

DATE: July 29, 2011

MEMORANDUM TO: Ronald K. Lorentzen
Deputy Assistant Secretary
for Import Administration

FROM: Christian Marsh
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the
Expedited Second Sunset Reviews of the Antidumping Duty
Orders on Certain Large Diameter Carbon and Alloy Seamless
Standard, Line and Pressure Pipe from Japan (A-588-850), Certain
Small Diameter Carbon and Alloy Seamless Standard, Line and
Pressure Pipe from Japan (A-588-851) and Romania (A-485-805)

SUMMARY

We have analyzed the substantive responses of the domestic interested party in the second sunset reviews of the antidumping duty orders covering certain large diameter carbon and alloy seamless standard, line and pressure pipe (“large diameter pipe”) from Japan and certain small diameter carbon and alloy seamless standard, line and pressure pipe (“small diameter pipe”) from Japan and Romania.¹ We recommend that you approve the positions described in the “Discussion of the Issues” section of this memorandum. Below is a complete list of the issues in this sunset review for which we received substantive responses:

1. Likelihood of a continuation or recurrence of dumping
2. Magnitude of the margin likely to prevail

¹ No response was received from respondent interested parties.

HISTORY OF THE ORDER

The Department of Commerce (“Department”) published its final affirmative determinations of sales at less than fair value with respect to imports of large diameter pipe from Japan and small diameter pipe from Japan on May 4, 2000.² For large diameter pipe from Japan, the Department established weighted-average dumping margins of 107.80 percent for Nippon Steel Corporation (“NSC”), Kawasaki Steel Corporation (“KSC”), and Sumitomo Metal Industries (“SMI”), and 68.88 percent for “all others.” For small diameter pipe from Japan, the Department established weighted-average dumping margins of 106.07 percent for NSC, KSC, SMI, and 70.43 percent for “all others.” The Department published the antidumping duty orders for large diameter pipe from Japan and small diameter pipe from Japan on June 26, 2000.³ No administrative reviews of these orders were requested for the periods December 14, 1999-May 31, 2001; June 1, 2001-May 31, 2002; June 1, 2002-May 31, 2003; and June 1, 2003-May 31, 2004.

The Department published its final affirmative determination of sales at less than fair value with respect to imports of small diameter pipe from Romania on June 23, 2000.⁴ On August 10, 2000, the Department amended its final affirmative determination of sales at less than fair value with respect to imports of small diameter pipe from Romania due to ministerial errors and published the antidumping duty order for small diameter pipe from Romania.⁵ The amended weighted-average dumping margins were 15.15 percent for Sota Communication Company (“Sota”),⁶ 11.08 percent for Metal Business International S.R.L. (“MBI”),⁷ and a country-wide rate of 13.06 percent. The first administrative review covered the period February 4, 2000, through July 31, 2001. Romania was treated as a nonmarket economy (“NME”) country during this review, and Silcotub was the only Romanian producer or exporter of the subject merchandise covered by the review. The Department calculated a de minimis weighted-average dumping margin of 0.04 percent for Silcotub during the first administrative review.⁸ The second administrative review covered the period August 1, 2001, through July 31, 2002, and Silcotub again was the only producer/exporter reviewed. The Department determined a zero margin for

² See Notice of Final Determinations of Sales as Less Than Fair Value: Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan; and Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and the Republic of South Africa, 65 FR 25907 (May 4, 2000) (“Final Determination”).

³ See Notice of Antidumping Duty Orders: Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan; and Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and the Republic of South Africa, 65 FR 39360 (June 26, 2000).

⁴ See Notice of Final Determination of Sales at Less Than Fair Value: Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Romania, 65 FR 39125 (June 23, 2000) (“Final Determination Romania”).

⁵ See Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Romania, 65 FR 48963 (August 10, 2000).

⁶ S.C. Silcotub S.A. (“Silcotub”) was the producer of seamless pipe that Sota exported. See Final Determination Romania, 65 FR 39125.

⁷ S.C. Petrotub S.A. (“Petrotub”) was the producer of the seamless pipe that MBI exported. See Final Determination Romania, 65 FR 39125.

⁸ See Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Romania: Final Results of Antidumping Duty Administrative Review, 68 FR 12672 (March 17, 2003) (“First Administrative Review”).

Silcotub.⁹ The third administrative review covered the period August 1, 2002, through July 31, 2003. Because the Department had designated Romania a market economy (“ME”) country, effective on January 1, 2003,¹⁰ the Department divided the period of review for the third administrative review into an NME and an ME portion. Silcotub, the only producer/exporter reviewed during this period, had a margin of 1.35 percent for the entire period of review.¹¹ Silcotub was again the only producer or exporter reviewed in the fourth administrative review. However, on March 4, 2005, Silcotub withdrew its participation in the review. For this review, the Department determined a margin of 15.15 percent for Silcotub, based on adverse facts available.¹²

On May 2, 2005, the Department initiated the first sunset reviews of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”).¹³ As noted above, prior to completion of the first sunset reviews, the Department conducted four administrative reviews of the antidumping order on small diameter pipe from Romania, and no administrative reviews of the orders on small or large diameter pipe from Japan. As a result of the first sunset reviews, pursuant to sections 751(c) and 752 of the Act, the Department determined that revocation of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania would likely lead to the continuation or recurrence of dumping.¹⁴ On April 24, 2006, the International Trade Commission (“ITC”), pursuant to section 751(c) of the Act, determined that revocation of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁵ Accordingly, the Department published a notice of the continuation of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania, pursuant to 19 CFR 351.218(f)(4).¹⁶

⁹ See Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe From Romania: Final Results of Antidumping Duty Administrative Review, 68 FR 54418 (September 17, 2003).

¹⁰ See First Administrative Review, 68 FR at 12673.

¹¹ See Notice of Amended Final Results of Antidumping Duty Administrative Review: Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Romania, 70 FR 14648, 14649 (March 23, 2005).

¹² See Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Romania: Final Results of Antidumping Duty Administrative Review and Final Determination Not to Revoke Order in Part, 70 FR 41206 (July 18, 2005).

¹³ See Initiation of Five-Year (“Sunset”) Reviews, 70 FR 22632 (May 2, 2005).

¹⁴ See Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and Mexico: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders, 70 FR 53159 (September 7, 2005); and Carbon and Alloy Seamless Standard, Line and Pressure Pipe (Under 4.5 Inches) from the Czech Republic, Japan, Romania, and South Africa: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders, 70 FR 53151 (September 7, 2005) (“First Sunset Review Final”).

¹⁵ See Carbon and Alloy Seamless Standard, Line, and Pressure Pipe From the Czech Republic, Japan, Mexico, Romania, and South Africa, 71 FR 24860 (April 27, 2006), and USITC Publication 3850 (April 2006), entitled “Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Czech Republic, Japan, Mexico, Romania, and South Africa, Investigation Nos. 731-TA-846-850 (Review)”.

¹⁶ See Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Japan and Romania: Continuation of Antidumping Duty Orders, 71 FR 26746 (May 8, 2006).

After the final results of the first sunset reviews, and prior to the current sunset reviews, four administrative reviews of the order on large diameter pipe from Japan were requested, but each of these reviews was subsequently rescinded.¹⁷ The order remains in effect for all manufacturers and exporters of the subject merchandise from Japan. No administrative reviews of the orders on small diameter pipe from Japan or small diameter pipe from Romania have been conducted since the first sunset review. These orders also remain in effect for all manufacturers and exporters of the subject merchandise from Japan and Romania, respectively.

BACKGROUND

On April 1, 2011, the Department published the notice of initiation of the second sunset reviews of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania, pursuant to section 751(c) of the Act. See Initiation of Five-Year (“Sunset”) Review, 76 FR 18163 (April 1, 2011). On April 13, 2011, the Department received a notice of intent to participate in all three reviews from a domestic interested party, United States Steel Corporation (“U.S. Steel” or “Petitioner”). Submission of the notice of intent to participate was filed by U.S. Steel within the deadline specified in 19 CFR 351.218(d)(1)(i). U.S. Steel claimed interested party status under section 771(9)(C) of the Act, as a manufacturer in the United States of a domestic like product. On May 2, 2011, the Department received a substantive response in all three reviews from U.S. Steel within the deadline specified in 19 CFR 351.218(d)(3)(i). We received no substantive responses from any respondent interested parties. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department is conducting expedited sunset reviews of these antidumping duty orders.

DISCUSSION OF THE ISSUES

In accordance with section 751(c)(1) of the Act, the Department is conducting sunset reviews to determine whether revocation of the antidumping duty orders would likely lead to continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and the period after, the issuance of the antidumping duty orders. In addition, section 752(c)(3) of the Act states that the Department shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the orders were revoked. Below we address the comments made by the domestic interested party.

1. Likelihood of Continuation or Recurrence of Dumping

¹⁷ See Certain Large Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Japan: Notice of Rescission of Antidumping Duty Administrative Review, 71 FR 76976 (December 22, 2006); Carbon and Alloy Seamless Standard, Line and Pressure Pipe (over 4.5 inches) from Japan: Notice of Rescission of Antidumping Duty Administrative Review, 73 FR 11393 (March 3, 2008); Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan: Rescission of Antidumping Duty Administrative Review, 74 FR 31249 (June 30, 2009); Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan: Rescission of Antidumping Duty Administrative Review, 75 FR 38781 (July 6, 2010).

U.S. Steel asserts that, in determining whether revocation would lead to continuation or recurrence of dumping, the Department considers (1) the weighted-average dumping margins determined in the investigation and subsequent reviews, and (2) the volume of imports of the subject merchandise both before and after the issuance of the antidumping order. U.S. Steel cites to the SAA¹⁸ and the Policy Bulletin¹⁹ in asserting that the Department will normally determine that revocation of an antidumping duty order will likely lead to continuation or recurrence of dumping where dumping continued at any level above de minimis after issuance of an order; imports of the subject merchandise ceased after issuance of the order; or dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.

U.S. Steel argues that revocation of the antidumping duty orders will likely lead to a continuation of dumping in the instant cases because (1) dumping has continued after the issuance of the orders at above de minimis levels for each of the three orders, and (2) import volumes declined significantly after the issuance of each of the three orders.

U.S. Steel asserts that since issuance of the orders, imports have been only a fraction of pre-petition levels: imports of large diameter pipe from Japan have ranged from 7.43 percent to 47.56 percent of pre-petition levels;²⁰ imports of small diameter pipe from Japan have ranged from 0.42 percent to 24.05 percent;²¹ and imports of small diameter pipe from Romania have ranged from 0.13 percent to 5.59 percent.²² Based on this information, U.S. Steel claims that, even if dumping had ceased, the significant drop in subject imports warrants continuation of the orders.²³

U.S. Steel avers that the orders have effectively remediated the harmful effects of the subject merchandise entering the U.S. market and that the Department should determine that dumping would likely continue or recur if the orders were revoked in these sunset reviews.

Department's Position:

Drawing on the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the SAA, the House Report, H. Rep. No. 103-826, pt. 1 (1994), and the Senate Report, S. Rep. No. 103-412 (1994), the Department normally determines that

¹⁸ See Statement of Administrative Action, H.R. Doc. No. 103-316, Vol. 1, at 890 (1994) ("SAA").

¹⁹ See Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders, 63 FR 18871 (April 16, 1998) ("Policy Bulletin") (quoting the SAA at 889).

²⁰ See U.S. Steel May 2, 2011 substantive response for Large Diameter Pipe from Japan at 10.

²¹ See U.S. Steel May 2, 2011 substantive response for Small Diameter Pipe from Japan at 9. It should be noted that while the Harmonized Tariff Schedule of the United States ("HTSUS") disaggregates import data by outer diameter, it does not disaggregate imports of standard pipe from imports of mechanical tube. U.S. Steel maintains that standard pipe is within the scope of the order, but mechanical tube is not. U.S. Steel claims that it asked the American Iron and Steel Institute ("AISI") to analyze the parameters of the HTSUS codes and to determine under which codes standard pipe would predominate. U.S. Steel claims that it adopted AISI's methodology and included only those HTSUS codes in which AISI concluded that standard pipe predominates. U.S. Steel maintains that it included all imports covered by HTSUS codes 7304.39.00.16, 7304.39.00.20, 7304.39.00.24, 7304.59.80.10, 7304.59.80.15. In addition, import volumes included HTSUS codes 7304.10.10.20, 7304.10.50.20, 7304.19.50.20, and 7304.19.10.20, which encompass line pipe.

²² See U.S. Steel May 2, 2011 substantive response for Small Diameter Pipe from Romania at 12.

²³ See Policy Bulletin, 63 FR at 18872.

revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping where (a) dumping continued at any level above de minimis after the issuance of the order, (b) imports of the subject merchandise ceased after the issuance of the order, or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.²⁴ In addition, pursuant to section 752(c)(1)(B) of the Act, the Department considers the quantity of imports of the subject merchandise for the period before and after the issuance of the order.

Deposit rates above de minimis remain in effect for all exports of large diameter pipe from Japan and small diameter pipe from Japan and Romania. For large and small diameter pipe from Japan, the investigation margins, in addition to being the margins based on a time period for which the orders were not yet in place, are the only margins we can examine because no reviews have been conducted. We infer from the fact that respondents have not requested an administrative review, that dumping continues--because if dumping had ceased, it is likely they would have requested an administrative review.

As cited previously, the Department conducted four administrative reviews before the first sunset review of the order on small diameter pipe from Romania and calculated or assigned above de minimis margins in the third and fourth administrative reviews. Those reviews covered a single exporter/producer. The Department has not conducted reviews for the other Romanian exporters/producers, and their rates remain above de minimis.

The Department also analyzed and considered the volume of imports of subject merchandise under each order, from the two-year period before issuance of the orders through 2010. See Memorandum to The File from Mary Kolberg, Case Analyst, through Nancy Decker, Program Manager, regarding the Import Volumes for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Japan and Romania; Final Results, dated concurrently with this memorandum (Import Volumes Memorandum). The import volumes continue to be well below pre-initiation levels for all three orders.²⁵

Given that dumping continues at levels above de minimis and imports are significantly below the pre-initiation level, we determine that dumping is likely to continue or recur if these orders were revoked.

Therefore, on the basis of information provided by U.S. Steel, information on the record, and the lack of information provided by respondent parties, we continue to find that revocation of the antidumping duty orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania would likely lead to a continuation or recurrence of dumping.

2. Magnitude of the Margins Likely to Prevail

²⁴ See SAA at 889-90, the House Report, H. Rep. No. 103-826, pt.1 at 63-64 (1994) reprinted at 1994 U.S.C.C.A.N. 3773, and the Senate Report, S. Rep. No. 103-412 (1994) at 52.

²⁵ See U.S. Steel May 2, 2011 substantive responses for Large Diameter Pipe from Japan at 10, Small Diameter Pipe from Japan at 9, and Small Diameter Pipe from Romania at 12.

U.S. Steel notes that section 752(c)(3) of the Act requires the Department to determine the magnitude of the margins of dumping that likely would prevail if the Department revoked the antidumping orders. U.S. Steel claims that the Department will normally select a margin from the investigation because it is the only calculated rate that reflects the behavior of exporters, without the discipline of an order or suspension agreement in place.

U.S. Steel concludes that the Department should inform the ITC that the following margins would be likely to prevail if the Department determines to revoke these orders:

For large diameter pipe from Japan

- 107.80 percent for NSC, KSC, and SMI
- 68.88 percent for all other producers

For small diameter pipe from Japan

- 106.07 percent for NSC, KSC, and SMI
- 70.43 percent for all other producers

For small diameter pipe from Romania

- 11.08 percent for MBI and Petrotub
- 15.15 percent for Sota and Silcotub
- 13.06 percent for all other producers

Department's Position:

Section 752(c)(3) of the Act provides that the Department will provide to the ITC the magnitude of the margin of dumping likely to prevail if the order were revoked. Normally, the Department will provide the ITC the company-specific margin from the investigation for each company.²⁶ Further, for those companies not investigated specifically, or for companies that did not begin shipping until after an order was issued, the Department normally will provide a margin based on the "all-others" rate from the investigation.²⁷ The Department's preference for selecting a margin from the investigation is based on the fact that it is the only calculated rate on the record that reflects the behavior of manufacturers, producers, and exports without the discipline of an order or suspension agreement in place.²⁸ However, under certain circumstances, the Department may select a more recently calculated margin to report to the ITC.²⁹ The

²⁶ See Eveready Battery Co., Inc. v. United States, 77 F. Supp. 2d 1327, 1333 (Ct. Int'l Trade 1999).

²⁷ See Certain Hot-Rolled Carbon Steel Flat Products from Argentina, the People's Republic of China, India, Indonesia, Kazakhstan, Romania, South Africa, Taiwan, Thailand, and Ukraine; Final Results of Expedited Sunset Reviews of the Antidumping Duty Orders, 71 FR 70506 (December 5, 2006) and accompanying Issues and Decision Memorandum at Comment 2.

²⁸ Id.

²⁹ See also Final Results of Full Sunset Review: Aramid Fiber Formed of Poly Para-Phenylene Terephthalamide From the Netherlands, 65 FR 65294 (November 1, 2000) and accompanying Issues and Decision Memorandum at Comment 3.

Department may use a rate from a more recent review where the dumping margin increased, as this rate may be more representative of a company's behavior in the absence of an order (e.g., where a company increases dumping to maintain or increase market share with an order in place).³⁰ In determining whether a more recently calculated margin is probative of the behavior of an exporter were the order to be revoked, the Department considers company-specific exports and company-specific margins and, when available, a company's share of imports.³¹

We agree with U.S. Steel that we should report the rates from the original investigations for large and small diameter pipe from Japan,³² because these are the only calculated rates that reflect the behavior of manufacturers, producers, and exporters without the discipline of an order in place. NSC, KSC, and SMI had a margin of 107.80 percent in the investigation of large diameter pipe, and a margin of 68.88 percent was found for all other producers/exporters. For small diameter pipe from Japan, NSC, KSC, and SMI had a margin of 106.07 percent in the investigation, and a 70.43 percent margin was found for imports from all other producers/exporters.

With respect to small diameter pipe from Romania, administrative reviews have resulted in margins of 0.04 percent, zero percent, 1.35 percent, and 15.15 percent for Silcotub. In the first sunset review in explaining the margin to report to the ITC, we stated that “[t]he Department may provide the ITC with a more recently assigned margin for a particular company, in this case Silcotub, where dumping margins increased for that company, even if the increase was a result of the application of best information or facts available. For Silcotub, the Department determines that it is appropriate to report to the ITC the rate from the most recently completed review.”³³

As discussed in section II.A.3 of the Sunset Policy Bulletin, the SAA at 890, and the House Report at 63-64, existence of dumping margins after the order is highly probative of the likelihood of continuation or recurrence of dumping. If companies continue to dump with the discipline of an order in place, the Department may reasonably infer that dumping would continue if the discipline of the order were removed. Because Silcotub continued to dump with the discipline of an order in place, we find that the 15.15 percent margin is probative of Silcotub's behavior were the order to be revoked. In addition, we note that in Wooden Bedroom Furniture,³⁴ we stated “[t]he Department's practice establishes that the onus is on the party requesting more recent rates to be reported to the ITC to provide the Department with the necessary data....” In this proceeding, where the Department reported a more recent margin of 15.15 percent for Silcotub to the ITC in the first sunset review,³⁵ the onus falls on the respondent to provide the necessary data to the Department for reporting a rate other than the 15.15 percent.

³⁰ See SAA at 890-91; Policy Bulletin at section II.B.2; see, e.g., Chloropicrin From the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order, 74 FR 57450 (November 6, 2009).

³¹ See Stainless Steel Bar from Germany; Preliminary Results of the Sunset Review of Antidumping Duty Order, 72 FR 29970 (May 30, 2007), and accompanying Issues and Decision Memorandum at Comment 2, as corrected in 72 FR 31660 (June 7, 2007) (unchanged in Stainless Steel Bar from Germany; Final Results of the Sunset Review of the Antidumping Duty Order, 72 FR 56985 (October 5, 2007)).

³² See Final Determination.

³³ See First Sunset Review Final and accompanying Issues and Decision Memorandum at 9.

³⁴ See Wooden Bedroom Furniture From the People's Republic of China: Final Results of Expedited Sunset Review of Antidumping Duty Order, 75 FR 19364 (April 14, 2010) and accompanying Issues and Decision Memorandum at 8 (“Wooden Bedroom Furniture”).

³⁵ See First Sunset Review Final.

In this instance, the respondents are not participating in the proceeding and, thus, there is no such submission on the record to consider. Accordingly, we find it appropriate to continue to report the margin of 15.15 percent for Silcotub to the ITC.

For the other Romanian companies that were subject to the investigation, Sota and MBI (and its producer Petrotub), U.S. Steel requests that the Department report to the ITC the margins from the investigation as the margins likely to prevail if the order were revoked. Because the investigation margins are the only calculated rates that reflect the behavior of these manufacturers, producers, and exporters without the discipline of an order in place, we agree that these margins best reflect the margins of dumping that would prevail if the order were revoked.

FINAL RESULTS OF REVIEWS

We determine that revocation of the orders on large diameter pipe from Japan and small diameter pipe from Japan and Romania would likely lead to a continuation or recurrence of dumping at the following weighted-average percentage margins:

Large Diameter Pipe from Japan

Manufacturer/exporter	Margin
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Nippon Steel Corporation (“NSC”).....	107.80%
Kawasaki Steel Corporation (“KSC”).....	107.80%
Sumitomo Metal Industries, Ltd. (“SMI”).....	107.80%
All Others.....	68.88%

Small Diameter Pipe from Japan

Manufacturers/producers/exporters	Margin
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Nippon Steel Corporation (“NSC”).....	106.07%
Kawasaki Steel Corporation (“KSC”).....	106.07%
Sumitomo Metal Industries, Ltd. (“SMI”).....	106.07%

All Others.....70.43%

Small Diameter Pipe from Romania

Manufacturers/producers/exporters

Margin

Metal Business International S.R.L. (“MBI”).....11.08%

S.C. Petrotub S.A. (“Petrotub”).....11.08%

Sota Communication Company (“Sota”)... ..15.15%

S.C. Silcotub (“Silcotub”).....15.15%

All Others.....13.06%

RECOMMENDATION

Based on our analysis of the substantive responses received, we recommend adopting the above positions. If this recommendation is accepted, we will publish the final results of these sunset reviews in the Federal Register, and notify the ITC of our determination.

AGREE _____

DISAGREE_____

Ronald K. Lorentzen
Deputy Assistant Secretary
for Import Administration

Date