



A-570-084
Administrative Review
POR: 11/20/2018 - 6/30/2020
Public Document
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March 30, 2021

MEMORANDUM TO: Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

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

SUBJECT: Decision Memorandum for Preliminary Results of the 2018-2020
Antidumping Duty Administrative Review of Certain Quartz
Surface Products from the People's Republic of China

I. SUMMARY

The Department of Commerce (Commerce) is conducting an administrative review of the antidumping duty (AD) order on certain quartz surface products (quartz surface products) from the People's Republic of China (China). The period of review (POR) is November 20, 2018, through June 30, 2020. We preliminarily find that mandatory respondents Heshan City Nande Stone Co., Ltd. (Nande Stone) and Xiamen Deyuan Panmin Trading Co., Ltd. (Xiamen Deyuan) have not established their eligibility for a separate rate; thus, they are part of the China-wide entity. Additionally, we have preliminarily determined that the following three additional companies have failed to demonstrate their eligibility for a separate rate as part of the China-wide entity as well: Dava Industry Co., Ltd. (Dava Industry); Deyuan Panmin International Limited (Deyuan Panmin); and Guangzhou Hercules Quartz Stone Co., Ltd. (Guangzhou Hercules).

Interested parties are invited to comment on these preliminary results. If these preliminary results are adopted in our final results of this review, we will instruct U.S. Customs and Border Protection (CBP) to assess AD duties on all appropriate entries of subject merchandise during the POR. We intend to issue our final results no later than 120 days from the date of publication of these preliminary results, pursuant to section 751(a)(3)(A) of the Tariff Act of 1930, as amended (the Act), unless this deadline is extended.



II. BACKGROUND

In July 2019, Commerce published in the *Federal Register* an AD duty order on quartz surface products from China.¹ The petitioner for this AD duty order is Cambria Company LLC. On July 1, 2020, Commerce published a notice of opportunity to request an administrative review of the *Order* on quartz surface products from China for the POR.² Pursuant to section 751(a)(1) of the Act and 19 CFR 351.213(b)(1), Commerce received timely requests for review from Xiamen Deyuan and Deyuan Panmin;³ Cosmos Granite (WEST) and Cosmos Granite (South East) (collectively, Cosmos);⁴ Unique Stone Concepts LLC (Unique);⁵ Quartz Master LLC (Quartz Master);⁶ Foshan Adamant Science & Technology Co., Ltd. (Foshan Adamant);⁷ and National Stoneworks, LLC (National Stoneworks).⁸ On September 3, 2020, in accordance with 19 CFR 351.221(c)(1)(i), we published a notice of initiation with respect to 14 companies.⁹

In the *Initiation Notice*, Commerce notified parties of the application/certification process by which exporters and producers of merchandise subject to an administrative review in a non-market economy (NME) country may qualify for separate rate status.¹⁰ Exporters and producers wishing to qualify for separate rate status in this administrative review were given 30 calendar days after publication of the *Initiation Notice* to complete, as appropriate, either a separate rate application or separate rate certification.¹¹ In September and October 2020, we received four timely separate rate certifications from those Chinese companies requesting separate rate status.¹²

¹ See *Certain Quartz Surface Products from the People's Republic of China: Antidumping and Countervailing Duty Orders*, 84 FR 33053 (July 11, 2019) (*Order*).

² See *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity to Request Administrative Review*, 85 FR 39531 (July 1, 2020).

³ See Xiamen Deyuan and Deyuan Panmin's Letter, "Quartz Surface Products from the People's Republic of China – Review Request," dated July 30, 2020.

⁴ See Cosmos' Letter, "Quartz Surface Products from the PRC; A-570-084; Request for Administrative Review," dated July 31, 2020.

⁵ See Unique's Letter, "Quartz Surface Products from the PRC; A-570-084; Request for Administrative Review," dated July 31, 2020.

⁶ See Quartz Master's Letter, "Request for Administrative Review of the Antidumping Duty Order on Quartz Surface Products from the People's Republic of China," dated July 31, 2020.

⁷ See Foshan Adamant's Letter, "Request for Administrative Review of the Antidumping Duty Order on Quartz Surface Products from the People's Republic of China," dated July 31, 2020.

⁸ See National Stoneworks' Letter, "Quartz Surface Products from the People's Republic of China; Request for Administrative Review," dated July 31, 2020.

⁹ See *Initiation of Antidumping and Countervailing Duty Reviews*, 85 FR 54983, 54990 (September 3, 2021) (*Initiation Notice*).

¹⁰ *Id.*, 85 FR at 54984.

¹¹ *Id.*

¹² See Deyuan Panmin's Letter, "Quartz Surface Products from the People's Republic of China – SRC," dated September 22, 2020 (Deyuan Panmin SRC); see also Xiamen Deyuan's Letter, "Quartz Surface Products from the People's Republic of China – SRC," dated September 22, 2020 (Xiamen Deyuan SRC); Foshan Sanshui Queen Ceramic Inc.'s and QJ Quartz Stone Ltd.'s Letter, "Quartz Surface Products from the PRC; A-570-084; Separate Rate Certification," dated October 1, 2020; and Foshan Adamant's Letter, "Foshan Adamant's Separate Rate Certification: First Antidumping Duty Administrative Review of Quartz Surface Products from the People's Republic of China, A-570-084," dated October 1, 2020.

The *Initiation Notice* also indicated that, in the event that Commerce limits the number of respondents selected for individual examination, we would select mandatory respondents based on CBP data for U.S. imports during the POR.¹³ On September 8, 2020, Commerce released the CBP data to all interested parties under an administrative protective order (APO).¹⁴ On October 19, 2020, pursuant to section 777A(c)(2)(B) of the Act, we selected Nande Stone and Xiamen Deyuan for individual examination in this administrative review and subsequently issued the NME AD questionnaire to them.¹⁵

On November 11, 2020, we received an untimely request from Xiamen Deyuan and Deyuan Panmin for an extension of the deadline to respond to the NME AD questionnaire.¹⁶ On November 17, 2020, Commerce denied Xiamen Deyuan and Deyuan Panmin's untimely request for an extension of the questionnaire deadline.¹⁷

From September to December, 2020, Quartz Master, Foshan Adamant, and National Stoneworks timely withdrew their requests for review for nine companies.¹⁸ As a result, we are rescinding the administrative review with respect to the nine companies for which we received timely withdrawals concurrently with these preliminary results.¹⁹ Thus, this administrative review remains active with respect to five companies: Dava Industry, Deyuan Panmin, Guangzhou Hercules, Nande Stone, and Xiamen Deyuan.

On November 25, 2020, Xiamen Deyuan and Deyuan Panmin (collectively, the Deyuan Companies) notified Commerce of their intent not to respond to Commerce's AD questionnaire.²⁰ Neither the Deyuan Companies nor Nande Stone submitted a response to

¹³ See *Initiation Notice*, 85 FR at 54983.

¹⁴ See Memorandum, "2018-2020 Antidumping Duty Administrative Review: Quartz Surface Products from the People's Republic of China: Release of Customs Entry Data from U.S. Customs and Border Protection," dated September 8, 2020.

¹⁵ See Memorandum, "2018-2020 Administrative Review of the Antidumping Duty Order on Certain Quartz Surface Products from the People's Republic of China: Selection of Respondents for Individual Examination," dated October 19, 2020 (Respondent Selection Memorandum); see also Commerce's Letters, "2018-2020 Administrative Review of the Antidumping Duty Order on Certain Quartz Surface Products from the People's Republic of China: Request for Information," dated October 20, 2020, and "2018-2020 Administrative Review of the Antidumping Duty Order on Certain Quartz Surface Products from the People's Republic of China: Request for Information," both dated October 20, 2020.

¹⁶ See Xiamen Deyuan and Deyuan Panmin's Letter, "Quartz Surface Products from the People's Republic of China – Request for Extension of Time to Respond to Questionnaire," dated November 11, 2020.

¹⁷ See Commerce's Letter, "2018-2020 Administrative Review of the Antidumping Duty Order on Certain Quartz Surface Products (Quartz Surface Products) from the People's Republic of China (China): Denies Extension of Deadline for Response to Initial Questionnaire," dated November 17, 2020.

¹⁸ See Quartz Master's Letter, "Partial Withdrawal of Request for Administrative Review of the Antidumping Duty Order on Quartz Surface Products from the People's Republic of China," dated September 18, 2020; see also Quartz Master's Letter, "Withdrawal of Quartz Master's Remaining Review Requests for Administrative Review of the Antidumping Duty Order on Quartz Surface Products from the People's Republic of China," dated December 2, 2020; Foshan Adamant's Letter, "Foshan Adamant's Withdrawal of Request for Administrative Review of the Antidumping Duty Order on Quartz Surface Products from the People's Republic of China," dated December 2, 2020; and National Stoneworks' Letter, "Quartz Surface Products from the People's Republic of China: Withdrawal of Request for Administrative Review," dated December 2, 2020.

¹⁹ See the accompanying unpublished *Federal Register* notice.

²⁰ See Xiamen Deyuan's and Deyuan Panmin's Letter, "Quartz Surface Products from the People's Republic of China – Inability to Respond to Questionnaire," dated November 25, 2020 (Deyuan Companies Notice).

Commerce's AD questionnaire by the established deadline. Dava Industry and Guangzhou Hercules failed to apply for a separate rate or submit a separate rate certification. On March 26, 2021, we placed on the record a memorandum containing the separate rate applications from Xiamen Deyuan and Deyuan Panmin from the less-than-fair-value (LTFV) investigation associated with the above-referenced antidumping duty (AD) order.²¹

III. SCOPE OF THE ORDER

The scope of the order covers certain quartz surface products.²² Quartz surface products consist of slabs and other surfaces created from a mixture of materials that includes predominately silica (e.g., quartz, quartz powder, cristobalite) as well as a resin binder (e.g., an unsaturated polyester). The incorporation of other materials, including, but not limited to, pigments, cement, or other additives does not remove the merchandise from the scope of the orders. However, the scope of the orders only includes products where the silica content is greater than any other single material, by actual weight. Quartz surface products are typically sold as rectangular slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. However, the scope of the orders includes surface products of all other sizes, thicknesses, and shapes. In addition to slabs, the scope of the orders includes, but is not limited to, other surfaces such as countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fire place surrounds, mantels, and tiles. Certain quartz surface products are covered by the orders whether polished or unpolished, cut or uncut, fabricated or not fabricated, cured or uncured, edged or not edged, finished or unfinished, thermoformed or not thermoformed, packaged or unpackaged, and regardless of the type of surface finish.

In addition, quartz surface products are covered by the orders whether or not they are imported attached to, or in conjunction with, non-subject merchandise such as sinks, sink bowls, vanities, cabinets, and furniture. If quartz surface products are imported attached to, or in conjunction with, such non-subject merchandise, only the quartz surface product is covered by the scope. Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise fabricated in a third country, including by cutting, polishing, curing, edging, thermoforming, attaching to, or packaging with another product, or any other finishing, packaging, or fabrication that would not otherwise remove the merchandise from the scope of the orders if performed in the country of manufacture of the quartz surface products.

The scope of the orders does not cover quarried stone surface products, such as granite, marble, soapstone, or quartzite. Specifically excluded from the scope of the orders are crushed glass surface products. Crushed glass surface products must meet each of the following criteria to qualify for this exclusion: (1) The crushed glass content is greater than any other single material, by actual weight; (2) there are pieces of crushed glass visible across the surface of the product; (3) at least some of the individual pieces of crushed glass that are visible across the surface are

²¹ See Memorandum, "Placing Documents on the Record—Separate Rate Applications from the Less-Than-Fair-Value Investigation", dated March 26, 2021 (Deyuan Companies Separate Rate Application Memo).

²² Quartz surface products may also generally be referred to as engineered stone or quartz, artificial stone or quartz, agglomerated stone or quartz, synthetic stone or quartz, processed stone or quartz, manufactured stone or quartz, and Bretonstone®.

larger than one centimeter wide as measured at their widest cross-section (glass pieces); and (4) the distance between any single glass piece and the closest separate glass piece does not exceed three inches.

The products subject to the scope are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheading: 6810.99.0010. Subject merchandise may also enter under subheadings 6810.11.0010, 6810.11.0070, 6810.19.1200, 6810.19.1400, 6810.19.5000, 6810.91.0000, 6810.99.0080, 6815.99.4070, 2506.10.0010, 2506.10.0050, 2506.20.0010, 2506.20.0080, and 7016.90.10.50. The HTSUS subheadings set forth above are provided for convenience and U.S. Customs purposes only. The written description of the scope of the orders is dispositive.

IV. DISCUSSION OF THE METHODOLOGY

A. Non-Market Economy Country Status

Commerce considers China to be an NME country.²³ In accordance with section 771(18)(C)(i) of the Act, any determination that a foreign country is an NME country shall remain in effect until revoked by Commerce. Therefore, we continue to treat China as an NME country for purposes of these preliminary results.

B. Separate Rates Determination

In NME proceedings, there is a rebuttable presumption that companies are subject to government control and, thus, should be assessed a single AD rate.²⁴ In the *Initiation Notice*, Commerce notified parties of the application process by which exporters and producers may obtain separate rate status in NME proceedings.²⁵ It is Commerce's policy to assign exporters of the subject merchandise from an NME country a single rate unless an exporter can affirmatively demonstrate an absence of government control, both in law (*de jure*) and in fact (*de facto*), with respect to exports. To establish whether a company is sufficiently independent to be entitled to a separate, company-specific rate, Commerce analyzes each exporting entity in an NME country under the test established in *Sparklers*,²⁶ as amplified by *Silicon Carbide*.²⁷ However, if Commerce determines that a company is wholly foreign-owned, then consideration of the *de jure*

²³ See *Antidumping Duty Investigation of Certain Aluminum Foil from the People's Republic of China: Affirmative Preliminary Determination of Sales at Less-Than-Fair Value and Postponement of Final Determination*, 82 FR 50858, 50861 (November 2, 2017), and accompanying Preliminary Decision Memorandum (PDM) at 8, unchanged in *Certain Aluminum Foil from the People's Republic of China: Final Determination of Sales at Less Than Fair Value*, 83 FR 9282 (March 5, 2018).

²⁴ See *Notice of Final Determination of Sales at Less Than Fair Value, and Affirmative Critical Circumstances, In Part: Certain Lined Paper Products from the People's Republic of China*, 71 FR 53079, 53082 (September 8, 2006); see also *Final Determination of Sales at Less Than Fair Value and Final Partial Affirmative Determination of Critical Circumstances: Diamond Sawblades and Parts Thereof from the People's Republic of China*, 71 FR 29303, 29307 (May 22, 2006).

²⁵ See *Initiation Notice*, 85 FR at 54984.

²⁶ See *Final Determination of Sales at Less Than Fair Value: Sparklers from the People's Republic of China*, 56 FR 20588 (May 6, 1991) (*Sparklers*).

²⁷ See *Notice of Final Determination of Sales at Less Than Fair Value: Silicon Carbide from the People's Republic of China*, 59 FR 22585 (May 2, 1994) (*Silicon Carbide*).

and *de facto* criteria is not necessary to determine whether it is independent from government control.²⁸

Under the separate rates test, Commerce considers the following *de jure* criteria in determining whether an individual company may be granted a separate rate: (1) an absence of restrictive stipulations associated with an individual exporter's business and export licenses; (2) legislative enactments decentralizing control over export activities of the companies; and (3) other formal measures by the government decentralizing control over export activities of companies.²⁹

Further, Commerce typically considers four factors in evaluating whether a respondent is subject to *de facto* government control of its export functions: (1) whether the export prices are set by, or are subject to the approval of, a government agency; (2) whether the respondent has authority to negotiate and sign contracts and other agreements; (3) whether the respondent has autonomy from the government in making decisions regarding the selection of management; and (4) whether the respondent retains the proceeds of its export sales and makes independent decisions regarding the disposition of profits or financing of losses.³⁰

Commerce continues to evaluate its practice with regard to the separate rates analysis in light of the diamond sawblades from China AD proceeding, and Commerce's determinations therein.³¹ In particular, we note that in litigation involving the diamond sawblades proceeding, the U.S. Court of International Trade (CIT) found Commerce's existing separate rates analysis deficient in the circumstances of that case, in which a government-controlled entity had significant ownership in the respondent exporter.³² Following the Court's reasoning, in recent proceedings, we have concluded that where a government entity holds a majority equity ownership, either directly or indirectly, in the respondent exporter, this interest in and of itself means that the

²⁸ See, e.g., *Final Results of Antidumping Duty Administrative Review: Petroleum Wax Candles from the People's Republic of China*, 72 FR 52355, 52356 (September 13, 2007).

²⁹ See *Sparklers*, 56 FR at 20589.

³⁰ See *Silicon Carbide*, 59 FR at 22586-89; see also *Notice of Final Determination of Sales at Less Than Fair Value: Furfuryl Alcohol from the People's Republic of China*, 60 FR 22544, 22545 (May 8, 1995).

³¹ See *Final Results of Redetermination Pursuant to Remand Order for Diamond Sawblades and Parts Thereof from the People's Republic of China* (May 6, 2013) in *Advanced Tech. & Materials Co. v. United States*, 885 F. Supp. 2d 1343 (CIT 2012) (*Advanced Tech.*), affirmed in *Advanced Tech. & Materials Co. v. United States*, 938 F. Supp. 2d 1342 (CIT 2013). This remand redetermination is on the Enforcement and Compliance website at <http://enforcement.trade.gov/remands/12-147.pdf>. See also *Diamond Sawblades and Parts Thereof from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 77098 (December 20, 2013), and accompanying PDM at 7, unchanged in *Diamond Sawblades and Parts Thereof from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2011-2012*, 79 FR 35723 (June 24, 2014), and accompanying Issues and Decision Memorandum at Comment 1.

³² See, e.g., *Advanced Tech.*, 885 F. Supp. 2d at 1349 ("The court remains concerned that Commerce has failed to consider important aspects of the problem and offered explanations that run counter to the evidence before it."); 1351 ("Further substantial evidence of record does not support the inference that SASAC's {state-owned assets supervision and administration commission} 'management' of its 'state-owned assets' is restricted to the kind of passive-investor *de jure* 'separation' that Commerce concludes.") (footnotes omitted); 1355 ("The point here is that 'governmental control' in the context of the separate rate test appears to be a fuzzy concept, at least to this court, since a 'degree' of it can obviously be traced from the controlling shareholder, to the board, to the general manager, and so on along the chain to 'day-to-day decisions of export operations,' including terms, financing, and inputs into finished product for export."); and 1357 ("AT&M *itself* identifies its 'controlling shareholder' as CISRI {owned by SASAC} in its financial statements and the power to veto nomination does not equilibrate the power of control *over* nomination.") (footnotes omitted).

respondent is not eligible for a separate rate.³³ Otherwise, we will analyze the impact of government ownership within the context of the *de facto* criteria as established above. This may include control over, for example, the selection of board members and management, key factors in determining whether a company has sufficient independence in its export activities to merit a separate rate. Consistent with our normal separate rate practice, any ability to control, or possess an interest in controlling, the operations of the company (including the selection of board members, management, and the profit distribution of the company) by a government entity is subject to Commerce's rebuttable presumption that all companies within the NME country are subject to government control.

1. Absence of *De Jure* and *De Facto* Control

As explained below, none of the companies subject to this administrative review have demonstrated an absence of *de jure* and *de facto* control, and, thus, have not established eligibility for a separate rate in this proceeding.

2. Companies Not Eligible for a Separate Rate

For the reasons detailed below, Commerce preliminarily determines that the following companies should be considered part of China-wide entity: Dava Industry, Deyuan Panmin, Guangzhou Hercules, Nande Stone, and Xiamen Deyuan.

Dava Industry and Guangzhou Hercules did not submit separate rate applications or certifications by the deadline established in the *Initiation Notice*. Furthermore, neither of these companies made a claim that it had no exports, sales, or entries of subject merchandise during the POR. Given the foregoing, we preliminarily find that these two companies failed to establish their eligibility for separate rate status. Therefore, Commerce preliminarily determines these companies to be considered part of the China-wide entity.

In addition, for the reasons detailed below, Commerce preliminarily determines that Nande Stone, Xiamen Deyuan, and Deyuan Panmin are part of the China-wide entity.

Pursuant to Commerce's practice, the China-wide entity will not be under review unless a party specifically requests, or Commerce self-initiates, a review of the entity.³⁴ Because no party requested a review of the China-wide entity in this review, the entity is not under review, and the entity's rate is not subject to change in this review. Therefore, if our determination is unchanged

³³ See, e.g., *Carbon and Certain Alloy Steel Wire Rod from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances, in Part*, 79 FR 53169 (September 8, 2014), and accompanying PDM at 5-9, unchanged in *Carbon and Certain Alloy Steel Wire Rod from the People's Republic of China: Final Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 79 FR 68860 (November 19, 2014).

³⁴ See *Antidumping Proceedings: Announcement of Change in Department Practice for Respondent Selection in Antidumping Duty Proceedings and Conditional Review of the Nonmarket Economy Entity in NME Antidumping Duty Proceedings*, 78 FR 65963 (November 4, 2013).

in the final results, entries from the aforementioned companies will be liquidated at the rate previously established for the China-wide entity (*i.e.*, 326.15 percent).³⁵

Nande Stone, Xiamen Deyuan, and Deyuan Panmin

In the *Initiation Notice*, Commerce stated that: “{f}or exporters and producers who submit a separate-rate status application or certification and subsequently are selected as mandatory respondents, these exporters and producers will no longer be eligible for separate rate status unless they respond to all parts of the questionnaire as mandatory respondents.”³⁶ Nande Stone and Xiamen Deyuan were selected for individual examination as mandatory respondents in this review.³⁷

Nande Stone did not submit a separate rate application or certification by the established deadline, but it was subsequently issued an AD questionnaire as a mandatory respondent. Nande Stone also failed to respond to Commerce’s questionnaire. Accordingly, we preliminarily determine that Nande Stone failed to establish eligibility for separate rate status and should be considered part of the China-wide entity.

Although Xiamen Deyuan and Deyuan Panmin both submitted separate rate certifications,³⁸ both companies notified Commerce that they would not respond to the AD Questionnaire,³⁹ and Xiamen Deyuan failed to respond to Commerce’s questionnaire by the established deadline. Although, Deyuan Panmin was not selected as a mandatory respondent in this administrative review, in the less-than-fair-value investigation, both Xiamen Deyuan and Deyuan Panmin stated in their respective separate rate application that they are affiliated.⁴⁰ In this review, Xiamen Deyuan and Deyuan Panmin both certified that their ownership structure remained the same as it was during the POI during this POR.⁴¹ Thus, Xiamen Deyuan and Deyuan Panmin’s affiliation continues into this POR. The AD Questionnaire requires mandatory respondents to report the information of all affiliates involved in the production or sale of subject merchandise.⁴² Thus, because Deyuan Panmin is a producer and exporter of subject merchandise,⁴³ Xiamen Deyuan and Deyuan Panmin were required to report Deyuan Panmin’s information as part of Xiamen Deyuan’s response to the AD Questionnaire. As a result, Deyuan Panmin also failed to timely respond to Commerce’s questionnaire by the established deadline. Accordingly, we preliminarily determine that Xiamen Deyuan and Deyuan Panmin failed to establish eligibility for separate rate status and should be considered part of the China-wide entity.

³⁵ The China-wide rate determined in the investigation was 336.69 percent. This rate was adjusted for export subsidies to determine the cash deposit rate (*i.e.*, 326.15 percent) collected for companies in the China-wide entity. *See Order*, 84 FR at 33054.

³⁶ *See Initiation Notice*, 85 FR at 54984.

³⁷ *See Respondent Selection Memorandum*.

³⁸ *See Xiamen Deyuan SRC; see also Deyuan Panmin SRC*.

³⁹ *See Deyuan Companies Notice*.

⁴⁰ *See Deyuan Companies Separate Rate Application Memo*.

⁴¹ *See Xiamen Deyuan SRC at 7; and Deyuan Panmin SRC at 7*.

⁴² *See generally AD Questionnaire*.

⁴³ *See Deyuan Panmin SRC at 1*.

V. RECOMMENDATION

We recommend applying the above methodology for these preliminary results.

☒

Agree

☐

Disagree

3/30/2021

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Signed by: CHRISTIAN MARSH

Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance