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

FROM: Christian Marsh */I/ CM* 01/31/2011
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Carbon Steel Butt-Weld Pipe Fittings From Brazil, Japan, Taiwan, Thailand, and the People's Republic of China

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SUMMARY:

We have analyzed the substantive responses of the interested parties in the sunset reviews of the antidumping duty orders on certain carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the People's Republic of China (PRC). We recommend that you approve the positions developed in the *Discussion of the Issues* section of this memorandum. Below is a complete list of the issues in these sunset reviews for which we received substantive responses:

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

History of the Orders

The Department of Commerce (the Department) published its final affirmative determinations of sales at less than fair value (LTFV) in the *Federal Register* with respect to imports of certain carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC[1] at the following percentage rates:

[1] See *Certain Carbon Steel Butt-Weld Pipe Fittings From Brazil; Final Determination of Sales at Less Than Fair Value,* 51 FR 37770 (October 24, 1986); *Certain Carbon Steel Butt-Weld Pipe Fittings From Japan: Final Determination of Sales at Less Than Fair Value*, 51 FR 46892 (December 29, 1986); *Certain Carbon Steel Butt-Weld Pipe Fittings From Taiwan; Final Determination of Sales at Less Than Fair Value*, 51 FR 37772 (October 24, 1986); *Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand: Final Determination of Sales at Less Than Fair Value*, 57 FR 21065 (May 18, 1992) (*Thailand LTFV)*; *Antidumping Duty Order and Amendment to the Final Determination of Sales at Less Than Fair Value; Certain Carbon Steel Butt-Weld Pipe Fittings from the People's Republic of China,* 57 FR 29702 (July 6, 1992).

<u>Brazil</u>	
All Brazilian Manufacturers, Producers and Exporters	52.25
<u>Japan</u>	
Awaji Sangyo, KK	30.83
Nippon Benkan Kogyo Co. Ltd.	65.81
All Other Japanese Manufacturers and Exporters	62.79
<u>Taiwan</u>	
Rigid Industries	6.84
Chung Ming Pipe Fitting Manufacturing Company. Ltd.	8.57
Gei Bey Corporation	87.30
Chup Hisin Enterprises	87.30
All Other Taiwanese Manufacturers and Exporters	49.46
<u>Thailand</u>	
Thai Benkan Company	50.84
TTU Industrial Corp. Ltd.	10.68
All Other Thai Manufacturers and Exporters	39.10
<u>The PRC</u>	
China North Industries Corp.	154.72
Jilin Provincial Machinery & Equipment Import & Export Corp.	75.23
Liaoning Machinery & Equipment Import & Export Corp.	134.79
Liaoning Metals & Minerals Import & Export Corp.	103.70
Shenyang Billiongold Pipe Fittings Co. Ltd.	110.39
Shandong Metals & Minerals Import & Export Corp.	35.06
Shenyang Machinery & Equipment Import & Export Corp.; Lianoning Metals; Shenzhen Machinery Industry Corporation; and all others	182.90

The Department later published in the *Federal Register* antidumping duty orders on certain carbon steel butt–weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC.[2]

[2] See *Antidumping Duty Order; Certain Carbon Steel Butt-Weld Pipe Fittings from Brazil*, 51 FR 45152 (December 17, 1986); *Antidumping Duty Order: Certain Carbon Steel Butt-Weld Pipe Fittings from Japan*, 52 FR 4167 (February 10, 1987); *Antidumping Duty Order; Certain Carbon Steel Butt-Weld Pipe Fittings From Taiwan*, 51 FR 45152 (December 17, 1986); *Antidumping Duty Order; Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand*, 57 FR 29702 (July 6, 1992); *Antidumping Duty Order and Amendment to the Final Determination of Sales at Less Than Fair Value; Certain Carbon Steel Butt-Weld Pipe Fittings From the People's Republic of China*, 57 FR 29702 (July 6, 1992).

Brazil and the PRC

Since the publication of the antidumping duty orders, the Department has conducted no administrative reviews of the antidumping duty orders on certain carbon steel butt-weld pipe fittings from the Brazil and the PRC.

Japan

Since the publication of the antidumping duty order, the Department initiated one administrative review of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Japan, which the Department later rescinded.[3]

Taiwan

Since the publication of the antidumping duty order, the Department initiated three administrative reviews of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Taiwan, completing two reviews and rescinding one review.[4] In the completed administrative reviews, the Department found that the producers/exporters continued to dump subject merchandise at levels above *de minimis* with the order in place.

Thailand

Since the publication of the antidumping duty order, the Department initiated four administrative reviews of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Thailand, completing three reviews and rescinding one review.[5] In the completed administrative reviews, the Department found that the producers/exporters continued to dump subject merchandise at levels above *de minimis* with the order in place.

Deposit rates remain in effect for all manufacturers, producers, and exporters of the subject merchandise from Brazil, Japan, Taiwan, Thailand, and the PRC.

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[3] See *Carbon Steel Butt-Weld Pipe Fittings from Japan: Rescission of Antidumping Duty Administrative Review*, 74 FR 39934 (August 10, 2009).

[4] See *Certain Carbon Steel Butt-Weld Pipe Fittings From Taiwan; Final Results of Antidumping Duty Administrative Review*, 56 FR 20187 (May 2, 1991); *Certain Carbon Steel Butt-Weld Pipe Fittings From Taiwan; Final Results of Administrative Review,* 60 FR 49585 (September 26, 1995); *Carbon Steel Butt-Weld Pipe Fittings From Taiwan; Termination of Antidumping Administrative Review*, 55 FR 22368 (June 1, 1990).

[5] See *Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand; Final Results of the Antidumping Duty Administrative Review*, 62 FR 40797 (July 30, 1997); *Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand; Final Results of Antidumping Duty Administrative Review*, 64 FR 69487 (December 13, 1999); *Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand; Final Results of Antidumping Duty Administrative Review*, 68 FR 6409 (February 7, 2003); *Carbon Steel Butt-Weld Pipe Fittings from Thailand: Notice of Rescission of Antidumping Duty Administrative Review*, 69 FR 65147 (November 10, 2004).

Duty-Absorption Findings, Scope Inquiries, Changed-Circumstances Reviews, Anti-circumvention Determinations

There have been no duty-absorption findings in administrative reviews of these orders. Duty-absorption inquiries may not be conducted on pre-Uruguay Round Agreements Act (URAA) orders. See *FAG Italia S.p.A. v. United States*, 291 F.3d 806 (Fed. Cir. 2002).

Brazil

There have been no changed-circumstances reviews, scope rulings, or anti-circumvention determinations with respect to the order on certain carbon steel butt-weld pipe fittings from Brazil.

Japan

There have been no changed-circumstances reviews or scope rulings with respect to the order on certain carbon steel butt-weld pipe fittings from Japan.

The Department issued a negative anti-circumvention determination with respect to the order on certain carbon steel butt-weld pipe fittings from Japan. See *Certain Carbon Steel Butt-Weld Pipe Fittings From Japan; Negative Final Determination of Circumvention of Antidumping Duty Order*, 60 FR 58329 (November 27, 1995).

Taiwan

There have been no changed-circumstances reviews or anti-circumvention determinations with respect to the order on certain carbon steel butt-weld pipe fittings from Taiwan.

The Department conducted a scope ruling on pipe fittings from Taiwan and determined in May 1992 that the "Sprink-let" is subject to the order.[6]

Thailand

There have been no changed-circumstances reviews, scope rulings, or anti-circumvention determinations with respect to the order on certain carbon steel butt-weld pipe fittings from Thailand.

The PRC

There have been no changed-circumstances reviews with respect to the order on certain carbon steel butt-weld pipe fittings from the PRC.

[6] See *Scope Rulings,* 57 FR 19602 (May 7, 1992).

The Department issued an affirmative anti-circumvention determination with respect to the order on certain carbon steel butt-weld pipe fittings from the PRC. The Department determined that PRC exporters circumvented the antidumping duty order by finishing the subject merchandise in Thailand and then exporting the finished products as products of Thailand.[7]

The Department conducted a scope proceeding on pipe fittings from the PRC and made its original determination in October 2009.[8] On remand from the U.S. Court of International Trade, the Department issued a remand redetermination in November 2010 construing the scope of the order as excluding pipe fittings used only in structural applications.[9] The Court sustained the Department's remand redetermination, but time has yet to run for purposes of appeal.[10]

Sunset Reviews

On May 3, 1999, the Department published a notice of initiation of the first five-year sunset reviews of the antidumping duty orders on certain carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC pursuant to section 751(c) of the Tarriff Act of 1930, as amended (the Act). See *Initiation of Five-Year ("Sunset") Reviews*, 64 FR 23596 (May 3, 1999). The Department published the final results of the first sunset reviews on December 3, 1999. See *Final Results of Expedited Sunset Reviews: Certain Carbon Steel Butt-Weld Pipe Fittings From Brazil, Taiwan, Japan, Thailand, and the People's Republic of China*, 64 FR 67847 (December 3, 1999) (First Sunset Reviews). In the final results of those reviews, the Department found that, in each proceeding, revocation of the antidumping duty order would be likely to lead to continuation or recurrence of dumping. As a result and pursuant to section 751(d)(2) of the Act, the Department published a notice of continuation following the International Trade Commission's (ITC's) determination that revocation of the orders would likely lead to a continuation or recurrence of material injury to the domestic industry within the foreseeable time. See *Continuation of Antidumping Orders: Certain Carbon Steel Butt-Weld Pipe Fittings From Brazil, China, Taiwan, Japan, and Thailand*, 65 FR 753 (January 6, 2000).

On December 1, 2004, the Department published a notice of initiation of the second five-year sunset reviews of the antidumping duty orders on pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC pursuant to section 751(c) of the Act. See *Initiation of Five-Year ("Sunset") Reviews*, 69 FR 69891 (December 1, 2004). The Department published the final results of the second sunset reviews on July 8, 2005. See *Certain Carbon Steel Butt-Weld Pipe Fittings from Brazil, Taiwan, Japan, Thailand, and the People's Republic of China*; *Final*

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[7] See *Certain Carbon Steel Butt-Weld Pipe Fittings From the People's Republic of China; Affirmative Final Determination of Circumvention of Antidumping Duty Order*, 59 FR 15155 (March 31, 1994).

[8] See *Final Scope Ruling: Antidumping Duty Order on Carbon Steel Butt-Weld Pipe Fittings from the People's Republic of China* (October 20, 2009).

[9] See *Final Results of Redetermination Pursuant to King Supply Company LLC, d/b/a King Architectural Metals v. United States* (November 9, 2010); see also *King Supply Co. LLC, d/b/a King Architectural Metals v. United States, et al.*, Court No. 09-477, Slip Op. 10-111 (CIT September 30, 2010).

[10] *King Supply Co. LLC, d/b/a King Architectural Metals v. United States, et al.* (*King Metals II*), Court No. 09-00477, Slip Op. 11-2 (CIT January 6, 2011) (appeal period not yet expired).

Results of Expedited Sunset Reviews of the Antidumping Duty Orders, 70 FR 39486 (July 8, 2005) (Second Sunset Review). In the final results of those reviews, the Department found that, in each proceeding, revocation of the antidumping duty order would be likely to lead to continuation or recurrence of dumping. As a result and pursuant to section 751(d)(2) of the Act, the Department published a notice of continuation following the ITC's determination that revocation of the orders would likely lead to a continuation or recurrence of material injury to the domestic industry within the foreseeable time. See *Notice of Continuation of Antidumping Orders: Certain Carbon Steel Butt-Weld Pipe Fittings from Brazil, Taiwan, Japan, Thailand, and the People's Republic of China*, 70 FR 70059 (November 21, 2005).

On October 1, 2010, the Department published a notice of initiation of the third five-year sunset reviews of the antidumping duty orders on pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC pursuant to section 751(c) of the Act. See *Initiation of Five-Year ("Sunset") Reviews*, 75 FR 60731 (October 1, 2010) (*Initiation Notice*).

On October 7, 2010, the Department received requests for recognition as an interested party from the following domestic interested parties: Weldbend Corporation (Weldbend), Tube Forgings of America, Inc. (TFA) Mills Iron Works, Inc. (MIW), and Hackney Ladish, Inc. (Ladish)[11] (collectively, the petitioners).

On October 18, 2010, the Department received notices of intent to participate from the petitioners within the deadline specified in 19 CFR 351.218(d)(1)(i). The petitioners claimed interested-party status under section 771(9)(C) of the Act as manufacturers of a domestic like product for each proceeding.

On November 1, 2010, the Department received complete substantive responses to the *Initiation Notice* from the petitioners within the 30-day period specified in 19 CFR 351.218(d)(3)(i). The petitioners were a part of the original investigations and have participated in all of the segments that have occurred since publication of the antidumping duty orders on subject merchandise from Brazil, Japan, Taiwan, Thailand, and the PRC. The Department received no substantive responses from respondent interested parties. As a result, pursuant to section 751(c)(3)(B) of the Act, the Department is conducting expedited (120-day) sunset reviews of the antidumping duty orders on certain carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC.

<u>Discussion of the Issues</u>

In accordance with section 751(c)(1) of the Act, the Department is conducting these sunset reviews to determine whether revocation of the antidumping duty orders would be likely to 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

[11] In 1997, the butt-weld pipe fitting production assets of the Ladish Company, a petitioner in the original investigations, were sold to Trinity Industries, Inc., and consolidated with the butt-weld pipe fitting production assets of Trinity's subsidiary, Hackney, Inc., under the name Trinity Fittings Group. In 2006, Trinity Fittings Group was sold to a private investment group. In 2008, the private investment group sold Hackney Ladish to Precision Castparts. See the Petitioner's Substantive Responses dated November 1, 2010.

dumping margins determined in the investigations and subsequent reviews and the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty orders. In addition, section 752(c)(3) of the Act provides that the Department shall provide to the ITC the magnitude of the margins of dumping likely to prevail if the orders were revoked. Below we address the comments of the interested parties, which were submitted in the November 1, 2010, substantive responses.

1. Likelihood of Continuation or Recurrence of Dumping

<u>Interested-Party Comments</u>

We received comments only from the petitioners with respect to each country-specific order.

Brazil

The petitioners argue that revocation of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Brazil would likely lead to the recurrence of dumping by the producers/exporters of subject merchandise.

The petitioners state that, since the imposition of the order, imports of the subject merchandise from Brazil ceased entirely, with the exception of a small quantity imported in 2003 (relative to pre-order volumes), which indicates that Brazilian producers/exporters need to dump to sell at pre-order volumes. The petitioners provide import data in support of this claim. The petitioners cite the Statement of Administrative Action (SAA) accompanying the URAA, H.R. Doc. 103-316, Vol. 1 (1994), at 890, which states "cessation of imports after the order is highly probative of the likelihood of continuation or recurrence of dumping." The petitioners also cite to *Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin*, 63 FR 18871, 18772 (April 16, 1998) (*Policy Bulletin*), which states, "{T}he Department normally will determine that revocation of an antidumping duty order…is likely to lead to continuation or recurrence of dumping where … (b) imports of the subject merchandise ceased after the issuance of the order …."

The petitioners also state that the dumping margin for Brazilian manufacturers is very high at 52.25 percent and that, because none of the respondents in the original investigation provided any information to the Department, the Department based the margin on best information available. The petitioners argue that, if the respondents had information to show that their dumping had ceased or abated, they would present this information through the process of an administrative review but no administrative reviews have been conducted. The petitioners state that, since the imposition of the order, the Brazilian manufacturers/exporters have withdrawn completely from the U.S. market and have never participated in any of the sunset reviews including the current sunset review. The petitioners conclude that the nearly complete cessation of imports to the United States, coupled with the high antidumping duties that have gone unchallenged by the Brazilian manufacturers/exporters, compels a finding by the Department that revocation of the order will likely lead to continuation or recurrence of dumping. Therefore, the petitioners conclude, the Department should find, in accordance with section 752(c)(1)(B) of the Act, that Brazilian producers/exporters would continue or resume dumping were the order revoked.

Japan

The petitioners argue that revocation of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Japan would likely lead to the recurrence of dumping by the producers/exporters of subject merchandise.

The petitioners explain that the available import data indicate that the antidumping duty order has had a direct effect on the behavior of Japanese manufacturers/exporters. Specifically, the petitioners assert, there has been a substantial decline in the volume of imports of carbon steel butt-weld pipe fittings from Japan following the imposition of the order, demonstrating the inability of Japanese producers and exporters to sell subject merchandise in the United States without dumping. The petitioners provide import data in support of this claim, asserting that the import data in their submission illustrate the overall decline of import volumes. The petitioners assert that, prior to the imposition of the order, the import levels were substantial. The petitioners allege that, in 1983, the year of publication of the order, imports of carbon steel butt-weld pipe fittings reached 8,844,144 kilograms. Following the publication of the order, the petitioners contend, imports declined steadily each year, reaching 1,000 kilograms in 2009. The petitioners conclude that, in accordance with the SAA at 890[12] and the *Policy Bulletin*, the Department should find that Japanese producers/exporters would continue or resume dumping were the order revoked.

The petitioners assert that the dumping margins for Japanese manufacturers range from 30.83 percent to 65.81 percent and the Department has conducted no administrative reviews of the order. The petitioners argue that, rather than availing themselves of the administrative review process to demonstrate that their dumping has ceased or abated, the Japanese manufacturers have reduced their exports to the U.S. market sharply, thus proving that they cannot maintain a presence in the U.S. market without dumping. The petitioners contend that their argument is strengthened further by the fact that no Japanese producer or exporter is participating in the sunset review. The petitioners cite the SAA at 890 and the Department's *Policy Bulletin* to argue that the Department will normally determine that revocation of an antidumping duty order would likely lead to a continuation or recurrence of dumping where dumping continued at any level above *de minimis* after the issuance of the order. The petitioners assert that this was the Department's conclusion in prior sunset reviews. Therefore, the petitioners argue, the Department should determine that, because dumping has continued over the life of the order, dumping is likely to continue if revocation occurs.

[12] The petitioners quote from the SAA at 890, which states the following: "The Administration believes that the existence of the dumping margins after the order, or the cessation of imports 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, it is reasonable to assume that dumping would continue if the discipline were removed. If imports cease after the order is issued, it is reasonable to assume that the exporters could not sell in the United States without dumping and that, to enter the U.S. market, they would have to resume dumping."

Taiwan

The petitioners argue that revocation of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Taiwan would likely lead to the recurrence of dumping by the producers/exporters of subject merchandise.

The petitioners explain that the available import data indicate that the antidumping duty order has had a direct effect on the behavior of the Taiwanese manufacturers/exporters. Specifically, the petitioners assert, that there has been a substantial decline in the volume of imports of carbon steel butt-weld pipe fittings from Taiwan following the imposition of the order, demonstrating the inability of Taiwanese producers and exporters to sell subject merchandise in the United States without dumping. The petitioners provide import data which they state illustrate the overall decline of import volumes. The petitioners assert that, prior to the imposition of the order, the import levels were substantial. The petitioners allege that, in 1983, imports of carbon steel butt-weld pipe fittings reached 2,699,782 kilograms. Following the publication of the order, the petitioners contend, imports declined steadily each year, reaching 547,000 kilograms in 2009. The petitioners conclude that, in accordance with the SAA at 889[13] and the *Policy Bulletin,* the Department should find that Taiwanese producers/exporters would continue or resume dumping were the order revoked.

The petitioners also argue that dumping has continued at levels above *de minimis* since the imposition of the order. The petitioners claim that, in the last review the Department conducted, all four named respondents were found to have dumped at margins above *de minimis*. The petitioners claim that two of the respondents did not participate, accepting margins of 87.30 percent based on best information available and the all-others rate of nearly 50 percent remained in place. The petitioners also contend that, in the fifteen years since the last administrative review, the respondents have not availed themselves of the review process to demonstrate that their dumping has ceased or abated nor are they participating in the current sunset review. The petitioners cite the SAA at 890 and the Department's *Policy Bulletin* to argue that the Department will normally determine that revocation of an antidumping duty order would likely lead to a continuation or recurrence of dumping where dumping continued at any level above *de minimis* after the issuance of the order. The petitioners assert that this was the Department's conclusion in prior sunset reviews. Therefore, the petitioners argue, the Department should determine that, because dumping has continued over the life of the order, dumping is likely to continue if revocation occurs.

[13] The petitioners quote from the SAA at 889, which states the following: "Commerce will examine the relationship between dumping margins, or the absence of margins, and the volume of imports of the subject merchandise, comparing the periods before and after the issuance of an order…. For example, declining import volumes accompanied by the continued existence of dumping margins after the issuance of an order may provide a strong indication that, absent an order, dumping would be likely to continue, because the evidence would indicate that the exporter needs to dump to sell at the pre-order volumes."

Thailand

The petitioners argue that revocation of the antidumping duty order on certain carbon steel butt-weld pipe fittings from Thailand would likely lead to the recurrence of dumping by the producers/exporters of subject merchandise.

The petitioners explain that the available import data indicate that the antidumping duty order has had a direct effect on the behavior of manufacturers/exporters in Thailand. Specifically, the petitioners assert, once the order was published, import volumes decreased and have remained at lower levels or similar levels compared to pre-order volumes. The petitioners provide import data in support of this claim. The petitioners contend that, although imports from Thailand have continued, the shipments do not necessarily reflect the effects of the order because the order does not apply to all Thai producers and non-subject imports from Thailand account for a substantial portion of imports from Thailand. The petitioners argue that the substantial decline in the volume of imports of carbon steel butt-weld pipe fittings from Thailand following the imposition of the order demonstrates the inability of Thai producers and exporters to sell subject merchandise in the United States without dumping. The petitioners conclude that, in accordance with the SAA at 889 and the *Policy Bulletin*, the Department should find that Thai producers/exporters would continue or resume dumping were the order revoked.

The petitioners also argue that dumping has continued at levels above *de minimis* since the imposition of the order. The petitioners claim that the Department conducted a second LTFV investigation after the order was issued which concluded in the imposition of a high margin of 38.41 percent on the only company that had received a *de minimis* margin in the first LTFV investigation.[14] The petitioners argue that the high margin demonstrates that the only Thai supplier found to have had a *de minimis* margin in the 1992 LTFV investigation was forced to resort to dumping at a margin of 38 percent three years later in order to sell to the U.S. market. The petitioners state that the remaining Thai manufacturers subject to the order must compete in the same market, therefore making it highly likely that dumping would resume or continue if the order were revoked. The petitioners also contend that the margins in two separate administrative reviews for two companies increased since the order was issued. The petitioners conclude that the increase in the margins for three companies since the issuance of the order demonstrates that the dumping has become more severe rather than abating, thus providing evidence that dumping would continue or recur if the order is revoked.

The PRC

The petitioners argue that revocation of the antidumping duty order on certain carbon steel butt-weld pipe fittings from the PRC would likely lead to the recurrence of dumping by the producers/exporters of subject merchandise.

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[14] The petitioners refer to *Notice of Final Determination of Sales at Less Than Fair Value*, 60 FR 10552 (February 27, 1995). This determination did not result in an antidumping duty order for the company investigated. See Investigations Nos. 701-TA-360 and 361 (Final) and 731-TA-688 through 695 (Final), *Certain Carbon Steel Butt-Weld Pipe Fittings From France, India, Israel, Malaysia, The Republic of Korea, Thailand, The United Kingdom, and Venezuela*, 60 FR 18611 (April 12, 1995).

The petitioners explain that the available import data indicate that the antidumping duty order has had a direct effect on the behavior of PRC exporters. Specifically, the petitioners assert, there has been a substantial decline in the volume of imports of carbon steel butt-weld pipe fittings from the PRC following the imposition of the order, demonstrating the inability of PRC exporters to sell subject merchandise in the United States without dumping. The petitioners provide import data, stating that it illustrates the overall decline of import volumes. The petitioners assert that, prior to the imposition of the order, import levels were substantial. The petitioners allege that, in 1991, imports of carbon steel butt-weld pipe fittings reached 13,521,588 kilograms. Following the publication of the order, the petitioners contend, imports declined, reaching 177,000 kilograms in 2009. The petitioners conclude that, in accordance with the SAA at 889 and the *Policy Bulletin*, the Department should find that PRC exporters would continue or resume dumping were the order revoked.

The petitioners also state that the dumping margins for PRC exporters are very high, ranging from 35.06 percent to 182.90 percent. The petitioners argue that, if the respondents had information to show that their dumping had ceased or abated, they would have presented this information through the process of an administrative review but no administrative reviews have been conducted. The petitioners state that, since the imposition of the order, PRC exporters have decreased their activity in the U.S. market and have never participated in any of the sunset reviews, including the current sunset review. The petitioners conclude that the dramatic decrease of import volumes to the United States, coupled with the high antidumping duties that have gone unchallenged by the PRC exporters, compels a finding by the Department that the revocation of the order will likely lead to continuation or recurrence of dumping. Therefore, the petitioners conclude, the Department should find, in accordance with 752(c)(1)(B) of the Act, that PRC exporters would continue or resume dumping were the order revoked.

The petitioners also claim that the Department's affirmative anti-circumvention finding demonstrates further that the PRC producers resorted to illegitimate means to participate in the U.S. market because they allegedly were unable to maintain a presence in the market without dumping.

The petitioners also contend that recent price quotes from PRC manufacturers to U.S. customers for subject merchandise are at such low levels as to undercut domestic manufacturers' prices even after the application of antidumping duties. The petitioners have documented this claim with price quotes from several companies which they appended to their November 1, 2010, substantive response.

<u>Department's Position</u>:

Drawing on the guidance provided in the legislative history accompanying the SAA, specifically the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report), and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), the Department's determinations of likelihood will be made on an order-wide basis for each case.[15] In addition, the Department will normally determine that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping if one or more of the following factors are met: (a) dumping continued at any level above *de minimis* after the issuance of the orders; (b) imports of the subject merchandise ceased after the issuance of the orders; (c) dumping was eliminated after the issuance of the orders and import volumes for the subject merchandise declined significantly.[16] In addition, pursuant to section 752(c)(1)(B) of the Act, in order to determine whether revocation of an antidumping duty order would be likely to lead to a continuation of dumping, the Department considers the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order.

Brazil

Using statistics available on the ITC Dataweb (see attachment), the Department finds that, since the issuance of the order, imports of Brazilian carbon steel butt-weld pipe fittings ceased in every year but 2003 when 4,560 kilograms entered the United States and 2008 when 256 kilograms entered the United States. The volumes that entered the United States in 2003 and 2008 are negligible quantities when compared to the 1985 pre-order volume of 1,438,341 kilograms. See attached import statistics. The Department has not conducted any administrative reviews of the order. Cash-deposit rates above *de minimis* remain in effect for all imports of carbon steel butt-weld pipe fittings from Brazil, and no respondent interested party has sought to change these rates by requesting an administrative review. As discussed in section II.A.3 of the Sunset Policy Bulletin and the SAA at 890, if companies continue dumping with the discipline of an order in place, the Department may reasonably infer that dumping would continue if the discipline were removed.[17] Dumping margins presently remain in place for producers and exporters of carbon steel butt-weld pipe fittings from Brazil and, therefore, dumping margins at levels above *de minimis* continue to exist for shipments of the subject merchandise from all Brazilian producers and exporters of the subject merchandise. Given the presumption that dumping continues at levels above *de minimis* in the absence of a request for administrative reviews and given that imports from Brazil have essentially ceased and are clearly below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

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[15] See SAA at 879 and House Report at 56. See also *Refined Brown Aluminum Oxide from the People's Republic of China: Final Results of Expedited Sunset Review*, 74 FR 4138 (January 23, 2009), and the accompanying Issues and Decision Memorandum (I&D Memo) at Comment 3, and *Freshwater Crawfish Tail Meat from the People's Republic of China: Final Results of the Expedited Second Sunset Review of the Antidumping Duty Order*, 73 FR 65832 (November 5, 2008), and the accompanying I&D Memo at 3 (*Crawfish Tail Meat – PRC).*

[16] See SAA at 889-890, House Report at 63-64, and Senate Report at 52. See also *Certain Frozen Fish Fillets From the Socialist Republic of Vietnam: Notice of Final Results of Expedited Sunset Review of Antidumping Duty Order*, 74 FR 5819 (February 2, 2009), and the accompanying I&D Memo at 3, *Crawfish Tail Meat – PRC* and the accompanying I&D Memo at 3, and *Folding Gift Boxes from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007), and the accompanying I&D Memo at 5.

[17] See *Certain Welded Large Diameter Line Pipe from Japan and Mexico; Notice of Final Results of Five-year ("Sunset") Reviews of Antidumping Duty Orders*, 72 FR 10498 (March 8, 2007), and accompanying I&D Memo in the section entitled "Likelihood of Continuation or Recurrence of Dumping."

Japan

Using statistics available on the ITC Dataweb (see attachment), the Department finds that, since the issuance of the order, imports of Japanese carbon steel butt-weld pipe fittings declined significantly. The volume that entered the United States in 2009 was 675 kilograms. This is a negligible quantity when compared to the 1985 pre-order volume of 6,507,236 kilograms. See attached import statistics. The Department has not conducted any administrative reviews of the order. Cash-deposit rates above *de minimis* remain in effect for all imports of carbon steel butt-weld pipe fittings from Japan, and no respondent interested party has sought to change these rates by requesting an administrative review. As discussed in section II.A.3 of the Sunset Policy Bulletin and the SAA at 890, if companies continue dumping with the discipline of an order in place, the Department may reasonably infer that dumping would continue if the discipline were removed.[18] Dumping margins presently remain in place for producers and exporters of carbon steel butt-weld pipe fittings from Japan and, therefore, dumping margins at levels above *de minimis* continue to exist for shipments of the subject merchandise from all Japanese producers and exporters of the subject merchandise. Given the presumption that dumping continues at levels above *de minimis* in the absence of a request for administrative reviews and given that imports from Japan have essentially ceased and are clearly below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Taiwan

Using statistics available on the ITC Dataweb (see attachment), the Department finds that, since the issuance of the order, imports of Taiwanese carbon steel butt-weld pipe fittings declined significantly. The volume entered that entered the United States in 2009 was 546,999 kilograms. This is a smaller quantity when compared to the 1985 pre-order volume of 10,326,937 kilograms. See attached import statistics. The Department has conducted two administrative reviews of the order for Taiwan and found that the producers/exporters continued to dump at levels above *de minimis*. Given that dumping continues at levels above *de minimis* and imports from Taiwan have remained below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Thailand

Using statistics available on the ITC Dataweb (see attachment), the Department finds that, since the issuance of the order, imports of Thai carbon steel butt-weld pipe fittings declined significantly. The volume entered that entered the United States in 2009 was 2,432,945 kilograms. This is a smaller quantity when compared to the 1992 pre-order volume of 4,835,673 kilograms. See attached import statistics. The Department has conducted three administrative reviews of the order and found that the producers/exporters continued to dump at levels above *de minimis*. Given that dumping continues at levels above *de minimis* and imports from Thailand have remained below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

[18] *Id.*

The PRC

Using statistics available on the ITC Dataweb (see attachment), the Department finds that, since the issuance of the order, imports of PRC carbon steel butt-weld pipe fittings declined significantly. The volume that entered the United States in 2009 was 177,084 kilograms. This is a smaller quantity when compared to the 1991 pre-order volume of 13,521,588 kilograms. The Department has not conducted any administrative reviews of the order for the PRC. Cash-deposit rates above *de minimis* remain in effect for all imports of carbon steel butt-weld pipe fittings from the PRC, and no respondent interested party has sought to change these rates by requesting an administrative review. As discussed in section II.A.3 of the Sunset Policy Bulletin and the SAA at 890, if companies continue dumping with the discipline of an order in place, the Department may reasonably infer that dumping would continue if the discipline were removed.[19] Dumping margins presently remain in place for producers and exporters of carbon steel butt-weld pipe fittings from the PRC and, therefore, dumping margins at levels above *de minimis* continue to exist for shipments of the subject merchandise from all PRC producers and exporters of the subject merchandise. Given the presumption that dumping continues at levels above *de minimis* in the absence of a request for administrative reviews and given that imports from the PRC have remained below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Conclusion

Because the records of the five proceedings show that dumping at levels above *de mimimis* has persisted since the issuance of these orders, because the aggregate import volumes have declined or ceased since the publication of the orders with respect to the five proceedings and because no party argued or submitted any evidence to the contrary, the Department determines that dumping is likely to continue if the orders are revoked.

2. Magnitude of the Margin Likely to Prevail

Interested-Party Comments

We received comments only from the petitioners with respect to each country-specific order.

Brazil, Japan, Taiwan, and the PRC **–** The petitioners cite the SAA and the *Policy Bulletin* to explain that, in determining the magnitude of the margins of dumping likely to prevail in the event of a revocation of an order, the Department will normally select the company-specific rate from the investigation, as this is the only calculated rate reflecting the behavior of exporters without the discipline of an order in place. Therefore, the petitioners argue, the Department should rely upon the company-specific margins from the original investigations as the margins of dumping that are likely to prevail were the orders revoked.

[19] *Id.*

Thailand – The petitioners cite the SAA at 890 and the *Policy Bulletin* to explain that, in determining the magnitude of the margins of dumping likely to prevail in the event of a revocation of an order, the Department will normally select the company-specific rate from the investigation, as this is the only calculated rate reflecting the behavior of exporters without the discipline of an order in place. The petitioners also cite the *Policy Bulletin* which explains that, where an exporter has increased dumping, a more recently calculated margin may be more representative of the behavior of a company absent the order. The petitioners argue that, for the order on merchandise from Thailand, the Department should report to the ITC the margins found in the most recent administrative reviews because those margins are higher than the margins determined in the LTFV investigation, demonstrating that the reviewed companies have increased their dumping despite the order. Specifically, the petitioners argue the margin for Thai Benkan Company should increase from 50.84 percent to 52.84 percent and for TTU Industrial Corp. Ltd. from 10.68 percent to 52.60 percent.

In conclusion, the domestic interested parties recommend that the Department report the antidumping duty margins for carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC as follows:

Country / Company	Recommended Weighted-Average Margin (Percent)
Brazil	
All Brazilian Manufacturers, Producers and Exporters	52.25
Japan	
Awaji Sangyo, KK	30.83
Nippon Benkan Kogyo Co. Ltd.	65.81
All Other Japanese Manufacturers and Exporters	62.79
Taiwan	
Rigid Industries	6.84
Chung Ming Pipe Fitting Manufacturing Company. Ltd.	8.57
Gei Bey Corporation	87.30
Chup Hisin Enterprises	87.30
All Other Taiwanese Manufacturers and Exporters	49.46
Thailand	
Thai Benkan Company	52.60
TTU Industrial Corp. Ltd.	52.60
All Other Thai Manufacturers and Exporters	39.10
The PRC	
China North Industries Corp.	154.72
Jilin Provincial Machinery & Equipment Import & Export Corp.	75.23
Liaoning Machinery & Equipment Import & Export Corp.	134.79

Liaoning Metals & Minerals Import & Export Corp.	103.70
Shenyang Billiongold Pipe Fittings Co. Ltd.	110.39
Shandong Metals & Minerals Import & Export Corp.	35.06
PRC-wide Entity (including Shenyang Machinery & Equipment Import & Export Corp.; Lianoning Metals; Shenzhen Machinery Industry Corp.)	182.90

Department's Position:

Section 752(c)(3) of the Act provides that the Department will report to the ITC the magnitude of the margin of dumping that is likely to prevail if the orders were revoked. The Department will normally provide to the ITC the company-specific margin from the investigation for each company. See SAA at 890 and *Eveready Battery Co., Inc. v. United States*, 77 F. Supp. 2d 1327, 1333 (CIT 1999). The Department's preference for selecting a margin from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of manufacturers, producers, and exporters without the discipline of an order or suspension agreement in place. See *Certain Hot-Rolled Carbon Steel Flat Products from Argentina, et al.; Final Results of Expedited Sunset Reviews of the Antidumping Duty Orders*, 71 FR 70506 (December 5, 2006), and the accompanying I&D Memo at 20-21 (*Carbon Steel Products*); see SAA at 890 and House Report at 64. Under certain circumstances, the Department may select a more recently calculated margin to report to the ITC. See section 752(c)(3) of the Act and *Final Results of Full Sunset Review: Aramid Fiber Formed of Poly Para-Phenylene Terephthalamide From the Netherlands*, 65 FR 65294 (November 1, 2000), and the accompanying I&D Memo at "Magnitude of the Margin Likely to Prevail," Comment 3 (citing SAA at 890-91 and *House Report* at 64). For companies not investigated specifically or for companies that did not begin shipping until after the order was issued, the Department normally will provide a margin based on the all-others rate from the investigation. See *Carbon Steel Products* and the accompanying I&D Memo at 20. In certain instances, a company may choose to increase dumping in order to maintain or increase market share. As a result, increasing margins may be more representative of a company's behavior in the absence of an order.

The Department does not find any indication that the margins determined in subsequent reviews of the orders on certain carbon steel butt-weld pipe fittings from Taiwan and Thailand are more probative of behaviors of manufacturers, producers, and exporters without the discipline of the orders. Dumping has continued at levels above *de minimis* regardless of whether the Department has conducted administrative reviews of the orders on certain carbon steel butt-weld pipe fittings from Taiwan and Thailand or through the presumption in the absence of a request for an administrative review of the orders on certain carbon steel butt-weld pipe fittings from Brazil, Japan, and the PRC. Given that dumping continued following the issuance of the orders and given the absence of argument and evidence to the contrary, the Department finds that the margins calculated in the original investigations are probative of the behavior of producers and exporters of subject merchandise from Brazil, Japan, Taiwan, and the PRC if these orders were revoked. Consistent with section 752(c) of the Act, the Department will report to the ITC the company-specific and all-others rates from the investigations concerning subject merchandise from Brazil, Japan, Taiwan, and the PRC as indicated in the "Final Results of Reviews" section of this memorandum.

With respect to the sunset review of the order on certain carbon steel butt-weld pipe fittings from Thailand, the Department does not find any indication that the margins determined in subsequent reviews of the order are more probative of the behaviors of manufacturers, producers, and exporters without the discipline of the order. Although the margins from more recent administrative reviews are higher than the LTFV margins, the margins the Department determined in those reviews are not calculated margins, but rather rates based on adverse facts available. As such, the margins do not represent the behavior of these companies absent an order but are instead reflective of the companies' failure to cooperate. Therefore, the Department finds that it is appropriate to report to the ITC the margins from the LTFV investigation. See *Thailand LTFV*, 57 FR at 21071.

Prior to the issuance of the final determination of the LTFV investigation, the Department had completed an administrative review of the countervailing duty order (CVD) on carbon steel butt-weld pipe fittings from Thailand.[20] In the LTFV investigation, the Department adjusted the margins by the amount attributable to the export subsidy. The CVD order has been revoked.[21] Therefore, the Department will report to the ITC the originally calculated margins in the LTFV investigation unadjusted for the export subsidy.

Final Results of Reviews

The Department determines that revocation of the antidumping duty orders on certain carbon steel butt-weld pipe fittings from Brazil, Japan, Taiwan, Thailand, and the PRC would be likely to lead to a continuation or recurrence of dumping at the following weighted-average percentage margins:

Country / Company	Weighted-Average Margin (Percent)
Brazil	
All Brazilian Manufacturers, Producers and Exporters	52.25
Japan	
Awaji Sangyo, KK	30.83
Nippon Benkan Kogyo Co. Ltd.	65.81
All Other Japanese Manufacturers and Exporters	62.79
Taiwan	
Rigid Industries	6.84
Chung Ming Pipe Fitting Manufacturing Company. Ltd.	8.57
Gei Bey Corporation	87.30

[20] See *Carbon Steel Butt-Weld Pipe Fittings from Thailand; Final Results of Countervailing Duty Administrative Review*, 57 FR 5248 (February 13, 1992).
[21] See *Notice of Revocation of Countervailing Duty Orders*, 60 FR 40568 (August 9, 1995).

Chup Hisin Enterprises	87.30
All Other Taiwanese Manufacturers and Exporters	49.46
<u>Thailand</u>	
Thai Benkan Company	52.60
TTU Industrial Corp. Ltd.	12.44
All Other Thai Manufacturers and Exporters	40.86
<u>The PRC</u>	
China North Industries Corp.	154.72
Jilin Provincial Machinery & Equipment Import & Export Corp.	75.23
Liaoning Machinery & Equipment Import & Export Corp.	134.79
Liaoning Metals & Minerals Import & Export Corp.	103.70
Shenyang Billiongold Pipe Fittings Co. Ltd.	110.39
Shandong Metals & Minerals Import & Export Corp.	35.06
PRC-wide Entity (including Shenyang Machinery & Equipment Import & Export Corp.; Lianoning Metals; Shenzhen Machinery Industry Corp.)	182.90

Recommendation

Based on our analysis of the responses received, we recommend adopting all of the above positions. If these recommendations are accepted, we will publish the final results of these reviews in the *Federal Register*.

Agree____X______ Disagree_________

/S/ Ron K Lorentzen

____

Ronald K. Lorentzen
Deputy Assistant Secretary
for Import Administration

__01/31/2011________
Date

Carbon Steel Butt-Weld Pipe: Customs Value by HTS Number and Customs Value for Sunset Carbon Steel Butt-Weld Pipe Fittings

U.S. Imports for Consumption

Annual Data

HTS Number	Country	1989	1990	1991	1992	1993	1994	1995	Percent Change 1994 - 1995
		In Actual Dollars							
Customs Value where quantities are collected in kilograms									
73079330	Thailand	11,837,402	8,132,040	6,800,637	3,875,013	3,928,092	3,758,502	1,878,480	-50.00%
.	China	10,171,897	15,700,392	12,062,956	41,925	49,754	50,477	17,543	-65.20%
.	Taiwan	4,883,978	2,855,705	1,116,121	3,023,338	2,959,181	3,264,893	4,265,149	30.60%
.	Japan	1,175,992	1,091,744	1,030,522	292,705	52,266	68,997	1,957	-97.20%
.	Brazil	96,689	79,048	0	0	0	0	0	N/A
Subtotal 73079330		28,165,958	27,858,929	21,010,236	7,232,981	6,989,293	7,142,869	6,163,129	-13.70%
Subtotal kilograms		28,165,958	27,858,929	21,010,236	7,232,981	6,989,293	7,142,869	6,163,129	-13.70%
Total		**28,165,958**	**27,858,929**	**21,010,236**	**7,232,981**	**6,989,293**	**7,142,869**	**6,163,129**	**-13.70%**

carbon steel butt-weld pipe: First Unit of Quantity by HTS Number and Customs Value for Carbon Steel Butt-Weld Pipe Fittings

U.S. Imports for Consumption

Annual Data

HTS Number	Country	1989	1990	1991	1992	1993	1994	1995	Percent Change 1994 - 1995
		In Actual Units of Quantity							
First Unit of Quantity where quantities are collected in kilograms									
73079330	Thailand	7,501,145	5,602,964	4,827,037	3,298,137	3,692,290	3,108,689	1,451,256	-53.30%
.	China	10,888,073	14,846,335	12,296,949	51,067	52,913	41,249	16,890	-59.10%
.	Taiwan	2,386,822	1,292,578	508,657	1,921,411	1,959,023	1,492,377	2,646,187	77.30%
.	Japan	550,642	461,755	482,197	201,136	50,752	17,891	308	-98.30%
.	Brazil	97,240	73,699	0	0	0	0	0	N/A
Subtotal 73079330		21,423,922	22,277,331	18,114,840	5,471,751	5,754,978	4,660,206	4,114,641	-11.70%
Subtotal kilograms		21,423,922	22,277,331	18,114,840	5,471,751	5,754,978	4,660,206	4,114,641	-11.70%

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

Carbon Steel Butt-Weld Pipe: Customs Value by HTS Number and Customs Value for Sunset Carbon Steel Butt-Weld Pipe Fittings

U.S. Imports for Consumption

Annual + Year-To-Date Data from Jan - Nov

HTS Number	Country	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2009 YTD	2010 YTD	Percent Change YTD2009 - YTD2010
		In Actual Dollars																
Customs Value where quantities are collected in kilograms																		
73079330 Iron or nonalloy steel, not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360mm	Thailand	2,985,352	3,359,562	3,974,081	6,150,189	6,253,636	7,014,084	5,793,911	5,070,056	6,974,558	9,503,497	7,441,571	3,893,994	8,202,536	8,309,398	7,627,169	7,662,944	0.50%
.	Taiwan	5,892,519	4,106,300	4,059,185	3,283,153	2,002,258	1,917,357	723,066	1,003,262	1,840,434	2,242,015	1,641,586	1,006,172	1,316,099	1,580,221	1,428,309	1,837,063	28.60%
.	China	0	0	8,950	53,785	70,377	133,424	64,164	39,642	96,379	50,049	492,015	522,567	633,010	333,270	325,796	415,268	27.50%
.	Japan	58,140	257,883	23,420	182,923	124,393	52,052	90,721	2,098	2,164	87,079	107,307	27,343	94,101	11,980	11,980	0	-100.00%
.	Brazil	0	0	0	0	0	0	0	54,515	0	0	0	0	2,696	0	0	0	N/A
Subtotal 73079330 Iron or nonalloy steel, not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360mm		8,936,011	7,723,745	8,065,636	9,670,050	8,450,664	9,116,917	6,671,862	6,169,573	8,913,535	11,882,640	9,682,479	5,450,076	10,248,442	10,234,869	9,393,254	9,915,275	5.60%
Subtotal kilograms		8,936,011	7,723,745	8,065,636	9,670,050	8,450,664	9,116,917	6,671,862	6,169,573	8,913,535	11,882,640	9,682,479	5,450,076	10,248,442	10,234,869	9,393,254	9,915,275	5.60%
Total		**8,936,011**	**7,723,745**	**8,065,636**	**9,670,050**	**8,450,664**	**9,116,917**	**6,671,862**	**6,169,573**	**8,913,535**	**11,882,640**	**9,682,479**	**5,450,076**	**10,248,442**	**10,234,869**	**9,393,254**	**9,915,275**	**5.60%**

carbon steel butt-weld pipe: First Unit of Quantity by HTS Number and Customs Value for Sunset PiPe Fittings

U.S. Imports for Consumption

Annual + Year-To-Date Data from Jan - Nov

HTS Number	Country	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2009 YTD	2010 YTD	Percent Change YTD2009 - YTD2010
		In Actual Units of Quantity																
First Unit of Quantity where quantities are collected in kilograms																		
73079330 Iron or nonalloy steel, not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360mm	Thailand	2,278,890	2,408,573	3,035,528	5,102,476	5,707,404	6,032,784	5,090,601	4,798,504	5,374,569	5,038,991	3,438,482	1,502,559	3,095,917	2,432,945	2,183,758	2,954,328	35.30%
.	Taiwan	3,554,620	2,607,283	2,666,094	2,246,083	1,500,429	1,439,446	488,118	726,760	1,125,606	1,011,072	625,165	409,026	514,912	546,999	497,045	811,631	63.30%
.	China	0	0	6,415	56,517	62,476	101,756	30,848	37,695	80,134	41,990	254,207	377,239	391,507	177,084	167,965	186,811	11.20%
.	Japan	44,946	203,026	14,587	132,619	99,704	33,344	45,844	175	60	20,842	16,919	3,107	4,277	675	675	0	-100.00%
.	Brazil	0	0	0	0	0	0	0	4,560	0	0	0	0	256	0	0	0	N/A
Subtotal 73079330 Iron or nonalloy steel, not cast, butt welding fittings for tubes/pipes, w/inside diam. less than 360mm		5,878,456	5,218,882	5,722,624	7,537,695	7,370,013	7,607,330	5,655,411	5,567,694	6,580,369	6,112,895	4,334,773	2,291,931	4,006,869	3,157,703	2,849,443	3,952,770	38.70%
Subtotal kilograms		5,878,456	5,218,882	5,722,624	7,537,695	7,370,013	7,607,330	5,655,411	5,567,694	6,580,369	6,112,895	4,334,773	2,291,931	4,006,869	3,157,703	2,849,443	3,952,770	38.70%

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.