



A-570-956
Sunset Review
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June 1, 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: Issues and Decision Memorandum for the Expedited Second
Sunset Review of the Antidumping Duty Order on Seamless
Carbon and Alloy Steel Standard, Line and Pressure Pipe from the
People's Republic of China

I. SUMMARY

We have analyzed the substantive responses of the domestic interested parties¹ in this second sunset review of the antidumping duty (AD) order² on imports of seamless carbon and alloy steel standard, line and pressure pipe (SSLP) from the People's Republic of China (China)³ and recommend adopting the positions described in the "Discussion of the Issues" section of this memorandum. No respondent interested party submitted a substantive response. Accordingly, we conducted an expedited (120-day) sunset review.⁴ The following is a complete list of the issues that we address in this expedited sunset review:

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

¹ The domestic interested parties are Tenaris Bay City, Inc.; IPSCO Tubulars Inc., BENTELER Steel/Tube Manufacturing Corp.; United States Steel Corporation; and Vallourec Star, LP (collectively, domestic interested parties).

² See *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 75 FR 69052 (November 10, 2010) (*Order*).

³ See Domestic Interested Parties' Letter, "Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe from the People's Republic of China: Substantive Response of Domestic Producers to Commerce's Notice of Initiation of Five-Year ("Sunset") Reviews," dated March 3, 2021 (Domestic Industry's Substantive Response).

⁴ See *Procedures for Conducting Five-year (Sunset) Reviews of Antidumping and Countervailing Duty Orders*, 70 FR 62061 (October 28, 2005) (Commerce normally will conduct an expedited sunset review where respondent interested parties provide an inadequate response).



II. BACKGROUND

On November 10, 2010, the Department of Commerce (Commerce) published an *Order* in the *Federal Register* on imports of SSLP from China.⁵ On March 16, 2016, Commerce published a continuation of the *Order*.⁶ On February 1, 2021, Commerce published its initiation of the second sunset review of the *Order*, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act).⁷ From February 5, 2020, Commerce received timely and complete notices of intent to participate in the sunset review from domestic interested parties within the deadline specified in 19 CFR 351.218(d)(1)(i).⁸ Domestic interested parties claimed interested party status pursuant to section 771(9)(C) of the Act as manufacturers in the United States of a domestic like product.⁹ On March 3, 2021, pursuant to 19 CFR 351.218(d)(3)(i), domestic interested parties filed timely and adequate substantive responses.¹⁰ Commerce did not receive a substantive response from any respondent interested party. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the respondent interested parties did not provide an adequate response to the notice of initiation and, therefore, Commerce conducted an expedited (120-day) sunset review of the *Order*.

III. SCOPE OF THE ORDER

The merchandise covered by this order is certain seamless carbon and alloy steel (other than stainless steel) pipes and redraw hollows, less than or equal to 16 inches (406.4 mm) in outside diameter, regardless of wall-thickness, manufacturing process (e.g., hot-finished or cold-drawn), end finish (e.g., plain end, beveled end, upset end, threaded, or threaded and coupled), or surface finish (e.g., bare, lacquered or coated). Redraw hollows are any unfinished carbon or alloy steel (other than stainless steel) pipe or “hollow profiles” suitable for cold finishing operations, such as cold drawing, to meet the American Society for Testing and Materials (“ASTM”) or American Petroleum Institute (“API”) specifications referenced below, or comparable specifications. Specifically included within the scope are seamless carbon and alloy steel (other than stainless steel) standard, line, and pressure pipes produced to the ASTM A-53, ASTM A-106, ASTM A-333, ASTM A-334, ASTM A-589, ASTM A-795, ASTM A-1024, and the API 5L specifications, or comparable specifications, and meeting the physical parameters described above, regardless of application, with the exception of the exclusion discussed below.

⁵ See *Order*.

⁶ See *Seamless Carbon Alloy Steel Standard Line and Pressure Pipes from the People’s Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 81 FR 14089 (March 16, 2016).

⁷ See *Initiation of Five-Year (Sunset) Reviews*, 86 FR 7709 (February 1, 2021).

⁸ See Tenaris Bay City, Inc.’s and IPSCO Tubulars Inc.’s (collectively, Tenaris USA’s) Letter, “Notice of Intent to Participate in Second Sunset Reviews of the Antidumping and Countervailing Duty Orders on Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe from China,” dated February 5, 2021; United States Steel Corporation’s (U.S. Steel’s) Letter, “Five-Year (“Sunset”) Review of Antidumping and Countervailing Duty Orders on Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe from China: Notice of Intent to Participate,” dated February 16, 2021; Vallourec Star, LP’s (Vallourec’s) Letter, “Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe from the People’s Republic of China (Second Sunset Review): Notice of Intent to Participate,” dated February 16, 2021; and BENTELER Steel/Tube Manufacturing Corp.’s (BENTELER’s) Letter, “Notice of Intent to Participate in Second Sunset Reviews of the Antidumping and Countervailing Duty Orders on Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe from China,” dated February 16, 2021.

⁹ *Id.*

¹⁰ See Domestic Industry’s Substantive Response at 1.

Specifically excluded from the scope of the order are: (1) All pipes meeting aerospace, hydraulic, and bearing tubing specifications; (2) all pipes meeting the chemical requirements of ASTM A-335, whether finished or unfinished; and (3) unattached couplings. Also excluded from the scope of the order are all mechanical, boiler, condenser and heat exchange tubing, except when such products conform to the dimensional requirements, i.e., outside diameter and wall thickness of ASTM A-53, ASTM A-106 or API 5L specifications.

The merchandise covered by the order is currently classified in the Harmonized Tariff Schedule of the United States (“HTSUS”) under item numbers: 7304.19.1020, 7304.19.1030, 7304.19.1045, 7304.19.1060, 7304.19.5020, 7304.19.5050, 7304.31.6050, 7304.39.0016, 7304.39.0020, 7304.39.0024, 7304.39.0028, 7304.39.0032, 7304.39.0036, 7304.39.0040, 7304.39.0044, 7304.39.0048, 7304.39.0052, 7304.39.0056, 7304.39.0062, 7304.39.0068, 7304.39.0072, 7304.51.5005, 7304.51.5060, 7304.59.6000, 7304.59.8010, 7304.59.8015, 7304.59.8020, 7304.59.8025, 7304.59.8030, 7304.59.8035, 7304.59.8040, 7304.59.8045, 7304.59.8050, 7304.59.8055, 7304.59.8060, 7304.59.8065, and 7304.59.8070.

Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the merchandise subject to this scope is dispositive.¹¹

IV. HISTORY OF THE *ORDER*

On November 10, 2010, Commerce published its affirmative final determinations of sales at less than fair value (LTFV) in the AD investigation of SSLP from China.¹² In the *Order*, Commerce assigned the following weighted-average dumping margins to the exporters and/or producers listed below:

<u>Exporter/Producer</u>	<u>Percent Margin</u>
Tianjin Pipe International Economic and Trading Corporation	50.01
Hengyang Steel Tube Group International Trading Inc.	82.24
Xingang Seamless Steel Tube Co., Ltd.	66.13
Jiangyin City Changjiang Steel Pipe Co., Ltd.	66.13
Pangang Group Chengdu Iron & Steel Co., Ltd.	66.13
Yangzhou Lontrin Steel Tube Co., Ltd	66.13
Yangzhou Chengde Steel Tube Co., Ltd.	66.13
China-Wide Entity	98.74

On August 14, 2015, Commerce implemented its determinations under Section 129 of the Uruguay Round Agreements Act¹³ pursuant to *United States – Countervailing and Anti-dumping Measures on Certain Products from China*, WT/DS449 (WTO DS 449). Commerce calculated adjusted margins of 49.93 percent for Tianjin Pipe International Economic and Trading Corporation, 80.12 percent for Hengyang Steel Tube Group International Trading Inc., 65.03

¹¹ See *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People’s Republic of China: Final Determination of Sales at Less Than Fair Value and Critical Circumstances, in Part*, 75 FR 57449 (September 21, 2010) (*Final Determination*), amended in *Order*.

¹² See *Order*.

¹³ See Public Law 103-465 (Uruguay Round Agreements Act).

percent for Xigang Seamless Steel Tube Co., Ltd., 65.03 percent for Jiangyin City Changjiang Steel; Pipe Co., Ltd., 65.03 percent for Pangang Group Chengdu Iron & Steel Co., Ltd., 65.03 percent for Pangang Group Chengdu Iron & Steel Co., Ltd., 65.03 percent for Yangzhou Lontrin Steel Tube Co., Ltd., and 65.03 percent for Yangzhou Chengde Steel Tube Co., Ltd.¹⁴ The China-wide entity's rate remained at 98.74 percent.¹⁵

Commerce has completed one sunset review,¹⁶ five scope rulings,¹⁷ but no administrative reviews for the AD order on SSLP from China. Although Commerce initiated two administrative reviews of the *Order* on December 30, 2011¹⁸ and December 31, 2012,¹⁹ these reviews were subsequently rescinded due to withdrawals of request for review submitted by the requestor of each review.²⁰ Commerce has not initiated any other administrative reviews, any duty absorption reviews, or any new shipper reviews in the history of the *Order*.

Accordingly, the *Order* remains in effect for all manufacturers, producers, and exporters of SSLP from China.

V. LEGAL FRAMEWORK

In accordance with section 751(c)(1) of the Act, Commerce is conducting this sunset review to determine whether revocation of the *Order* would be likely to lead to a continuation or recurrence of dumping. 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*.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act (URAA), specifically the Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (SAA), the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House

¹⁴ See *Implementation of Determinations Under Section 129 of the Uruguay Round Agreements Act: Citric Acid and Citrate Salts from the People's Republic of China; Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses from the People's Republic of China; Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People's Republic of China; High Pressure Steel Cylinders from the People's Republic of China; Multilayered Wood Flooring from the People's Republic of China; Certain Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, from the People's Republic of China; Utility Scale Wind Towers from the People's Republic of China*, 80 FR 48812 (August 14, 2015) (Section 129 Implementation Determination).

¹⁵ *Id.*

¹⁶ See *Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 81 FR 7305 (February 11, 2016).

¹⁷ See *Notice of Scope Rulings*, 82 FR 13794 (March 15, 2017); *Notice of Scope Rulings*, 82 FR 48799 (October 20, 2017); *Notice of Scope Rulings*, 83 FR 31733 (July 9, 2018); *Notice of Scope Rulings*, 84 FR 11742 (March 28, 2019); *Notice of Scope Rulings*, 84 FR 33915 (July 16, 2019).

¹⁸ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part*, 76 FR 82268 (December 30, 2011).

¹⁹ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part*, 77 FR 77017 (December 31, 2012).

²⁰ See *Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People's Republic of China: Rescission of Antidumping Duty Administrative Review*, 77 FR 43806 (July 26, 2012); *Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the People's Republic of China: Rescission of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 33809 (June 5, 2013).

Report), and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), Commerce's likelihood determinations will be made on an order-wide, rather than company-specific, basis.²¹ In addition, Commerce normally will determine that revocation of an AD order is likely to lead to continuation or recurrence of dumping where, among other scenarios: (a) dumping continued at any level above *de minimis* after the 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.²² In addition, as a base period of 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.²³ Also, when analyzing import volumes for second and subsequent sunset reviews, Commerce's practice is to compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice.²⁴

Alternatively, Commerce normally will determine that revocation of an AD 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.²⁵ 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 order would not be likely to lead to a continuation or recurrence of sales at LTFV.²⁶ Generally, Commerce selects the dumping margin from the final determination in the investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an order in place.²⁷ However, in certain circumstances, a more recently calculated rate may be more appropriate (e.g., "if dumping margins have declined over the life of an order and imports have remained steady or increased, Commerce may conclude that exporters are likely to continue dumping at the lower rates found in a more recent review.").²⁸

On February 14, 2012, Commerce announced it was modifying its practice in sunset reviews such that it will not rely on weighted-average dumping margins that were calculated using the methodology found to be World Trade Organization (WTO)-inconsistent.²⁹ In the *Final*

²¹ See SAA at 879; see also House Report at 56.

²² See SAA at 889-90, House Report at 63-64, and Senate Report at 52 for a description of our practice; see also *Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*; *Policy Bulletin*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).

²³ 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.

²⁴ See *Ferrovanadium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders*, 79 FR 14216 (March 13, 2014), and accompanying IDM.

²⁵ See SAA at 889-890; see also House Report at 63.

²⁶ See *Folding Gift Boxes from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 72 FR 16765 (April 5, 2007), and accompanying IDM at Comment 1.

²⁷ See SAA at 890; and *Sunset Policy Bulletin* at section II.B.1; 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), and accompanying IDM at Comment 2.

²⁸ See SAA at 890-91; see also *Sunset Policy Bulletin* at section II.B.2.

²⁹ 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*).

Modification for Reviews, Commerce stated that “only in the most extraordinary circumstances” would it rely on margins other than those calculated and published in prior determinations.³⁰ Commerce further stated that apart from the “most extraordinary circumstances,” it did not anticipate needing to recalculate dumping margins in the vast majority of future sunset determinations, and instead would “limit its reliance to margins determined or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent” and that it “may also rely on past dumping margins that were not affected by the WTO-inconsistent methodology, such as dumping margins recalculated pursuant to Section 129 proceedings, dumping margins determined based on the use of total adverse facts available, and dumping margins where no offsets were denied because all comparison results were positive.”³¹

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

VI. DISCUSSION OF THE ISSUES

1. Likelihood of Continuation or Recurrence of Dumping

Domestic Interested Parties’ Comments:

- Pursuant to section 751(c)(1) of the Act, Commerce considers (1) the dumping margins determined in the original investigation and in subsequent reviews; and 2) import volumes of subject merchandise for the period before and after the issuance of an AD order.³²
- Commerce will normally determine that the revocation of an AD order is likely to lead to a continuation or recurrence of dumping where: (a) dumping continued at any level above *de minimis* after the issuance of the order; b) imports of the subject merchandise ceased after the issuance of the order; or c) dumping was eliminated after issuance of the order, and import volumes for the subject merchandise declined significantly.³³
- In the instant investigation, all of the applicable dumping margins, as amended in Commerce’s *Final Modification for Reviews*,³⁴ were calculated pursuant to a manner that is consistent with the United States’ obligations to the WTO, and therefore Commerce should rely on these amended dumping margins in its analysis of this sunset review.³⁵
- In the *Order*, Commerce determined that Chinese producers of subject merchandise were selling subject merchandise at LTFV at levels above *de minimis*.³⁶ Since the publication of the *Order*, no administrative review has been completed for any producer of subject merchandise from China.³⁷ Therefore, the existence of above *de minimis* levels of

³⁰ *Id.*

³¹ *Id.*

³² See Domestic Interested Parties’ Substantive Response at 6.

³³ *Id.* at 7.

³⁴ See *Final Modification for Reviews* at 80 FR 48814.

³⁵ See Domestic Interested Parties’ Substantive Response at 8 and 9.

³⁶ *Id.* at 12.

³⁷ *Id.*

dumping in the *Order* is sufficient to conclude that producers are likely to continue the dumping of subject merchandise in the absence of the *Order*.³⁸

- In determining whether import volumes of subject merchandise have declined significantly, Commerce compares the level of import volumes of subject merchandise prior to the initiation of an investigation to the import volumes following the issuance of an order.³⁹
- Import volumes of subject merchandise have dropped to a substantially lower level than prior to the petition and the initiation of the investigation.⁴⁰ Therefore, Commerce should determine that dumping would be likely to continue or recur at the dumping margins as amended pursuant to Section 129 proceedings in the absence of the *Order*.⁴¹

Commerce's Position:

Consistent with the legal framework laid out above and in section 752(c)(1)(A) of the Act, we first considered the weighted-average dumping margins determined in the investigation and any subsequent reviews. According to the SAA and the House Report, "if companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed."⁴² In the investigation, Commerce found that imports of SSLP from the exporters and/or producers stated in the "History of the *Order*" section above were being sold in the United States at LTFV.⁴³ There have been no subsequent reviews completed; however, on August 14, 2015, Commerce adjusted margins as a result of its determinations under Section 129 of the Uruguay Round Agreements Act pursuant to WTO DS 449.⁴⁴ Since the dumping margins published in Commerce's *Order* are the only margins available to review in this proceeding and are all above *de minimis* levels, we consider all dumping margins determined in this proceeding to have been above *de minimis* levels and, therefore, it is likely to assume that dumping would continue if the order were removed or terminated.

In addition, pursuant to section 752(c)(1)(B) of the Act, we also considered the volume of imports of subject merchandise for the period before and after the issuance of the *Order* in determining whether revocation of the *Order* is likely to lead to continuation or recurrence of dumping. Commerce examined import volumes from the International Trade Commission (ITC)'s Trade Dataweb for the period 2016 through 2020 to the import volume in the year immediately preceding the initiation period, *i.e.*, 2008.⁴⁵

In the instant case, the volume of imports has decreased overall since the issuance of the *Orders*. The import volume for SSLP from China for 2008, the year immediately preceding the initiation of the investigation, was 402,134,057 kilograms (kg).⁴⁶ By contrast, the import volumes for SSLP from China from 2016 through 2020 ranged from 53,810,662 kg in 2017 to 11,805,425 kg

³⁸ *Id.* at 12 and 13.

³⁹ *Id.* at 13.

⁴⁰ *Id.* at 13 and 14.

⁴¹ *Id.* at 15.

⁴² See SAA at 890 and House Report at 63-64.

⁴³ See *Order*.

⁴⁴ See *Final Modification for Reviews*.

⁴⁵ See Domestic Interested Parties' Substantive Response at 13 and 14.

⁴⁶ *Id.* at 14.

in 2020.⁴⁷ While the import volumes of subject merchandise between 2016 and 2020 did not decrease consistently, import volumes remained below pre-*Order* import levels each year.⁴⁸ Given the overall decrease in import volumes from 2016 through 2020, it is unlikely that Chinese producers and exporters of SSLP would be able to sell at pre-*Order* volumes without dumping. Accordingly, Commerce determines that dumping is likely to continue if the *Order* was revoked.

2. Magnitude of the Dumping Margins Likely to Prevail

Domestic Interested Parties' Comments:

- In determining the magnitude of dumping that would be likely to continue or recur in the absence of an order, the *SAA* and Commerce's *Sunset Policy Bulletin* state that the agency will normally select the dumping margins established in the original investigation and provide these margins to the ITC with its notification of its final results,⁴⁹ because they are the only calculated rates that reflect the behavior of exporters without the discipline of an order or suspension agreement in place.⁵⁰ Commerce normally provides the company-specific dumping margins from the original investigation for each company.⁵¹
- As stated above, revocation of the *Order* would likely lead to a continuation or recurrence of dumping in the instant case.⁵² Therefore, Commerce should report the dumping margins from the original investigation, as amended by Commerce's determinations in its Section 129 proceeding, specifically: 49.93 percent for Tianjin Pipe International Economic and Trading Corporation; 80.12 percent for Hengyang Steel Tube Group International Inc.; 65.03 percent for all of the separate rate applicants in the investigation;⁵³ and 98.75 percent for China-wide entity.⁵⁴

Commerce's Position:

Pursuant to section 752(c)(3) of the Act, Commerce shall provide to the ITC the magnitude of the dumping margin that is likely to prevail if an AD order were revoked. Commerce's preference is to select a weighted-average dumping margin from the LTFV investigation because it is the only calculated rate that reflects the behavior of the producers and exporters without the discipline of an order or suspension agreement in place.⁵⁵ Under certain circumstances, however, Commerce may select a more recent rate to report to the ITC. As indicated in the "Legal Framework" portion of this memorandum, Commerce's practice is to not rely on weighted-average dumping margins calculated using the WTO-inconsistent methodology that was modified in the *Final Modification for Reviews*.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.* at 15.

⁵⁰ *Id.* at 6 and 7.

⁵¹ *Id.*

⁵² *Id.* at 14.

⁵³ The separate applicants were Xigang Seamless Steel Tube Co., Ltd.; Jiangyin City Changjiang Steel Pipe Co., Ltd.; Pangang Group Chengdu Iron & Steel Co., Ltd.; Yangzhou Lontrin Steel Tube Co., Ltd.; and Yangzhou Chengde Steel Tube Co., Ltd.

⁵⁴ See Domestic Interested Parties' Substantive Response at 15.

⁵⁵ *Id.*

Consistent with Commerce's practice, we considered the dumping margins from the LTFV investigation to be the best evidence of the exporters' behavior in the absence of an order, and they are the margins likely to prevail if the *Order* were revoked. Moreover, the rates from the LTFV investigation do not involve the zeroing methodology. After the adjustments made in the Section 129 determination, the China entity-wide weighted-average dumping margin remained the same as the margin that Commerce determined before adjustments were made.⁵⁶

VII. FINAL RESULTS OF SUNSET REVIEW

For the reasons stated above, we determine that revocation of the *Order* on SSLP from China would likely lead to continuation or recurrence of dumping. We also determine that the magnitude of the dumping margins likely to prevail would be weighted-average dumping margins up to 98.74 percent.

VIII. RECOMMENDATION

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

☒ ☐

Agree Disagree

6/1/2021

X



Signed by: CHRISTIAN MARSH
Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

⁵⁶ See Section 129 Implementation Determination at 48814.