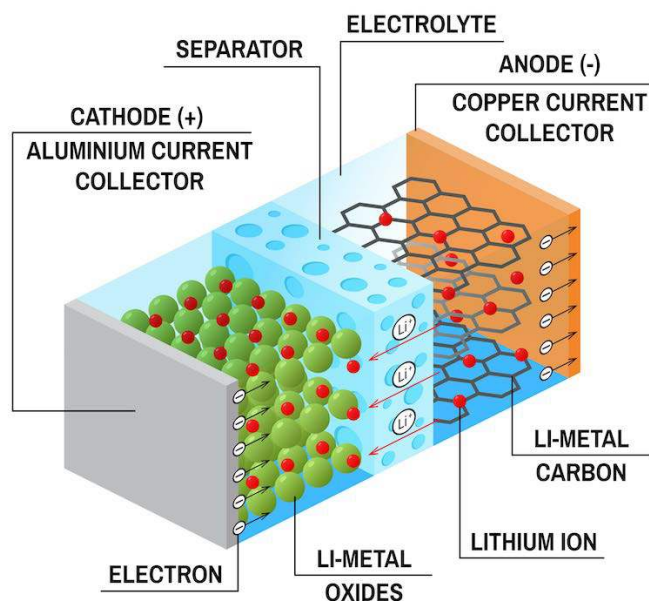
Pursuant to the Commission’s request for comments,¹ Group14 Technologies, Inc. (“Group14”) submits this statement regarding the public interest. The remedial orders requested by Complainants Sila Nanotechnologies, Inc. (“Sila”) and Georgia Tech Research Corporation (“Georgia Tech”) are well within the public interest and therefore no evidence needs to be taken at the trial level. As a non-party, Group14 focuses this statement on the Commission’s request for information related to (i) explaining “how the articles potentially subject to the requested remedial orders are used in the United States”; (iii) identifying “like or directly competitive articles that . . . could replace the subject articles if they were to be excluded;” and (iv) identifying suppliers that “have the capacity to replace the volume of articles potentially subject to the requested exclusion order and/or cease and desist order within a commercially reasonable time.”²

The technology at issue—silicon-carbon-composite anode material (“SCC material”) for use in lithium-ion batteries—represents a groundbreaking development in lithium-ion battery

¹ Solicitation of Comments Relating to the Public Interest, 90 Fed. Reg. 37422 (June 23, 2026); *see also* 19 C.F.R. 210.8(c).

² Solicitation of Comments Relating to the Public Interest, 90 Fed. Reg. 37422, 37423 (June 23, 2026).

technology. A lithium-ion battery cell includes, at its core, an anode, a cathode, and an electrolyte, as can be seen in the image below:³

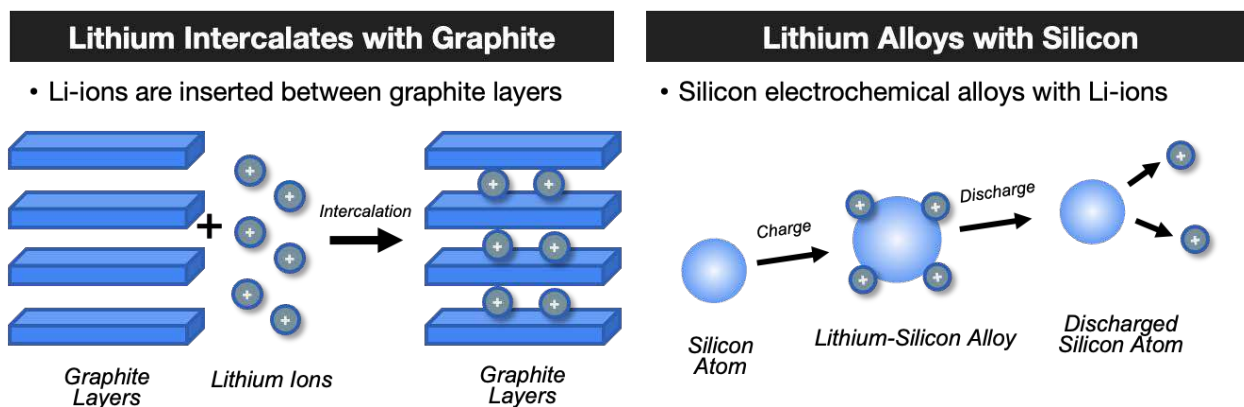


When a battery cell is charged, current is run through the cell, drawing electrons and ultimately lithium ions from the cathode to the anode. When it is discharged, the lithium ions diffuse back to the cathode, thereby drawing electrons through the circuit, powering the device. This process repeats for, potentially, hundreds of cycles. Therefore, an important role of the anode is to store and release lithium ions and electrons safely and effectively, many times in a row.

For years, anodes were manufactured by using some form of carbon, most commonly graphite, which has a layered hexagonal structure allowing lithium ions to nest (“intercalate”) into the structure, as can be seen in the images above and below. However, there are limits to this process. Most relevant here, graphite is limiting as an anode material. In a graphite anode, lithium ions are inserted between graphite layers at a ratio of approximately one lithium ion to six carbon atoms. This, of course, limits the capacity of the battery, forcing manufacturers to incorporate

³ Paid download from shutterstock.com.

more anode material into the battery for the same capacity. SCC material revolutionizes anode manufacture because it creates an entirely different charging paradigm. Instead of intercalating, the lithium ions bond directly with silicon, thereby forming an alloy, as can be seen in the image below.



Importantly, silicon bonds with lithium ions at a ratio of approximately four lithium ions to every one silicon atom, reflecting a significant increase in capacity over traditional carbon anodes. While SCC materials are not made of pure silicon but instead include a mix of carbon and silicon to improve other aspects of anode performance, the use of SCC materials significantly improves the charge time and capacity of lithium-ion batteries.

As noted in Sila’s public interest statement, at this time, the vast majority of batteries within the United States continue to use traditional carbon anodes, rather than SCC material. Complainant Sila Nanotechnologies, Inc. and Georgia Tech Research Corporation’s Statement Regarding Public Interest, Doc. ID. 885566, filed June 18, 2026 (“Sila Public Interest Statement”) at 4. But the market is slowly changing. If an exclusion order were to issue, Group14 Technologies could supply the nascent market within a commercially reasonable period of time. Group14 has existing production capacity and plants under construction that is expected to supply over 6,000 tons of material annually, of which over 4,000 tons would be produced from U.S.

facilities. By contrast, the respondents have the capacity to produce only 1,000 tons of SCC material per year. *Id.* Therefore, Group14 alone will have sufficient capacity to replace the respondents and to supply the market within a commercially reasonable period of time.

Of course, Group14 is not alone. As Sila notes in its public interest statement, Sila's US manufacturing will provide SCC materials in the "low hundreds of tons per year" as of Q3 2026, and it expects to be able to produce 2,000 tons of SCC material per year by 2028. *See id.* Further, neither Group14 nor Sila need to supply the market immediately. Instead, the product life cycle of anode material has multiple stages of qualification, meaning large quantities of SCC materials will not need to be imported or manufactured immediately but are instead only required for commercial runs, with only much smaller quantities necessary for qualification. Therefore, extending the timeline beyond the Target Date, Group14 will be in an even better position to supply the market.

Addressing the remaining factors, Group14 does not believe that, if a remedial order were issued in this investigation, it would adversely impact the public health, safety, or welfare, nor would it negatively impact consumers within the United States.⁴ In a worst case scenario, if the market could not access SCC material, manufacturers would simply continue to use graphite to manufacture anodes, which has been the industry standard for some time. However, as noted above, Group14 alone has the capacity to replace anything lost by Sila and Georgia Tech's requested remedial order, so any such order would not negatively impact public health, safety, welfare, or consumers within the United States for this reason as well.

⁴ *See Solicitation of Comments Relating to the Public Interest*, 90 Fed. Reg. 37422, 37423 (June 23, 2026).

Dated: July 1, 2026

Respectfully submitted,

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