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Sunset Reviews
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March 1, 2017

MEMORANDUM TO: Ronald K. Lorentzen
Acting Assistant Secretary
for Enforcement & Compliance

FROM: James Maeder
Senior Office Director, Office I
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum: Final Results of Expedited
Sunset Reviews of the Antidumping Duty Orders on Welded
ASTM A-312 Stainless Steel Pipe from South Korea and Taiwan

Summary

We have analyzed the substantive responses of the interested parties in the fourth sunset reviews of the antidumping duty (AD) orders covering welded ASTM A-312 stainless steel pipe (WSSP) from South Korea and Taiwan. We recommend that you approve the positions as set forth in the “Discussion of Issues” section of this memorandum. Below is the complete list of the issues in these sunset reviews for which we received a substantive response:

1. Likelihood of Continuation or Recurrence of Dumping
2. Magnitude of the Margins Likely to Prevail

Background

On November 1, 2016, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act), the Department initiated the fourth sunset reviews of the antidumping duty orders on WSSP from South Korea and Taiwan.¹ On November 8, 2016, Bristol Metals LLC,² Felker Brothers Corporation, Marcegaglia USA, and Outokumpu Stainless Pipe, Inc. (Domestic Interested Parties) filed a notice of intent to participate in both sunset reviews. The notices of intent to participate were timely filed pursuant to 19 CFR 351.218(d). The Domestic Interested Parties claimed interested party status under section 771(9)(C) of the Act as U.S. producers of subject merchandise.

¹ See *Initiation of Five-Year (“Sunset”) Reviews*, 81 FR 75808 (November 1, 2016).

² Bristol Metals was the petitioner during the Less Than Fair Value Investigation. See “Letter from Schagrin Associates to the Honorable Penny Pritzker, Secretary to Commerce, Welded ASTM A-312 stainless steel pipes from Korea, Fourth Sunset Review: Substantive Response to Notice of Initiation,” dated December 1, 2016, at 2. See also “Letter from Schagrin Associates to the Honorable Penny Pritzker, Secretary to Commerce, Welded ASTM A-312 stainless steel pipes from Taiwan Fourth Sunset Review: Substantive Response to Notice of Initiation,” dated November 8, 2016 at 2.



On December 1, 2016, we received a complete substantive response³ to the notice of initiation from the Domestic Interested Parties within the specified time pursuant to 19 CFR 351.218(d)(3)(i). On January 17, 2017, Domestic Interested Parties submitted a letter clarifying which U.S. Harmonized Tariff Schedule (HTSUS) numbers were included in the import data provided in Exhibit 1 of its substantive responses.⁴ We received no response from respondent interested parties to these proceedings. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(3)(l)(ii)(C)(2), the Department conducted expedited sunset reviews of these antidumping duty orders.⁵

Scope of the Orders

South Korea:

The products covered by this order are shipments of WSSP from Korea that meets the standards and specifications set forth by the American Society for Testing and Materials (ASTM) for the welded form of chromium-nickel pipe designated ASTM A-312. WSSP is produced by forming stainless steel flat-rolled products into a tubular configuration and welding along the seam. WSSP is a commodity product generally used as a conduit to transmit liquids or gases. Major applications for WSSP include, but are not limited to, digester lines, blow lines, pharmaceutical lines, petrochemical stock lines, brewery process and transport lines, general food processing lines, automotive paint lines and paper process machines.

Imports of these products are currently classifiable under the following HTSUS: 7306.40.5005, 7306.40.5015, 7306.40.5040, 7306.40.5065 and 7306.40.5085. Although the HTSUS subheadings include both pipes and tubes, the scope of the order is limited to welded austenitic stainless steel pipes. The HTSUS subheadings are provided for convenience and customs purposes. The written description remains dispositive.

We have not issued any scope rulings or circumvention determinations with respect to this order. We have conducted one changed circumstance review for SeAH, the successor to Pusan Steel Pipe Co., Ltd. (PSP).⁶

Taiwan:

The merchandise subject to the antidumping duty order is WSSP that meets the standards and specifications set forth by the ASTM for the welded form of chromium-nickel pipe designated ASTM A-312. The merchandise covered by the scope of the order also includes austenitic welded stainless steel pipes made according to standards of other nations, which are comparable to ASTM A-312.

³ The response covered the sunset reviews of the antidumping duty orders on WSSP from South Korea and Taiwan.

⁴ See Letter from Schagrin Associates to the Honorable Penny Pritzker, "Welded ASTM A-312 stainless steel pipes from Korea and Taiwan, Fourth Sunset Review: Clarification of Substantive Response to Notice of Initiation," dated January 17, 2017.

⁵ Pursuant to section 351.218(e)(l)(ii)(C)(l) of the Department's regulations, the Department notified the ITC that respondent interested companies provided an inadequate response to the Notice of Initiation of the antidumping duty orders on WSSP from Korea and Taiwan. See November 21, 2016 letter to Catherine DeFilippo, Director of Investigations, International Trade Commission, from Jim Doyle, Director, Office V, AD/CVD Operations, Enforcement and Compliance.

⁶ See *Certain Welded Stainless Steel Pipe from Korea; Final Results of Antidumping Duty Changed Circumstances Review*, 63 FR 16979 (April 7, 1998) (*WSSP from Korea Changed Circumstances Review*).

WSSP is produced by forming stainless steel flat-rolled products into a tubular configuration and welding along the seam. WSSP is a commodity product generally used as a conduit to transmit liquids or gases. Major applications for WSSP include, but are not limited to, digester lines, blow lines, pharmaceutical lines, petrochemical stock lines, brewery process and transport lines, general food processing lines, automotive paint lines and paper process machines. Imports of these products are currently classifiable under the following United States Harmonized Tariff Schedule (HTSUS) subheadings: 7306.40.5005, 7306.40.5015, 7306.40.5040, 7306.40.5065 and 7306.40.5085. Although the HTSUS subheadings include both pipes and tubes, the scope of the order is limited to welded austenitic stainless steel pipes. The HTSUS subheadings are provided for convenience and customs purposes. The written description remains dispositive.

We have not issued any scope rulings or circumvention determinations with respect to this order.

History of the Antidumping Duty Orders through the Third Sunset Reviews

On December 30, 1992, the Department of Commerce (the Department) published the antidumping duty orders on WSSP from South Korea and Taiwan.⁷ With respect to South Korea, the Department determined final weighted-average dumping margins of 2.67 percent for PSP,⁸ 7.92 percent for Sammi Metal Products, Ltd. (Sammi), and 7.00 percent for “All Others.”⁹

For Taiwan, the Department determined weighted-average dumping margins of 3.27 percent for Ta Chen Stainless Steel Pipe Co., Ltd. (Ta Chen), 31.90 percent for Jaung Yuann Enterprise Co., Ltd. and Yeun Chyang Industrial, and 19.94 percent for “All Others.”¹⁰ In 2000, the Department revoked the order with respect to Ta Chen.¹¹

In the first sunset review of these *Orders*, the Department determined that revocation would likely lead to the continuation or recurrence of dumping.¹² On October 2, 2000, the International Trade Commission (ITC) determined, pursuant to section 751(c) of the Act, that revocation of the *Orders* would be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹³ Accordingly, the Department published the continuation of these *Orders*.¹⁴

⁷ See *Antidumping Duty Order and Clarification of Final Determination: Certain Welded Stainless Steel Pipes from Korea*, 57 FR 62301 (December 30, 1992) and *Notice of Amended Final Determination and Antidumping Duty Order: Certain Welded Stainless Steel Pipe from the Republic of Korea*, 60 FR 10064 (February 23, 1995); see also *Amended Final Determination and Antidumping Duty Order: Certain Welded Stainless Steel Pipe from Taiwan*, 57 FR 62300 (December 30, 1992) (the *Orders*).

⁸ See *Certain Welded Stainless Steel Pipe from Korea; Final Results of Antidumping Duty Changed Circumstances Review*, 63 FR 16979 (April 7, 1998).

⁹ See the *Orders*.

¹⁰ See *Amended Final Determination and Antidumping Duty Order: Certain Welded Stainless Steel Pipe from Taiwan*, 57 FR 62300 (December 30, 1992) (*Amended Final Determination*).

¹¹ See *Certain Welded Stainless Steel Pipe from Taiwan: Final Results of Antidumping Duty Administrative Review and Determination to Revoke Order In Part*, 65 FR 39367 (June 26, 2000).

¹² See *Final Results of Expedited Sunset Reviews: Certain Welded Stainless Steel Pipes from the Republic of Korea and Taiwan*, 65 FR 5607 (February 4, 2000) (*First Sunset Review*).

¹³ See *Certain Welded Stainless Steel Pipes from Korea and Taiwan*, 65 FR 58806 (October 2, 2000) and USITC Publication 3351, Investigation Nos. 731-TA-540 and 731-TA-541 (September 2000).

¹⁴ See *Continuation of Antidumping Duty Orders: Certain Welded Stainless Steel Pipe from South Korea and Taiwan*, 65 FR 61143 (October 16, 2000).

In the second sunset review of these antidumping duty orders, the Department determined that revocation of these orders would likely lead to the continuation or recurrence of dumping.¹⁵ On August 26, 2006, the ITC determined pursuant to the Act that revocation of the *Orders* would be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁶ Accordingly, the Department published the continuation of these *Orders*.¹⁷

In the third sunset review of these *Orders*, the Department determined that revocation would likely lead to the continuation or recurrence of dumping.¹⁸ On December 7, 2011, the ITC published its determination pursuant to the Act that revocation of the *Orders* would be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁹ Accordingly, the Department published the continuation of these *Orders*.²⁰

Since the publication of the continuation notice on December 19, 2011, the case histories are as follows:

South Korea

The Department completed an administrative review for the period December 1, 2013, through November 30, 2014 (*2013-2014 POR*) for SeAH Steel Corporation (SeAH) and LS Metal Co. Ltd. (LS Metal) and is currently conducting an administrative review for the period December 1, 2014, through November 30, 2015 (*2014-2015 POR*). On July 18, 2016, the Department published the final results of an administrative review for SeAH with a dumping margin of 2.58 percent and for LS Metal with a dumping margin of 31.70 percent in the *2013-2014 POR*.²¹ On December 30, 2016, the Department published the preliminary results of an administrative review for SeAH with a preliminary dumping margin of 1.91 percent.²² We also made a preliminary finding of no shipments for LS Metal.²³

¹⁵ See *Welded ASTM A-312 Stainless Steel Pipe from South Korea and Taiwan: Notice of Final Results of Expedited ("Sunset") Reviews of Antidumping Duty Orders*, 71 FR 96 (January 3, 2006) (*Second Sunset Review*).

¹⁶ See *Certain Welded Stainless Steel Pipes from Korea and Taiwan* 71 FR 48942 (August 22, 2006) and USITC Publication 3877, Investigation Nos. 731-TA-540 and 731-TA-541 (August 2006) (*Second Review*).

¹⁷ *Continuation of Antidumping Duty Orders on Welded ASTM A-132 Stainless Steel Pipe from Korea and Taiwan*, 71 FR 53412 (September 11, 2006).

¹⁸ See *Welded ASTM A-312 Stainless Steel Pipe from South Korea and Taiwan: Notice of Final Results of Expedited Sunset Reviews of the Antidumping Duty Orders*, 76 FR 67673. (November 2, 2011) (*Third Sunset Review*).

¹⁹ See *Certain Welded Stainless Steel Pipes from Korea and Taiwan* 71 FR 48942 (December 7, 2011) USITC Publication 3877, Investigation Nos. 731-TA-540 and 731-TA-541 (December 2011) (*Third Review*).

²⁰ *Welded ASTM A-312 Stainless Steel Pipe from South Korea and Taiwan: Continuation of Antidumping Duty Orders*, 76 FR 78614 (December 19, 2011) (*Third Sunset Review*).

²¹ See *Welded ASTM A-312 Stainless Steel Pipe from the Republic of Korea: Final Results of Antidumping Duty Administrative Review*, 81 FR 46647 (July 18, 2016) (2013-2014 Administrative Review Final Results).

²² See *Welded Stainless Steel ASTM Pipe from the Republic of Korea: Preliminary Results of Antidumping Duty Administrative Review; 2014-2015* 81 FR 96435 (December 30, 2016).

²³ *Id.*

Taiwan

No interested parties requested an administrative review for any of the periods of review (PORs) from December 1, 2011, through November 30, 2016.

Discussion of Issues

In accordance with section 751(c)(3)(B) of the Act, the Department has conducted these sunset reviews to determine whether revocation of the *Orders* would be likely to lead to continuation or recurrence of dumping. Section 752(c)(1) of the Act provides that, in making these determinations, the Department shall consider the weighted-average dumping margins determined in the investigation and subsequent reviews and the volume of imports of the subject merchandise for the period before and the period after the issuance of the *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 terminated. Below we address the comments of the interested parties.

1. Likelihood of Continuation or Recurrence of Dumping

The Domestic Interested Parties cite to section 752(c)(1) of the Act, which states that, in determining the likelihood of continuation or recurrence of dumping, the Department will consider the following factors: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; (2) the volume of imports of the subject merchandise for the period after the issuance of the antidumping duty order or acceptance of suspension. The Domestic Interested parties provided a chart with the volume and value of imports of WSSP from South Korea and Taiwan for 2011 through 2015.²⁴ The import volumes shown in Exhibit 1 for South Korea range from 6,283 short tons in 2013 to 9,308 short tons in 2015.²⁵ The imports of WSSP for Taiwan range from 16,517 short tons in 2011 to 25,252 short tons in 2014.²⁶

Quoting the Statement of Administrative Action Accompanying the Uruguay Round Agreements Act (SAA), the Domestic Interested Parties referred to the Department's Policies Regarding the Conduct of Five-Year Reviews of Antidumping and Countervailing Duty Orders (Policy Bulletin):

{D}eclining import volumes accompanied by the continued existence of dumping margins after the issuance of the 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 pre-order volumes.²⁷

²⁴ Domestic Interested Parties provided data from U.S. International Trade Commission (ITC) Dataweb based on the following HTS numbers 7306.40.5005, 7306.40.5040, 7306.40.5062, 7306.40.5064, 7306.40.5085. Domestic Interested Parties did not include HTSUS number 7306.40.5015 when calculating import volumes in the most recently completed (third) sunset review either.

²⁵ See Exhibit 1 of Domestic Interested Parties' Submissions, filed on December 1, 2016 (for South Korea).

²⁶ See Exhibit 1 of Domestic Interested Parties' Submissions, filed on December 1, 2016 (for Taiwan).

²⁷ See *Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin*, 63 FR 18871 (April 16, 1998).

The Domestic Interested Parties also quote the Department's Policy Bulletin, stating that "the Department . . . will normally determine that revocation of an antidumping duty order is likely to lead to a continuation or recurrence of dumping where: (a) dumping continued at any level above *de minimis* after the issuance of an order . . . (b) imports of the subject merchandise ceased after the issuance of the order . . . or (c) dumping was eliminated after the issuance of the order or the suspension agreement . . . and import volumes for the subject merchandise declined significantly."²⁸

For both South Korea and Taiwan, the Domestic Interested Parties rely on the fact that "most of the dumping margins determined in the less-than-fair-value (LTFV) investigations continue to exist for shipments of the subject merchandise."²⁹ The Domestic Interested Parties further argue that the Department should rely on the weighted-average dumping margins calculated in the LTFV investigations and the amended final results for South Korea, because imports for all companies continue to exist for shipments of the subject merchandise, and the South Korean producers have continued dumping at above *de minimis* levels since the issuance of the order, which the SAA indicates is highly probative of the likelihood of continuation or recurrence of dumping. Regarding the weighted-average dumping margins calculated in the LTFV investigations and amended final results for South Korea, the Domestic Interested Parties stated that none of the applicable dumping margins were calculated using zeroing. As such, the Domestic Interested Parties argue that these weighted-average dumping margins were calculated in a manner that is not inconsistent with the United States' WTO obligations and, therefore, the Department may rely on such margins. For the above reasons, Domestic Interested Parties argue that the Department should find, for both South Korea and Taiwan, that dumping would be likely to continue or recur if the *Orders* were revoked.³⁰

The Department's Position

Pursuant to section 752(c)(1) of the Act, the Department will consider "the weighted average dumping margins determined in the investigation and subsequent reviews," as well as "the volume of imports of the subject merchandise for the period before and the period after the issuance of the antidumping duty order"

Consistent with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act (URAA), specifically the SAA H.R. Doc. No. 103-316, vol. 1 (1994), 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 determination of likelihood will be made on an order-wide basis. In addition, the Department indicated that normally it will determine that revocation of an AD 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)

²⁸ See Domestic Interested Parties' Submissions, filed on December 1, 2016, at 5-6.

²⁹ See Domestic Interested Parties' Submissions, filed on December 1, 2016, at 7 (for both South Korea and Taiwan).

³⁰ See Domestic Interested Parties Submissions, filed on December 1, 2016, at 9.

dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.

Below is the Department's analysis for each order:

South Korea

As noted above, the Department found dumping margins in excess of the *de minimis* level in the one completed administrative review of SeAH conducted since the *Third Sunset Review*.³¹ Annual import levels since the *Third Sunset Review* range from 2,045 short tons in 2013 to 9,978 short tons in 2014.³² Only in 2014 did the import volumes exceed the 5,074 short tons imported in 1991, the year before the initiation of the LTFV investigation.³³

If companies continue to dump with the discipline of an order in place, it is reasonable to conclude that dumping would continue or recur if the order were revoked.³⁴ As noted above, the Department found companies to be dumping at levels above *de minimis* during the time since the *Third Sunset Review*. Moreover, when the Department finds above *de minimis* levels of dumping accompanied by declining import volumes, it is reasonable to conclude that dumping would continue or recur if the order were revoked, because it is evidence that the exporter would need to dump to sell at pre-order volumes.³⁵ Here, the Department found dumping margins above *de minimis* and import volumes that, with the exception of 2014, were declining below pre-order levels.³⁶ Thus, the Department determines that dumping is likely to continue or recur if the order were revoked, pursuant to section 752(c)(1) of the Act.

Taiwan

In the LTFV investigation of WSSP from Taiwan, the Department found dumping of subject merchandise by Taiwanese companies at above the *de minimis* level,³⁷ and there is no evidence that the pricing behavior of the companies that are currently covered by the antidumping duty order has changed. No administrative review was requested by any Taiwanese respondent since prior to the *First Sunset Review* in 2000, and Customs and Border Protection has continued to assess and collect antidumping duties on entries of WSSP from Taiwan since that time. Annual import levels since the *Third Sunset Review* range from 8,143 short tons to 12,561 short tons, exceeding the 9,197 short tons imported in 1991—the year before the start of the original investigation—for three out of the five years. Thus, even though they were below the 1991 level

³¹ See 2013-2014 Administrative Review Final Results.

³² See "Memorandum from Jacqueline Arrowsmith to The File, through Thomas Gilgunn, on Import Volumes for the Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders on Welded ASTM A0312 Stainless Steel Pipe from South Korea and Taiwan," dated concurrently with this Issues and Decision Memorandum (Import Volumes Memo) at Attachment 1.

³³ *Id.*

³⁴ See SAA at 890.

³⁵ See SAA at 889.

³⁶ See *Import Volumes Memo*.

³⁷ Although Ta Chen Stainless Pipe Co., Ltd. (Ta Chen) was included in the investigation and subsequent administrative reviews of the antidumping duty order on WSSP, including the *First Sunset Review*, we revoked the order with respect to Ta Chen on June 26, 2000. See *Certain Welded Stainless Steel Pipe from Taiwan: Final Results of Antidumping Duty Administrative Review and Determination to Revoke Order In Part*, 65 FR 39367 (June 26, 2000).

in two of the five years (8,143 short tons in 2011 and 8,650 short tons in 2012), Taiwanese manufacturers have continued to import, exceeding pre-import levels in three out of the five years. In the other three years since the *Third Sunset Review*, imports were 9,360 short tons in 2013, 12,561 short tons in 2014, and 10,547 short tons in 2015.

If companies continue to dump with the discipline of the order in place, it is reasonable to conclude that dumping would continue or recur if the order were revoked.³⁸ As noted above, imports have continued since the *Third Sunset Review* despite the above *de minimis* dumping margins that remain in effect, and there is no evidence that indicates dumping has ceased. Thus, the Department determines that dumping is likely to continue or recur if the order were revoked, pursuant to section 752(c)(1) of the Act.

2. Magnitude of Margins Likely to Prevail

For both South Korea and Taiwan, the Domestic Interested Parties argue that the Department should find that the dumping margins likely to prevail were the order to be revoked are the dumping margins calculated in the LTFV investigations, because these are the “only calculated rate{s} that reflects the behavior of the exporter . . . without the discipline of an order or suspension agreement in place.”³⁹ The Domestic Interested Parties also note that these rates were also determined to be the dumping margins likely to prevail in the *First Sunset Review*, the *Second Sunset Review*, and the *Third Sunset Review*.

The Department’s Position

Section 752(c)(3) of the Act provides that the Department normally will provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. The Department normally will select a dumping margin that was determined in the final determination of the LTFV investigation because that is the only calculated rate that reflects the behavior of each exporter and/or producer without the discipline of an order.⁴⁰ For companies not specifically investigated or for companies that did not begin shipping until after the order or suspended investigation was issued, the Department normally will provide a dumping margin based on the “All Others” rate from the investigation. Finally, in accordance with the *Final Modification for Reviews*, the Department will not rely on weighted-average dumping margins that were calculated using methodology found to be WTO-inconsistent.⁴¹

The Department disagrees with the Domestic Interested Parties concerning the dumping margins likely to prevail if the *Order* on WSSP from South Korea were revoked. The Department could not confirm that the dumping margins calculated in the investigation were calculated using a methodology found to be WTO-consistent. Therefore, in order to comply with the *Final Modification for Reviews*, the Department finds that the best available information to report to the ITC as the margins likely to prevail for South Korea is based on weighted-average dumping margins from the 2013-2014 administrative review, which was the most recently completed

³⁸ See SAA at 890.

³⁹ See SAA at 890.

⁴⁰ See SAA at 890 and the House Report at 64.

⁴¹ 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*).

review.⁴² Because this administrative review was completed after the *Final Modification for Reviews* was in effect, we know those rates were calculated in a manner consistent with the *Final Modification for Reviews*. In addition, reporting rates based on the final results of an administrative review is explicitly contemplated by the Act.⁴³ Therefore, the Department finds that the best available information for “All Others” is based on the simple average of the weighted-average margins for SeAH and LS Metal Co., Ltd., from the 2013-2014 administrative review, which is 17.14 percent.⁴⁴

The Department agrees with the Domestic Interested Parties concerning the dumping margins likely to prevail if the *Order* on WSSP from Taiwan were revoked. For Taiwan, the rate we are reporting to the ITC for this sunset review is from the *Amended Final Determination*. This rate for both Jaung Yuann Enterprise Co., Ltd. (Jaung Yuann) and Yeun Chyang Industrial Co., Ltd. (Yeun Chyang), of 31.90 percent is not affected by zeroing because it was based entirely on “best information available,” instead of a calculated rate. We determine that this rate from the investigation is probative of the behavior of producers and exporters of WSSP from Taiwan without the discipline of the *Order* because this dumping margin is the only rate that reflects the behavior of exporters without the discipline of the *Order*.

Final Results of Reviews

We determine that revocation of the *Order* on WSSP from South Korea would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be up to 17.14 percent.

We determine that revocation of the *Order* on WSSP from Taiwan would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be up to 31.90 percent.

⁴² See *Welded ASTM A-312 Stainless Steel Pipe from the Republic of Korea: Final Results of Antidumping Duty Administrative Review; 2013-2014*, 81 FR 46647 (July 18, 2016).

⁴³ See Section 752(c)(3) of the Act.

⁴⁴ *Id.*

RECOMMENDATION

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



Agree

Disagree

3/1/2017

X

Ronald K. Lorentzen

Signed by: RONALD LORENTZEN