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MEMORANDUM TO: David M. Spooner
Assistant Secretary
for Import Administration

FROM: Stephen J. Claeys
Deputy Assistant Secretary
for Import Administration

SUBJECT: Issues and Decision Memorandum for the Final Results of the
Administrative Review of the Antidumping Duty Order on Certain
Corrosion-Resistant Carbon Steel Flat Products from Canada

Summary

We have analyzed the comments in the case and rebuttal briefs submitted by interested parties in the antidumping duty administrative review of certain corrosion-resistant carbon steel flat products (CORE) from Canada. As a result of our analysis, we have made the appropriate changes in the margin calculation. We recommend that you approve the positions we have developed in the Discussion of Interested Party Comments section of this memorandum.

Issues

- Comment 1: Stelco's Sales of "Excess Prime" Merchandise in the Home Market
- Comment 2: Level of Trade (LOT) Analysis for Dofasco
- Comment 3: Stelco's Margin Calculation Errors
- Comment 4: Dofasco's Margin Calculation Errors

Background

On September 9, 2005, the Department of Commerce (the Department) issued its preliminary determination in the antidumping duty administrative review of CORE from Canada. See Certain Corrosion-Resistant Carbon Steel Flat Products from Canada: Preliminary Results of Antidumping Duty Administrative Review, 70 FR 53621 (September 9, 2005) (Preliminary Results). The period of review (POR) is August 1, 2003, through July 31, 2004. This review covers the following Canadian producers of subject merchandise: Dofasco Inc., Sorevco Inc., and DoSol Galva Ltd., which have been collapsed into a single entity (collectively, Dofasco) for purposes of calculating a dumping margin, and Stelco Inc. (Stelco). See the "Affiliation and

Collapsing” section of the Preliminary Results, 70 FR at 53622. The petitioners are U.S. Steel Corporation, Mittal Steel USA ISG Inc., and Nucor Corporation (collectively, the petitioners).

Discussion of Interested Party Comments

Comment 1: Stelco’s Sales of “Excess Prime” Merchandise in the Home Market

Petitioners argue that the Department should disregard Stelco’s sales of “excess prime” merchandise in the home market as being outside the ordinary course of trade. Petitioners cite Sections 771(15) and 773 of the Tariff Act of 1930, as amended (the Act), which provide that the Department may disregard certain sales as being outside the ordinary course of trade. Petitioners note that Stelco’s computer sales database does not differentiate between regular prime and excess prime merchandise. Petitioners cite to Stelco’s questionnaire response, where Stelco states that excess prime can either result from a production overrun or from material not suitable for the original order in terms of dimensions, quality, or mechanical properties, but which could still be sold for another end use.

Petitioners argue that, according to the factors normally considered by the Department in conducting an ordinary course of trade analysis, Stelco’s sales of excess prime merchandise are outside the ordinary course of trade. Petitioners state that the Department has recognized that the purpose of the ordinary course of trade provision is to prevent a company’s dumping margin from being based on sales that are not representative of the home market. See Gray Portland Cement and Clinker From Mexico: Final Results of Antidumping Duty Administrative Review, 63 FR 12764, 12770 (March 16, 1998) (Cement From Mexico). In addition, petitioners argue that the Department’s ordinary course of trade inquiry is “far-reaching” in nature. See Gray Portland Cement and Clinker From Mexico: Final Results of Antidumping Duty Administrative Review, 65 FR 13943 (March 15, 2000), and accompanying Issues and Decision Memorandum at Issue 3. Pursuant to its well-established practice, the Department considers several factors in evaluating whether home market sales are outside the ordinary course of trade. These factors are as follows: 1) whether there are different standards and product uses for the merchandise in question; 2) the comparative volume of the sales of such merchandise; 3) the number of customers for the sales in question in relation to other home market sales; 4) the average price of the sales in question compared to other home market sales; 5) the relative profitability of the sales in question; and 6) whether the sales in question were of production overruns or seconds. See, e.g., Structural Steel Beams From the Republic of Korea: Final Results of Antidumping Duty Administrative Review, 69 FR 7200 (February 13, 2004), and accompanying Issues and Decision Memorandum at Issue 1 (Steel Beams from Korea); Circular Welded Non-Alloy Steel Pipe From the Republic of Korea: Notice of Preliminary Determination of Sales at Less Than Fair Value, 68 FR 68331, 68333 (December 8, 2003); Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From Japan: Notice of Final Determination of Sales at Less Than Fair Value, 64 FR 24329, 24341 (May 6, 1999) (Steel From Japan); Cement From Mexico, 63 FR at 12770-72; and Certain Welded Carbon Steel Standard Pipes and Tubes From India: Final Results of Antidumping Duty Administrative Review, 56 FR 64753, 64755 (December 12, 1991).

First, petitioners state that there are indeed different standards and product uses for Stelco's excess prime merchandise because the merchandise in question is not suitable for the original order in terms of dimensions, quality, mechanical properties, or end use. In addition, petitioners note that this merchandise is sold through special "excess prime offerings." Therefore, petitioners contend, this material has different standards and end-uses, and is sold in a different manner than regular prime merchandise.

Petitioners also argue that there are sufficient differences between excess prime and regular prime merchandise with respect to sales volume, sales price, number of customers, and profitability. According to petitioners, this indicates that excess prime sales are outside of the ordinary course of trade. Petitioners state that Stelco's excess prime sales consist of off-spec merchandise and sales overruns. Petitioners cite to numerous cases where sales of production overruns were considered by the Department to be outside the ordinary course of trade. Accordingly, petitioners argue that because these sales were made outside the ordinary course of trade, they should be excluded from the calculation of Stelco's dumping margin.

Stelco argues that the Department should not exclude Stelco's sales of excess prime merchandise. Stelco notes that in past cases, the Department has considered sales of excess prime merchandise to be within the ordinary course of trade. Stelco argues that in Certain Corrosion-Resistant Carbon Steel Flat Products from Australia: Final Results of Antidumping Administrative Review, 61 FR 14049, 14050-51 (March 29, 1996), the Department found sales of excess prime merchandise to be within the ordinary course of trade based on similar facts.

Stelco contends that its sales of excess prime in the instant review are made in the ordinary course of trade. According to Stelco, while excess prime material is not suitable for the original order, it is still prime merchandise. Further, Stelco states that petitioners have not substantiated their claims with regard to the different properties of excess prime merchandise.

Stelco also discusses the circumstances under which excess prime sales occur. According to Stelco, "the merchandise can be sold in the following ways: 1) the customer can decide to take the additional production, either at the time of the order or at a later date; 2) the merchandise can be applied to another order for prime merchandise; or 3) the merchandise can be returned to stock, for example, the merchandise may be sold directly to another customer to meet an order, or it may be sold as part of an 'excess prime' offering." Because Stelco's computer system is unable to track excess prime merchandise that is sold directly to a customer, the only sales of excess prime reported are those which have been returned to inventory and later sold pursuant to an excess prime offering. Stelco argues that such offerings are of material that is still prime merchandise, and that these excess prime offerings are made at arm's length to customers who pay market value for this merchandise. Finally, Stelco states that these excess prime offerings are a natural and unavoidable consequence of the steel production process, and are not unusual in the North American steel market.

Department's Position:

We find that Stelco's sales of off-spec, excess prime material sold through public offerings are outside the ordinary course of trade and, therefore, should be disregarded. Section 771(15) of the Act defines the term "ordinary course of trade" as "the conditions and practices which, for a reasonable time prior to the exportation of the subject merchandise, have been normal in the trade under consideration with respect to merchandise of the same class or kind." The Statement of Administrative Action (SAA), which accompanied the passage of the Uruguay Round Agreements Act of 1995, H.R. Doc. No. 103-316 (1994) further clarifies this portion of the statute when it states: "Commerce may consider other types of sales or transactions to be outside the ordinary course of trade when such sales or transactions have characteristics that are not ordinary as compared to sales or transactions generally made in the same market." See SAA at 834.

In examining whether these sales are within the ordinary course of trade, we examined the following four factors: (1) whether there are different standards and product uses; (2) the comparative volume of sales and number of buyers in the home market; (3) price and profit differentials; and (4) whether sales in the home market consisted of production overruns or seconds. See Steel Beams from Korea at Issue 1. In addition, we looked at whether the sales in question were made only after a delay from the production time because the excess merchandise was not applied to the original sale. See Steel From Japan, 64 FR at 24341.

Stelco sold excess prime merchandise that was either the result of production overruns or involved off-spec material not suitable for the original order in terms of dimensions, quality, or mechanical properties, but was nevertheless prime merchandise. Stelco reported that it cannot identify production overruns sold directly to customers, but can identify the off-spec merchandise that is sold through excess prime offerings.

Based on the information available on the record concerning the portion of Stelco's sales of excess prime merchandise associated with production overruns for sales made in response to orders from customers, we find this merchandise to be within the ordinary course of trade. According to Stelco's May 20, 2005, supplemental questionnaire response at page 5, production overruns meet all the product characteristics of the customer's original order, carry the price quoted in the order, and are shipped along with the ordered quantity. Stelco has also reported that some of this merchandise is returned by its customers, but that it is unable to track these returns since it would require the manual review of thousands of invoices. Moreover, we have no record evidence to indicate that this returned merchandise would not meet the customer's original specifications as ordered. As more information becomes available in subsequent reviews, the Department will reexamine Stelco's sales of excess prime merchandise involving production overruns.

In considering all the factors enumerated above for determining whether a sale is in the ordinary course of trade, we find the portion of Stelco's sales of excess prime merchandise associated with off-spec material and sold through excess prime offerings to be outside the ordinary course of trade. Stelco is able to identify this portion of its excess prime merchandise sales since it is sold through public offerings (as opposed to sales of excess prime merchandise from production

overruns which were made in response to a customer's order). See Stelco's section B questionnaire response, dated December 23, 2004, at page B-4. As a result, we find that this merchandise was not applied to an original order, but the sale was instead made from inventory and, therefore, that a time lag existed between its production and sale. In addition, we find that this merchandise has different physical characteristics and product uses, based on Stelco's response that while still prime merchandise, it was "not suitable for the original order in terms of dimensions, quality, or mechanical properties, but... would still be suitable for another end-use." See Stelco's section B questionnaire response, dated December 23, 2004, at page B-3. Due to the proprietary nature of the remaining information, a complete discussion of our analysis is found in the Memorandum from Douglas Kirby (AD/CVD Analyst) through Sean Carey (Acting Program Manager) to the File; Certain Corrosion-Resistant Carbon Steel Flat Products from Canada: Analysis of Stelco Inc. (Stelco) for the Final Results (March 8, 2006) (Stelco Final Analysis Memo), on file in the Central Record Unit (CRU), room B-099 of the main Commerce building.

Finally, in response to Stelco's statement that the Department included Stelco's sales of excess prime material in the 1993-1994 administrative review, we note that the argument there was based on whether partial control numbers (CONNUMs) related to the sales of excess prime merchandise could be used for purposes of matching home market sales to U.S. sales. Accordingly, no ordinary course of trade analysis was performed by the Department, nor are the circumstances of a public offering of off-spec merchandise evident in the record of that earlier proceeding.

Comment 2: LOT Analysis for Dofasco

Dofasco argues that the Department should find that sales to service centers and sales to the construction/manufacturing industry are made at separate LOTs. Dofasco states that the Department has ignored previous determinations in prior proceedings that followed the same fact pattern and concluded that sales to these two customer categories are made at different and distinct stages of marketing. Dofasco also contends that the Department wrongly concluded that freight services were provided at the same LOT between these two customer categories. Finally, Dofasco adds that the information included in Dofasco's verification report supports a level of trade distinction between service center customers and construction/manufacturers.

Dofasco contends that, under identical circumstances in prior reviews, the Department has determined that the construction/manufacturer and service centers constitute separate LOTs. According to Dofasco, the number of different selling functions that were performed by these two customer categories accounted for more than half of its total number of reported selling functions. Dofasco states that in the 1996-97 administrative review, the Department found the same number of differences between these customer categories in determining that they were at different LOTs. See Certain Corrosion-Resistant Carbon Steel Flat Products and Certain Cut-to-Length Carbon Steel Plate from Canada: Preliminary Results of Antidumping Duty Administrative Reviews and Intent to Revoke in-Part, 63 FR 37320, 37326 (July 10, 1998).

Dofasco argues that, on this basis alone, the Department should find that these two categories constitute separate LOTs. Dofasco adds that there are no factual grounds on which to base a different conclusion in this segment of the proceeding.

Dofasco further argues that the Department has cited no relevant law, regulation, policy, or practice that has changed between review periods. According to Dofasco, where the facts of the case and the governing rules are the same, and where the Department has explicitly examined those facts under those rules to reach its determination, the Department is precluded from reaching a different conclusion. See, e.g., Notice of Preliminary Results, Partial Rescission of Antidumping Duty Administrative Review and Revocation of the Antidumping Duty Order in Part: Eighth Administrative Review of the Antidumping Duty Order on Certain Pasta from Italy, 70 FR 42303 (July 22, 2005); and Notice of Final Results of the Seventh Administrative Review of the Antidumping Duty Order on Certain Pasta From Italy and Determination to Revoke in Part, 70 FR 6832 (February 9, 2005).

Dofasco states that the Department's analysis of freight services, which was part of the Department's LOT analysis for the Preliminary Results, did not incorporate any distinction of these services by customer category. Dofasco contends that this is necessary for determining the relative performance of freight services by customer category.

Finally, Dofasco argues that the Department has failed to justify its assessments of the overall level of services provided for the selling and marketing, technical service, and inventory categories. According to Dofasco, the Department should assess each individual service function listed and reported by Dofasco as was done in prior reviews, instead of attempting to classify these functions under certain categories. Dofasco also argues that discounts and rebates should also be considered a selling function.

Petitioners argue that the Department should continue to find that sales to service centers and sales to construction/manufacturers are made at one level of trade. Petitioners state that Dofasco's construction and service center customers are not at different stages of marketing. Petitioners assert that even though the customers in question are different types or classes of customers, this is not sufficient to demonstrate that such customers are at different stages of marketing or to establish a difference in the LOT. According to petitioners, the Department has found in numerous cases that sales to end users and resellers constitute a single level of trade.

Petitioners state that the Department may change its position on a particular issue from a prior proceeding where a further understanding of the facts and applicable methodologies warrants such a change. See, e.g., Static Random Access Memory Semiconductors from Taiwan: Final Results and Partial Rescission of Antidumping Duty Administrative Review, 65 FR 55005 (September 12, 2000) (SRAM Semiconductors from Taiwan), and accompanying Issues and Decision Memorandum at Comment 6. Accordingly, petitioners contend that the Department properly revisited its prior position and found it more appropriate and accurate to collapse Dofasco's 16 reported selling activities into four categories, instead of separately analyzing each

activity, in making its finding of a single LOT with regard to Dofasco's sales to construction and service center customers.

Petitioners also contend that the Department has determined in several cases that it is more reasonable and more accurate to group similar or related selling activities into categories of selling functions for purposes of its level of trade analysis. See Stainless Steel Bar (SSB) from Germany: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination, 66 FR 40208, 40212 & n. 2 (August 2, 2001) (SSB From Germany). Thus, the Department's decision to do so in the instant case is in accordance with its normal practice and produces a more accurate result. Petitioners state that the Department has adequately explained and justified its analysis of the four categories of selling functions that are used in making its determination. According to petitioners, any lack of clarity in the classification of the level of services performed by Dofasco with respect to each of the selling functions is attributable not to the Department, but to Dofasco itself. In reaching its LOT determination in the Preliminary Results, the Department reasonably assessed and interpreted the inconsistent and confusing information provided by Dofasco regarding its selling activities.

Petitioners argue that there is nothing in the Department's verification report of Dofasco that would support a finding that Dofasco's sales to construction and service center customers were made at different LOTs. According to petitioners, there is no information in this report that was not before the Department at the time the Preliminary Results were issued. Finally, petitioners cite to Certain Cut-to-Length Carbon Steel Plate from South Africa: Notice of Final Determination of Sales at Less Than Fair Value, 62 FR 61731, 61746 (November 19, 1997), as evidence that discounts and rebates are accounted for in the calculation of normal value and are not considered as selling functions.

Department's Position:

We continue to find, as in the Preliminary Results, that sales made by Dofasco to service centers and construction/manufacturers constitute one LOT. In reviewing the comments from interested parties, we did re-evaluate our four selling function categories. However, in weighing the totality of these activities, we still conclude that Dofasco's sales to service centers and construction/manufacturers in both the home and U.S. markets constitute a single LOT.

The Department recognizes that it found sales to service centers and construction/manufacturers to have been made at separate LOTs in prior reviews that had the same fact pattern as the instant case. However, the Department has the discretion to change its position with respect to a particular issue from a prior proceeding if an explanation is provided. Even if the facts are precisely the same, the Department can change its position in cases where a further understanding of the facts and applicable methodologies warrant such a change. See SRAM Semiconductors from Taiwan at Comment 6. Here, the Department has revised its LOT analysis from previous reviews to account for the additional selling functions of inventory and freight that were not considered in prior administrative reviews, to reflect the Department's current practice. See, e.g., SSB From Germany, 66 FR at 40212 & n.2 (evaluating the freight and inventory in its LOT

analysis).

Our revised analysis included re-examining the narrative answers corresponding to each of Dofasco's 16 reported selling activities. Under closer scrutiny, the narratives showed that the 16 selling activities separated activities that could best be grouped into four selling function categories. The Department has an established practice with regard to organizing the selling and distribution activities reported by a respondent into categories that are essentially identical to those used in the Preliminary Results (i.e., sales process and marketing support, freight and delivery, inventory and warehousing, and quality assurance/warranty services). See, e.g., SSB From Germany, 66 FR at 40212 & n. 2; and Greenhouse Tomatoes from Canada: Final Determination of Sales at Less Than Fair Value, 67 FR 8781, 8784 (February 26, 2002).

Accordingly, we have categorized Dofasco's reported selling and distribution activities in order to bring our LOT methodology in this proceeding into conformance with the Department's current practice and because we find that this re-evaluation of the selling activities is necessary for a more accurate LOT analysis in the instant case. As a result of our re-evaluation, the Department concludes that the four categories used in the Preliminary Results (selling and marketing, technical service, freight, and inventory) more accurately evaluate the extent and level of selling functions occurring at a place in the chain of distribution by limiting the analysis to selling activities that are linked to sales to that class of customer(s), i.e., in this instance, the customer categories.

For purposes of these final results, we have re-examined and clarified these groupings for service centers and construction/manufacturers, taking into consideration the selling functions reported by Dofasco, as well as any relevant information obtained during verification. In addition, we agree with Dofasco that its rebates/discount programs should be considered as a selling function and, therefore, have analyzed the frequency with which service centers and construction/manufacturers utilized these programs and incorporated this information into our LOT analysis. See, e.g., Certain Welded Carbon Steel Pipes and Tubes from Thailand: Preliminary Results of Antidumping Duty Administrative Review, 63 FR 16974, 16978 (April 7, 1998) (unchanged in final results). Due to the proprietary nature of this information, these groupings and activities are discussed in full detail in Attachment I of the Memorandum from Douglas Kirby (AD/CVD Analyst) through Sean Carey (Acting Program Manager) to the File: Certain Corrosion-Resistant Carbon Steel Flat Products from Canada: Analysis of Dofasco Inc. (Dofasco) and Sorevco for the Final Results, (March 8, 2006) (Dofasco Final Analysis Memo), on file in the CRU, room B-099 of the main Commerce building.

In its LOT argument, Dofasco asserted that there were three levels of trade in the home market: one level for automotive customers (e.g., LOTH1), a second level for service center customers (e.g., LOTH2), and a third for construction/manufacturers (e.g., LOTH3). However, based on our analysis, we continue to find that Dofasco's home market sales to service center customers and construction/manufacturers are similar with respect to selling and marketing activities, technical service, warehouse/inventory maintenance and, and freight services. As a result, we continue to find that these home market sales constituted a single level of trade. Therefore, we have combined construction/manufacturers and service centers (e.g., LOTH2 and

LOTH3) as one level of trade, which we denominated (LOTH2), for this LOT analysis.

Dofasco asserted the same three levels of trade in the U.S. market (e.g., LOTU1, LOTU2, and LOTU3). We re-examined the chain of distribution and the selling activities associated with Dofasco's U.S. sales to construction and service centers. We find that these sales are similar with respect to selling and marketing activities, technical service, and warehouse/inventory maintenance, but differ slightly with respect to freight services. As a result, we also find that sales to these two customer categories constitute a single level of trade in the U.S. market, and therefore we have combined construction and service centers as one level of trade, which we denominated (LOTU2), for this LOT analysis. Next, we then compared these levels of trade in the U.S. and home markets (LOTU2 to LOTH2) and found that they are similar with respect to technical service, warehouse/inventory maintenance, and freight services, but differ slightly with regard to selling and marketing activities. Consequently, we find that sales to construction and service center customers in the home market (LOTH2) and sales to construction and service center customers in the U.S. market (LOTU2) are made at the same LOT.

Comment 3: Stelco's Margin Calculation Errors

First, petitioners argue that the Department made several calculation errors in its preliminary determination with respect to Stelco. First, petitioners state that in the Preliminary Results, the Department incorrectly performed the currency conversion in determining normal value for Stelco's home market sales. Petitioners assert that the Department should make the appropriate changes to its coding in the final margin program to correct this conversion error. Stelco did not comment on this point.

Second, petitioners note that Stelco made sales to the United States denominated in both U.S. and Canadian dollars. For these sales, the amounts reported in the fields GRSUPRU, BILLADJU, and CREDITU are denominated in either U.S. or Canadian currency based on the currency of the particular sale in question. Petitioners contend that for those sales that were denominated in Canadian dollars, the Department made errors in certain calculations with regard to the field listed above. Petitioners state that the Department should correct this error by changing certain programming language in the U.S. Sales Program. Stelco did not comment on this point.

Third, petitioners argue that Stelco did not report a value for a certain field on a number of U.S. sales, and that the Department made errors regarding the calculation of the credit expense for these sales. Stelco did not comment on this point.

Fourth, petitioners argue that the Department miscalculated the home market net price for sales denominated in Canadian dollars for use in the cost test. Petitioners state that a specific field should be removed from the net price/cost test calculation in the Home Market Sales Program. Stelco agrees with petitioners that the Department erroneously calculated net price in its Preliminary Results. However, Stelco also notes that the Department erred in the calculation of the net price for U.S. sales denominated in Canadian dollars, which should be corrected by

removing the variable DIRSELH_US from the home market sales program.

Finally, petitioners contend that the Department incorrectly calculated the currency conversion of Stelco's U.S. packing expenses for the Preliminary Results. Petitioners argue that the Department should correct this error by modifying the U.S. sales program for the final results. Stelco notes that the Department's practice is to add U.S. packing costs to home-market price and to deduct home-market packing costs from home-market price, but not make any similar adjustment to U.S. price for such costs. Therefore, Stelco argues that if the Department corrects the errors identified by petitioners in the calculation of U.S. packing costs, it must also remove the deduction of the variable PACKU from the net export price.

Department's Position:

The Department has corrected the program errors noted by petitioners in Stelco's margin calculation. In addition, the Department has also corrected this programming to account for the errors noted by Stelco. As a result, these changes will be integrated into the final calculation programs for these final results. For a further discussion regarding these changes to Stelco's margin calculation program, see Stelco Final Analysis Memo.

Comment 4: Dofasco Margin Calculation Errors

Dofasco argues that the Department inadvertently failed to use Dofasco's reported U.S. market date of sale in Dofasco's margin calculations. Dofasco states that the Department inadvertently excluded a large number of Dofasco's home market sales from the margin analysis by failing to expand the window period to include all home market sales with a date of sale three months preceding the earliest month of U.S. sales, through the two months after the latest month of U.S. sales. In addition, Dofasco contends that the Department excluded a significant number of its U.S. sales by analyzing only sales made during the POR rather than correctly analyzing sales of all entries made during the POR.

Petitioners contend that the Department did not correctly calculate the LOT adjustment to be included in the foreign unit price denominated in U.S. dollars.

Department's Position:

The Department agrees with Dofasco's margin calculation error allegations and, as a result, the relevant corrections will be incorporated into the final margin calculation program for these final results. The Department also will correct the LOT calculation error noted by petitioners. For further discussion in regard to the Department's changes to the margin calculation programs for Dofasco, see Dofasco Final Analysis Memo.

Recommendation

Based on our analysis of the comments received, we recommend adopting the positions described above. If these recommendations are accepted, we will publish the final results and the final weighted-average dumping margin in the Federal Register.

Agree_____ Disagree_____

David M. Spooner
Assistant Secretary
for Import Administration

(Date)