



A-570-909
Administrative Review
POR: 8/1/2019 - 7/31/2020
Public Document
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May 3, 2021

MEMORANDUM TO: Ryan Majerus
Deputy Assistant Secretary
for Policy and Negotiations

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

SUBJECT: Decision Memorandum for the Preliminary Results of the
Antidumping Duty Administrative Review: Certain Steel Nails
from the People's Republic of China; 2019-2020

I. SUMMARY

In response to requests from interested parties, the Department of Commerce (Commerce) is conducting this administrative review of the antidumping duty (AD) order on certain steel nails (nails) from the People's Republic of China (China) for the period of review (POR) from August 1, 2019 through July 31, 2020. Commerce preliminarily finds that Qingdao D&L Group Ltd. (Qingdao D&L) and Shanghai Yueda Nails Industry Co., Ltd., a.k.a. Shanghai Yueda Nails Co. (Shanghai Yueda), the two mandatory respondents selected for individual examination, have not established their entitlement to a separate rate, and are, therefore, being treated as part of the China-wide entity. In addition, we preliminarily determine that two companies are eligible for a separate rate, 21 companies had no shipments, and 429 companies are part of the China-wide entity.

If these preliminary results are adopted in our final results of review, we will instruct U.S. Customs and Border Protection (CBP) to assess antidumping duties on all appropriate entries of subject merchandise during the POR. Interested parties are invited to comment on these preliminary results. We intend to issue our final results no later than 120 days from the date of publication of this notice, pursuant to section 751(a)(3)(A) of the Tariff Act of 1930, as amended (the Act) and 19 CFR 351.213(h)(1).



II. BACKGROUND

On August 1, 2008, Commerce published the AD order on nails from China.¹ On August 4, 2020, we published a notice of opportunity for interested parties to request that Commerce conduct an administrative review of the *Order*.² On October 6, 2020, Commerce initiated an administrative review of 457 exporters and producers of nails from China.³ Between October 21, 2020 and November 5, 2020, four companies requested separate-rate status, and twenty-one companies filed no shipment certifications.⁴ On October 20, 2020, the petitioner withdrew its request for review for Oriental Cherry Hardware Group., Ltd., Youngwoo Fasteners Co., Ltd., China Staple Enterprise Co., Ltd., Faithful Engineering Products Co., Ltd., and Promising Way (Hong Kong) Ltd.⁵ No other party requested a review of these exporters. On January 26, 2021, Commerce rescinded the review with respect to these five companies pursuant to 19 CFR 351.213(d)(1) and (4).⁶

On January 21, 2021, we selected Qingdao D&L and Shanghai Yueda as mandatory respondents,⁷ and issued each respondent the standard non-market economy (NME) questionnaire.⁸ On February 11, 2021, Qingdao D&L failed to respond to section A of the NME questionnaire. On March 3, 2021, Shanghai Yueda notified Commerce that it was withdrawing from the review.⁹ Neither Qingdao D&L or Shanghai Yueda submitted a response to Commerce's NME AD questionnaire by the established deadline.

III. SCOPE OF THE *ORDER*¹⁰

The merchandise covered by the *Order* includes certain steel nails having a shaft length up to 12 inches. Certain steel nails include, but are not limited to, nails made of round wire and nails that are cut. Certain steel nails may be of one piece construction or constructed of two or more pieces. Certain steel nails may be produced from any type of steel, and have a variety of finishes, heads, shanks, point types, shaft lengths and shaft diameters. Finishes include, but are not limited to, coating in vinyl, zinc (galvanized, whether by electroplating or hot dipping one or

¹ See *Notice of Antidumping Duty Order: Certain Steel Nails from the People's Republic of China*, 73 FR 44961 (August 1, 2008) (*Order*).

² See *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity to Request Administrative Review*, 85 FR 47167 (August 4, 2020).

³ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 85 FR 63081 (October 6, 2020) (*Initiation Notice*).

⁴ See "Preliminary Determination of No Shipments" and "Separate Rates" sections.

⁵ See Petitioner's Letter, "Withdrawal of Request for Administrative Reviews," dated October 20, 2020.

⁶ See *Certain Steel Nails from the People's Republic of China: Partial Rescission of Antidumping Duty Administrative Review; 2019-2020*, 86 FR 7065 (January 26, 2021).

⁷ See Memorandum, "Respondent Selection," dated January 21, 2021 (Respondent Selection Memorandum).

⁸ See Commerce's Letter, "Administrative Review of Certain Steel Nails from the People's Republic of China: Request for Information," dated January 21, 2021; and Commerce's Letter, "Administrative Review of Certain Steel Nails from the People's Republic of China: Request for Information," dated January 21, 2021 (collectively, NME Questionnaire).

⁹ See Shanghai Yueda's Letter, "Notice of Withdrawal from the Review: Twelfth Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the People's Republic of China (A-570-979)," dated March 3, 2021 (Shanghai Yueda's Withdrawal Letter).

¹⁰ See *Order*; see also *Certain Steel Nails from the People's Republic of China: Final Results of Antidumping Duty Changed Circumstances Review*, 84 FR 49508 (September 20, 2019).

more times), phosphate cement, and paint. Head styles include, but are not limited to, flat, projection, cupped, oval, brad, headless, double, countersunk, and sinker. Shank styles include, but are not limited to, smooth, barbed, screw threaded, ring shank and fluted shank styles. Screw-threaded nails subject to the *Order* are driven using direct force and not by turning the fastener using a tool that engages with the head. Point styles include, but are not limited to, diamond, blunt, needle, chisel and no point. Finished nails may be sold in bulk, or they may be collated into strips or coils using materials such as plastic, paper, or wire. Certain steel nails subject to the *Order* are currently classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7317.00.55, 7317.00.65, 7317.00.75, and 7907.00.6000.¹¹

Excluded from the scope are steel roofing nails of all lengths and diameter, whether collated or in bulk, and whether or not galvanized. Steel roofing nails are specifically enumerated and identified in ASTM Standard F 1667 (2005 revision) as Type I, Style 20 nails, inclusive of the following modifications: 1) Non-collated (i.e., hand-driven or bulk), steel nails as described in ASTM Standard F 1667 (2005 revision) as Type I, Style 20 nails, as modified by the following description: having a bright or galvanized finish, a smooth, barbed or ringed shank, an actual length of 0.500" to 4", inclusive; an actual shank diameter of 0.1015" to 0.166", inclusive; and an actual head diameter of 0.3375" to 0.500", inclusive; 2) Wire collated steel nails, in coils, as described in ASTM Standard F 1667 (2005 revision) as Type I, Style 20 nails, as modified by the following description: having a galvanized finish, a smooth, barbed or ringed shank, an actual length of 0.500" to 1.75", inclusive, an actual shank diameter of 0.116" to 0.166", inclusive; and an actual head diameter of 0.3375" to 0.500", inclusive; and 3) Non-collated (i.e., hand-driven or bulk), as described in ASTM Standard F 1667 (2005 revision) as Type I, Style 20 nails, as modified by the following description: steel nails having a convex head (commonly known as an umbrella head), a smooth or spiral shank, a galvanized finish, an actual length of 1.75" to 3", inclusive; an actual shank diameter of 0.131" to 0.152", inclusive; and an actual head diameter of 0.450" to 0.813", inclusive.

Also excluded from the scope are the following steel nails: Non-collated (i.e., hand-driven or bulk), two-piece steel nails having plastic or steel washers (caps) already assembled to the nail, having a bright or galvanized finish, a ring, fluted or spiral shank, an actual length of 0.500" to 8", inclusive; and an actual shank diameter of 0.1015" to 0.166", inclusive; and an actual washer or cap diameter of 0.900" to 1.10", inclusive.

Also excluded from the scope of the *Order* are corrugated nails. A corrugated nail is made of a small strip of corrugated steel with sharp points on one side. Also excluded from the scope of the *Order* are fasteners suitable for use in powder-actuated hand tools, not threaded and threaded, which are currently classified under HTSUS 7317.00.20 and 7317.00.30. Also excluded from the scope of the *Order* are thumb tacks, which are currently classified under HTSUS 7317.00.10.00.

Also excluded from the scope of the *Order* are certain brads and finish nails that are equal to or less than 0.0720 inches in shank diameter, round or rectangular in cross section, between 0.375

¹¹ Commerce added the Harmonized Tariff Schedule category 7907.00.6000, "Other articles of zinc: Other," to the language of the AD order. See *Certain Steel Nails from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 80 FR 18816, 18816 n.5 (April 5, 2018).

inches and 2.5 inches in length, and that are collated with adhesive or polyester film tape backed with a heat seal adhesive. Also excluded from the scope of the *Order* are fasteners having a case hardness greater than or equal to 50 HRC, a carbon content greater than or equal to 0.5 percent, a round head, a secondary reduced-diameter raised head section, a centered shank, and a smooth symmetrical point, suitable for use in gas-actuated hand tools. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the *Order* is dispositive.

IV. PRELIMINARY DETERMINATION OF NO SHIPMENTS

Between October 21, 2020, and November 5, 2020, the following twenty-one companies filed no shipment certifications indicating that they did not export subject merchandise to the United States during the POR:

1. Astrotech Steels Private Limited
2. Dezhou Hualude Hardware Products Co., Ltd.
3. Geekay Wires Limited
4. Hebei Minmetals Co., Ltd.
5. Mingguang Ruifeng Hardware Products Co., Ltd.
6. Nanjing Caiqing Hardware Co., Ltd.
7. Nanjing Yuechang Hardware Co., Ltd.
8. Region Industries Co., Ltd.
9. Region System Sdn. Bhd
10. Schenker China Ltd Chengdu Branch
11. Schenker China Ltd.
12. SDC International AUST. PTY. Ltd.
13. Shandong Qingyun Hongyi Hardware Products Co., Ltd.
14. Shanxi Hairui Trade Co., Ltd.
15. Shanxi Pioneer Hardware Industrial Co., Ltd. (Shanxi Pioneer)
16. Shanxi Yuci Broad Wire Products Co., Ltd.
17. S-Mart (Tianjin) Technology Development Co., Ltd.
18. Suntec Industries Co., Ltd.
19. Tianjin Jinchi Metal Products Co., Ltd.
20. Tianjin Jinghai County Hongli Industry & Business Co., Ltd.
21. Xi'an Metals & Minerals Import & Export Co., Ltd.

To examine these claims, we sent inquiries to CBP requesting that CBP inform Commerce if it had any information contrary to those no-shipment claims.¹² CBP's response indicated that Shanxi Pioneer did have shipments to the United States during the POR.¹³ However, CBP provided no information contrary to the no-shipment claims for the remaining 20 companies.¹⁴

¹² See Memorandum, "No Shipment Inquiry Instructions," dated April 21, 2021.

¹³ See Memorandum, "Certain Steel Nails from the People's Republic of China (A-570-909)," dated January 12, 2021.

¹⁴ *Id.*

Shanxi Pioneer filed comments stating that entries which appeared from Shanxi Pioneer in the CBP data were exported to the United States by a reseller prior to and during the POR without Shanxi Pioneer's knowledge or involvement, and provided sample sales documentation as evidence.¹⁵ Accordingly, Shanxi Pioneer argued that the entries should not be attributed to Shanxi Pioneer pursuant to Commerce's reseller policy. While the petitioner filed comments contesting the claims Shanxi Pioneer made in its no-shipment certification, we find no evidence that Shanxi Pioneer had knowledge at the time of sale to the reseller that these shipments were destined for the United States, or that they otherwise constitute sales by Shanxi Pioneer to the United States.¹⁶ After reviewing the information on the record, we do not find there is sufficient evidence to prove Shanxi Pioneer knew that the ultimate destination of its shipments was the United States. Furthermore, no party submitted evidence demonstrating an ownership or affiliation link between Shanxi Pioneer and the reseller reflected in the documentation provided by Shanxi Pioneer. Therefore, based on Shanxi Pioneer's no-shipment certification, we preliminarily determine that Shanxi Pioneer had no shipments of subject merchandise during the POR.¹⁷

We also preliminarily determine that Astrotech Steels Private Limited; Dezhou Hualude Hardware Products Co., Ltd.; Geekay Wires Limited; Hebei Minmetals Co., Ltd.; Mingguang Ruifeng Hardware Products Co., Ltd.; Nanjing Caiqing Hardware Co., Ltd.; Nanjing Yuechang Hardware Co., Ltd.; Region Industries Co., Ltd.; Region System Sdn. Bhd; Schenker China Ltd Chengdu Branch; Schenker China Ltd.; SDC International Aust. Pty. Ltd.; Shandong Qingyun Hongyi Hardware Products Co., Ltd.; Shanxi Hairui Trade Co., Ltd.; Shanxi Yuci Broad Wire Products Co., Ltd.; S-Mart (Tianjin) Technology Development Co., Ltd.; Suntec Industries Co., Ltd.; Tianjin Jinchi Metal Products Co., Ltd.; Tianjin Jinghai County Hongli Industry & Business Co., Ltd.; and Xi'an Metals & Minerals Import & Export Co., Ltd. did not have any reviewable shipments during the POR.

V. DISCUSSION OF THE METHODOLOGY

A. Non-Market Economy Country Status

Commerce considers China to be an NME country.¹⁸ 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

¹⁵ Shanxi Pioneer originally submitted its comments on October 20, 2020. However, they were overly bracketed and Shanxi Pioneer submitted a revised version on April 8, 2021, following a request by Commerce. *See* Shanxi Pioneer's Letter, "Certain Steel Nails from the People's Republic of China: No Shipment Supplemental Questionnaire Response," dated April 8, 2021 at 2 (citing *Antidumping and Countervailing Duty Proceedings: Assessment of Antidumping Duties*, 68 FR 23954 (March 6, 2003)); *see also* Shanxi Pioneer's Letter, "Steel Nails from the People's Republic of China: Comments on CBP Data," dated October 20, 2020.

¹⁶ *See* Petitioner's Letter, "Comments on Shanxi Pioneer No Shipment Letter dated October 20, 2020," dated November 27, 2020.

¹⁷ This determination is consistent with the finding in the preliminary results in the previous administrative review of this order. *See Certain Steel Nails from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review, Preliminary Determination of No Shipments, and Partial Rescission; 2018-2019*, 85 FR 83054 (December 21, 2020), and accompanying Preliminary Decision Memorandum (PDM) at 7.

¹⁸ *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

until revoked by Commerce. Therefore, we continue to treat China as an NME country for purposes of these preliminary results.

B. Separate Rates

Pursuant to section 771(18)(C) of the Act, in proceedings involving NME countries, Commerce has a rebuttable presumption that all companies within China are subject to government control and, thus, should be assessed a single AD rate.¹⁹ It is Commerce's policy to assign all exporters of the merchandise subject to review in NME countries 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 its exports. To establish whether a company is sufficiently independent to be eligible for a separate, company-specific rate, Commerce analyzes each exporting entity in a NME country under the test established in *Sparklers*.²⁰ However, if Commerce determines that a company is wholly foreign-owned, then a separate-rate analysis is not necessary to determine whether it is independent from government control.

Commerce continues to evaluate its practice with regard to the separate rate analysis in light of the *Diamond Sawblades from China* AD proceeding, and its determinations therein.²¹ In particular, in litigation involving the *Diamond Sawblades from China* 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-owned and controlled entity had significant ownership in the respondent exporter.²² Following the CIT's reasoning, in recent proceedings,

50858 (November 2, 2017), and accompanying PDM (citing Memorandum, "China's Status as a Non-Market Economy," dated October 26, 2017), 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), and accompanying Issues and Decision Memorandum (IDM) at Comment 1.

¹⁹ See, e.g., *Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses from the People's Republic of China: Notice of Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*, 75 FR 24892, 24899 (May 6, 2010), unchanged in *Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses from the People's Republic of China: Final Determination of Sales at Less Than Fair Value*, 75 FR 59217 (September 27, 2010).

²⁰ See *Final Determination of Sales at Less than Fair Value: Sparklers from the People's Republic of China*, 56 FR 20588, 20589 (May 6, 1991) (*Sparklers*).

²¹ See Final Results of Redetermination pursuant to *Advanced Technology & Materials Co., Ltd., et al. v. United States*, 885 F. Supp. 2d 1343 (CIT 2012) (*Advanced Technology I*), *aff'd* *Advanced Technology & Materials Co., Ltd., et al. v. United States*, 938 F. Supp. 2d 1342 (CIT 2013), *aff'd* *Advanced Technology & Materials Co., Ltd., et al. v. United States*, Case No. 2014-1154 (Fed. Cir. 2014); 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 IDM at Comment 1.

²² See, e.g., *Advanced Technology I*, 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."); *Id.* at 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); *Id.* at 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

we have concluded that where a government entity holds a majority ownership share, either directly or indirectly, in the respondent exporter, the majority ownership holding in and of itself means that the government exercises, or has the potential to exercise, control over the company's operations generally.²³ This may include control over, for example, the selection of management, a key factor in determining whether a company has sufficient independence in its export activities to merit a separate rate. Consistent with normal business practices, we would expect any majority shareholder, including a government, to have the ability to control, and an interest in controlling, the operations of the company, including the selection of board members, management, and the profit distribution of the company.

In order to demonstrate eligibility for separate-rate status, Commerce normally requires entities, for which a review was requested, and which were assigned a separate rate in a previous segment of this proceeding, to submit a separate-rate certification (SRC) stating that they continue to meet the criteria for obtaining a separate rate.²⁴ For entities that were not assigned a separate rate in the previous segment of this proceeding, to demonstrate eligibility, Commerce requires a separate-rate application (SRA).²⁵ Companies that submit an SRA or SRC which are subsequently selected as mandatory respondents must respond to all parts of Commerce's questionnaire in order to be eligible for separate-rate status.²⁶

Between November 2, 2020, and November 5, 2020, Commerce received SRCs or SRAs from the following 4 companies (listed in alphabetical order): Qingdao D&L; Shanghai Curvet Hardware Products Co., Ltd. (Shanghai Curvet); Shanghai Yueda; and Tianjin Zhonglian Metals Ware Co., Ltd. (Tianjin Zhonglian).²⁷ Qingdao D&L and Shanghai Yueda were subsequently selected as mandatory respondents following their application for separate-rate status.

i. Wholly Foreign Owned

Shanghai Curvet reported 100 percent ownership by foreign entities.²⁸ As there is no Chinese ownership of this company, and because Commerce has no evidence indicating that this

inputs into finished product for export.”); *Id.* at 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).

²³ See *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), and accompanying IDM.

²⁴ See *Initiation Notice*, 85 FR at 63082-63083.

²⁵ *Id.*

²⁶ *Id.*

²⁷ See Qingdao D&L's Letter, “Certain Steel Nails from the People's Republic of China: Separate Rate Certification of Qingdao D&L Group Ltd.,” dated November 4, 2020; see also Shanghai Curvet's Letter, “Certain Steel Nails from the People's Republic of China: Separate Rate Certification,” dated November 2, 2020 (Shanghai Curvet's SRC); Shanghai Yueda's Letter, “Separate Rate Certification for Shanghai Yueda Nails Industry Co., Ltd. in the Twelfth Annual Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the People's Republic of China, A-570-909,” dated November 5, 2020; and Tianjin Zhonglian's Letter, “Certain Steel Nails from the People's Republic of China: Separate Rate Application,” dated November 5, 2020 (Tianjin Zhonglian's SRA).

²⁸ See Shanghai Curvet's SRC.

company is under the control of the Chinese government, we find that this company is independent from government control.²⁹ Consequently, we preliminarily determine that Shanghai Curvet meets the criteria for a separate rate.

ii. Absence of *De Jure* Control

One company, Tianjin Zhonglian, requires additional analysis to determine separate rate status. 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) any legislative enactments decentralizing control of companies; and (3) other formal measures by the government decentralizing control of companies.³⁰ The evidence provided by Tianjin Zhonglian in its separate rate application supports a preliminary finding of an absence of *de jure* government control based on the following: (1) there is an absence of restrictive stipulations associated with the individual exporter's business and export licenses; (2) there are applicable legislative enactments decentralizing control of the companies; and (3) there are formal measures by the government decentralizing control of the companies.³¹

iii. Absence of *De Facto* Control

Typically, Commerce 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 disposition of profits or financing of losses.³²

An analysis of *de facto* control is critical in determining whether the respondent is, in fact, subject to a degree of government control over export activities which would preclude Commerce from assigning a separate rate. For Tianjin Zhonglian, we determine that the evidence on the record supports a finding of an absence of *de facto* government control based on record statements and supporting documentation showing the following: (1) the respondent sets its own export prices independent of the government and without the approval of a government authority; (2) the respondent has the authority to negotiate and sign contracts and other

²⁹ See *Brake Rotors from the People's Republic of China: Preliminary Results and Partial Rescission of the Fourth New Shipper Review and Rescission of the Third Antidumping Duty Administrative Review*, 66 FR 1303, 1306 (January 8, 2001), unchanged in *Brake Rotors from the People's Republic of China: Final Results and Partial Rescission of Fourth New Shipper Review and Rescission of Third Antidumping Duty Administrative Review*, 66 FR 27063 (May 16, 2001); *Notice of Final Determination of Sales at Less Than Fair Value: Creatine Monohydrate from the People's Republic of China*, 64 FR 71104 (December 20, 1999).

³⁰ 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*).

³¹ See Tianjin Zhonglian's SRA.

³² 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*); 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).

agreements; (3) the respondent has autonomy from the government regarding the selection of management; and (4) the respondent retains the proceeds from its sales and makes independent decisions regarding disposition of profits or financing of losses. The evidence placed on the record of this review in the SRA for Tianjin Zhonglian demonstrates an absence of *de jure* and *de facto* government control with respect to the company's exports of subject merchandise, in accordance with the criteria identified in *Sparklers* and *Silicon Carbide*.

iv. Rate Assigned to Separate Rate Companies

We are preliminarily assigning a rate of 41.75 percent to the two companies determined to be eligible for a separate rate in this administrative review, Shanghai Curvet and Tianjin Zhonglian. For further discussion regarding the derivation of this rate, *see* the "Preliminary Results of Review" section in the accompanying *Federal Register* notice.

v. China-Wide Entity

The record indicates that certain Chinese companies did not respond to Commerce's request for information. Specifically, Commerce did not receive a no-shipment certification, SRA, or SRC from 427 companies that were named in the *Initiation Notice*.³³ In addition, as noted above, Qingdao D&L failed to respond to Commerce's questionnaire and Shanghai Yueda withdrew its participation from the review.³⁴ Therefore, for the preliminary results of this administrative review, we consider these 429 companies, including Qingdao D&L and Shanghai Yueda, to be part of the China-wide entity.

Because no party requested a review of the China-wide entity and Commerce no longer considers the China-wide entity as an exporter conditionally subject to administrative review, Commerce is not conducting a review of the China-wide entity.³⁵ Thus, the rate for the China-wide entity (*i.e.*, 118.04 percent) is not subject to change pursuant to this review.³⁶

³³ See Appendix I.

³⁴ See Shanghai Yueda's Withdrawal Letter.

³⁵ 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, 65969-70 (November 4, 2013).

³⁶ See *Order*.

VI. RECOMMENDATION

We recommend applying the above methodology for these preliminary results.

☒

Agree

☐

Disagree

5/3/2021

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Signed by: RYAN MAJERUS

Ryan Majerus
Deputy Assistant Secretary
for Policy and Negotiations

Appendix I

List of Companies Preliminarily Determined to Be Part of the China-Wide Entity

1. ARaymond Automotive Fasteners
2. Achbest Company Ltd.
3. Air Tiger Express (Asia) Inc.
4. A-Jax Enterprises Ltd.
5. Alfa Marine (Shanghai) Co., Ltd
6. Alltrade Pacific Co., Ltd.
7. Am Global Shipping Lines Co., Ltd.
8. American Ocean Maritime Inc.
9. Apex Maritime (Ningbo) Co., Ltd.
10. Aplix Shanghai Fasteners
11. Arvid Nilsson Logistics & Trade (Shanghai) Co., Ltd
12. Auto Way Wuxi Casting Industry Co
13. Beijing Catic Industry Limited
14. Beijing Century Joyo Courier Service
15. Beijing Jinheung Co., Ltd
16. Beijing Kang Jie Kong International Cargo Agent Co., Ltd.
17. Beijing MMCC Ltd.
18. Bollore Logistics China Co., Ltd Nanjing Branch
19. Bollore Logistics China Co., Ltd Tianjin Branch
20. Bonuts Hardware Logistics
21. Brilliant Group Logistics Corp.
22. Brilliant Logistics Group Inc.
23. C.H. Robinson Freight Services (China)
24. C.H. Robinson Freight Services China Ltd. Ningbo Branch
25. Caesar Shipping Logistics Co., Ltd.
26. Cana (Rizhao) Hardware Co. Ltd.
27. Cangzhou Xinqiao International Trade Co. Ltd.
28. Cargo Services (Tianjin) Co., Ltd.
29. Carotrans
30. Cas International Co., Ltd
31. Casia Global Logistics Company Ltd.
32. Certified Products International Inc.
33. Cheng Ch International Co., Ltd.
34. China International Freight (China) Ltd. Tianjin Branch
35. China International Freight Co. Ltd.
36. China Mast Forwarders Co., Ltd.
37. China Sea Marine Co., Ltd
38. Chinatrans International Limited
39. Chinatrans International Limited (China) Ltd. Tianjin Branch

40. City Ocean Logistics Co., Ltd.
41. Clearfreight Shanghai Limited
42. CN Worldwide International Freight Forwarding (Shanghai) Ltd.
43. Cosco International Freight Company
44. CRSA Global Logistics (Shanghai) Co.
45. CTS International Logistics Corporation Limited
46. D&F Material Products Ltd.
47. Daejin Steel Co. Ltd.
48. Dalian Dragon Star Imp. & Exp. Co., Ltd
49. Dalian Wanxiang International Trade Co., Ltd
50. Damco China Limited (Dongguan Forta Electronics Co. Ltd.)
51. Damco China Limited Ningbo Branch
52. Damco China Limited Qingdao Branch
53. Damco China Limited Shenzhen Branch
54. Damco Shenzhen
55. De Fasteners Inc.
56. DHL Global Forwarding (China) Co., Ltd. Tianjin Branch
57. Doublemoon Hardware Company Ltd
58. Dsv Air & Sea Co., Ltd (Tianjin)
59. Dynamic Network Container Line Ltd
60. E Cargoway Logistics Co. Ltd.
61. Eastrong International Logistics Co.
62. Eclat Int'l Co., Ltd.
63. Eco-Friendly Floor Ltd.
64. ECO System Corporation
65. Ejen Brothers Limited
66. ELG Logistic
67. Essentra Plastic Products Ningbo Co.
68. Eternity Int'l Freight Forwarder
69. E-Top Shipping Co., Ltd
70. Eumex Line Shenzhen Limited
71. Evergreen Global
72. Everscene Logistics Company Limited
73. Everstar Logistics Co., Ltd.
74. Fastgrow International Co., Inc.
75. Fastic Shipping Co., Ltd.
76. Fedex International Freight
77. Forest Shipping International Ltd.
78. Foshan Hosontool Development Hardware
79. Fourever International Limited
80. Gem-Duo Co., Ltd.
81. Gem-Year Industrial Co., Ltd.
82. Global Link (Shanghai) Co., Ltd.

83. Glori-Industry Hongkong Incorporation
84. Grandpac Aviation Shanghai Co. Ltd.
85. GTG Logistics Co., Ltd (Tianjin Branch)
86. Guangdong Meite Mechanical Co., Ltd.
87. Guangzhou Caixuan Cosmetics Co., Ltd.
88. Guangzhou Feixing Trading Co., Ltd.
89. Guangzhou Guanhong Cosmetics
90. Guangzhou Unigel Nails Syst
91. H&H International Forwarders Co., Ltd.
92. Haiyan Sanhuan Fasteners Co., Ltd.
93. Haiyan Yuanyang Standard Piece Co., Ltd.
94. Hangzhou Jiefa Materials Co., Ltd
95. Hebei Airsea Logistics Ltd.
96. Hebei Cangzhou New Century Foreign Trade Co., Ltd.
97. Hebei Chunghwa Star International Trading Company Limited
98. Hebei Five-Star Metal Products Co., Ltd.
99. Hebei Metal Trading Co., Ltd.
100. Hebei Minghao Import &Export Co., Ltd
101. Hebei Tianfeng Metal Products Co., Ltd
102. Hecny Shipping Limited
103. Hecny Transportation (Shanghai) Ltd.
104. Hengtuo Metal Products Co., Ltd
105. Hong Kong Yu Xi Co., Ltd.
106. Honour Lane Shipping Limited
107. Honour Lane Shipping Ltd Ningbo Branch
108. Honour Lane Shipping Ltd Qingdao Branch
109. Honour Lane Shipping Ltd. Tianjin Branch
110. Hualin Hydraulic Nantong Co., Ltd.
111. Hualin Ltd.
112. Huanghua Rc Business Co., Ltd
113. Huanghua Yingjin Hardware Products
114. Huiwen Jiahe (Shandong) Trading Co., Ltd.
115. Huzhou Jiehui Import And Export Co.
116. IFI & Morgan Ltd.
117. Interglobo International Freight Co., Ltd.
118. J.Y. Logistics Co., Ltd.
119. Jade Shuttle Enterprise Co. Ltd.
120. JCD Group Company Limited
121. Jeter Shipping Guangzhou Limited
122. Jiangsu Cheda Auto Accessories Co, Ltd.
123. Jiangsu Globe Logistics Ltd., Co.
124. Jiangsu Globe Logistics Ltd., Co., Tianjin Branch
125. Jiangsu Soho Honry Import & Export Co.

126. Jiarong Enterprises Co., Ltd.
127. Jiaxing Haijin Hardware Technology
128. Jiaxing Innofast Trading Co., Ltd.
129. Jiaxing Port Lixin Fasteners Co., Ltd
130. Jiaxing TSR Hardware Inc.
131. Jiele Construction Materials
132. Jinan High Strength Standard Pa Co., Ltd.
133. Jinan Jinbao Plastic Co., Ltd.
134. Jinan Zhongchuan Equipment Co., Ltd.
135. Jinhai Hardware Co., Ltd.
136. Jinheung Steel Corporation
137. Jinsco International Corp.
138. Jushiqiangsen (Tianjin)International
139. K-Apex International Freight (Ningbo) Co., Ltd.
140. K-Apex Logistics (Nanjing) Co., Ltd.
141. K-Apex Logistics (Qingdao) Co., Ltd.
142. K-Apex Logistics (Shanghai) Co., Ltd
143. K-Apex Logistics (Tianjin) Co., Ltd.
144. King Freight International Corp.
145. Kingshadow Co., Limited
146. Kingteam Precision Technology Co., Ltd.
147. Kintetsu World Express (China) Co.
148. Koram Inc.
149. Koram Steel Co., Ltd.
150. Korea Wire Co., Ltd.
151. Ko's Nail Incorporation
152. Kuehne & Nagel Ltd
153. Kuehne & Nagel Ltd Ningbo Branch Office
154. Kuehne & Nagel Ltd Tianjin Branch
155. Kuraray Magictape Shanghai Co Ltd
156. Lf Logistics (China) Co., Ltd.
157. Li Ya Xuan Furniture Factory
158. Liangmei Furniture Factory
159. Linksworld Logistics Limited
160. Linqing Huawei Bearing Co., Ltd.
161. Linyi Andi Supply Chain Co., Ltd.
162. Linyi Compass Supply Chain Co., Ltd
163. Linyi Flying Arrow Imp. & Exp. Co., Ltd.
164. Linyi Jianchengde Metal Hardware Co.
165. Linyi Vega Trading Co., Ltd.
166. Linyi Wan Gong Industry & Trade Co., Ltd.
167. Lishui Hongda Industry Co., Ltd
168. M+R Forwarding (China) Ltd.

169. M+R Forwarding (China) Ltd. Tianjin
170. Madison Shanghai Trading Co., Ltd.
171. Mallory Alexander (Asia Pacific)
172. Master International Logistics China Co., Ltd.
173. Maxwide Logistics Inc.
174. MB Logistics International Cn Ltd.
175. Mingguang Abundant Hardware Products Co. Ltd.
176. Morito Scovill HK Co., Ltd.
177. Nailtech Co. Ltd.
178. Nanjing North Star Intl Freight Forwarder Co Ltd
179. Nanjing Nuochun Hardware Co., Ltd.
180. Nanjing Toua Hardware & Tools Co. Ltd.
181. Neptune Shipping Limited
182. New Chain Logistics Co., Ltd
183. New Line Industry Company Limited
184. New Pole Power System Co Ltd
185. Nightingale Global Co., Ltd
186. Ningbo Beilun Xiangzi Imp&Exp Co., Ltd.
187. Ningbo Cosmos International Logistics
188. Ningbo Echoes International Trading Co., Ltd.
189. Ningbo Etdz Holdings Ltd
190. Ningbo Giftyland Co., Limited
191. Ningbo Haishu Ling Lang Trade Co., L
192. Ningbo Haitian Holding Group Co., Ltd.
193. Ningbo Hyderon Hardware Co., Ltd
194. Ningbo Kaili International Trading
195. Ningbo Kan Grow Bags Co., Ltd
196. Ningbo Langyi Metal Products Co., Ltd.
197. Ningbo Nd Imp. & Exp., Co., Ltd.
198. Ningbo Panxiang Imp & Exp Co., Ltd.
199. Ningbo Port Southeast Logistics Gro
200. Ningbo Shixun Import & Export Co., Ltd.
201. Ningbo Skycan Mold Manufacturing Ltd.
202. Ningbo Tianqi Ecommerce Co Ltd
203. Ningbo Truepower Import & Export Co., Ltd.
204. Ningbo United Group Import & Export Co., Ltd.
205. Ningbo Wepartner Import & Export Company Limited
206. Ningbo Winjoy Intl Trading Co.
207. Ningbo Winpex Imp & Exp Co., Ltd.
208. Ningbo Yanyi Trade Co Ltd
209. Ningbo Yinzhou Angelstar (International Trading) Co., Ltd.
210. Ningbo Yinzhou Wintie Auto Parts Co
211. Ningbo Zhenda Stationery Co., Ltd.

212. Ninghai Rayguang Horsemanship Products Co., Ltd
213. Ocean Industrial Co Limited
214. Ocean King Industries Limited
215. OEC Logistics (Qingdao) Co., Ltd
216. OEC Logistics (Qingdao) Co., Ltd, Tianjin Branch
217. OEC Logistics (Qingdao) Co., Ltd. (Dalian Branch)
218. One Touch Share Co., Limited
219. Ong Ming Enterprise Co., Ltd.
220. OOCL Logistics (China) Limited
221. Orient Express Container Co., Ltd
222. Orient Express Container Co., Ltd. Shenzhen Branch
223. Orient Star Transport International
224. Oriental Air Transport Service Inc.
225. Oriental Logistics Group Ltd.
226. Pacific Link International Freight
227. Pacific Star Express (China) Co., Ltd.
228. Packcraft Co., Ltd.
229. Panalpina World Transport (Prc) Ltd
230. Pantos Logistics (China) Co., Ltd
231. Parisi Grand Smooth Logistics Ltd.
232. Paslode Fastener (Shanghai) Co., Ltd.
233. Patek Tool Co., Ltd.
234. Peaksight (Shanghai) Technologies
235. Pem China Co., Ltd.
236. Penavico International Logistics, Co., Ltd.
237. Pennengineering Automotive Fasteners Kunshan Co., Ltd.
238. Pilot Logistics China Co., Ltd
239. Pino Industry Co Ltd
240. Prime Shipping International, Inc.
241. Pro-Team Coil Nail Enterprise Inc.
242. Prym Consumer Ningbo Trading Limited
243. Pudong Prime International Logistics, Inc
244. Pudong Prime Int'l Logistics, Inc. (Qingdao Branch)
245. Qifeng Precision Industry Sci-Tech Corp.
246. Qingdao Ant Hardware Manufacturing Co., Ltd.
247. Qingdao Cheshire Trading Co., Ltd.
248. Qingdao D&L Group Ltd.
249. Qingdao Gold Dragon Co. Ltd.
250. Qingdao Grand Intl Co. Ltd.
251. Qingdao Hailifeng Rigging Co., Ltd
252. Qingdao Hongyuan Nail Industy Co Ltd.
253. Qingdao JCD Machinery Co., Ltd.
254. Qingdao Jisco Co., Ltd.

- 255. Qingdao Kinghood Tools Co., Ltd
- 256. Qingdao Meijialucky Industry & Commerce Co., Ltd.
- 257. Qingdao Mst Industry & Commerce Co.
- 258. Qingdao Powerful Machinery Co., Ltd.
- 259. Qingdao Qinhang International
- 260. Qingdao Shantron International
- 261. Qingdao Shenghengtong Metal Products Co., Ltd
- 262. Qingdao Sun Star International
- 263. Qingdao Tansky International, Ltd.
- 264. Qingdao Tianshi Logistics Co., Limited
- 265. Qinhuangdao Ampac Building Products
- 266. Quick Advance Inc.
- 267. RMB Fasteners Limited Shanghai Rep. Office
- 268. Robertson Inc. (Jiaxing)
- 269. Rohlig China Limited Shanghai Branch
- 270. Romp Coil Nail Industries Inc.
- 271. Safround Logistic Co., Ltd
- 272. Scanwell Container Line Ltd
- 273. Seamaster Global Forwarding (China) Limited Tianjin Branch
- 274. Seamaster Global Forwarding (Shanghai)
- 275. Seasky Logistics Co. Ltd.
- 276. Shandong Dinglong Import & Export Co., Ltd.
- 277. Shandong Guomei Industry Co., Ltd
- 278. Shandong Intco Recycling Resources Co., Ltd.
- 279. Shandong Kangrong International
- 280. Shandong Tengda Fasten Tech. Co.
- 281. Shanghai Ai Lian International Trade Co., Ltd.
- 282. Shanghai Amass Freight International
- 283. Shanghai Autocraft Co., Ltd
- 284. Shanghai Ba-Shi Yuexin Logistics Development Co., Ltd.
- 285. Shanghai Cedargreen Imp & Exp Co., Ltd
- 286. Shanghai Danube International Logistics Co., Ltd.
- 287. Shanghai E-Sky Transportation Co., Ltd
- 288. Shanghai Finigate Integrated Logistics
- 289. Shanghai Goldenbridge International
- 290. Shanghai Goro Conveyor System Components Co Ltd
- 291. Shanghai Grand Sound International Transportation Co., Ltd
- 292. Shanghai Hu Nan Foreign
- 293. Shanghai Hualin Co., Ltd
- 294. Shanghai International Trade Transportation Co., Ltd.
- 295. Shanghai Jade Shuttle Hardware Tools Co. Ltd.
- 296. Shanghai Kaijun Logistics Co., Ltd. (Shenzhen Branch)
- 297. Shanghai Kaijun Logistics Co. Ltd.

298. Shanghai Landa International Trade Co., Ltd.
299. Shanghai Lead Trans International Ltd.
300. Shanghai March Import Export Company Ltd.
301. Shanghai Nanshi Foreign Economic Co.
302. Shanghai Nanshi Foreign Economic Cooperation Trading Company Ltd.
303. Shanghai Overseas Imp. & Exp Co., Ltd
304. Shanghai Pudong Int'l Transportation
305. Shanghai Seti Enterprise Int'l Co. Ltd.
306. Shanghai Shenda Imp. & Exp. Co., Ltd
307. Shanghai Solex Express Inc.
308. Shanghai Speedier Logistics Co., Ltd
309. Shanghai Sutek Industries Co., Ltd.
310. Shanghai Television & Electronics Import & Export Co., Ltd.
311. Shanghai Textile Raw Materials Co., Ltd.
312. Shanghai Tianshi Logistics Co., Ltd
313. Shanghai Worldtrans Logistics Services Limited
314. Shanghai Xuanming International
315. Shanghai Yueda Nails Industry Co., Ltd., a.k.a. Shanghai Yueda Nails Co.
316. Shantou Wanli Biotechnology Co., Ltd.
317. Shanxi Tianli Industries Co., Ltd
318. Shaoxing Bohui Import & Export Co., Ltd.
319. Shaoxing Chengye Metal Producing Co. Ltd.
320. Sheenbow Pigment Technology Co., Ltd
321. Shenzhen Baoyuanxin Trading Co., Ltd.
322. Shenzhen Lucky Logistics Ltd
323. Shenzhen Lucky Logistics Ltd. Guangzhou Branch
324. Shenzhen Pacific-Net Logistics Inc.
325. Shenzhen Pacific-Net Logistics Inc. Shanghai Branch
326. Shenzhen Sea Aerosol Co., Ltd.
327. Shenzhen Sunray Technology Co., Ltd.
328. Shenzhen Xinda Tongyuan Trading Co., Ltd.
329. Shenzhen Xinjintai Hardware Co., Ltd.
330. Shenzhen Yibai Network Technology
331. Shenzhen Zbao Logistics Company Limited
332. Shijiazhuang North Ornamental Casting Products Limited Company
333. Shijiazhuang Shuangming Trade Co., Ltd.
334. Shine International Transportation Ltd.
335. Shipco Transport (Shanghai) Ltd., Shen Zhen Branch
336. Shye Chang Ningbo Precision Electronic Co. Ltd
337. Sino Connections Logistics Inc.
338. Sunwell Industries Co., Ltd
339. Suzhou Jinyuan Fastener Co., Ltd
340. Suzhou Lantai Hardware Products

- 341. T.H.I. Group (Shanghai) Ltd.
- 342. Tag Fasteners Sdn Bhd
- 343. Tangshan Jikuang Mining Supplies Co.
- 344. Tengzhou Tri-Union Machinery Co. Ltd
- 345. Tian Heng Xiang Metal Products Co Ltd
- 346. Tianjin Baisheng Metal Products Co. Ltd.
- 347. Tianjin Coways Metal Products Co., Ltd
- 348. Tianjin Dagang Jingang Nail Factory
- 349. Tianjin Dongjiang Intl. Shipping Exchange Market
- 350. Tianjin Free Trade Service Co Ltd
- 351. Tianjin High Wing International
- 352. Tianjin Hongli Qiangsheng Import & Export Co., Ltd.
- 353. Tianjin Huixinshangmao Co. Ltd.
- 354. Tianjin Hweschun Fasteners Manufacturing
- 355. Tianjin Jin Xin Sheng Long Metal Products Co., Ltd.
- 356. Tianjin Jinyifeng Hardware Co., Ltd
- 357. Tianjin Lianda Group Co. Ltd.
- 358. Tianjin Seungil Chem Tech Co., Ltd.
- 359. Tianjin Star Pet Tech Co., Ltd.
- 360. Tianjin Universal Machinery Imp. & Exp. Corporation
- 361. Tianjin Yinghua Arts & Crafts Co., Ltd.
- 362. Tianjin Zhonglian Times Technology Co., Ltd.
- 363. Tianshi Logistics Co., Limited
- 364. Titan ITM (Tianjin) Co, Ltd
- 365. Toll Global Forwarding (Hong Kong)
- 366. Topocean Consolidation Service (China) Ltd.
- 367. Topocean Consolidation Service (China) Ltd. Tianjin Branch
- 368. Topocean Consolidation Service (China) Ltd., Qingdao Branch
- 369. Total Glory Logistics Co., Ltd.
- 370. Trans Knights Inc.
- 371. Trans Knights Intl Logistics (Shanghai) Co., Ltd.
- 372. Trans Wagon International China Co., Ltd.
- 373. Translink Shipping Inc.
- 374. Translink Shipping Inc Nanjing Branch
- 375. Translink Shipping Inc., Xiamen Branch
- 376. Translink Shipping Inc-Qingdao
- 377. Translink Shipping Lines—Ningbo (China) Co., Ltd.
- 378. Trans-Union International Logistics
- 379. Transwell Logistics Co., Ltd.
- 380. Triumph Link Logistics Limited
- 381. TTI Freight Forwarder Company Limited
- 382. U.S. United Logistics (Ningbo) Inc.
- 383. UBI Logistics (China) Limited

- 384. Unicorn Fasteners Co., Ltd.
- 385. Unique Logistics International (H.K.) Ltd.
- 386. UPS SCS (China) Co., Ltd. Jiangsu
- 387. UPS SCS (China) Co., Ltd Ningbo
- 388. Walkbase Rubber Products Co., Ltd.
- 389. Waxman Technology China Limited
- 390. Weida Freight System Co., Ltd
- 391. Weifang Wenhe Pneumatic Tools Co. Ltd
- 392. Whale Logistics (Shanghai) Company
- 393. World Jaguar Logistics, Inc.
- 394. Worldwide Logistics Co., Ltd.
- 395. Wuhu Diamond Metal Products Co., Ltd
- 396. Wulian Zhanpeng Metals Co
- 397. Wuxi Phoenix Artist Materials Co., Ltd.
- 398. Xiamen Greeting Logistics Company Ltd
- 399. Xiamen Jianming Rising Import & Exp
- 400. Xiamen Universe Solar Technology Co Ltd
- 401. Xinchang Xinchai Machinery Co., Ltd.
- 402. Suzhou Xingya Nail Co., Ltd.
- 403. Senco-Xingya Metal Products (Taicang) Co., Ltd.
- 404. Hong Kong Yu Xi Co., Ltd.
- 405. Omnifast Inc.
- 406. CIP International Group Co, Ltd.
- 407. Yangzhou Tongxie Weaving Co Ltd
- 408. Beijing Kang Jie Kong Int'l Cargo Ag
- 409. Youngwoo (Cangzhou) Fasteners Co., Ltd.
- 410. Yusen Logistics (Shenzhen) Co., Ltd
- 411. Zhangjiagang Bo Hong Trade Co., Ltd.
- 412. Zhangjiagang Bolnut Trade Co., Ltd.
- 413. Zhangjiagang Chenjun Trade Co., Ltd.
- 414. Zhangjiagang Double-Whale Bags Mfg
- 415. Zhangjiagang Lianfeng Metals Products Co. Ltd.
- 416. Zhangjiagang Longxiang Industries Co. Ltd.
- 417. Zhaoqing Harvest Nails Co., Ltd
- 418. Zhejiang Focus-On Imp. Exp. Co.,
- 419. Zhejiang Hatehui Technology Co., Ltd
- 420. Zhejiang Hengyi Science & Technology
- 421. Zhejiang Huantai Precision Machinery Co., Ltd.
- 422. Zhejiang Laibao Precision Technology
- 423. Zhejiang Longquan Foreign Trade Co., Ltd.
- 424. Zhejiang Milestone Fastener Manufacturing Co., Ltd.
- 425. Zhejiang Rongpeng Imp & Exp Co., Ltd.
- 426. Zhejiang Sanlin Metals Products Co.

- 427. Zhejiang Yiwu Yongzhou Imp. & Exp. Co., Ltd
- 428. Zhejiang Yongzhu Casting Technology Co., Ltd.
- 429. Zhongge International Trading Co.