



A-570-932  
Sunset Review  
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October 28, 2019

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

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

**SUBJECT:** Issues and Decision Memorandum for the Final Results of the Expedited Second Sunset Review of the Antidumping Duty Order on Certain Steel Threaded Rod from the People's Republic of China

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## I. SUMMARY

We have analyzed the response of a domestic producer of certain steel threaded rod (steel threaded rod) in the second expedited sunset review of the antidumping duty order on steel threaded rod from the People's Republic of China (China). We recommend that you approve the positions we developed in the "Discussion of the Issues" section of this memorandum. Below is the complete list of the issues in this sunset review for which we received a substantive response:

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

## II. BACKGROUND

On April 14, 2009, the Department of Commerce (Commerce) published the antidumping duty order on steel threaded rod from China.<sup>1</sup> On July 1, 2019, Commerce published the *Initiation* of the sunset review of the antidumping duty order on steel threaded rod from China pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act).<sup>2</sup> Commerce received a notice of intent to participate from a domestic interested party, Vulcan Threaded Products, Inc. (the petitioner), within the deadline specified in 19 CFR 351.218(d)(1)(i).<sup>3</sup> The petitioner claimed interested party status under section 771(9)(C) of the Act as a producer of the domestic like

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<sup>1</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order*, 74 FR 17154 (April 14, 2009) (the *Order*).

<sup>2</sup> See *Initiation of Five-Year (Sunset) Reviews*, 84 FR 31304 (July 1, 2019) (*Initiation*).

<sup>3</sup> See Petitioner's Letter, "Certain Steel Threaded Rod from the People's Republic of China, Second Sunset Review: Notice of Intent to Participate," dated July 9, 2019.

product. On July 31, 2019, Commerce received an adequate substantive response from the petitioner within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i).<sup>4</sup> Commerce received no responses from respondent interested parties with respect to the *Order* covered by this sunset review. 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 steel threaded rod from China.

### III. HISTORY OF THE *ORDER*

On February 27, 2009, Commerce published its final affirmative determination of sales at less than fair value (LTFV) with respect to imports of steel threaded rod from China.<sup>5</sup> Commerce found the following *ad valorem* dumping margins:<sup>6</sup>

| Exporter                                       | Weighted-Average Margin (%) |
|--|-----------------------------|
| RMB Fasteners Ltd. and IFI & Morgan Ltd.       | 55.16                       |
| Ningbo Yinzhou Foreign Trade Co. Ltd.          | 206.00                      |
| Shanghai Recky International Trading Co., Ltd. | 55.16                       |
| Suntec Industries Co., Ltd.                    | 55.16                       |
| Hangzhou Grand Imp. & Exp. Co., Ltd.           | 55.16                       |
| Shanghai Prime Machinery Co. Ltd.              | 55.16                       |
| Jiaxing Xinyue Standard Part Co., Ltd.         | 55.16                       |
| Certified Products International Inc.          | 55.16                       |
| Zhejiang New Oriental Fastener Co., Ltd.       | 55.16                       |
| Jiashan Zhongsheng Metal Products Co., Ltd.    | 55.16                       |
| Haiyan Dayu Fasteners Co., Ltd.                | 55.16                       |
| <b>China-wide Entity</b>                       | <b>206.00</b>               |

Following the issuance of Commerce’s final determination, the International Trade Commission (ITC) found that the U.S. industry was materially injured by reason of imports from China

<sup>4</sup> See Petitioner’s Letter, “Certain Steel Threaded Rod from the People’s Republic of China, Second Sunset Review: Substantive Response to Notice of Initiation,” dated July 31, 2019 (Substantive Response).

<sup>5</sup> See *Certain Steel Threaded Rod from the People’s Republic of China: Final Determination of Sales at Less Than Fair Value*, 74 FR 8907 (February 27, 2009) (*LTFV Investigation*).

<sup>6</sup> *Id.* at 8910.

pursuant to section 735(b) of the Act.<sup>7</sup> Subsequently, Commerce published the antidumping duty order on steel threaded rod from China.<sup>8</sup>

As a result of litigation before the U.S. Court of International Trade (CIT), Commerce recalculated the weighted-average dumping margin for exporter RMB Fasteners Ltd. and IFI & Morgan Ltd. (RMB/IFI Group) in the *LTFV Investigation* of steel threaded rod from China to 47.37 percent and, on May 11, 2011, published an amended final determination and amended antidumping duty order reflecting that change.<sup>9</sup>

Since the issuance of the *Order*, Commerce has completed eight administrative reviews with respect to steel threaded rod from China.<sup>10</sup> There have been no new shipper or changed-circumstances reviews of the antidumping duty order. There have been nine scope determinations and one circumvention determination on steel threaded rod from China.<sup>11</sup> The *Order* remains in effect for all manufacturers, producers, and exporters of steel threaded rod from China.

### Scope, Circumvention, and Sunset Determinations

On February 25, 2013, Commerce issued an affirmative final determination in a circumvention inquiry with respect to imports from China of steel threaded rod containing greater than 1.25 percent chromium, by weight, produced by Gem-Year Industrial Co. Ltd., and otherwise meeting the description of in-scope merchandise. Commerce determined that such products are subject to

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<sup>7</sup> See *Certain Steel Threaded Rod from China*, U.S. Int'l Trade Commission, Inv. No. 731-TA-1145 (Final), ITC Pub. 4070 (April 2009).

<sup>8</sup> See the *Order*.

<sup>9</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Notice of Court Decision Not in Harmony With the Final Determination of Sales at Less-Than-Fair-Value and Notice of Amended Final Determination of Sales at Less-Than-Fair-Value and Amended Antidumping Duty Order Pursuant to Court Decision*, 76 FR 27304 (May 11, 2011).

<sup>10</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Final Results and Final Partial Rescission of Antidumping Duty Administrative Review*, 76 FR 68400 (November 4, 2011), as amended *Certain Steel Threaded Rod From the People's Republic of China: Notice of Court Decision Not in Harmony With Final Results of Administrative Review and Notice of Amended Final Results of Administrative Review*, 78 FR 14075 (March 4, 2013); *Certain Steel Threaded Rod from the People's Republic of China: Final Results and Final Partial Rescission of Antidumping Duty Administrative Review; 2010-2011*, 77 FR 67332 (November 9, 2012), as amended *Certain Steel Threaded Rod from the People's Republic of China: Amended Final Results of Antidumping Duty Administrative Review; 2010-2011*, 78 FR 4389 (January 22, 2013); *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Third Antidumping Duty Administrative Review; 2011-2012*, 78 FR 66330 (November 5, 2013); *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 79 FR 71743 (December 3, 2014); *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2013-2014*, 80 FR 69938 (November 12, 2015); *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2014-2015*, 81 FR 83800 (November 22, 2016), as amended *Certain Steel Threaded Rod from the People's Republic of China: Amended Final Results of Antidumping Duty Administrative Review; 2014-2015*, 82 FR 1698 (January 6, 2017); *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2015-2016*, 82 FR 51611 (November 7, 2017); and *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Antidumping Duty Administrative Review and Final Determination of No Shipments; 2016-2017*, 83 FR 57429 (November 15, 2018).

<sup>11</sup> See Scope, Circumventions, and Sunset Determinations section below.

the antidumping duty order on steel threaded rod from China.<sup>12</sup> Additionally, Commerce completed nine scope inquiries with respect to steel threaded rod.<sup>13</sup> There have been no duty absorption findings.

On June 26, 2014, Commerce published the first sunset determination with respect to steel threaded rod from China. Commerce found that revocation of this antidumping duty order would be likely to lead to the continuation or recurrence of dumping.<sup>14</sup>

#### **IV. SCOPE OF THE ORDER**

The merchandise covered by the *Order* is steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon quality steel, having a solid, circular cross section, of any diameter, in any straight length, that have been forged, turned, cold-drawn, cold-rolled, machine straightened, or otherwise cold-finished, and into which threaded grooves have been applied. In addition, the steel threaded rod, bar, or studs subject to the order are non-headed and threaded along greater than 25 percent of their total length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (*i.e.*, galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Included in the scope of the order are steel threaded rod, bar, or studs, in which: (1) iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 1.80 percent of manganese, or
- 1.50 percent of silicon, or
- 1.00 percent of copper, or
- 0.50 percent of aluminum, or
- 1.25 percent of chromium, or
- 0.30 percent of cobalt, or
- 0.40 percent of lead, or
- 1.25 percent of nickel, or
- 0.30 percent of tungsten, or
- 0.012 percent of boron, or

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<sup>12</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order*, 78 FR 12728 (February 25, 2013).

<sup>13</sup> See *Notice of Scope Rulings*, 75 FR 38081 (July 1, 2010); *Notice of Scope Rulings*, 76 FR 10558 (February 25, 2011); *Notice of Scope Rulings*, 77 FR 9893 (February 21, 2012); *Notice of Scope Ruling*, 79 FR 19057 (April 7, 2014); *Notice of Scope Rulings*, 79 FR 73552 (December 11, 2014); *Steel Threaded Rod from the People's Republic of China: Notice of Court Decision Not in Harmony With the Final Results of Scope Ruling on Antidumping Duty Order and Notice of Amended Final Results of Scope Ruling on Antidumping Duty Order*, 80 FR 18200 (April 3, 2015); and *Notice of Scope Rulings*, 84 FR 9295 (March 14, 2019).

<sup>14</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Order*, 79 FR 36288 (June 26, 2014) (*First Sunset Review*); and *Certain Steel Threaded Rod from the People's Republic of China: Continuation of Antidumping Duty Order*, 79 FR 36288 (August 19, 2014) (*Continuation of Order*).

- 0.10 percent of molybdenum, or
- 0.10 percent of niobium, or
- 0.41 percent of titanium, or
- 0.15 percent of vanadium, or
- 0.15 percent of zirconium.

Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, 7318.15.5090, and 7318.15.2095 of the United States Harmonized Tariff Schedule (HTSUS). Although the HTSUS subheading is provided for convenience and customs purposes, the written description of the merchandise is dispositive.

Excluded from the scope of the order are: (a) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total length; and (b) threaded rod, bar, or studs made to American Society for Testing and Materials (ASTM) A193 Grade B7, ASTM A193 Grade B7M, ASTM A193 Grade B16, or ASTM A320 Grade L7.

## 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 continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making this determination, 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 periods before and after the issuance of the *Order*.

As explained in the Statement of Administrative Action, 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.<sup>15</sup> 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.<sup>16</sup> In addition, 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 the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew comparison.<sup>17</sup> When analyzing import volumes for second and subsequent sunset reviews, Commerce's practice is to

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<sup>15</sup> See Statement of Administrative Action Accompanying the Uruguay Round Agreements Act, H.R. Doc. 103-316, vol. 1 (1994) (SAA) at 889-90.

<sup>16</sup> *Id.*

<sup>17</sup> 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 (IDM) at Comment 1.

compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice.<sup>18</sup>

Further, section 752(c)(3) of the Act states that Commerce shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the order were revoked. Generally, Commerce selects the margin(s) from the final determination in the original investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an order in place.<sup>19</sup> However, Commerce may use a rate from a more recent review where the dumping margin increased, as this rate may be more representative of a company's behavior in the absence of an order (e.g., where a company increases dumping to maintain or increase market share with an order in place).<sup>20</sup> Finally, 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 antidumping duty order would not be likely to lead to a continuation or recurrence of sales at LTFV.

In the *Final Modification for Reviews*, Commerce announced that it was modifying its practice in sunset reviews, such that it will not rely on weighted-average dumping margins that were calculated not using the zeroing methodology.<sup>21</sup> Commerce also noted that “*only in the most extraordinary circumstances* will Commerce rely on margins other than those calculated and published in prior determinations.”<sup>22</sup> Commerce further noted that it does not anticipate that it will need to recalculate the dumping margins in the vast majority of sunset determinations to avoid zeroing, apart from the “most extraordinary circumstances” provided for in its regulations.<sup>23</sup> Our analysis of the comments submitted by domestic interested parties follows.

## *Analysis*

### 1. Likelihood of Continuation or Recurrence of Dumping

The petitioner argues that revocation of the *Order* would lead to a continuation or recurrence of dumping by producers and exporters of steel threaded rod from China.<sup>24</sup> The petitioner asserts that, since the continuation of the *Order* following the *First Sunset Review*, Commerce found that Chinese producers have continued to engage in dumping in the United States.<sup>25</sup> Specifically, Commerce found there to be above *de minimis* dumping in all four administrative reviews that have been completed since the *First Sunset Review* of the *Order*, and that the

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<sup>18</sup> See *Ferrovandium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Review of the Antidumping Duty Orders*, 79 FR 14216 (March 13, 2014) and accompanying IDM.

<sup>19</sup> See SAA at 890; see also, e.g., *Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008) (*Persulfates Second Sunset Review*), and accompanying IDM at Comment 2.

<sup>20</sup> See SAA at 890-91.

<sup>21</sup> 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*).

<sup>22</sup> *Id.* (emphasis added); see also 19 CFR 351.218(e)(2).

<sup>23</sup> See *Final Modification for Reviews*; see also 19 CFR 351.218(e)(2).

<sup>24</sup> See Substantive Response at 5.

<sup>25</sup> *Id.* at 10.

continued existence of such above *de minimis* margins is sufficient for Commerce to conclude that Chinese producers are likely to continue to engage in dumping in the absence of the *Order*.<sup>26</sup>

The petitioner further asserts that the volume of imports of steel threaded rod from China declined significantly following the imposition of the *Order*. Specifically, arguing that, in the two years prior to the filing of the petition and the initiation of the investigation, imports of steel threaded rod were 36,300 net tons and 43,650 net tons, respectively. The petitioner claims that, following the imposition of the *Order*, subject imports dropped significantly below pre-petition levels in the previous review period and that the volume of imports remained significantly below pre-petition levels in the instant review period (*i.e.* 6,202 net tons in 2014, 2,302 net tons in 2015, 867 net tons in 2016, 1,743 net tons in 2017, and 2,209 net tons in 2018).<sup>27</sup> Thus, Chinese producers and exporters could not continue to ship significant quantities of the subject merchandise under the discipline of the *Order*, which warrants continuation of the *Order*.

### *Commerce's Position*

As explained in the Legal Framework section above, when determining whether revocation of the order would be likely to lead to continuation of dumping, sections 752(c)(1)(A) and (B) of the act instruct Commerce to consider: (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 period before and after the issuance of the antidumping duty order. According to the SAA, existence of dumping margins after the order “is highly probative of the likelihood of continuation or recurrence of dumping. If companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed. If imports cease after the order is issued, it is reasonable to assume that the exporters could not sell in the United States without dumping and that, to reenter the U.S. market, they would have to resume dumping.”<sup>28</sup> In addition, “declining 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.”<sup>29</sup> Alternatively, the legislative history provides that declining (or no) dumping margins accompanied by steady or increasing imports may indicate that foreign companies do not have to dump to maintain market share in the United States and that dumping is less likely to continue or recur if the order were revoked.<sup>30</sup>

In the instant review, for the reasons stated below, we find the revocation of the antidumping duty order on steel threaded rod from China would likely result in the continuation of dumping in the United States. In this sunset proceeding, Commerce has relied on a dumping margin

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<sup>26</sup> *Id.*

<sup>27</sup> *Id.*, at 11.

<sup>28</sup> See SAA at 890.

<sup>29</sup> *Id.* at 889; H. Rep. No. 103-826, pt. 1 (1994) (House Report) at 63; and See S. Rep. No. 103-412 (1994) (Senate Report) at 52.

<sup>30</sup> See SAA at 889-90; House Report at 63; and Senate Report at 52.

consistent with the *Final Modification for Reviews*.<sup>31</sup> We consider the rates from the *LTFV Investigation* as demonstrating a likelihood of continuation or recurrence of dumping, given that these are the only calculated rates that reflect the behavior of exporters without the discipline of an order in place and that some of these rates continue to be applicable during the sunset review period.<sup>32</sup>

Pursuant to section 752(c)(1)(A) of the Act, Commerce first considered the weighted-average dumping margins determined in the investigation and any subsequent reviews. As discussed above, in the *Final Modification for Reviews*, Commerce's practice in sunset reviews is that it does not rely on weighted-average dumping margins that are calculated using the "zeroing" methodology. In the *LTFV Investigation*, Commerce assigned a margin of 206 percent based on total adverse facts available (AFA) to the China-wide entity. As this margin was established in the investigation and did not rely on a methodology that employed zeroing,<sup>33</sup> it is reflective of the level of dumping without the discipline of an order in place. Further, this margin is above *de minimis* and has remained in effect since the *LTFV Investigation*. This margin provides the best evidence of dumping behavior, and there is no evidence on the record of this sunset review that indicates dumping has ceased. Accordingly, it is reasonable to conclude that dumping would continue if the *Order* were revoked.

Moreover, the petitioner provided import volume data to Commerce from 2006 to 2007, and 2014 to 2018, which illustrate that imports of steel threaded rod from China declined for the period following imposition of the *Order*.<sup>34</sup> Based on the import data provided by the petitioner, Commerce finds that import volumes from China under that HTSUS categories specific to subject steel threaded rod have declined sharply after imposition of the *Order* in April 2009, and fluctuated within a narrow band, relative to this much lower level of imports, during the period of the sunset review (*i.e.*, 2015-2019). As noted above, when analyzing import volumes for the second and subsequent 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. The last continuation notice for this sunset review was issued August 19, 2014.<sup>35</sup> Therefore, for this sunset review, we examined imports prior to the initiation of the antidumping duty investigation as compared to import volumes during the second sunset review period.<sup>36</sup> The import data on the record demonstrate that the import volumes during the second sunset review period never recovered to the level of pre-investigation imports.<sup>37</sup> Commerce finds that the continued sharp decrease in imports during the second sunset review period, versus the level of imports before the initiation of the underlying investigation, reflects the effect that the *Order* has had on the companies that are subject to it, and that the significant decrease in imports of subject merchandise, coupled with the continued existence of dumping

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<sup>31</sup> See *Final Modification for Reviews*, 77 FR at 8103.

<sup>32</sup> See SAA at 890; see also *Persulfates Second Sunset Review* IDM at Comment 2; and *Final Modification for Reviews*, 77 FR 8103.

<sup>33</sup> See *Certain Steel Threaded Rod from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value*, 73 FR 58931, 58937 (October 8, 2008) (*LTFV Prelim*) (explaining that 206 percent rate was based on the highest calculated rate from the petition), unchanged at *LTFV Investigation*, 74 FR at 8910.

<sup>34</sup> See Substantive Response at 11.

<sup>35</sup> See *Continuation Order*.

<sup>36</sup> See Substantive Response at 11.

<sup>37</sup> *Id.*



margins, supports a finding of likelihood of continuation or recurrence of dumping absent of the *Order*.

## 2. Magnitude of the Margins Likely to Prevail

The petitioner contends that Commerce should report to the ITC that the magnitude of the dumping margin that is likely to prevail is identical to the dumping margin determined in the original investigation (*i.e.* between 47.37 percent for RMB/IFI Group and 206 percent for the China-wide entity).<sup>38</sup>

### *Commerce's Position*

Pursuant to section 752(c)(3) of the Act, the administering authority shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Normally, Commerce will select a weighted-average dumping margin from the LTFV investigation to report to the ITC.<sup>39</sup> Commerce's preference for selecting a margin from the LTFV investigation is based on the fact that it is the only calculated rate that reflects the behavior of the manufacturers, producers, and exporters without the discipline of an order in place.<sup>40</sup> Because dumping continued following the issuance of the *Order* and given the absence of argument and evidence to the contrary, Commerce finds that the margins calculated in the original investigation are probative of the behavior of producers and exporters of subject merchandise from China if the *Order* were revoked. As indicated in the "Legal Framework" section above, consistent with *Final Modification for Reviews*, Commerce's current practice is to not rely on weighted-average dumping margins calculated using the zeroing methodology. The 206 percent rate applied in the *LTFV Investigation* was based on a rate from the petition and was calculated without zeroing.<sup>41</sup> Accordingly, consistent with section 752(c) of the Act, Commerce will report to the ITC the rate as indicated in the Final Results of Sunset Review section below.

## VI. FINAL RESULTS OF SUNSET REVIEW

Commerce determines that revocation of the *Order* on steel threaded rod from China would be likely to lead to continuation or recurrence of dumping. Commerce also determines that the magnitude of the dumping margins likely to prevail would be weighted-average margins up to 206 percent.

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<sup>38</sup> *Id.* at 12-13.

<sup>39</sup> See SAA at 890; see also, *e.g.*, *Persulfates Second Sunset Review* IDM at Comment 2.

<sup>40</sup> See SAA at 890; and *Policies Regarding the Conduct of Five-Year (Sunset) Reviews of Antidumping and Countervailing Duty Orders*; *Policy Bulletin 98.3*, 63 FR 18871,18872 (April 16, 1998) at section II.B.1; see also *Persulfates Second Sunset Review* IDM at Comment 2.

<sup>41</sup> See *LTFV Prelim*, 73 FR at 58937, unchanged at *LTFV Investigation*, 74 FR at 8910.

**VII. RECOMMENDATION**

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

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Agree

\_\_\_\_\_  
Disagree

**X**  
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Jeffrey I. Kessler  
Assistant Secretary  
for Enforcement and Compliance