UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

A-588-850
A-588-851
A-485-805
Sunset Reviews
Public Document
AD/CVD I: TES

December 15, 2016

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

FROM: Gary Taverman
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the Expedited Third 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)

I. SUMMARY

We have analyzed the substantive responses of the domestic interested party in the third 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 these sunset reviews for which we received substantive responses:

1. Likelihood of a continuation or recurrence of dumping

2. Magnitude of the margin likely to prevail

II. BACKGROUND

[1] No response was received from respondent interested parties.

On September 1, 2016, the Department of Commerce (the Department) published the notice of initiation of the third 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).[2] On September 13, 2016, and September 16, 2016, the Department received notices of intent to participate in both of the Japan reviews from TMK IPSCO, Vallourec Star, L.P. (Vallourec), and United States Steel Corporation (U.S. Steel), domestic interested parties (collectively, the petitioners) and a notice of intent to participate in the Romania review from Vallourec and U.S. Steel. Submission of the notices of intent to participate was filed by the petitioners within the deadline specified in 19 CFR 351.218(d)(1)(i). The petitioners all claimed interested party status under section 771(9)(C) of the Act, as manufacturers in the United States of a domestic like product. On October 3, 2016, the Department received substantive responses in all three reviews from the petitioners 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.

III. SCOPE OF THE ORDERS

Large Diameter Pipe from Japan

The products covered by this order are large diameter seamless carbon and alloy (other than stainless) steel standard, line, and pressure pipes produced, or equivalent, to the American Society for Testing and Materials (ASTM) A-53, ASTM A-106, ASTM A-333, ASTM A- 334, ASTM A-589, ASTM A-795, and the American Petroleum Institute (API) 5L specifications and meeting the physical parameters described below, regardless of application. The scope of this order also includes all other products used in standard, line, or pressure pipe applications and meeting the physical parameters described below, regardless of specification, with the exception of the exclusions discussed below. Specifically included within the scope of this order are seamless pipes greater than 4.5 inches (114.3 mm) up to and including 16 inches (406.4 mm) in outside diameter, regardless of wall-thickness, manufacturing process (hot finished or cold-drawn), end finish (plain end, beveled end, upset end, threaded, or threaded and coupled), or surface finish.

The seamless pipes subject to this order are currently classifiable under the subheadings 7304.10.10.30, 7304.10.10.45, 7304.10.10.60, 7304.10.50.50, 7304.19.10.30, 7304.19.10.45, 7304.19.10.60, 7304.19.50.50, 7304.31.60.10, 7304.31.60.50, 7304.39.00.04, 7304.39.00.06, 7304.39.00.08, 7304.39.00.36, 7304.39.00.40, 7304.39.00.44, 7304.39.00.48, 7304.39.00.52, 7304.39.00.56, 7304.39.00.62, 7304.39.00.68, 7304.39.00.72, 7304.51.50.15, 7304.51.50.45, 7304.51.50.60, 7304.59.20.30, 7304.59.20.55, 7304.59.20.60, 7304.59.20.70, 7304.59.60.00, 7304.59.80.30, 7304.59.80.35, 7304.59.80.40, 7304.59.80.45, 7304.59.80.50, 7304.59.80.55, 7304.59.80.60, 7304.59.80.65, and 7304.59.80.70 of the Harmonized Tariff Schedule of the United States (HTSUS).

[2] *See Initiation of Five-Year ("Sunset") Review*, 81 FR 60343 (September 1, 2016).

Specifications, Characteristics, and Uses: Large diameter seamless pipe is used primarily for line applications such as oil, gas, or water pipeline, or utility distribution systems. Seamless pressure pipes are intended for the conveyance of water, steam, petrochemicals, chemicals, oil products, natural gas and other liquids and gasses in industrial piping systems. They may carry these substances at elevated pressures and temperatures and may be subject to the application of external heat. Seamless carbon steel pressure pipe meeting the ASTM A-106 standard may be used in temperatures of up to 1000 degrees Fahrenheit, at various American Society of Mechanical Engineers (ASME) code stress levels. Alloy pipes made to ASTM A-335 standard must be used if temperatures and stress levels exceed those allowed for ASTM A-106. Seamless pressure pipes sold in the United States are commonly produced to the ASTM A-106 standard. Seamless standard pipes are most commonly produced to the ASTM A-53 specification and generally are not intended for high temperature service.

They are intended for the low temperature and pressure conveyance of water, steam, natural gas, air and other liquids and gasses in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipes (depending on type and code) may carry liquids at elevated temperatures but must not exceed relevant ASME code requirements. If exceptionally low temperature uses or conditions are anticipated, standard pipe may be manufactured to ASTM A-333 or ASTM A-334 specifications.

Seamless line pipes are intended for the conveyance of oil and natural gas or other fluids in pipe lines. Seamless line pipes are produced to the API 5L specification. Seamless water well pipe (ASTM A-589) and seamless galvanized pipe for fire protection uses (ASTM A-795) are used for the conveyance of water.

Seamless pipes are commonly produced and certified to meet ASTM A-106, ASTM A-53, API 5L-B, and API 5L-X42 specifications. To avoid maintaining separate production runs and separate inventories, manufacturers typically triple or quadruple certify the pipes by meeting the metallurgical requirements and performing the required tests pursuant to the respective specifications. Since distributors sell the vast majority of this product, they can thereby maintain a single inventory to service all customers.

The primary application of ASTM A-106 pressure pipes and triple or quadruple certified pipes in large diameters is for use as oil and gas distribution lines for commercial applications. A more minor application for large diameter seamless pipes is for use in pressure piping systems by refineries, petrochemical plants, and chemical plants, as well as in power generation plants and in some oil field uses (on shore and off shore) such as for separator lines, gathering lines and metering runs. These applications constitute the majority of the market for the subject seamless pipes. However, ASTM A-106 pipes may be used in some boiler applications.

The scope of this order includes all seamless pipe meeting the physical parameters described above and produced to one of the specifications listed above, regardless of application, with the exception of the exclusions discussed below, whether or not also certified to a non-covered specification. Standard, line, and pressure applications and the above-listed specifications are defining characteristics of the scope of this review. Therefore, seamless pipes meeting the physical description above, but not produced to the ASTM A-53, ASTM A-106, ASTM A-333,

ASTM A-334, ASTM A-589, ASTM A-795, and API 5L specifications shall be covered if used in a standard, line, or pressure application, with the exception of the specific exclusions discussed below.

For example, there are certain other ASTM specifications of pipe which, because of overlapping characteristics, could potentially be used in ASTM A-106 applications. These specifications generally include ASTM A-161, ASTM A-192, ASTM A-210, ASTM A-252, ASTM A-501, ASTM A-523, ASTM A-524, and ASTM A-618. When such pipes are used in a standard, line, or pressure pipe application, such products are covered by the scope of this order.

Specifically excluded from the scope of this order are: A. Boiler tubing and mechanical tubing, if such products are not produced to ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-589, ASTM A-795, and API 5L specifications and are not used in standard, line, or pressure pipe applications. B. Finished and unfinished oil country tubular goods ("OCTG"), if covered by the scope of another antidumping duty order from the same country. If not covered by such an OCTG order, finished and unfinished OCTG are included in this scope when used in standard, line or pressure applications. C. Products produced to the A-335 specification unless they are used in an application that would normally utilize ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-589, ASTM A-795, and API 5L specifications. D. Line and riser pipe for deepwater application, *i.e.*, line and riser pipe that is (1) used in a deepwater application, which means for use in water depths of 1,500 feet or more; (2) intended for use in and is actually used for a specific deepwater project; (3) rated for a specified minimum yield strength of not less than 60,000 psi; and (4) not identified or certified through the use of a monogram, stencil, or otherwise marked with an API specification (*e.g.*, API 5L).

With regard to the excluded products listed above, the Department will not instruct U.S. Customs and Border Protection (CBP) to require end-use certification until such time as the petitioner or other interested parties provide to the Department a reasonable basis to believe or suspect that the products are being utilized in a covered application. If such information is provided, we will require end-use certification only for the product(s) (or specification(s)) for which evidence is provided that such products are being used in a covered application as described above. For example, if, based on evidence provided by Petitioner, the Department finds a reasonable basis to believe or suspect that seamless pipe produced to the A-335 specification is being used in an A-106 application, we will require end-use certifications for imports of that specification. Normally we will require only the importer of record to certify to the end use of the imported merchandise. If it later proves necessary for adequate implementation, we may also require producers who export such products to the United States to provide such certification on invoices accompanying shipments to the United States.

Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the merchandise subject to this scope is dispositive.

Small Diameter Pipe from Japan and Romania

The products covered by these orders include small diameter seamless carbon and alloy (other than stainless) steel standard, line, and pressure pipes and redraw hollows produced, or

equivalent, to the ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-335, ASTM A-589, ASTM A-795, and the API 5L specifications and meeting the physical parameters described below, regardless of application. The scope of these orders also includes all products used in standard, line, or pressure pipe applications and meeting the physical parameters described below, regardless of specification. Specifically included within the scope of these orders are seamless pipes and redraw hollows, less than or equal to 4.5 inches (114.3 mm) in outside diameter, regardless of wall-thickness, manufacturing process (hot finished or cold-drawn), end finish (plain end, beveled end, upset end, threaded, or threaded and coupled), or surface finish.

The seamless pipes subject to these orders are currently classifiable under the subheadings 7304.10.10.20, 7304.10.50.20, 7304.19.10.20, 7304.19.50.20, 7304.31.30.00, 7304.31.60.50, 7304.39.00.16, 7304.39.00.20, 7304.39.00.24, 7304.39.00.28, 7304.39.00.32, 7304.51.50.05, 7304.51.50.60, 7304.59.60.00, 7304.59.80.10, 7304.59.80.15, 7304.59.80.20, and 7304.59.80.25 of the HTSUS.

Specifications, Characteristics, and Uses: Seamless pressure pipes are intended for the conveyance of water, steam, petrochemicals, chemicals, oil products, natural gas and other liquids and gasses in industrial piping systems. They may carry these substances at elevated pressures and temperatures and may be subject to the application of external heat. Seamless carbon steel pressure pipe meeting the ASTM A-106 standard may be used in temperatures of up to 1000 degrees Fahrenheit, at various ASME code stress levels. Alloy pipes made to ASTM A-335 standard must be used if temperatures and stress levels exceed those allowed for ASTM A-106. Seamless pressure pipes sold in the United States are commonly produced to the ASTM A-106 standard.

Seamless standard pipes are most commonly produced to the ASTM A-53 specification and generally are not intended for high temperature service. They are intended for the low temperature and pressure conveyance of water, steam, natural gas, air and other liquids and gasses in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipes (depending on type and code) may carry liquids at elevated temperatures but must not exceed relevant ASME code requirements. If exceptionally low temperature uses or conditions are anticipated, standard pipe may be manufactured to ASTM A-333 or ASTM A-334 specifications.

Seamless line pipes are intended for the conveyance of oil and natural gas or other fluids in pipe lines. Seamless line pipes are produced to the API 5L specification.

Seamless water well pipe (ASTM A-589) and seamless galvanized pipe for fire protection uses (ASTM A-795) are used for the conveyance of water.

Seamless pipes are commonly produced and certified to meet ASTM A-106, ASTM A-53, API 5L-B, and API 5L-X42 specifications. To avoid maintaining separate production runs and separate inventories, manufacturers typically triple or quadruple certify the pipes by meeting the metallurgical requirements and performing the required tests pursuant to the respective

specifications. Since distributors sell the vast majority of this product, they can thereby maintain a single inventory to service all customers.

The primary application of ASTM A-106 pressure pipes and triple or quadruple certified pipes is in pressure piping systems by refineries, petrochemical plants, and chemical plants. Other applications are in power generation plants (electrical-fossil fuel or nuclear), and in some oil field uses (on shore and off shore) such as for separator lines, gathering lines and metering runs. A minor application of this product is for use as oil and gas distribution lines for commercial applications. These applications constitute the majority of the market for the subject seamless pipes. However, ASTM A-106 pipes may be used in some boiler applications.

Redraw hollows are any unfinished pipe or "hollow profiles" of carbon or alloy steel transformed by hot rolling or cold drawing/hydrostatic testing or other methods to enable the material to be sold under ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-335, ASTM A-589, ASTM A-795, and API 5L specifications.

The scope of these orders includes all seamless pipe meeting the physical parameters described above and produced to one of the specifications listed above, regardless of application, with the exception of the specific exclusions discussed below, and whether or not also certified to a non-covered specification. Standard, line, and pressure applications and the above-listed specifications are defining characteristics of the scope of the orders. Therefore, seamless pipes meeting the physical description above, but not produced to the ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-335, ASTM A-589, ASTM A-795, and API 5L specifications shall be covered if used in a standard, line, or pressure application, with the exception of the specific exclusions discussed below.

For example, there are certain other ASTM specifications of pipe which, because of overlapping characteristics, could potentially be used in ASTM A-106 applications. These specifications generally include ASTM A-161, ASTM A-192, ASTM A-210, ASTM A-252, ASTM A-501, ASTM A-523, ASTM A-524, and ASTM A-618. When such pipes are used in a standard, line, or pressure pipe application, such products are covered by the scope of these orders.

Specifically excluded from the scope of these orders are boiler tubing and mechanical tubing, if such products are not produced to ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-335, ASTM A-589, ASTM A-795, and API 5L specifications and are not used in standard, line, or pressure pipe applications. In addition, finished and unfinished OCTG are excluded from the scope of these orders, if covered by the scope of another antidumping duty order from the same country. If not covered by such an OCTG order, finished and unfinished OCTG are included in these scopes when used in standard, line or pressure applications.

With regard to the excluded products listed above, the Department will not instruct CBP to require end-use certification until such time as Petitioner or other interested parties provide to the Department a reasonable basis to believe or suspect that the products are being used in a covered application. If such information is provided, we will require end-use certification only for the product(s) (or specification(s)) for which evidence is provided that such products are being used in covered applications as described above. For example, if, based on evidence provided by

Petitioner, the Department finds a reasonable basis to believe or suspect that seamless pipe produced to the A-161 specification is being used in a standard, line or pressure application, we will require end-use certifications for imports of that specification. Normally we will require only the importer of record to certify to the end use of the imported merchandise. If it later proves necessary for adequate implementation, we may also require producers who export such products to the United States to provide such certification on invoices accompanying shipments to the United States.

Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the merchandise under these orders is dispositive.

IV. HISTORY OF THE ORDERS

The 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.[3] 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.[4]

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.[5] 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.[6] The amended weighted-average dumping margins were 15.15 percent for Sota Communication Company (Sota),[7] 11.08

---

[3] *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) (*Japan Final Determination*).

[4] *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) (*Japan Orders*).

[5] *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) (*Romania Final Determination*), as amended by *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) (*Romania Order*).

[6] *See Romania Order*.

[7] S.C. Silcotub S.A. (Silcotub) was the producer of seamless pipe that Sota exported. *See Final Determination Romania*, 65 FR 39125.

percent for Metal Business International S.R.L. (MBI),[8] and a country-wide rate of 13.06 percent.[9]

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 Act.[10] 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.[11] 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.[12] 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).[13]

On April 1, 2011, the Department initiated 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.[14] As a result of the second 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.[15] On September 28, 2011, the 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

---

[8] S.C. Petrotub S.A. (Petrotub) was the producer of the seamless pipe that MBI exported. *See Final Determination Romania*, 65 FR 39125.

[9] The Department had designated Romania a market economy (ME) country, effective on January 1, 2003. *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, 12673 (March 17, 2003). As a result, we now regard the "country-wide rate" as the all-others rate for this order.

[10] *See Initiation of Five-Year ("Sunset") Reviews*, 70 FR 22632 (May 2, 2005).

[11] *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).

[12] *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)".

[13] *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).

[14] *See Initiation of Five-Year ("Sunset") Reviews*, 76 FR 18163 (April 1, 2011).

[15] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan; Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan and Romania: Final Results of the Expedited Second Five-Year Sunset Reviews of the Antidumping Duty Orders*, 76 FR 47555 (August 5, 2011) (*Second Sunset Review Final*).

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.[16] 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).[17]

After the final results of the second sunset reviews, and prior to the current sunset reviews, we issued the final results of review for the 2009-10 review,[18] the 2010-11 review,[19] the 2011-12 review,[20] and the 2012-13 review[21] with respect to large diameter pipe from Japan. We found that the respondents in *Japan LD 2009-10 Review*, *Japan LD 2010-11 Review*, and *Japan LD 2011-12 Review* did not export subject merchandise during the periods of review, with the exception of Canadian Natural Resources Limited (CNRL) in *Japan LD 2011-12 Review*, which we determined had no reviewable entries of subject merchandise during the period of review.[22] In *Japan LD 2012-13 Review,* we found a margin of 107.80 percent for SMI based on adverse facts available.[23] The order remains in effect for all manufacturers and exporters of the subject merchandise from Japan.

In addition, one administrative review of the order on small diameter pipe from Japan was requested by one exporter since the second sunset review, but was subsequently rescinded.[24] The order remains in effect for all manufacturers and exporters of the subject merchandise from Japan.

Finally, for small diameter pipe from Romania, we have conducted a number of administrative reviews. 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

---

[16] *See Carbon and Alloy Seamless Standard, Line, and Pressure Pipe From Japan and Romania*, 76 FR 60083 (September 28, 2011), and USITC Publication 4262 (September 2011), entitled "Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Japan and Romania: Investigation Nos. 731–TA–847 and 849 (Second Review)."

[17] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan; Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Japan and Romania: Continuation of Antidumping Duty Orders*, 76 FR 62762 (October 11, 2011).

[18] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe (Over 4½ Inches) From Japan: Final Results of the Antidumping Duty Administrative Review*, 76 FR 66688 (October 27, 2011) (*Japan LD 2009-10 Review*).

[19] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe (Over 4½ Inches) From Japan: Final Results of Antidumping Duty Administrative Review*, 77 FR 27428 (May 10, 2012) (*Japan LD 2010-11 Review*).

[20] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe (Over 4½ Inches) From Japan: Final Results of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 64475 (October 29, 2013) (*Japan LD 2011-12 Review*).

[21] *See Certain Large Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe From Japan: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 79 FR 68408 (November 17, 2014) (*Japan LD 2012-13 Review*).

[22] *See Japan LD 2009-10 Review*, *Japan LD 2010-11 Review*, and *Japan LD 2011-12 Review*, 78 FR at 64476-7.

[23] *See Japan LD 2012-13 Review*, 79 FR at 68409.

[24] *See Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe (Under 4½ Inches) From Japan: Rescission of Antidumping Duty Administrative Review,* 77 FR 59374 (September 27, 2012) (*Rescission of Japan SD 2011-12 Review*).

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.[25] 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 Silcotub.[26] The third administrative review covered the period August 1, 2002, through July 31, 2003. Because the Department designated Romania a ME country, effective on January 1, 2003,[27] 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.[28] Silcotub was again the only producer or exporter reviewed in the administrative review covering the period August 1, 2003, through July 31, 2004. 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.[29]

After the final results of the second sunset reviews, and prior to the current sunset reviews, we issued the final results of review for the 2010-11 review and the 2011-12 review.[30] We found a margin of zero percent for ArcelorMittal Tubular Products Roman S.A. (AMPT) in both *Romania 2010-11 Review* and in *Romania 2011-12 Review*; moreover, we determined that CNRL had no reviewable entries of subject merchandise during the period of review in *Romania 2011-12 Review*.[31] The order remains in effect for all manufacturers and exporters of the subject merchandise from Romania.

V. LEGAL FRAMEWORK

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 the 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

---

[25] *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) (*Romania 2000-01 Review*).
[26] *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) (*Romania 2001-02 Review*).
[27] *See Romania 2000-01 Review*, 68 FR at 12673.
[28] *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) (*Romania 2002-03 Review*).
[29] *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) (*Romania 2003-04 Review*).
[30] *See Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Romania: Final Results of Antidumping Duty Administrative Review; 2010-2011*, 77 FR 67336 (November 9, 2012) (*Romania 2010-11 Review*), and *Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe From Romania: Final Results of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 63164 (October 23, 2013) (*Romania 2011-12 Review*).
[31] *Id*.

imports of the subject merchandise for the period before, and the period after, the issuance of the antidumping duty orders.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (*SAA*), 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, rather than company-specific, basis.[32] In addition, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when, among other scenarios: (a) dumping continued at any level above *de minimis* after issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.[33] Alternatively, the Department normally will determine that revocation of an antidumping duty order is not likely to lead to continuation or recurrence of dumping where dumping was eliminated after issuance of the order and import volumes remained steady or increased.[34]

In addition, as a base period for import volume comparison, it is the Department's practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew comparison.[35] Also, when analyzing import volumes for second and subsequent sunset reviews, the Department's practice is to compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice.[36]

Further, 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 order were revoked. Generally, the Department selects the margin(s) from the final determination in the original investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an order in place.[37] However, the 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).[38] Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" the Department to determine that

---

[32] *See SAA* at 879 and House Report at 56.
[33] *See SAA* at 889-90, House Report at 63-64, and Senate Report at 52. *See also Policies Regarding the Conduct of Five-Year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin 98.3*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).
[34] *See SAA*, H.R. Rep. No. 103-316, Vol. 1 (1994), at 889-90.
[35] *See*, *e.g.*, *Stainless Steel Bar from Germany; Final Results of the Sunset Review of the Antidumping Duty Order*, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.
[36] *See Ferrovanadium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders*, 79 FR 14216 (March 13, 2014) and accompanying Issues and Decision Memorandum.
[37] *See SAA* at 890. *See also*, *e.g.*, *Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.
[38] *See SAA* at 890-91.

revocation of an antidumping duty order would not be likely to lead to a continuation or recurrence of sales at less than fair value.

In the *Final Modification for Reviews,* the Department announced that it was modifying its practice in sunset reviews such that it will not rely on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be World Trade Organization (WTO)-inconsistent, *i.e*, zeroing/the denial of offsets.[39] The Department also noted that "*only in the most extraordinary circumstances* will the Department rely on margins other than those calculated and published in prior determinations."[40] The Department further noted that it does not anticipate that it will need to recalculate the dumping margins in sunset determinations to avoid WTO inconsistency, apart from the "most extraordinary circumstances" provided for in its regulations.[41]

VI. DISCUSSION OF THE ISSUES

Below we address the comments submitted by the petitioners.

1. Likelihood of Continuation or Recurrence of Dumping

The petitioners assert 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. The petitioners cite to the SAA[42] and the *Policy Bulletin*[43] 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.

The petitioners argue 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.

Department's Position: As explained in the Legal Framework section above, the Department's determination of likelihood of continuation or recurrence will be made on an order-wide basis for each case.[44] In addition, the Department will normally determine that revocation of an

---

[39] *See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification*, 77 FR 8101, 8103 (February 14, 2012) (*Final Modification for Reviews*).
[40] *Id.* (emphasis added).
[41] *Id.*
[42] *See* SAA at 890.
[43] *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).
[44] *See* SAA at 879 and House Report at 56.

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 an order and import volumes for the subject merchandise declined significantly.[45] In addition, the Department also considers the volume of imports of the subject merchandise in determining whether revocation of the antidumping duty order is likely to lead to continuation or recurrence of dumping. As discussed above, it is the Department's practice to compare the volume of imports for the one-year period preceding the initiation of the LTFV investigation to the volume of imports during the period of review. We address the import volumes for all three orders below.[46]

For large diameter pipe from Japan, deposit rates above *de minimis* remain in effect for all exports. In addition, as described above, we completed the 2012-13 administrative review;[47] the rate we found was the same as the highest rate from the investigation.[48] Furthermore, as discussed below, and as demonstrated at Attachment 1, our review of statistics from the ITC's DataWeb demonstrates that imports of large diameter pipe from Japan declined substantially since the imposition of the order. Specifically, the ITC's DataWeb shows that imports of subject merchandise ranged from 11,341,999kg to 29,650,667kg on an annual basis during the period 2011-2015, in contrast to 41,349,867kg in 1997. In conjunction with the Department's determination that dumping has continued at above *de minimis* levels since the imposition of the order and since the second sunset review, the decreased volumes support a conclusion that exporters and importers of subject merchandise are declining to enter into some transactions at dumped prices that would have been made prior to the possible application of antidumping duties, and likely would be made again if the possibility of antidumping duties were removed.

For small diameter pipe from Japan, deposit rates above *de minimis* also remain in effect for all exports. As discussed above, the investigation margins are the only margins we can examine because no reviews have been completed (*i.e.*, only one review has been requested in the history of the order (which occurred during this sunset review period), and it was subsequently rescinded).[49] In the *Final Modification for Reviews*, the Department noted that "if there are no dumping margins during the five-year sunset period, decreased volumes may provide another basis to determine that dumping is likely to continue or recur if the discipline of the order is removed."[50] As discussed below, and as demonstrated at Attachment 2, our review of statistics from the ITC's DataWeb demonstrates that imports of small diameter pipe from Japan declined substantially since the imposition of the order. Specifically, the ITC's DataWeb shows that imports of subject merchandise ranged from zero to 4,150,333kg on an annual basis during the period 2011-2015, in contrast to 9,839,140kg in 1997. The decreased volumes support a conclusion that exporters and importers of subject merchandise are declining to enter into some transactions at dumped prices that would have been made prior to the possible application of antidumping duties, and likely would be made again if the possibility of antidumping duties were

[45] *See* SAA at 889-890, House Report at 63-64, and Senate Report at 52.
[46] *See* Attachments 1, 2, and 3.
[47] *See Japan LD 2012-13 Review*, 79 FR at 68409.
[48] *See Japan Orders*, 65 FR at 39362.
[49] *See Rescission of Japan SD 2011-12 Review*, 77 FR at 59374.
[50] *See Final Modification for Reviews*, 77 FR at 8103.

removed.

For small diameter pipe from Romania, deposit rates above *de minimis* also remain in effect for all exports. 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, Silcotub. Since the second sunset review, the Department has conducted reviews for one other Romanian exporter/producer, AMPT, and its rate was *de minimis*. The Department has not conducted reviews for the other Romanian exporters/producers, and their rates thus remain above *de minimis*, at the country-wide rate. As discussed below, and as demonstrated at Attachment 3, our review of statistics from the ITC's DataWeb demonstrates that imports of small diameter pipe from Romania declined substantially since the imposition of the order. Specifically, the ITC's DataWeb shows that imports of subject merchandise ranged from 6,517,105kg to 15,727,122kg on an annual basis during the period 2011-2015, in contrast to 39,078,635kg in 1997. The decreased volumes support a conclusion that exporters and importers of subject merchandise are declining to enter into some transactions at dumped prices that would have been made prior to the possible application of antidumping duties, and likely would be made again if the possibility of antidumping duties were removed.

Given that dumping continues at levels above *de minimis* and imports are significantly below the pre-initiation level, we determine that revocation of the antidumping duty orders would be likely to lead to the continuation or recurrence of dumping.

2. Magnitude of the Margins Likely to Prevail

The petitioners note 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. The petitioners claim 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.

The petitioners conclude that the Department should report to the ITC the margins determined in the LTFV investigations. The petitioners assert that all of the applicable dumping margins have been calculated in a manner that is not inconsistent with the United States' WTO obligations.

Department's Position: Normally, the Department will provide to the ITC the company-specific weighted-average dumping margin from the investigation for each company.[51] For companies not individually examined, or for companies that did not begin shipping until after the order was issued, the Department will normally provide a rate based on the all-others rate from the investigation.

The Department prefers to select a margin from the investigation because it is the only calculated rate that reflects the behavior of producers or exporters without the discipline of an order or suspension agreement in place.[52] Under certain circumstances, however, the Department may

[51] *See Eveready Battery Co., Inc. v. United States*, 77 F. Supp. 2d 1327, 1333 (CIT 1999).
[52] *Id*. *See also* SAA at 890.

select a more recent rate to report to the ITC. As indicated above, the Department's current practice is not to rely on weighted-average dumping margins calculated using the zeroing methodology, consistent with the *Final Modification for Reviews*. Instead, we may rely on other rates that may be available, or we may recalculate weighted-average dumping margins using our current offsetting methodology in extraordinary circumstances.[53]

With respect to the *Japan Orders*, the margins from both investigations were based on the highest margins alleged in the respective petitions as adverse facts available.[54] Accordingly, the Department has determined that these rates do not need to be recalculated and will be reported to the ITC without modification.

With respect to the *Romania Order*, the margins for the respondents were calculated by comparing exports prices to surrogate normal value.[55] Because Romania was considered a NME at the time of the *Romania Final Determination*, we calculated a Romania-wide rate for the "NME entity," which was based on the weighted-average margins for the respondents.[56] For this sunset review, we recalculated the margin for Sota Communication Company from the *Romania Order* to allow offsets for sales with negative dumping margins. This recalculated rate is 14.25 percent, which is higher than either the rate for Metal Business International S.R.L. (the other mandatory respondent in the less-than-fair-value investigation) or the Romania-wide rate.[57]

VII. FINAL RESULTS OF SUNSET REVIEWS

We determine that revocation of the order on large diameter pipe from Japan would be likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be weighted-average margins up to 107.80 percent.

We determine that revocation of the order on small diameter pipe from Japan would be likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be weighted-average margins up to 106.07 percent.

We determine that revocation of the order on small diameter pipe from Romania would be likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be weighted-average margins up to 14.25 percent.

---

[53] *See Final Modification for Reviews*, 77 FR at 8103.

[54] *See Notice of Preliminary Determinations of Sales at 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*, 64 FR 69718, 69722 (December 14, 1999), unchanged in *Japan Final Determination*.

[55] *See Romania Final Determination*, 65 FR at 39127. The petitioner asserted that "the Department calculated the margins for all respondents without the use of zeroing" in the antidumping investigation of small diameter pipe from Romania. *See* Letter from the petitioners, "Carbon and Alloy Seamless Standard, Line and Pressure Pipe (Under 4 ½ Inches) from Romania, Third Sunset Review: Substantive Response to Notice of Initiation," (October 3, 2016) at 7, n.7. However, the petitioners incorrectly cited to the final determination involving certain pipe from the People's Republic of China. *Id.*

[56] *See Romania Final Determination*, 65 FR at 39126-7.

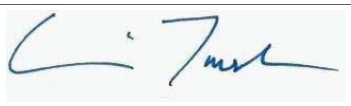
[57] *See* Memorandum to File, "Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Romania: Recalculation of Amended Final Margin for Sota Communication Company," dated concurrently with this memorandum.

VIII. 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

12/15/2016

X 

Signed by: CHRISTIAN MARSH
Christian Marsh
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

Attachments

Attachment 1

LD Pipe: Customs Value by HTS Number
for Japan

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Dollars						
Customs Value where quantities are collected in kilograms							
7304598070	4,059,685	1,711,177	8,002,308	2,685,459	2,927,501	5,175,032	76.80%
7304598065	379,691	275,277	377,808	418,183	501,595	542,392	8.10%
7304598060	246,422	282,886	962,194	510,172	278,905	1,462,911	424.50%
7304598055	1,880,658	1,316,349	3,505,090	1,296,303	4,876,996	1,145,650	-76.50%
7304598050	628,564	475,083	1,446,144	1,063,433	3,154,841	820,770	-74.00%
7304598045	338,732	278,600	471,647	392,292	1,027,824	1,229,639	19.60%
7304598040	1,036,524	1,089,858	1,316,981	888,301	3,507,916	692,864	-80.20%
7304598035	434,431	267,670	99,203	1,255,960	466,218	1,389,015	197.90%
7304598030	1,755,256	13,842,167	5,213,110	1,749,492	1,705,715	1,980,931	16.10%
7304596000	2,151,214	11,089,361	11,533,835	10,278,214	9,119,224	9,011,505	-1.20%
7304592070	216,620	14,394	172,608	1,980,899	60,087	242,577	303.70%
7304592060	214,185	28,372	283,300	1,891,483	58,886	11,293	-80.80%
7304592055	20,263	0	245,829	1,066,037	297,077	0	-100.00%
7304592030	3,319	1,143,758	1,949,631	74,032	10,181	0	-100.00%
7304515060	16,265,333	11,915,196	1,796,723	5,083,285	11,032,834	10,844,694	-1.70%
Subtotal Product Group (Quantities Collected in kilograms)	29,630,897	43,730,148	37,376,411	30,633,545	39,025,800	34,549,273	-11.50%
All Other:	36,228,539	30,480,815	70,204,247	60,262,416	41,476,779	58,481,060	41.00%
Total	**65,859,436**	**74,210,963**	**107,580,658**	**90,895,961**	**80,502,579**	**93,030,333**	**15.60%**

LD Pipe: First Unit of Quantity by HTS Number
for Japan

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Units of Quantity						
First Unit of Quantity where quantities are collected in kilograms							
7304598070	3,493,957	607,970	2,260,446	800,482	984,017	2,006,058	103.90%
7304598065	346,099	71,686	124,373	97,117	195,737	240,189	22.70%
7304598060	218,493	96,018	304,080	193,021	105,793	680,335	543.10%
7304598055	1,771,021	426,674	1,167,806	445,082	1,989,836	428,007	-78.50%
7304598050	518,358	139,111	435,361	288,392	1,555,255	297,333	-80.90%
7304598045	284,509	93,934	146,072	137,889	347,163	409,810	18.00%
7304598040	1,037,156	370,012	379,662	289,957	1,726,102	255,690	-85.20%
7304598035	317,383	83,239	36,847	488,862	241,308	663,828	175.10%
7304598030	1,019,909	7,136,364	2,394,611	689,941	679,097	575,165	-15.30%
7304596000	1,172,737	2,772,477	2,539,239	2,393,425	2,166,349	2,394,942	10.60%
7304592070	179,644	4,186	23,100	374,940	18,482	50,004	170.60%
7304592060	107,683	2,932	46,643	522,233	22,276	3,914	-82.40%
7304592055	18,796	0	51,098	262,132	114,602	0	-100.00%
7304592030	30	247,551	433,022	16,471	2,267	0	-100.00%
7304515060	8,392,827	3,238,002	544,960	1,328,339	3,431,457	3,282,528	-4.30%
All Other:	41,349,867	11,341,999	28,784,353	29,650,667	15,456,577	22,531,651	45.80%

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.

Attachment 2

SD Pipe: Customs Value by HTS Number
for Japan

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Dollars						
Customs Value where quantities are collected in kilograms							
7304598025	1,411,424	773,842	276,486	264,327	5,470	51,063	833.50%
7304598020	1,795,091	8,595,672	1,097,472	275,540	260,281	0	-100.00%
7304598015	829,735	0	706,998	168,516	20,855	349,596	1576.30%
7304598010	415,696	0	7,457,313	982,308	4,000	47,835	1095.90%
7304596000	2,151,214	11,089,361	11,533,835	10,278,214	9,119,224	9,011,505	-1.20%
7304515060	16,265,333	11,915,196	1,796,723	5,083,285	11,032,834	10,844,694	-1.70%
7304515005	14,977	1,014,760	30,310	809,383	86,864	258,676	197.80%
7304390032	1,593,843	0	0	35,021	0	0	N/A
7304390028	982,869	197,271	0	28,371	4,550	159,396	3403.20%
7304390024	756,769	1,363,072	77,738	44,177	24,120	41,786	73.20%
7304390020	1,472,844	3,741,163	4,396,190	2,617,408	1,114,153	1,619,682	45.40%
7304390016	0	0	0	0	0	11,583	N/A
7304316050	5,575,197	14,286,036	19,595,944	16,925,754	16,391,295	19,681,545	20.10%
7304313000	4,800	56,407	2,870	11,538	507,572	0	-100.00%
7304195020	0	11,123	0	25,576	0	28,599	N/A
Subtotal Product Group (Quantities Collected in kilograms)	33,269,792	53,043,903	46,971,879	37,549,418	38,571,218	42,105,960	9.20%
All Other:	7,505,188	0	21,272	18,423	3,831	8,223,094	214546.10%
Total	**40,774,980**	**53,043,903**	**46,993,151**	**37,567,841**	**38,575,049**	**50,329,054**	**30.50%**

SD Pipe: First Unit of Quantity by HTS Number
for Japan

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Units of Quantity						
First Unit of Quantity where quantities are collected in kilograms							
7304598025	1,137,468	264,488	110,135	69,019	1,516	21,781	1336.70%
7304598020	933,144	4,626,986	565,041	102,434	24,827	0	-100.00%
7304598015	593,167	0	255,796	143,777	1,749	102,296	5748.80%
7304598010	205,179	0	1,544,786	223,882	24	17,914	74541.70%
7304596000	1,172,737	2,772,477	2,539,239	2,393,425	2,166,349	2,394,942	10.60%
7304515060	8,392,827	3,238,002	544,960	1,328,339	3,431,457	3,282,528	-4.30%
7304515005	1,275	22,270	1,237	21,263	3,742	4,236	13.20%
7304390032	968,049	0	0	11,155	0	0	N/A
7304390028	1,421,030	113,775	0	17,706	3,237	78,000	2309.60%
7304390024	1,015,065	757,836	32,071	8,679	621	869	39.90%
7304390020	1,550,996	1,248,564	1,412,158	1,200,170	575,610	897,160	55.90%
7304390016	0	0	0	0	0	15,043	N/A
7304316050	2,674,620	2,403,222	3,314,714	2,434,871	1,895,039	2,240,309	18.20%
7304313000	2,776	18,226	1,047	4,211	143,023	0	-100.00%
7304195020	0	7,745	0	17,809	0	19,913	N/A
All Other:	9,839,140	0	23,986	16,180	4,320	4,150,333	95972.50%

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.

Attachment 3

SD Pipe: Customs Value by HTS Number
for Romania

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Dollars						
Customs Value where quantities are collected in kilograms							
7304598025	0	2,756,937	3,981,243	847,513	4,044,644	1,280,142	-68.30%
7304598020	0	3,361,970	14,285,087	1,664,536	2,245,443	1,765,548	-21.40%
7304598015	0	855,590	376,715	256,931	333,973	367,754	10.10%
7304598010	0	0	47,268	58,290	0	0	N/A
7304515060	0	0	59,676	1,470,921	9,769,875	3,994,719	-59.10%
7304390032	15,745	1,642,189	1,448,103	1,817,514	747,270	1,001,197	34.00%
7304390028	26,607	1,169,420	8,599,502	4,039,000	1,040,054	240,226	-76.90%
7304390024	155,077	829,004	1,719,660	3,160,741	1,282,976	840,383	-34.50%
7304390020	0	235,317	550,751	1,769,158	133,121	176,578	32.60%
7304316050	27,897	4,099,996	5,781,260	12,043,592	8,359,206	8,896,313	6.40%
7304313000	0	0	592,297	0	0	6,185	N/A
7304191020	0	183,637	648,148	150,943	107,025	217,552	103.30%
7304101020	21,997,331	0	0	0	0	0	N/A
Subtotal kilograms	22,222,657	15,134,060	38,089,710	27,279,139	28,063,587	18,786,597	-33.10%
Total	**22,222,657**	**15,134,060**	**38,089,710**	**27,279,139**	**28,063,587**	**18,786,597**	**-33.10%**

SD Pipe: First Unit of Quantity by HTS Number
for Romania

U.S. Imports for Consumption

Annual Data

HTS Number	1997	2011	2012	2013	2014	2015	Percent Change 2014 - 2015
	In Actual Units of Quantity						
First Unit of Quantity where quantities are collected in kilograms							
7304598025	0	1,189,118	1,967,755	419,489	2,276,756	588,600	-74.10%
7304598020	0	1,251,480	4,922,156	807,232	1,357,864	732,056	-46.10%
7304598015	0	493,475	219,240	150,964	199,710	230,620	15.50%
7304598010	0	0	30,364	33,656	0	0	N/A
7304515060	0	0	17,070	407,365	2,986,843	1,317,721	-55.90%
7304390032	30,188	1,052,834	970,609	1,378,313	594,534	897,369	50.90%
7304390028	50,402	700,270	4,103,664	2,084,004	737,813	187,102	-74.60%
7304390024	282,935	550,504	1,101,418	2,010,339	980,157	707,274	-27.80%
7304390020	0	155,568	339,300	1,211,602	101,475	212,316	109.20%
7304316050	59,576	1,000,693	1,521,919	3,874,665	2,500,895	2,759,132	10.30%
7304313000	0	0	132,888	0	0	1,371	N/A
7304191020	0	123,163	400,739	85,840	48,126	132,907	176.20%
7304101020	38,655,534	0	0	0	0	0	N/A
Subtotal kilograms	39,078,635	6,517,105	15,727,122	12,463,469	11,784,173	7,766,468	-34.10%

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.