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January 9, 2012

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Import Administration

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

SUBJECT: Tapered Roller Bearings from the People's Republic of China: Issues and Decision Memorandum for the Final Results of the 2009-2010 Administrative Review

SUMMARY:
We have analyzed the case briefs and rebuttal briefs submitted by Petitioner,[1] CPZ/SKF, Hailin I&E, FIT, and Northfield in the 2009-2010 administrative review of the antidumping duty order on TRBs from the PRC. As a result of our analysis, we have made changes to the *Preliminary Results*.

We recommend that you approve the positions described in the "Discussion of the Issues" section of this Issues and Decision Memorandum. Below is the complete list of the issues in this antidumping duty administrative review for which we received comments.

Case Issues:
Comment 1: Whether CPZ/SKF Accurately Reported its Steel Bar Consumption
Comment 2: Whether CPZ/SKF Accurately Reported its ME Purchases
Comment 3: Whether to Use Prior Period FOPs When Valuing Certain of CPZ/SKF's Sales
Comment 4: Whether Hailin I&E's Producer, Hailin Zhongke, is the Successor-in Interest to HB Factory
Comment 5: Whether to Reinstate the Order With Respect to Hailin I&E
Comment 6: Whether to Modify Hailin I&E's Liquidation Instructions
Comment 7: Whether the Department Incorrectly Merged Databases

[1] Below the list of Case Issues addressed within this memorandum is a List of Abbreviations and Acronyms used herein and the full name to which each applies. Additionally, attached at the end of this memorandum is a list of short and corresponding full cites for referenced administrative determinations, litigation findings. Documents on the record of this administrative review and other authorities referenced within this memorandum.

DISCUSSION OF THE ISSUES

Comment 1: Whether CPZ/SKF Accurately Reported its Steel Bar Consumption

- Petitioner argues that CPZ/SKF failed to include in its steel bar consumption calculation the weight of the steel bar used to produce certain of CPZ/SKF's forged and turned parts produced by subcontractors. Petitioner contends that the Department should correct CPZ/SKF's steel bar allocation calculation to account for the steel which was consumed in the production of subject merchandise. Petitioner suggests a steel bar consumption ratio and an adjustment ratio which could be used to provide an estimate of the amount of steel bar actually used.

- CPZ/SKF argues that its allocation figures need to be corrected only for the forged parts purchased from its subcontractors. CPZ/SKF argues that, because all of its purchased turned parts were made from steel tube which was accounted for in its steel tube FOP, no adjustment to the steel bar consumption factor is required. To account for the amount of steel bar actually used to produce turned parts, CPZ/SKF suggests that the Department use the same steel bar consumption ratio suggested by Petitioner, and the adjustment ratio suggested by CPZ/SKF, using a different denominator to account for CPZ/SKF's revised total standard steel consumption.

Department's Position: We agree with CPZ/SKF and have adjusted its steel bar consumption ratio to account for the unreported steel bar CPZ/SKF's subcontractors purchased and consumed in their manufacture of forged TRB parts, which were made from steel bar not provided by CPZ/SKF. For the turned parts, we have made no adjustment to the steel bar consumption ratio because the steel consumed to produce these parts is steel tube, not steel bar, and is captured in CPZ/SKF's steel tube FOPs.[2]

CPZ/SKF utilizes subcontractors for several steps in the production process of subject merchandise, including the forging and turning of rings.[3] CPZ/SKF reported the total consumption, its own and that it provided to its subcontractors, of two main types of steel inputs: steel bar and steel tube. CPZ/SKF calculated the model-specific consumption for its steel bar input by first calculating a ratio of total actual steel bar consumption during the POR to total standard steel consumption for all models.[4] This ratio was then applied to CPZ/SKF's model-specific standard input norm describing the standard usage of steel bar required to produce each particular model,[5] with the result being the actual steel consumed, by model. As noted by Petitioner, the total actual steel bar consumption figure used by CPZ/SKF did not include the steel required to produce the forged or turned parts which CPZ/SKF purchased from its subcontractors.[6] As explained further below, we find that the steel required to produce the

[2] *See* CPZ/SKF's Section D questionnaire response dated December 3, 2010, at exhibit 12.

[3] *See* CPZ/SKF's Section D questionnaire response dated December 3, 2010, at page 5.

[4] *See* CPZ/SKF's supplemental Section D questionnaire response dated April 15, 2011, at exhibit 6.

[5] *See* CPZ/SKF's supplemental Section D questionnaire response dated December 3, 2010, at exhibit 13.

[6] CPZ/SKF's input-and-output worksheet by stage of production lists weights for "Forged Parts Purchased" and for "Turned Parts Purchased" that are not included in the beginning stage entry for "Steel Input." S*ee* CPZ/SKF's supplemental D response dated April 15, 2011, at exhibit 1.

purchased forged parts was inappropriately left out of CPZ/SKF's consumption calculation but that the steel required for purchased turned parts was correctly reported.

With respect to CPZ/SKF's purchases of turned parts, we note that those parts[7] were produced using steel tube, not steel bar, and thus the steel bar calculation did not reflect consumption of TRBs produced from purchased turned parts produced from steel tube. As CPZ/SKF explained in its responses, certain models were produced using steel tube in some instances and using steel bar in other instances.[8] Petitioner points to the inclusion of some of these models, identified as using steel tube, in CPZ/SKF's steel bar consumption calculation[9] as evidence of CPZ/SKF's underestimating the steel bar consumption ratio. However, as noted above, the same model can be produced using either steel bar or steel tube inputs. Given that, we find it appropriate that CPZ/SKF included the production of some products that can be produced using either steel bar or steel tube in its calculation of its steel bar consumption. Thus, we find that CPZ correctly allocated consumption of its steel bar and steel tube in this instance based on its explanation that some products consumed both types of steel while others consumed either just bar or tube.

With respect to CPZ/SKF's purchases of forged parts, however, we agree with Petitioner and CPZ/SKF that the total steel bar consumption used as the basis for CPZ/SKF's steel bar FOP requires adjustment. Specifically, the total actual steel bar consumption figure should be revised to include the steel bar used to produce the forged parts which CPZ/SKF purchased.

Because the reported quantity of purchases for forged parts[10] is a "finished" weight and does not include yield loss, the purchase quantity must first be adjusted to account for the loss that is typical when moving from the "steel input" stage of forging parts production (with steel bar as the input) to the "forged part output" stage (yielding forged parts).[11] This calculation, recommended by both Petitioner and CPZ/SKF,[12] consists of a simple ratio between CPZ/SKF's output and input figures at this production stage to determine the quantity of input required by CPZ/SKF to produce a given quantity of output. Therefore, consistent with Petitioner and CPZ/SKF's recommendation,[13] we have adjusted CPZ/SKF's steel bar consumption ratio by including the quantity of forged parts purchases, after adjusting that figure for yield loss to account for the total quantity of unreported steel bar consumption.

Comment 2: Whether CPZ/SKF Accurately Reported its ME Purchases

- Petitioner argues that because CPZ/SKF failed to report certain purchases of steel bar in its calculation of the percentage of its ME purchases, the Department should value steel bar using surrogate values.

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[7] *See* CPZ/SKF's supplemental Section D questionnaire response dated April 15, 2011, at exhibit 1, attachment 8 titled, "turned parts purchased."

[8] *See* CPZ/SKF's Section D questionnaire response dated December 3, 2010, at D-12.

[9] *See* CPZ/SKF's Section D questionnaire response dated December 3, 2010, at exhibit 13.

[10] S*ee* CPZ/SKF's supplemental Section D questionnaire response dated April 15, 2011, at exhibit 1.

[11] S*ee id*.

[12] *See* Petitioner's case brief at 4-5, *see also* CPZ/SKF's rebuttal brief at 4.

[13] While Petitioner and CPZ/SKF differ slightly in their calculation with respect to the standard steel consumption used as the denominator in this calculation, we note that the appropriate figure, as recommended by CPZ/SKF, was provided in its supplemental Section D questionnaire response dated April 15, 2011, at exhibit 6.

- CPZ/SKF contends that adjusting the calculation for the unreported purchases still demonstrates that CPZ/SKF purchased over 33 percent of its steel bar from market economy sources, and therefore the Department should continue to value steel bar using its market economy input prices, citing *Antidumping Methodologies*.

Department's Position: In accordance with 19 CFR 351.408(c)(1), the Department will normally use publicly available information as a surrogate to value FOPs. However, when a producer sources an input from an ME country and pays for it in an ME currency, the Department normally will value the factor using the actual ME price paid for the input. There is a rebuttable presumption that ME input prices are the best available information for valuing an input when the total volume of the input purchased from all ME sources during the period of investigation or review meets or exceeds 33 percent of the total volume of the input purchased from all sources during the period.[14]

Unless case-specific facts provide adequate grounds to rebut the Department's presumption, the Department will use the weighted-average ME purchase price to value the input where the volume of ME purchases meets or exceeds 33 percent of the volume of all purchases of that input. Alternatively, when the volume of an NME firm's purchases of an input from ME suppliers during the period is below 33 percent of its total volume of purchases of the input during the period, but where these purchases are otherwise valid and there is no reason to disregard the prices, the Department will weight-average the ME purchase price with an appropriate SV according to their respective shares of the total volume of purchases, unless case-specific facts provide adequate grounds to rebut the presumption.[15] When a firm has made ME input purchases that may have been dumped or subsidized, are not *bona fide*, or are otherwise not acceptable for use in a dumping calculation, the Department will exclude them from the numerator of the ratio to ensure a fair determination of whether valid ME purchases meet the 33 percent threshold.[16]

In the *Preliminary Results*, the Department valued CPZ/SKF's steel bar input using the company's reported ME purchase prices because the volume of those purchases exceeded 33 percent of total volume of reported purchases of the input during the POR.[17] Subsequently, as discussed in Comment 1 above, we found that CPZ/SKF failed to account for the quantity of steel bar purchased by its suppliers for the production of certain finished forged parts which CPZ/SKF purchased from those suppliers. The omitted purchases necessarily impact the calculation of the ratio of ME purchases to all of CPZ/SKF's purchases of the input. Specifically, because the purchased forged parts were produced using steel bar, and because CPZ/SKF did not report the steel bar purchases made by its NME suppliers in producing the finished forged parts in this instance, these steel bar purchases were not included in the denominator of the ME purchase ratio (*i.e.*, total purchases). Citing the Department's regulations with respect to calculating adjustments to NV, Petitioner argues that this omission demonstrates that CPZ/SKF did not meet the "burden of establishing to the satisfaction of the Secretary the

[14] *See Antidumping Methodologies*, 71 FR at 61716.
[15] *See id.*
[16] *See id.*
[17] *See* CPZ/SKF Preliminary Analysis Memorandum at 7.

amount and nature of a particular adjustment." *See* 19 CFR 351.401(b)(1).

We find Petitioner's reliance on this section of the Department's regulations to be misplaced. The Department does not examine ME prices reported by a respondent as a type of adjustment to NV, but instead we evaluate ME prices through the analysis outlined above, pursuant to 19 CFR 351.408(c)(1), as clarified by *Antidumping Methodologies*. Specifically, the analysis to determine whether to value FOPs using ME purchase prices focuses on the volume of the ME purchases in relationship to the volume of all purchases of that input and the reliability of the ME prices themselves.

Because of the small quantity of steel bar at issue relative to the quantity of all purchases of the input, we find that correcting for CPZ/SKF's omission still demonstrates that the volume of ME purchases accounted for at least 33 percent of the volume of all POR purchases of steel bar. We note that, as the record does not contain information on whether these additional purchases were made in a ME currency for ME-produced steel bar, the Department has conservatively treated these as NME transactions and included them in the denominator of the ratio of the volume of ME purchases to the volume of total purchases of the input. Thus, because we find that the volume of CPZ/SKF's ME purchases of steel bar - after accounting for the omitted NME purchases of steel bar used to produce forged parts - constitute greater than 33 percent of the volume of its total purchases of the input, we have continued to value CPZ/SKF's steel bar input using the ME purchase prices. Because we treated the newly reported bar purchases as NME transactions, we did not include their prices in the value applied to CPZ/SKF's steel bar input.

Comment 3: Whether to Use Prior Period FOPs When Valuing Certain of CPZ/SKF's Sales

- Petitioner argues that, for products produced by CPZ/PBCD in the prior POR but sold in this POR, the Department should use the FOPs which CPZ/PBCD reported in the prior POR because CPZ/SKF was not the producer of this merchandise.[18]

- CPZ/SKF contends the Department should continue to use CPZ/SKF's FOPs reported in the current POR to value all sales of subject merchandise, consistent with case precedent.[19]

Department's Position: After considering record evidence, we have determined to include CPZ/PBCD's FOPs from the prior review when valuing the subject merchandise that was produced by CPZ/PBCD and sold by SKF's U.S. sales affiliate in the instant review.

In the prior POR, CPZ/SKF acquired CPZ/PBCD and its U.S sales affiliate along with a significant amount of previously-imported inventory which was manufactured by the PRC producer, CPZ/PBCD.[20] In CPZ/SKF's U.S. sales database, it indicated which of its U.S.

[18] Petitioner cites section 773(c)(1) of the Act and the following cases in support of its argument: *TRBs/PRC (January 19, 2011)* and accompanying IDM at 8-9; *AFBs/France (October 12, 2007)* and accompanying IDM at 41-49.

[19] CPZ/SKF cites the following cases in support of its argument: *TRBs/PRC (January 19, 2011)* and accompanying IDM at comment 5; *Bars/Belarus (June 22, 2001)* and accompanying IDM at Comment 3.

[20] *See* CPZ/SKF's supplemental Section C questionnaire response dated March 14, 2011 at SC-7.

affiliate's U.S. sales during the POR were made from this acquired inventory.[21] Because the Department determined in *TRBs/PRC (January 19, 2011)* that CPZ/SKF is not the successor-in-interest to the pre-acquisition CPZ/PBCD,[22] we agree with Petitioner's characterization[23] that the TRBs produced by CPZ/PBCD were manufactured by a different producer than the respondent, CPZ/SKF.

In its rebuttal brief, CPZ/SKF cites to *TRBs/PRC (January 19, 2011)* in support of the argument that the Department prefers to calculate NV based on the FOP data corresponding to production of subject merchandise during the POR, and not the FOP data corresponding to the production of the merchandise actually sold during the POR. We agree with this argument; however, we find that the facts in this review differ from those discussed in *TRBs/PRC (January 19, 2011)* and accompanying IDM at comment 5, where the Department expressed a preference for contemporaneous FOPs over FOPs from another period for the same producer. It is the Department's preference to calculate normal value using the FOPs of the actual producer(s) of the merchandise.[24]

In this review, certain models of TRBs sold by CPZ/SKF were produced by CPZ/SKF and CPZ/PBCD. In such a situation and to the extent practicable, the Department has a clear practice of calculating an average FOP based on the data from all producers that produced a specific product or CONNUM. In this review, CPZ/PBCD no longer existed and thus had no production for this POR. Nevertheless, because CPZ/PBCD was a producer of some of the subject merchandise sold during this POR, we find that it is appropriate to include CPZ/PBCD's actual data from the prior period in the NV calculation for merchandise that it had produced rather than to solely use contemporaneous POR data from a different, unaffiliated producer, namely CPZ/SKF. Reflecting this practice, the Department's standard antidumping questionnaire directs respondents, in the event that "{they} did not produce the merchandise under consideration," to request FOP data from "the company that produces the merchandise."[25] Although the Department prefers contemporaneous POR production data, the Department frequently, including in the *Preliminary Results*,[26] uses a producer's pre-POR data when current production data are unavailable. This is consistent with the Department's determination in *Activated Carbon/PRC (March 2, 2007)*, where the Department requested an unaffiliated supplier's consumption information where a respondent sold merchandise which was produced by an unaffiliated supplier.[27]

With respect to CPZ/SKF's argument, citing *Bars/Belarus (June 22, 2001)*, that using prior

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[21] *See id*.
[22] *See TRBs/PRC (January 19, 2011).*
[23] *See* Petitioner's case brief at 11.
[24] *Activated Carbon/PRC (March 2, 2007)*, and accompanying IDM at Comment 20.
[25] *See* Section D of the Department's antidumping questionnaire, "General Explanation: Reporting Requirements"
[26] CPZ/SKF submitted, and the Department used for valuation purposes, prior period data to value certain inputs. *See* CPZ/SKF's supplemental Section D questionnaire response at D-3, explaining "Some products…were not produced during the current POR. For these products, factors were calculated based on the inputs utilized during the most recent previous POR for which they were available."
[27] *See, e.g., Nails/PRC* (*March 23, 2011*) and accompanying IDM at Comment 17. *See also Activated Carbon/PRC* (*March 2, 2007*), and accompanying IDM at Comment 20.

period data in this case would constitute a departure from the consistent, predictable approach the Department has taken in the past, we disagree. In *Bars/Belarus (June 22, 2001)*, the Department expressed a preference for contemporaneous data where there was only one producer at issue, unlike here.

For the reasons outlined above, as facts available, we have determined to include CPZ/PBCD's FOP data and third country processing costs from the prior period, which were placed on the record by Petitioner in its factual submission,[28] for sales of models produced by CPZ/PBCD and sold by SKF's U.S. sales affiliate during the POR. Consistent with our practice regarding production by multiple producers of the same product,[29] for models which were produced by both CPZ/PBCD and by CPZ/SKF we established NV by calculating a weighted average of both sets of production costs.

For the limited number of CPZ/PBCD produced models which were sold by SKF's U.S. sales affiliate during the POR but for which we do not have relevant CPZ/PBCD-specific production data, as facts available, we have relied on CPZ/SKF's current reported consumption factors to calculate normal value. Finally, where CPZ/PBCD's FOP data required surrogate values which were not needed to value CPZ/SKF's FOPs in the *Preliminary Results*, (*i.e.*, for steel bar, coal, and spacers) we valued those FOPs using Indian import data already on the record,[30] consistent with the prior administrative review of this proceeding.

Comment 4: Whether Hailin I&E's Producer, Hailin Zhongke, is the Successor-in Interest to HB Factory

- Petitioner argues that the Department should reverse its determination from the *Preliminary Results* and determine that Hailin I&E has not provided sufficient evidence to demonstrate that Hailin Zhongke is the successor-in-interest to HB Factory (a producer revoked from the order when its merchandise is sold in the United States by Hailin I&E) and, therefore, should calculate a dumping margin based upon Hailin I&E's sales of subject merchandise produced by Hailin Zhongke. Petitioner argues that Hailin Zhongke does not operate as the same business entity as HB Factory because its operations are materially dissimilar. Petitioner argues that Hailin Zhongke's ownership, management, and operations are substantially different from HB Factory.
- Petitioner argues that, in the 14th administrative review (the period in which the revocation was granted), HB Factory was both the producer and exporter, but in this POR, Hailin Zhongke does not export merchandise. Petitioner argues that this demonstrates that Hailin Zhongke does not operate in a substantially similar manner, citing *Brake Rotors/PRC (May 13, 2005)*.

- Hailin I&E argues that the Department should reject Petitioner's argument that Hailin Zhongke is not the successor-in-interest to HB Factory because the record as a whole demonstrates that Hailin Zhongke is not substantially different from HB Factory in terms of: (1) ownership, management, operations, (2) production facilities, (3) supplier relationship,

[28] *See* Petitioner's factual submission pertaining to CPZ/SKF, dated December 17, 2010.
[29] *See Pipe Fittings/PRC (October 28, 2003)* and accompanying IDM at Comment 19.
[30] *See* Petitioner's submission titled "Surrogate Value Comments," dated January 14, 2011.

and (4) customer base. Accordingly, the Department should continue to find that Hailin Zhongke is the successor-in-interest to HB Factory and that the review with respect to Hailin I&E should be rescinded on the basis of no shipments subject to review.

- Hailin I&E also argues that the Department should reject Petitioner's argument that the Department should consider a new factor which would compare "activities and possible margins from the current review period" with "activities and margins from nine to eleven years ago" as evidence that Hailin Zhongke is not the successor-in-interest to HB Factory because. Hailin I&E asserts that, without any legal support, Petitioner introduces this new factor that the Department has not considered as being relevant to the successor-in-interest analysis in any prior proceeding.[31] Moreover, according to Hailin I&E, the pursuant to 19 CFR 351.213(e), the Department is obligated to calculate margins for a specific period and not impute margins from one period to the next.
- Furthermore, Hailin I&E asserts that Petitioner's argument that the Department calculate a dumping margin for Hailin I&E for the first time in the final results is contrary to the Department's practice of making a preliminary dumping determination and giving parties an opportunity to comment on the margin calculation.

- Northfield argues that the Department should continue to find that Hailin Zhongke is the successor-in-interest to HB Factory because the Department's successor-in-interest analysis was thorough and correctly found that Hailin Zhongke satisfied the factors the Department examines in making successor-in-interest determinations.

- FIT argues that the Department should continue to find that all the TRBs exported by Hailin I&E were produced by Hailin Zhongke and rescind the review as no sales or entries of the subject merchandise were made for review or for which a margin could be calculated.

Department's Position: For the final results, we continue to find that Hailin Zhongke is the successor-in-interest to HB Factory. Additionally, because we find Hailin Zhongke is the successor-in-interest to HB Factory, and entries or sales of TRBs exported by Hailin I&E that were produced by HB Factory are revoked from the antidumping order on TRBs from the PRC, we find that TRBs produced by Hailin Zhongke and exported by Hailin I&E are not subject to the antidumping duty order.

In the 14th (2000/01) administrative review of the antidumping duty order on TRBs from the PRC, the Department revoked the order with respect to TRBs exported by Hailin I&E that were produced by HB Factory.[32] In the *Amended Initiation Notice* for the current administrative review, we clarified that the instant administrative review covers TRBs exported by Hailin I&E that were produced by any manufacturer other than HB Factory.[33] In the *Preliminary Results*, the Department determined that the totality of the circumstances demonstrate that Hailin Zhongke is the successor-in-interest to HB Factory and, as such, the companies are to be treated as the same entity.[34] Therefore, in the *Preliminary Results*, in order to determine whether Hailin I&E's exports of TRBs to the United States during the POR were subject to the review, the

[31] *See* Hailin I&E's case brief at 16.
[32] *See TRBs/PRC* (*November 14, 2002*).
[33] *See Amended Initiation Notice* 75 FR at 53274, 53276.
[34] *See Preliminary Results* 76 FR at 41207-41209. *See also* Preliminary Successor-In-Interest Memorandum.

Department conducted two specific analyses: one to determine whether all exports by Hailin I&E were produced by Hailin Zhongke, and one to determine whether Hailin Zhongke, is the successor-in-interest to HB Factory.[35] Specifically, with regard to the latter analysis, the Department examined a number of factors including, but not limited to, changes in: (1) management, (2) production facilities, (3) supplier relationships, and (4) customer base.[36] Consistent with our practice, we stated that no single or even several of these factors will necessarily provide a dispositive indication of successorship. Based on our analysis, we preliminarily determined that Hailin Zhongke is the successor-in-interest to HB Factory.[37] However, we also stated that, after the *Preliminary Results*, we intended to solicit additional information to further consider Hailin Zhongke's successor-in-interest status, as well as information concerning whether Hailin Zhongke was the sole producer of the subject merchandise sold by Hailin I&E to the United States during the POR.[38] Since the publication of the *Preliminary Results*, Hailin I&E submitted post-preliminary supplemental information with respect to the Department's preliminary successor-in-interest determination.[39]

We have analyzed the information on the record and arguments submitted by interested parties, and have determined that Hailin Zhongke became the successor-in-interest to HB Factory on November 9, 2001, the date that SASAC transferred a significant portion of HB Factory's assets to Hailin Zhongke.[40] Although "successorship" is necessarily a case-by-case determination, generally in the case of an asset acquisition, the Department will consider the acquiring company to be a successor to the company covered by the antidumping duty order, and thus subject to its cash deposit rate, if the resulting operation is essentially similar to that existing before the acquisition.[41] Because the Department is concerned with whether the company is substantially similar after the acquisition, and the acquisition in this case occurred in November 2001, the Department has focused its analysis on the period at which the acquisition occurred. In this case, at the time of transfer, Hailin Zhongke's resulting operations were the same as HB Factory's and Hailin Zhongke operated as the same business entity as HB Factory.[42] Additionally, documentation on the record indicates that in the period immediately following the date of the occurrence: (1) production capacity utilized by Hailin Zhongke remained at a comparable level as that of HB Factory;[43] (2) production of TRBs and other bearings continued uninterrupted;[44] (3) supplier relationships were similar; and (4) Hailin Zhongke's customer base remained unchanged.[45]

Petitioner cites to the Department's decision in *Brake Rotors* (*May 13, 2005*), where we stated

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[35] *See id*.

[36] *See* Preliminary Successor-In-Interest Memorandum.

[37] *See Preliminary Results* 76 FR at 41207-41209. *See also* Preliminary Successor-In-Interest Memorandum.

[38] *See Preliminary Results* 76 FR at 41209.

[39] *See* Hailin I&E's July 26, 2011, sixth supplemental response.

[40] *See* Hailin I&E's May 20, 2011, supplemental Section A questionnaire response at Exhibit 13, Hailin Zhongke's translated version of its capital verification report.

[41] *See, e.g.*, *Salmon/Norway* (*March 1, 1999*), 64 FR at 9979-80; *see also Brass Sheet and Strip/Canada* (*May 13, 1992*) at Comment 1.

[42] *See* Hailin I&E's May 20, 2011, supplemental Section A questionnaire response at Exhibit 13, Hailin Zhongke's translated version of its capital verification report.

[43] *See* Hailin I&E's July 26, 2011, supplemental response at Exhibit 5.

[44] *See id*. at Exhibit 5.

[45] *See* Hailin I&E's July 26, 2011, supplemental response at Exhibit 6.

that we only give exporters a separate rate, to support its argument that Hailin Zhongke is substantially different from HB Factory because Petitioner argues that Hailin Zhongke is a producer, while HB Factory was an exporter/producer. In *Brake Rotors* (*May 13, 2005*), we preliminarily determined that one company was not the successor-in-interest to another for several reasons, including the fact that evidence on the record of that review indicated that the original company was an exporter/producer while the new company was only a producer.[46] In this case, we find that the facts differ from *Brake Rotors* (*May 13, 2005*) because Hailin I&E, the exporter to which the revocation applies, was the exporter prior to, subsequent to, and on the date that HB Factory's assets were transferred to Hailin Zhongke. Our successor-in-interest analysis, discussed above, is to determine whether, with the asset transfer of November 9, 2001, Hailin Zhongke as producer succeeded to the revocation that applied to merchandise produced by HB Factory and exported by Hailin I&E.

The record of this review shows:

- While Hailin I&E may have been referred to as a "division" of HB Factory in the questionnaire responses of the 14th review, "Tianshui Hailin Imp/Exp Corp." was a separate company, and as such, was granted an export Certificate of Approval from the PRC government on November 11, 1991, and there is no mention of HB Factory on the certificate. In other words, Hailin I&E was the exporter at that time.
- That up through November 9, 2001 (the date HB Factory's assets were transferred to Hailin Zhongke), Hailin I&E was still an exporter of subject merchandise;[47]
- That HB Factory produced and sold bearings and parts;[48] and that Hailin Zhongke produces and sells, among other merchandise, bearings and parts.[49]
- While Hailin Zhongke's business license shows that it has been granted the authority to export self-produced products,[50] the record shows that in the 15th POR (June 1, 2001-5/31/2002) it did not have sales of subject merchandise to the United States, but continued to export through Hailin I&E.[51]

Given the facts on the record, we continue to find that the "totality of circumstances" demonstrates that, with respect to the production and sale of the subject merchandise, the new company operates as the same business entity as the former company, and we consider the successor company (Hailin Zhongke) the same as the predecessor (HB Factory) for antidumping purposes.[52] Thus, for the final results, we continue to find that Hailin Zhongke is the successor-

[46] In the final results of that review, the Department determined that the new company was the successor-in-interest to the original company, based in part on the submission of the new company's certificate which indicates that it is able to export merchandise. *See Brake Rotors/PRC (July 18, 2005)* and accompanying IDM at comment 1.

[47] *See* Hailin I&E's Section A response dated November 18, 2010 at Exhibit 4, certificate of approval, which states that Hailin I&E's date of approval began 11/18/1991 and the certificate's business scope indicates that Hailin I&E is in the business of importing and exporting "good and technologies."

[48] *See* Hailin I&E's May 20, 2011, supplemental Section A questionnaire response at Exhibit 8, business license.

[49] *See* Hailin I&E's May 23, 2011, letter regarding inadvertent omitted documents from it Section A response at Exhibit 1.

[50] *See Id*.

[51] *See* Hailin I&E's July 26, 2011, supplemental response at Exhibit 6.

[52] *See* Hailin I&E's May 20, 2011, supplemental Section A questionnaire response at Exhibit 13, Hailin Zhongke's translated version of its capital verification report; Hailin I&E's July 26, 2011, supplemental response at Exhibit 5; and Hailin I&E's July 26, 2011, supplemental response at Exhibit 6.

in-interest to HB Factory.

Also, in our review of record information, we found that all of Hailin I&E's sales of TRBs to the United States during the POR were produced by Hailin Zhongke.[53] Because this review covers TRBs exported by Hailin I&E that were produced by any manufacturer other than HB Factory and we consider Hailin Zhongke and HB Factory to be the same entity, we have determined that Hailin I&E did not have sales of subject merchandise to the United States during the POR. Accordingly, we have not calculated a dumping margin for Hailin I&E.

Comment 5: Whether to Reinstate the Order With Respect to Hailin I&E

- Petitioner argues that the Department should review its prior determination to revoke the antidumping duty order in part with regard to Hailin I&E/HB Factory because inconsistencies in Hailin I&E's 14th POR sales data are sufficient to allow the Department to reopen its prior decision, citing to *Printing Presses/Japan CCR (March 8, 2006)*. Petitioner also argues that the Department should reinstate the antidumping order as to Hailin I&E/Hailin Zhongke because the entity agreed to immediate reinstatement in the order should it resume dumping, citing *TRBs/PRC* (*November 14, 2002*), 67 FR at 68991. Petitioner also cites to additional cases in which the Department has reinstated an antidumping duty order where the previously-revoked company has resumed dumping, a practice which has been affirmed by the CIT.[54]

- Hailin I&E argues that Petitioner has provided insufficient factual and legal bases for the Department to reconsider its decision from the 14th POR to revoke the AD order with respect to Hailin I&E/HB Factory. Hailin I&E argues that *Printing Presses/Japan (March 8, 2006)* involved unusual factual circumstances which are not present in this case. Hailin contends that the inconsistencies raised by Petitioner are most likely errors in Hailin's data collection in the current review, not the data submitted in the 14th review which was verified by the Department during that segment. Hailin I&E argues that the Department should not reopen this decision because of the Department's interest in preserving the finality of its decisions, citing, *e.g., Alloy Piping (Fed. Cir. 2003)*.

- Northfield argues that given the facts of this review, the Department has no authority to reinstate the AD order with respect to Hailin I&E, because, while the Department has requested some sales and cost information, this information does not meet the threshold of analysis the Department must undertake for reinstatement of an order, and even if the Department were to reinstate the order, the policy of the Department is to make reinstatement prospective, not retroactive.

- FIT acknowledges the Department's authority to reopen completed and closed proceedings; however, it argues that in this case the Department must disregard Petitioner's claim because it fails to demonstrate a factual or legal basis for the Department to reconsider the completed 14th review and revocation.

[53] *See* Hailin I&E's July 26, 2011, supplemental response at Exhibit 6.

[54] *See Hot Rolled Carbon/Thailand (May 15, 2009)* and *SSI (CIT 2010); Pasta/Italy (January 12, 2009)*; *Sebacic Acid/PRC (March 30, 2005)*.

- FIT also argues that the Department should not calculate a margin or reinstate the order as to Hailin I&E because the Department did not initiate and did not conduct the review of sales and entries of TRBs of Hailin I&E produced by the excluded producer, *i.e.*, the predecessor HB Factory and successor Hailin Zhongke.

Department's Position: There are two fundamental questions at issue here; first, whether the Department has the authority to reinstate a previously revoked company into an antidumping duty order, and second, whether the conduct of such a determination to reinstate is consistent with interested parties' original requests for review. We first address the question regarding our authority to reinstate a revoked company.

We agree with Petitioner and FIT that the Department has the authority to reinstate an AD order.[55] The Department's authority to reinstate a revoked company into an antidumping duty order derives from sections 751(b) and (d) of the Act and 19 CFR 351.222(b) and (e). In particular, the Department's authority to partially revoke an order is expressed in section 751(d) of the Act. The statute, however, provides no detailed description of the criteria, procedures or conditions relating to the Department's exercise of this authority. Accordingly, the Department has issued regulations setting forth in detail how the Department will exercise the authority granted to it under the statute. In particular, the Department has reasonably interpreted the authority to partially revoke the antidumping duty order with respect to a particular company it finds to be no longer dumping to include the authority to impose a condition that the partial revocation may be withdrawn (*i.e.*, the company may be reinstated) if dumping is resumed during a time in which an antidumping order continues to exist. To interpret the statute otherwise would permit the Department to abdicate its responsibility to ensure that injurious dumping is remedied by imposition of offsetting antidumping duties. Therefore, reinstatement of an order is supported by the statute and the Department's regulations. Further, the CIT has recognized the Department's authority to reinstate an AD order.[56]

However, unlike in the cases cited by Petitioner,[57] in which the Department determined to reinstate an order with respect to a company for resumed dumping, in this case, Petitioner has not timely filed in the context of this review an allegation with respect to reinstating the order for exporter Hailin I&E and its producer HB Factory/Hailin Zhongke.[58] Rather, Petitioner alleges for the first time at the briefing stage of this administrative review that the Department should review its prior determination to revoke the antidumping duty order in part with regard to Hailin I&E/HB Factory.

In response to timely requests from interested parties, the Department initiated this administrative review.[59] Petitioner requested that we conduct an administrative review of all entries of TRBs during the POR exported by Hailin I&E and produced by any manufacturer other than HB Factory, and we have conducted this review accordingly.[60] Petitioner did not

[55] *See e.g.*, *Sebacic Acid/PRC* (*March 30, 2005*) and *Printing Presses/Japan (March 8, 2006)*.
[56] *See SSI (CIT 2010)*.
[57] *See, e.g.*, *Printing Presses/Japan CCR (March 8, 2006).*
[58] *See* Petitioner's case brief dated September 9, 2011, at 30-33.
[59] *See Initiation Notice*.
[60] *See* section 751(a)(1) of the Act and 19 CFR 351.213.

request that the Department conduct a changed circumstances review for purposes of reinstating the AD order with respect to the revoked entity. While we initially initiated the review to cover all exports by Hailin I&E, we amended the *Initiation Notice* with respect to TRBs exported by Hailin I&E to clarify that this administrative review covers TRBs exported by Hailin I&E that were produced by any manufacturer other than HB Factory, because the Department previously revoked the order with respect to TRBs exported by Hailin I&E that had been produced by HB Factory.[61] In the course of the review, we conducted a successor-in-interest analysis to determine whether Hailin Zhongke is the successor-in-interest to HB Factory, for purposes of determining whether there were shipments of TRBs exported by Hailin I&E that were produced by any manufacturer other than HB Factory.

We find that *Printing Presses/Japan (March 8, 2006)* dealt with facts much different than those present here, and thus does not support Petitioner's argument that we should determine at this stage in the administrative review to reinstate the order as to Hailin I&E/HB Factory. In *Printing Presses/Japan (March 8, 2006)* the Department had adequate time to initiate a changed circumstance review in response to evidence of fraud that came to light subsequent to a partial revocation of the order for a specific exporter/producer combination. It is the Department's practice to review a request to reinstate the order on exporters/producers in the context of a request for a changed circumstances review, rather than an administrative review.[62] In *Sebacic Acid/PRC* (*August 5, 2004*), the Department determined not to address the issue in the context of the administrative review and initiated a changed circumstances review.[63] In this case, while Petitioner alleged that the Department's determination in the 14th POR may have been incorrect, we do not find that the administrative case brief is an appropriate place to file such allegations, especially with respect to a prior review where the current record does not contain all of the facts specific to the allegation. At the outset of this review, Petitioner did not request that we consider reinstating the *Order* with respect to Hailin I&E/HB Factory, rather it first made this request in its case brief submitted at the very end of this review, and we find that it would be inappropriate to consider such a request at this stage in the proceeding. Therefore, we have not reinstated the *Order* with respect to Hailin I&E/HB Factory in the context of this administrative review.

Comment 6: Whether to Modify Hailin I&E's Liquidation Instructions

- Hailin I&E and FIT argue that the Department should modify the effective date of Hailin I&E's draft liquidation instructions from June 1, 2009, (the first day of the POR) to November 14, 2002 (date of partial revocation with respect to Hailin I&E (exporter)/HB Factory (producer)) because the Department's successor-in-interest determination is not limited to entries made during the POR, but is also applicable to any entries that remain unliquidated after November 14, 2002.

- Petitioner argues that the Department's liquidation instructions regarding Hailin I&E should apply only to unliquidated entries that were entered, or withdrawn from warehouse, for consumption on or after November 14, 2002 because the antidumping duty order was revoked in part with regard to Hailin I&E on November 14, 2002. Thus,

[61] *See Amended Initiation Notice* at n 5 *(citing TRBs/PRC* (*November 14, 2002*)).
[62] *See e.g., Sebacic Acid/PRC* (*July 1, 2004*).
[63] *See Sebacic Acid/PRC (August 5, 2004)*, 69 FR at 47411.

> the revocation of the order applies only to entries that were entered, or withdrawn from warehouse, for consumption on or after November 14, 2002. *See TRBs/PRC (November 14, 2002)*.

Department's Position: In cases where the Department has determined that a company is a successor-in-interest to a predecessor company that had been excluded from the antidumping order, the Department's practice is to apply the determination retroactively to the date of the occurrence that prompted a review of the successor-company.[64] In this case, the date of occurrence was November 9, 2001, the date that SASAC transferred a significant portion of HB Factory's assets to Hailin Zhongke. This date is subsequent to the effective date (June 1, 2001) of the partial revocation with respect to exporter Hailin I&E and producer HB Factory.[65]

In the *Preliminary Results*, the Department released draft liquidation instructions for TRBs produced by Hailin Zhongke and exported by Hailin I&E to all parties for comment. In the draft version of Hailin I&E's liquidation instructions, we were instructing CBP to liquidate "all entries . . . on or after 6/1/2009 without regard to antidumping duties." Because we continue to find that Hailin Zhongke is the successor-in-interest to HB Factory,[66] consistent with our practice in recent cases,[67] we intend to send to CBP liquidation instructions applying the determination retroactively to the date of the occurrence (*i.e.*, the date of HB Factory's asset transfer to Hailin Zhongke, November 9, 2001).[68]

With respect to the parties' argument that Hailin I&E's liquidation instructions should apply only to unliquidated entries that were entered, or withdrawn from warehouse, for consumption on or after November 14, 2002, in *TRBs/PRC* (*November 14, 2002*), the Department was silent as to the effective date of the revocation for Hailin I&E/HB Factory. However, in its revocation instructions to CBP issued pursuant to *TRBs/PRC (November 14, 2002)*, the Department stated that the effective date of the revocation for Hailin I&E/HB Factory is the first day after the 14th (2000-2001) review period (*i.e.*, June 1, 2001).[69] In this case, both parties have argued that the Department should use November 14, 2002 as the effective date of Hailin I&E/Hailin Zhongke's liquidation instructions because they believe that this date is the effective date of Hailin I&E/HB Factory's revocation. However, because we have determined that the actual effective date of the revocation for Hailin I&E/HB Factory is June 1, 2001, that is the date we will continue to treat as the effective date of Hailin I&E/HB Factory's revocation consistent with 19 CFR 351.222(f)(3).

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[64] *See AFBs/France CCR* (*December 10, 2009)* and accompanying IDM at Comment 2; *see also CC Steel Pipe/Thailand CCR* (*February 27, 2009*) and accompanying IDM at Comment 1.

[65] *See* message number 9085201 regarding, "Revocation of Antidumping Duty Order on Tapered Roller, Bearings From China, Prod/Expt By Tianshui Hailin Imp &, Export Corp....(Aka Tianshui...) (A-570-601-012)" (March 26, 2009), available at: http://www.addcvd.cbp.gov ("Hailin I&E/HB Factory's revocation instructions").

[66] *See* Comment 4 above.

[67] *See AFBs/France CCR* (*December 10, 2009)* and accompanying IDM at Comment 2; *see also CC Steel Pipe/Thailand CCR* (*February 27, 2009*) and accompanying IDM at Comment 1.

[68] *See* Hailin I&E's supplemental section A submission at Exhibit 13 translated version of Hailin Zhongke's capital verification report.

[69] *See* Hailin I&E/HB Factory's revocation instructions; 19 CFR 351.222(f)(3),

Comment 7: Whether the Department Incorrectly Merged Databases

- Petitioner argues that the Department failed to correctly sort databases in its margin calculation for the *Preliminary Results*, leading to the incorrect matching of certain sales with FOPs.

- CPZ/SKF did not comment on this issue.

Department's Position: We agree with Petitioner and have corrected the margin calculation to sort by the fields "CONNUM" and "LINKVAR" (instead of "CONNUM" alone), because together these fields form the unique code by which sales and FOPs may be matched to each other because of CPZ/SKF's reporting of third country processing costs.[70]

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 this review and the final weighted-average dumping margins in the *Federal Register*.

AGREE___________ DISAGREE___________

____
Paul Piquado
Assistant Secretary
for Import Administration

____
Date

[70] *See* CPZ/SKF's supplemental Section D questionnaire response dated April 15, 2011, at 12.

List Of Abbreviations And Acronyms Used In This Memorandum:	
Acronym/Abbreviation	**Full Name**
Act or Statute	Tariff Act of 1930, as amended
AD	Antidumping
AD/CVD	Antidumping and Countervailing Duty
CBP or Customs	U.S. Customs and Border Protection
CFR	Code of Federal Regulations
CIT or Court	U.S. Court of International Trade
CPZ/PBCD	Pre-acquisition Changshan Peer Bearing Co., Ltd.
CPZ/SKF	Changshan Peer Bearing Co., Ltd.
CONNUM	Control Number
Department	Department of Commerce
FIT	Fremont International Trading Inc., d/b/a FIT Bearings
FOPs or FOP	Factors of Production or Factor of Production
Hailin I&E	Tianshui Hailin Import and Export Corporation
HB Factory	Hailin Bearing Factory
Hailin Zhongke	Gansu Hailin Zhongke Science & Technology Co., Ltd.
IDM	Issues and Decision Memorandum
LINKVAR	Link Variable
ME	Market Economy
NME	Non-Market Economy
NV	Normal Value
Northfield	Northfield Industries LLC
Petitioner	The Timken Company
POR	Period of Review
PRC	People's Republic of China
SASAC	State-owned Assets Administration Commission – Tianshui Municipality
SV	Surrogate Value
TRBs	tapered roller bearings and parts thereof, finished and unfinished

Antidumping/Countervailing Duty Proceeding Federal Register Cite Table All cites in this table are listed alphabetically by short cite	
Case Short Cite:	**Case Full Cite:**
Activated Carbon/PRC (March 2, 2007)	*Certain Activated Carbon from the People's Republic of China: Final Determination of Sales at Less Than Fair Value*, 72 FR 9508 (March 2, 2007)
AFBs/France (October 12, 2007)	*Ball Bearings and Parts Thereof from France, Germany, Italy, Japan, Singapore, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews and Rescission of Review in Part*, 72 FR 58053 (October 12, 2007)
AFBs/France CCR (*December 10, 2009*)	*Ball Bearings and Parts Thereof From France: Final Results of Changed-Circumstances Review*, 74 FR 65522 (December 10, 2009)

Antidumping/Countervailing Duty Proceeding Federal Register Cite Table ***All cites in this table are listed alphabetically by short cite***	
Case Short Cite:	**Case Full Cite:**
Amended Initiation Notice	*Initiation of Antidumping and Countervailing Duty Administrative Reviews and Deferral of Initiation of Administrative Review*, 75 FR 53274 (August 31, 2010)
Antidumping Methodologies	*Antidumping Methodologies: Market Economy Inputs, Expected Non-Market Economy Wages, Duty Drawback; and Request for Comments*, 71 FR 61716 (October 19, 2006).
Bars/Belarus (June 22, 2001)	*Notice of Final Determination of Sales at Less Than Fair Value: Steel Concrete Reinforcing Bars From Belarus,* 66 FR 33528 (June 22, 2001)
Brake Rotors/PRC (May 13, 2005)	*Brake Rotors From the People's Republic of China: Preliminary Results of Changed Circumstances Antidumping Duty Review*, 70 FR 25545 (May 13, 2005)
Brake Rotors/PRC (July 18, 2005)	*Brake Rotors From the People's Republic of China: Final Results of Changed Circumstances Antidumping Duty Administrative Review*, 70 FR 41204 (July 18, 2005).
Brass Sheet and Strip/Canada (May 13, 1992)	*Brass Sheet and Strip from Canada: Final Result of Administrative Review*, 57 FR 20460 (May 13, 1992)
CC Steel Pipe/Thailand CCR (*February 27, 2009*)	*Certain Carbon Steel Butt-Weld Pipe Fittings From Thailand: Final Results of Changed-Circumstances Antidumping Duty Review*, 74 FR 8904 (February 27, 2009)
Graphite Electrodes/PRC (January 14, 2009)	*Final Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances: Small Diameter Graphite Electrodes from the People's Republic of China 74 FR 2049, (January 14, 2009)*
Hot Rolled Carbon/Thailand (May 15, 2009)	*Certain Hot-Rolled Carbon Steel Flat Products from Thailand: Final Results of Antidumping Duty Changed Circumstances Review and Reinstatement in the Antidumping Duty Order*, 74 FR 22885 *(May 15, 2009)*
Initiation Notice	*Initiation of Antidumping and Countervailing Duty Administrative Reviews and Requests for Revocation in Part*, 75 FR 44224 (July 28, 2010)
Nails/PRC (March 23, 2011)	*Certain Steel Nails From the People's Republic of China: Final Results of the First Antidumping Duty Administrative Review*, 76 FR 16379 (March 23, 2011)
Pipe Fittings/PRC (October 28, 2003)	*Final Determination of Sales at Less Than Fair Value and Critical Circumstances: Certain Malleable Iron Pipe Fittings From the People's Republic of China,* 68 FR 61395 (October 28, 2003)
Pasta/Italy (January 12, 2009)	*Certain Pasta from Italy: Final Results of Antidumping Duty Changed Circumstances Review and Reinstatement of Order*, 74 FR 1173 (January 12, 2009)
Preliminary Results	*Tapered Roller Bearings and Parts Thereof, Finished or Unfinished, From the People's Republic of China: Preliminary*

Antidumping/Countervailing Duty Proceeding Federal Register Cite Table All cites in this table are listed alphabetically by short cite	
Case Short Cite:	**Case Full Cite:**
	Results of the 2009–2010 Administrative Review of the Antidumping Duty Order and Intent To Rescind Administrative Review, in Part, 76 FR 41207 (July 13, 2011)
Printing Presses/Japan CCR (March 8, 2006)	*Large Newspaper Printing Presses and Components Thereof, Whether Assembled or Unassembled, from Japan: Final Results of Changed Circumstances Review*, 71 FR 11590 (March 8, 2006)
Salmon/Norway (March 1, 1999)	*Fresh and Chilled Atlantic Salmon From Norway; Final Results of Changed Circumstances Antidumping Duty Administrative Review*, 64 FR 9979 (March 1, 1999)
Sebacic Acid/PRC (*August 5, 2004*).	*Sebacic Acid From The People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review and Notice of Partial Rescission*, 69 FR 47409 (August 5, 2004)
Sebacic Acid/PRC (*July 1, 2004*).	*Sebacic Acid From the People's Republic of China: Notice of Initiation of Changed Circumstances Review, 69 FR 39906* (July 1, 2004)
Sebacic Acid/PRC (*March 30, 2005*)	*Sebacic Acid from the People's Republic of China: Final Results of Antidumping Duty Changed Circumstances Review and Reinstatement of the Antidumping Duty Order*, 70 FR 16218 (March 30, 2005)
TRBs/PRC (*November 14, 2002*)	*Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, from the People's Republic of China: Final Results of 2000-2001 Administrative Review, Partial Rescission of Review, and Determination to Revoke Order, in Part*, 67 FR 68990 (November 14, 2002)
TRBs/PRC (January 19, 2011)	*Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People's Republic of China: Final Results of the 2008-2009 Antidumping Duty Administrative Review*, 76 FR 3086 (January 19, 2011)

Short Cite Table For Litigation All cites in this table are listed alphabetically by short cite	
Litigation: Short Cite	**Litigation: Full Cite**
Alloy Piping (Fed. Cir. 2003)	*Alloy Piping Products, Inc. v. United States*, 334 F.3d 1284 (Fed. Cir. 2003)
SSI (CIT 2010)	*Sahaviriya Steel Indus. Pub. Co. v. United States*, 714 F. Supp. 2d 1263 (CIT 2010)

Short Cite Table For Memorandum/Reports & Miscellaneous *All cites in this table are listed alphabetically by short cite*	
Memorandum: Short Cite	**Memorandum: Full Cite**
CPZ/SKF Preliminary Analysis Memorandum	Memorandum from the Department titled, "2009-2010 Administrative Review of the Antidumping Duty Order on Tapered Roller Bearings and Parts Thereof, Finished or Unfinished, from the People's Republic of China: Analysis of the Preliminary Determination Margin Calculation for Changshan Peer Bearing Company," dated June 30, 2011
Preliminary Successor-In-Interest Memorandum	Memorandum from the Department titled, "2009-2010 Administrative Review of the Antidumping Duty Order on Tapered Roller Bearings from the People's Republic of China: Preliminary Successor-In-Interest Determination," dated June 30, 2011