A-570-847
Sunset Review
Public Document
E&C/OIV: TH

June 5, 2019

MEMORANDUM TO: Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance

FROM: James Maeder
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Expedited Fourth Sunset Review of the Antidumping Duty Order on Persulfates from the People's Republic of China

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I. Summary

In this fourth sunset review of the antidumping duty order covering persulfates from the People's Republic of China (China), PeroxyChem LLC (PeroxyChem), a domestic producer of persulfates, submitted an adequate and timely notice of intent to participate[1] and a substantive response.[2] No respondent interested party submitted a substantive response. Accordingly, we conducted an expedited (120-day) sunset review pursuant to section 751(c)(3)(B) of the Tariff Act of 1930, as amended (the Act) and 19 CFR 351.218(e)(1)(ii)(C)(2).[3] In accordance with our analysis of the domestic interested party's substantive response, we recommend that you approve the positions described in the instant memorandum. The following is a complete list of issues in the instant sunset review for which we received a substantive response:

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

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[1] *See* PeroxyChem's letter, "Persulfates from the People's Republic of China – Five-Year (4th Sunset) Review of Antidumping Duty Order – Notice of Intention to Participate," dated February 19, 2019 (PeroxyChem's Notice of Intent).
[2] *See* PeroxyChem's letter, "Persulfates from the People's Republic of China – Domestic Industry's Substantive Response," dated March 6, 2019 (PeroxyChem's Substantive Response).
[3] *See Procedures for Conducting Five-year (Sunset) Reviews of Antidumping and Countervailing Duty Orders*, 70 FR 62061(October 28, 2005) (Commerce normally will conduct an expedited sunset review where respondent interested parties provide an inadequate response).

II. Background

On February 5, 2019, the Department of Commerce (Commerce) published the notice of initiation of the sunset review of the antidumping duty order on persulfates from China, pursuant to section 751(c) of the Act.[4] On February 19, 2019, pursuant to 19 CFR 351.218(d)(1), Commerce received a timely and complete notice of intent to participate in the sunset review from a domestic interested party.[5] On March 6, 2019, pursuant to 19 CFR 351.218(d)(3), the domestic interested party filed a timely and adequate substantive response.[6] Commerce received no substantive responses from any respondent interested party. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), Commerce conducted an expedited (120-day) sunset review of the antidumping duty order on persulfates from China.

III. Scope of the Order

The merchandise subject to the order is persulfates, including ammonium, potassium, and sodium persulfates. The chemical formula for these persulfates are, respectively, $(NH_4)_2S_2O_8$, $K_2S_2O_8$, and $Na_2S_2O_8$. Potassium persulfates are currently classifiable under subheading 2833.40.10 of the Harmonized Tariff Schedule of the United States ("HTSUS"). Sodium persulfates are classifiable under HTSUS subheading 2833.40.20. Ammonium and other persulfates are classifiable under HTSUS subheadings 2833.40.50 and 2833.40.60. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the order is dispositive.

IV. History of the Proceeding

Order

On July 7, 1997, Commerce published in the *Federal Register* its antidumping duty order and amended final affirmative determination in the less-than-fair-value (LTFV) investigation of persulfates from China.[7] Commerce found weighted-average dumping margins of 32.22, 34.41, and 34.97 percent for separate rate exporters Sinochem Jiangsu Wuxi Import & Export Corporation (Wuxi), Shanghai AJ Import & Export Corporation (or Shanghai Ai Jain Import & Export Corporation) (Ai Jian), and Guangdong Petroleum Chemical Import & Export Trade Corporation (Guangdong), respectively, and 119.02 percent for the China-wide entity.

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[4] *See Initiation of Five-Year (Sunset) Review*, 84 FR 1704 (February 5, 2019) (*Sunset Initiation*).
[5] *See* PeroxyChem's Notice of Intent.
[6] *See* PeroxyChem's Substantive Response.
[7] *See Notice of Antidumping Duty Order and Amended Final Determination of Sales at Less Than Fair Value: Persulfates from the People's Republic of China*, 62 FR 36259 (July 7, 1997) (*Order*), as amended by *Notice of Amended Antidumping Duty Order: Persulfates from the People's Republic of China*, 62 FR 39212 (July 22, 1997).

Administrative, Changed Circumstances, and Sunset Reviews

Since the issuance of the *Order*, Commerce completed eight administrative reviews,[8] terminated or rescinded five administrative reviews,[9] and completed a changed circumstances review.[10] Further, Commerce conducted three sunset reviews, all of which resulted in continuation of the *Order*.[11]

On October 4, 2002, Commerce determined that the revocation of the *Order* would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be 32.22, 34.41, and 34.97 percent for separate rate exporters Wuxi, Ai Jian, and Guangdong, respectively and 119.02 percent for the China-wide entity.[12] On December 24, 2002, Commerce published the notice of continuation of the *Order*.[13]

On March 5, 2008, Commerce determined that the revocation of the *Order* would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be 32.22, 34.41, and 34.97 percent for separate rate exporters Wuxi, Ai Jian, and

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[8] *See Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 64 FR 69494 (December 13, 1999) (*Persulfates I*); *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review and Partial Rescission of Administrative Review*, 65 FR 46691 (July 31, 2000) (*Persulfates II*); *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 66 FR 42628 (August 14, 2001) (*Persulfates III*), *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 68 FR 6712 (February 10, 2003) (*Persulfates IV*), *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 68 FR 68030 (December 5, 2003) (*Persulfates V*), *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 70 FR 6836 (February 9, 2005) (*Persulfates VI*), *Persulfates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 71 FR 7725 (February 14, 2006) (*Persulfates VII*), and *Persulfates from the People's Republic of China: Final Results of 2009-2010 Antidumping Duty Administrative Review*, 76 FR 28419 (May 17, 2011); *Persulfates from the People's Republic of China: Notice of Correction to the Final Results of the 2009-2010 Antidumping Duty Administrative Review, 76 FR 35402 (June 7, 2011)* (*Persulfates XIII*).

[9] *See Persulfates from the People's Republic of China: Notice of Rescission of Antidumping Duty Administrative Review*, 71 FR 13810 (March 17, 2006), *Persulfates from the People's Republic of China: Notice of Rescission of Antidumping Duty Administrative Review,* 71 FR 75935 (December 19, 2006), *Persulfates from the People's Republic of China: Notice of Rescission of Antidumping Duty Administrative Review,* 73 FR 2900 (January 16, 2008), *Persulfates from the People's Republic of China: Notice of Rescission of the 2007-2008 Administrative Review of the Antidumping Duty Order,* 74 FR 798 (January 8, 2009), *Persulfates from the People's Republic of China: Notice of Rescission of the 2008-2009 Administrative Review of the Antidumping Duty Order,* 75 FR 2112 (January 14, 2010).

[10] *See Persulfates from the People's Republic of China: Notice of Final Results of Changed Circumstances Review*, 68 FR 68031 (December 5, 2003).

[11] *See Notice of Continuation of Antidumping Duty Order: Persulfates from the People's Republic of China, 67 FR* 78415 (December 24, 2002); *Persulfates from the People's Republic of China: Continuation of Antidumping Duty Order*, 73 FR 21318 (April 21, 2008); and *Persulfates from the People's Republic of China: Continuation of Antidumping Duty Order,* 79 FR 17506 (March 28, 2014).

[12] *See Final Results of Expedited Sunset Review: Persulfates from the People's Republic of China*, 67 FR 61226 (October 4, 2002) (*First Sunset Review*).

[13] *See Notice of Continuation of Antidumping Duty Order: Persulfates from the People's Republic of China*, 67 FR 78415 (December 24, 2002) (*First Continuation Notice*).

Guangdong, respectively and 119.02 percent for the China-wide entity.[14] On April 21, 2008, Commerce published the notice of continuation of the *Order*.[15]

On July 8, 2013, Commerce determined that the revocation of the *Order* would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be 119.02 percent for all exporters of persulfates from China.[16] On March 28, 2014, Commerce published the notice of continuation of the *Order*.[17]

Scope Inquiries, New Shipper Reviews, and Duty Absorption

There have been no scope clarifications, new shipper reviews, or duty absorption findings in connection with the *Order*.

V. Discussion of the Issues

Legal Framework

In accordance with section 751(c)(1) of the Act, Commerce is conducting this sunset review to determine whether revocation of the *Order* would be likely to lead to a continuation or recurrence of dumping. If Commerce determines that revocation of the *Order* would be likely to lead to a continuation or recurrence of dumping, pursuant to section 752(c)(3) of the Act, Commerce shall provide to the ITC with the magnitude of the margin of dumping likely to prevail if the *Order* were revoked.

As explained in the Statement of Administrative Action (SAA) accompanying the Uruguay Round Agreements Act, Commerce normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when: (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.[18] Pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" Commerce to determine that revocation of an AD order would not be likely to lead to a

[14] *See 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) (*Second Sunset Review*).
[15] *See Persulfates from the People's Republic of China: Continuation of Antidumping Duty Order*, 73 FR 21318 (April 21, 2008) (*Second Continuation Notice*).
[16] *See Persulfates from the People's Republic of China: Notice of Final Results of Expedited Third Sunset Review of Antidumping Duty Order*, 78 FR 40695 (July 8, 2013) (*Third Sunset Review*).
[17] *See Persulfates from the People's Republic of China: Continuation of Antidumping Duty Order*, 79 FR 17506 (March 28, 2014) (*Third Continuation Notice*).
[18] *See* Statement of Administrative Action Accompanying the Uruguay Round Agreements Act, H.R. Doc. 103-316, vol 1 (1994) at 889-90(SAA); H. Rep. No. 103-826, pt. 1 (1994) (House Report), reprinted in 1994 U.S.C.C.A.N. 3773 (1994); S. Rep. No. 103-412 (1994) (Senate Report); *see also Policies Regarding the Conduct of Five-year (Sunset) Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).

continuation or recurrence of sales at less than fair value.[19] Alternatively, Commerce 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.[20] Consistent with guidance provided in the legislative history accompanying the Uruguay Round Agreements Act Commerce will make its likelihood determination on an order-wide, rather than company-specific, basis.[21]

Sections 752(c)(1)(A) and (B) of the Act provide that, in determining whether revocation of the *Order* would be likely to lead to a continuation or recurrence of dumping, Commerce shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and the period after, the issuance of the antidumping duty order. As a base period for import volume comparison, it is Commerce's practice to use the one-year period immediately preceding the initiation of the investigation, rather than a period after initiation but before issuance of the order, as the initiation of an investigation may dampen import volumes and, thus, skew the comparison.[22] Also, when analyzing import volumes for second and subsequent sunset reviews, Commerce'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.[23]

If Commerce determines that revocation of the *Order* would be likely to lead to a continuation or recurrence of dumping, generally Commerce provides the ITC with the magnitude of the margin of dumping likely to prevail based on the dumping margin(s) from the final determination in the investigation because this is the only calculated dumping margin that reflects the behavior of exporters without the discipline of an order in place.[24] However, in certain circumstances, Commerce may determine that a more recently calculated dumping margin 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 or "if dumping margins have declined over the life of an order and imports have remained steady or increased, {Commerce} may conclude that exporters are likely to continue dumping at the lower rates found in a more recent review").[25]

Regarding the margin of dumping likely to prevail, in the *Final Modification for Reviews,* Commerce announced that in five-year (*i.e.*, sunset) reviews, it will not rely on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body

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[19] *See Folding Gift Boxes from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007) (*Folding Gift Boxes*) and accompanying Issues and Decision Memorandum at Comment 1.
[20] *See* SAA at 889-90; *see also Sunset Policy Bulletin*.
[21] *See* SAA at 879, and House Report at 56.
[22] *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.
[23] *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.
[24] *See* SAA at 890 and *Sunset Policy Bulletin* at section II.B.1; *see, 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.
[25] *See* SAA at 890-91; *Sunset Policy Bulletin* at section II.B.2.

to be World Trade Organization (WTO)-inconsistent, *i.e.*, zeroing/the denial of offsets.[26] Commerce also noted that "only in the most extraordinary circumstances will Commerce rely on margins other than those calculated and published in prior determinations."[27] Commerce further stated that, apart from the "most extraordinary circumstances," it would "limit its reliance to margins determined or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent" and that it "may also rely on past dumping margins recalculated pursuant to Section 129 proceedings, dumping margins determined based on the use of total adverse facts available (AFA), and dumping margins where no offsets were denied because all comparison results were positive."[28]

Below we address the comments submitted by the domestic interested party.

Likelihood of continuation or recurrence of dumping

Domestic Interested Party's Comments

- In determining whether revocation of an antidumping duty order would be likely to lead to continuation or recurrence of dumping, Commerce considers: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews, and (2) the volume of imports of the subject merchandise for the periods before and after the issuance of the antidumping duty order or issuance of a suspension agreement.
- Since the investigation, dumping continued at levels above *de minimis* and the companies that received separate dumping margins in the investigation are now part of the China-wide entity (effective with the final results of *Persulfates XIII*).
- Two of the three respondents in the investigation, Guangdong Petroleum and Wuxi, withdrew from the U.S. market shortly after the *Order* was issued. Cessation of imports by Wuxi, Guangdong Petroleum, and United Initiators/Ai Jian, demonstrates that the companies are unable to ship to the United States without dumping. As stated in the SAA:

  > The cessation of imports after the order, is highly probative of the likelihood of continuation or recurrence of dumping. . . . If imports cease after the order is issued, it is reasonable to assume that the exporters could not sell in the United States without dumping and that, to re-enter the U.S. market, they would have to resume dumping.[29]

- Given that import volumes have declined significantly since issuance of the order, and dumping has continued at above *de minimis* levels, Commerce must find that if the antidumping duty order on persulfates from China were revoked, dumping by Chinese exporters would likely continue or recur.

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[26] *See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification*, 77 FR 8101, 8109 (February 14, 2012) (*Final Modification for Reviews*).
[27] *Id.*; *see also* 19 CFR 351.218(e)(2).
[28] *Final Modification for Reviews.*
[29] *See* SAA, at 890.

Commerce's Position

Consistent with the legal framework laid out above and section 752(c)(1)(A) of the Act, we first considered the weighted-average dumping margins determined in the investigation and subsequent reviews in this proceeding. As stated above, in the investigation, Commerce found dumping margins from 32.22 percent to 119.02 percent.[30] Chinese exporters of persulfates have continued to sell into the United States at prices below normal value following the issuance of the *Order.* Since issuance of the *Order,* Commerce found dumping at rates exceeding *de minimis* levels in numerous completed reviews. Although *de minimis* rates were calculated for certain respondents in some reviews, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" Commerce to determine that revocation of an AD order would not be likely to lead to a continuation or recurrence of sales at less than fair value.[31] Moreover, the respondents which received *de minimis* rates received rates greater than *de minimis* in subsequent reviews.[32] Notably, since the last administrative review (*Persulfates XIII*), all exporters of persulfates from the China to the United States are subject to the rate of 119.02 percent as part of the China-wide entity.

Pursuant to section 752(c)(1)(B) of the Act, we also considered the volume of imports of the subject merchandise in determining whether revocation of the *Order* is likely to lead to continuation or recurrence of dumping. As noted above, when analyzing import volumes for second and subsequent sunset reviews, Commerce's practice is to compare import volumes during the year preceding initiation of the underlying investigation (*i.e.*, 1996 for this sunset review) to import volumes since the issuance of the last continuation notice.[33] The last continuation notice for this sunset review was issued in March 2014.[34]

In analyzing import volumes for the five calendar years following issuance of the notice of continuation of the *Order* (*i.e.*, 2014 through November 2018 (only partial year import data are on the record for 2018), we have determined that the annual import volumes of subject merchandise from China for the harmonized tariff schedule (HTSUS) numbers that cover the persulfates identified in the scope of the *Order* are significantly lower than the pre-initiation volume.[35] During the sunset period, annual import volumes of subject merchandise ranged from no imports for one year to approximately 10.53 percent of the import volume of the year preceding initiation of the underlying investigation (*i.e.*, 1996), with import volumes for three of the five years accounting for 0.96 percent or less of the 1996 volume.[36]

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[30] *See Order*.
[31] *See Folding Gift Boxes from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007) (*Folding Gift Boxes*) and accompanying Issues and Decision Memorandum at Comment 1.
[32] *See Persulfates VI.*
[33] The record contains annual import data from 1994 through November 2018. *See* Substantive Response at Attachment 1.
[34] *See Persulfates from the People's Republic of China: Continuation of Antidumping Duty Order,* 79 FR 17506 (March 28, 2014) (*Continuation Notice*).
[35] *See* PeroxyChem's Substantive Response at Attachment 1.
[36] *Id*.

As noted in the SAA, "declining import volumes accompanied by the continued existence of dumping margins after the issuance of an order may provide a strong indication that, absent an order, dumping would be likely to continue, because the evidence would indicate that the exporter needs to dump to sell at pre-order volumes."[37] Furthermore, according to the SAA and the House Report, "if companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed."[38] Record evidence shows significantly lower import values during the years covering this sunset review compared to the year preceding initiation of the underlying investigation (*i.e.*, 1996).[39] This indicates that Chinese exporters may not be able to maintain pre-initiation import levels without selling subject merchandise at dumped prices.[40] Therefore, pursuant to section 752(c)(1) of the Act, because we found lower levels of imports in each of the years covered by this sunset review compared to the year before initiation, accompanied by the continued existence of dumping after issuance of the *Order*, we recommend finding that dumping is likely to continue or recur if the *Order* is revoked.

Section 752(c)(2) of the Act provides that Commerce shall also consider "other factors" than those listed in section 752(c)(1) of the Act if "good cause is shown." We have concluded that no such "good cause" exists in this case because we find that the continued above *de minimis* margins and the decline in the volume of imports alone support the statutory test for determining if likelihood of dumping would continue or recur in the event of revocation of the *Order*.

Magnitude of the Margin of Dumping Likely to Prevail

Domestic Interested Party's Comments

- The SAA, states that Commerce will normally select the magnitude of the margin of dumping that is likely to prevail if Commerce revokes the order "from the investigation, because that is the only calculated rate that reflects the behavior of exporters without the discipline of an order."41 There is no reason to depart from the normal policy in this case.
- Commerce should provide the ITC with the company-specific weighted-average dumping margins found in the investigation, as well as the 119.02 percent rate for the China-wide entity, as the magnitude of the dumping margins that are likely to prevail if the *Order* were revoked.

Commerce's Position

Pursuant to section 752(c)(3) of the Act, Commerce shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the *Order* were revoked. Normally, Commerce

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[37] *See* SAA at 889, the House Report at 63, and the Senate Report at 52.
[38] *See* SAA at 889; *see also* House Report at 63-64.
[39] *See* PeroxyChem's Substantive Response at 20 and Attachment 1.
[40] *See*, *e.g.*, *Certain Activated Carbon from the People's Republic of China: Final Results of Expedited Sunset Review of the Antidumping Duty Order*, 77 FR 33420 (June 6, 2012), and accompanying Issues & Decision Memorandum at Comment 1.
[41] *See* SAA at 890.

will select a weighted-average dumping margin from the investigation to report to the ITC.[42] Commerce's preference is to select a weighted-average dumping margin from the LTFV investigation because it is the only calculated rate that reflects the behavior of the producers and exporters without the discipline of an *Order* or suspension agreement in place.[43] Under certain circumstances, however, Commerce may select a more recent rate to report to the ITC.

No companies are currently eligible for a separate rate because each of the three separate rate respondents from the investigation has lost its eligibility for a separate rate and is now considered to be part of the China-wide entity. Therefore, if the order were to be revoked, Commerce finds that the magnitude of the margin of dumping likely to prevail would be weighted-average dumping margins up to 119.02 percent.[44] As explained above, in accordance with the *Final Modification for Reviews*, Commerce will not rely on weighted-average dumping margins that were calculated using the zeroing methodology found to be WTO-inconsistent.[45] The weighted-average dumping margin for the China-wide entity in the antidumping investigation was based on the dumping margin from the petition and, therefore, does not include zeroing and is consistent with the *Final Modification for Reviews*.

Final Results of Review

We determine that revocation of *Order* on persulfates from China would likely lead to continuation or recurrence of dumping and that the magnitude of the dumping margin likely to prevail would be weighted-average dumping margins up to 119.02 percent.

[42] *See* SAA at 890; *see also 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.
[43] *See* SAA at 890.
[44] *See Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, from the People's Republic of China: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 76 FR 76143 (December 6, 2011).
[45] *See Final Modification for Reviews* at 77 FR at 8103.

Recommendation

Based on our analysis of the substantive response received, we recommend adopting the above positions. If these recommendations are accepted, we will publish the final results of this expedited sunset review in the *Federal Register* and notify the ITC of our determination.

☒	☐
Agree	Disagree

6/5/2019

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Signed by: JEFFREY KESSLER

Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance