



A-583-803
Sunset Review 2017
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DATE: May 3, 2017

MEMORANDUM TO: Ronald K. Lorentzen
Acting Assistant Secretary
for Enforcement and Compliance

FROM: Gary Taverman
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the
Expedited Fourth Sunset Review of the Antidumping Duty Order
on Light-Walled Welded Rectangular Carbon Steel Tubing from
Taiwan

SUMMARY

We have analyzed the substantive responses of Atlas Tube, Bull Moose Tube, and Searing Industries (collectively, the domestic interested parties) in the fourth sunset review of the antidumping duty (AD) order on light-walled welded rectangular carbon steel tubing (steel tubing) from Taiwan. No respondent interested party submitted a substantive response. Accordingly, we have conducted an expedited (120-day) sunset review.¹ We recommend that you approve the positions developed in the “Discussion of the Issues” section of this memorandum. Below is a complete list of the issues in this sunset review for which we received substantive responses:

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

BACKGROUND

On January 3, 2017, the Department of Commerce (the Department) published the notice of initiation of the fourth sunset review of the AD order on steel tubing from Taiwan, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act).² On January 10, 2017, the

¹ See section 751(c)(3)(B) of the Tariff Act of 1930, as amended (the Act) and 19 CFR 351.218(e)(1)(ii)(C)(2).

² See *Initiation of Five-Year (“Sunset”) Review*, 82 FR 84 (January 3, 2017).



Department received a notice of intent to participate from the domestic interested parties.³ Submission of the notice of intent to participate was timely filed by the domestic interested parties within the 15-day deadline, as specified in 19 CFR 351.218(d)(1)(i). The domestic interested parties claimed interested party status under section 771(9)(C) of the Act, as manufacturers in the United States of a domestic like product. On February 2, 2017, the Department received the domestic interested parties' substantive response within the deadline specified in 19 CFR 351.218(d)(3)(i).⁴ We received no substantive responses from respondent interested parties. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department is conducting an expedited sunset review of this AD order.

HISTORY OF THE ORDER

On February 3, 1989, the Department published its final affirmative determination of sales at less than fair value (LTFV) in the *Federal Register* with respect to imports of steel tubing from Taiwan.⁵ In the *Final Determination*, the Department established AD margins of 5.51 percent for Ornatube Enterprise (Ornatube), 40.97 percent for Vulcan Industrial Corp. (Vulcan) and Yieh Hsing Industries, Ltd. (Yieh), and 29.15 percent for "all-other" producers and exporters.⁶

Following the publication of the Department's final determination, the International Trade Commission (ITC) found that the U.S. industry was materially injured by reason of the imports of subject merchandise.⁷ On March 27, 1989, the Department published the AD order on steel tubing from Taiwan.⁸

Administrative Reviews

Since the publication of the *Order*, the Department has completed two administrative reviews of the *Order*.⁹

³ See Letter from domestic interested parties regarding "Light-Walled Rectangular Welded Carbon Steel Pipe and Tube from Taiwan," dated January 10, 2017.

⁴ See Letter from domestic interested parties regarding "Light-Walled Rectangular Welded Carbon Steel Pipe and Tube from Taiwan, Fourth Sunset Review: Substantive Response to Notice of Initiation," dated February 2, 2017. (Domestic Interested Parties' Substantive Response).

⁵ *Final Determination of Sales at Less Than Fair Value; Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan*, 54 FR 5532 (February 3, 1989) (*Final Determination*).

⁶ *Id.* at 5536.

⁷ See *Certain Light-Walled Rectangular Pipes and Tubes from Taiwan*, Inv. No. 731-TA-410 (Final), USITC Pub. 2169 (March 1989).

⁸ *Antidumping Duty Order; Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan*, 54 FR 12467 (March 27, 1989) (*Order*).

⁹ *Final Results of Antidumping Duty Administrative Review; Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan*, 56 FR 26382 (June 7, 1991) (*Administrative Review I*); *Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan; Final Results of Antidumping Duty Administrative Review*, 57 FR 24464 (June 9, 1992) (*Administrative Review II*).

In *Administrative Review I*, the Department calculated a *de minimis* dumping margin for Ornatube, the only respondent under review.¹⁰

In *Administrative Review II*, the Department found that the only respondent under review, Ornatube dumped subject merchandise at a level above *de minimis* during the period of review.¹¹ There have been no administrative reviews since the publication of the 2011 sunset review results.¹²

Deposit rates remain in effect for imports of subject merchandise from Taiwan.

Duty-Absorption Findings, Changed-Circumstances Reviews, Scope Inquiries

There have been no duty-absorption findings, changed-circumstance reviews, or scope inquiries with respect to the *Order*.

Sunset Reviews

The Department has conducted three sunset reviews of the *Order*, pursuant to section 751(c) of the Act, and found in each of the reviews that revocation of the *Order* would likely lead to continuation or recurrence of dumping at the same rates as found in the original investigation.¹³ In each of these sunset reviews, the ITC likewise determined, pursuant to section 751(c) of the Act, that revocation of the *Order* would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁴ Following the publication of the ITC's determinations, the Department published continuation notices of the *Order*.¹⁵

¹⁰ See *Administrative Review I*, 56 FR at 26383.

¹¹ See *Administrative Review II*, 57 FR at 24466.

¹² See *Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 76 FR 64312 (October 18, 2011) (*Sunset III*).

¹³ See *Final Results of Expedited Sunset Review: Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan*, 64 FR 67871 (December 3, 1999), as corrected by *Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan; Corrected Final Results of Expedited Sunset Review*, 65 FR 11763 (March 6, 2000) (*Sunset I*); *Light-Walled Welded Rectangular Carbon Steel Tubing from Argentina and Taiwan; Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders*, 70 FR 67432 (November 7, 2005) (*Sunset II*); *Sunset III*.

¹⁴ See *Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela*, 65 FR 48733 (August 9, 2000); *Certain Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, 71 FR 42118 (July 25, 2006); *Light-Walled Rectangular Pipe and Tube from Taiwan*, 77 FR 3497 (January 24, 2012).

¹⁵ See *Continuation of Antidumping Duty Orders: Light-Walled Rectangular Welded Carbon Steel Pipe and Tube from Argentina and Taiwan; Circular Welded Non-Alloy Steel Pipe and Tube from Brazil, Korea, Mexico, and Taiwan; Welded Carbon Steel Pipe and Tube from India, Thailand, and Turkey; and Small Diameter Standard and Rectangular Steel Pipe and Tube from Taiwan*, 65 FR 50955 (August 22, 2000); *Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan: Continuation of Antidumping Duty Order*, 71 FR 45521 (August 9, 2006); *Light-Walled Welded Rectangular Carbon Steel Tubing from Taiwan: Continuation of Antidumping Duty Order*, 77 FR 5240 (February 2, 2012);

LEGAL FRAMEWORK

In accordance with section 751(c)(1) of the Act, the Department is conducting this sunset review to determine whether revocation of the *Order* would be likely to lead to the continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that in making this determination, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and the period after, the issuance of the *Order*.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (SAA),¹⁶ the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report),¹⁷ and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), the Department's determinations of likelihood will be made on an order-wide, rather than company-specific, basis.¹⁸ In addition, the Department normally determines that revocation of an AD order is likely to lead to continuation or recurrence of dumping when, among other scenarios: (a) dumping continued at any level above *de minimis* after issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.¹⁹ Alternatively, the Department 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.²⁰

In addition, as a base period for import volume comparison, it is the Department'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.²¹ Also, when analyzing import volumes for second and subsequent sunset reviews, the Department'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.²²

Further, section 752(c)(3) of the Act states that the Department shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the order were revoked. Generally, the Department selects a margin from the final determination in the original investigation, as these are the only calculated rates that reflect the behavior of exporters without the discipline of an

¹⁶ Reprinted in 1994 U.S.C.C.A.N. 4040 (1994).

¹⁷ Reprinted in 1994 U.S.C.C.A.N. 3773 (1994).

¹⁸ See SAA at 879, and House Report at 56.

¹⁹ See SAA at 889-90, House Report at 63-64, and Senate Report at 52. See also *Policies Regarding the Conduct of Five-Year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*; *Policy Bulletin 98.3*, 63 FR 18871, 18872 (April 16, 1998) (*Sunset Policy Bulletin*).

²⁰ See SAA at 889-90.

²¹ See, e.g., *Stainless Steel Bar from Germany*; *Final Results of the Sunset Review of the Antidumping Duty Order*, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

²² See *Ferrovanadium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders*, 79 FR 14216 (March 13, 2014) and accompanying Issues and Decision Memorandum.

order in place.²³ However, the Department may use a rate from a more recent review where the dumping margin increased, as this rate may be more representative of a company's behavior in the absence of an order (*e.g.*, where a company increases dumping to maintain or increase market share with an order in place).²⁴ Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" the Department to determine that revocation of an AD order would not be likely to lead to a continuation or recurrence of sales at LTFV.²⁵

In the *Final Modification for Reviews*, the Department announced that 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 determined to be inconsistent with World Trade Organization (WTO) obligations, *i.e.*, zeroing.²⁶ The Department also noted that "*only in the most extraordinary circumstances* will the Department rely on margins other than those calculated and published in prior determinations."²⁷ The Department further stated that, apart from the "most extraordinary circumstances," it would "limit its reliance to margins determined or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent" and that it "may also rely on past dumping margins 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."²⁸

DISCUSSION OF THE ISSUES

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

1. Likelihood of Continuation or Recurrence of Dumping

Comments from Domestic Interested Parties:

The domestic interested parties argue that revocation of the AD order on steel tubing from Taiwan would likely lead to a continuation or recurrence of dumping by the manufacturers/producers and exporters of the subject merchandise.²⁹

²³ See SAA at 890. See also, *e.g.*, *Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

²⁴ See SAA at 890-91.

²⁵ 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 Issues and Decision Memorandum at Comment 1.

²⁶ 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*).

²⁷ *Id.* (emphasis added).

²⁸ *Id.*

²⁹ See Domestic Interested Parties' Substantive Response at page 3.

The domestic interested parties cite section 752(c)(1) of the Act, which instructs the Department to determine whether revocation of an AD order would likely lead to a continuation or recurrence of dumping by considering the weighted-average dumping margins determined in the investigation and administrative reviews, and by considering the volume of imports of subject merchandise prior to and following issuance of the order. The domestic interested parties also refer to the *Sunset Policy Bulletin*, which explains that declining import volumes accompanied by continued dumping following issuance of an order may indicate that dumping would be likely to continue absent an order, because information would indicate that the exporter would need to dump to sell at pre-order volumes.³⁰ Additionally, the domestic interested parties argue, the *Sunset Policy Bulletin* explains that the existence of dumping or the cessation of imports following implementation of an order is highly probative of the likelihood of continuation or recurrence of dumping. Thus, the domestic interested parties maintain, the Department will normally determine that revocation of an order is likely to lead to a continuation or recurrence of dumping where:

- (a) dumping continued at any level above *de minimis* after issuance of an order;
- (b) imports of subject merchandise ceased following issuance of an order;
- (c) dumping was eliminated following issuance of an order but import volumes declined.³¹

The domestic interested parties state that Taiwanese producers and exporters have continued to dump subject merchandise in the United States.³² Specifically, the domestic interested parties assert that dumping margins above *de minimis* continue to exist for all Taiwanese producers and exporters still subject to the order. According to the domestic interested parties, the continued existence of dumping margins above *de minimis* is a sufficient basis for the Department to conclude that dumping is likely to continue were the order revoked as a result of this sunset review.³³

Additionally, the domestic interested parties contend that import statistics indicate the existence of imports during the most recent sunset review period (2011-2016),³⁴ a period where there were dumping margins above *de minimis*. The domestic interested parties claim that, according to the SAA, the occurrence of imports when there were dumping margins above *de minimis* is highly probative of the likelihood of continuation or recurrence of dumping.

Accordingly, the domestic interested parties contend, considering the continued existence of dumping margins and the existence of imports of steel tubing from Taiwan following imposition of the *Order*, the Department should again conclude that dumping is likely to continue or recur were the *Order* revoked, consistent with the previously completed sunset reviews.

³⁰ See *Sunset Policy Bulletin*, 63 FR at 18872; see also SAA at 889.

³¹ Domestic Interested Parties' Substantive Response at 5-6 (citing *Sunset Policy Bulletin*, 63 FR at 18872; SAA at 890).

³² *Id.*, at 7.

³³ *Id.* (citing *Sunset Policy Bulletin*, 63 FR at 18872).

³⁴ *Id.*, at Exhibit 1.

Department's Position:

As explained in the Legal Framework section above, when determining whether revocation of an order would be likely to lead to continuation or recurrence of dumping, sections 752(c)(1)(A) and (B) of the Act instruct the Department to consider: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; and (2) the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order. Furthermore, the Department's determination of likelihood of continuation or recurrence of dumping will be made on an order-wide basis for each proceeding.³⁵ In addition, the Department will normally determine that the revocation of an AD order is likely to lead to 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 the issuance of an order and import volumes for the subject merchandise declined significantly.³⁶

Pursuant to section 752(c)(1)(A) of the Act, the Department considered the weighted-average dumping margins determined in the investigation and the subsequent administrative reviews. As discussed above and in the *Final Modification for Reviews*, the Department has modified its practice in sunset reviews, such that it does not rely on weighted-average dumping margins that are calculated using the "zeroing" methodology found to be WTO-inconsistent. The three previous sunset reviews occurred prior to the effective date of the *Final Modification for Reviews* and, therefore, did not address the issue of zeroing. Accordingly, for this proceeding, the Department reviewed its official records to establish whether the weighted-average dumping margins determined in the LTFV investigation were calculated using zeroing.

In the *Final Determination*, the Department assigned a best information available (BIA)³⁷ dumping rate of 40.97 percent to Vulcan and Yieh, and calculated a rate of 5.51 percent for Ornatube.³⁸ All other Taiwanese producers and exporters received a rate of 29.15 percent, an average of the weighted-average dumping margins assigned to the individually examined respondents.³⁹ Additionally, the record of the proceeding demonstrates that dumping has persisted since the issuance of the *Order*. The Department has conducted two administrative reviews of the *Order*, in which Ornatube was the sole respondent under review. Although the Department calculated a *de minimis* weighted-average dumping margin for Ornatube in *Administrative Review I*,⁴⁰ in the most recently completed administrative review, *Administrative Review II*, the Department found that Ornatube dumped during the POR and calculated a

³⁵ See SAA at 879 and House Report at 56.

³⁶ See SAA at 889-890, House Report at 63-64, and Senate Report at 52. See also *Certain Frozen Fish Fillets from the Socialist Republic of Vietnam: Notice of Final Results of Expedited Sunset Review of Antidumping Duty Order*, 74 FR 5819 (February 2, 2009), and accompanying Issues & Decision Memorandum at 3, *Crawfish Tail Meat – PRC, and 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 Issues & Decision Memorandum at 5.

³⁷ "Best information available," under the pre-URAA statute, is equivalent to the current, post-URAA application of "adverse facts available."

³⁸ See *Final Determination*, 54 FR at 5536.

³⁹ *Id.*

⁴⁰ See *Administrative Review I*, 56 FR at 26383.

weighted-average rate of 18.05 percent.⁴¹ In this same administrative review, the Department updated the cash deposit rate for all other manufacturers to 18.05 percent.⁴² There were no further administrative reviews since these June 1992 final results.

Due to the age of this proceeding, the record relating to the Department's original margin calculations and methodology is limited.⁴³ From the limited record, the Department was able to discern that rates calculated for Ornatube both in the *Final Determination* and *Administrative Review II*, were calculated using the zeroing methodology found to be WTO-inconsistent. Therefore, we are not relying on these weighted-average dumping margins, or on the all-others rate derived from Ornatube's calculated results, for our analysis. However, the Department was able to confirm that the LTFV BIA rate assigned to Vulcan and Yieh was the highest petition rate and was not calculated using zeroing. These rates remain in place for those two respondents. Thus, the Department considers this to be indicative that dumping has continued at rates exceeding *de minimis* since the most recently-completed sunset review of the *Order*.⁴⁴

Pursuant to section 752(c)(1)(B) of the Act, the Department also considered the import volumes of subject merchandise both prior to and following implementation of the *Order*. As discussed above, it is the Department's practice to compare the volume of imports for the one-year period preceding the initiation of the LTFV investigation to the volume of imports during the period of this sunset review. According to data gathered by the ITC, U.S. imports of the subject merchandise from Taiwan have remained at consistent levels in the last five years since the third sunset review and at levels significantly lower than the import volume in the calendar year immediately preceding the initiation of the LTFV investigation.⁴⁵ Thus, because dumping of the subject merchandise continues at dumping margins above *de minimis*, because import volumes remain at significantly lower levels than the pre-initiation volumes, and because no party argued or submitted evidence to the contrary, the Department determines that dumping is likely to continue or recur if the *Order* were revoked.

2. Magnitude of the Margin of Dumping Likely to Prevail

Comments from Domestic Interested Parties:

The domestic interested parties explain that the Department normally will report to the ITC the company-specific weighted-average dumping margins that were determined in the original investigation because, the domestic interested parties maintain, those rates best represent the behavior of these producers and exporters in the absence of the discipline of an AD order. Thus, the domestic interested parties request that the Department report the weighted-average dumping

⁴¹ See *Administrative Review II*, 57 FR at 24464.

⁴² *Id.*

⁴³ The limited record contains paper copies of the computer output from which the Department discerns that the calculations of the 5.51 percent LTFV margin and the 18.05 percent *Administrative Review II*, contained negative margins. However, the limited record from 1989 and 1992 does not contain electronic copies of the margin calculation program or the sales and cost data that Ornatube submitted.

⁴⁴ *Id.*

⁴⁵ See Memorandum to the File dated May 3, 2017, titled "Placement of the United States International Trade Commission's Third Review of Light-Walled Rectangular Pipe and Tube from Taiwan. See also Domestic Interested Parties' Substantive Response at Exhibit 1.

margins from the investigation for steel tubing from Taiwan as follows: 40.97 percent for Vulcan and Yieh, 5.51 percent for Ornatube, and 29.15 percent for “all-other” producers and exporters⁴⁶

Department’s Position:

Section 752(c)(3) of the Act provides that the Department will report to the ITC the magnitude of the margin of dumping that is likely to prevail if an order were revoked. The Department will normally select a rate from the final determination of the investigation because that is the only calculated rate that reflects the behavior of an exporter without the discipline of an order.⁴⁷ As explained above, in accordance with the *Final Modification for Reviews*, the Department will not rely on weighted-average dumping margins that were calculated using the zeroing methodology found to be WTO-inconsistent.⁴⁸

The Department’s preference for selecting a rate from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of manufacturers, producers, and exporters without the discipline of an order.⁴⁹ Under certain circumstances, the Department may select a more recently calculated margin to report to the ITC.⁵⁰

The Department does not find any indication that the weighted-average dumping margins calculated in subsequent reviews of the *Order* on steel tubing from Taiwan better reflect the margin of dumping that is likely to prevail if the *Order* were revoked than the rates assigned in the *Final Determination*. Given the absence of argument and evidence to the contrary, the Department finds that it is appropriate to report to the ITC that the magnitude of the margin of dumping that is likely to prevail if the order were revoked is up to 40.97 percent. This rate was not calculated using zeroing and reflects the behavior of producers and exporters of subject merchandise from Taiwan without the discipline of an order in place.

FINAL RESULTS OF SUNSET REVIEW

We determine that revocation of the *Order* would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be at a rate up to 40.97 percent.

⁴⁶ See Domestic Interested Parties’ Substantive Response at 7.

⁴⁷ See SAA at 890 and *Eveready Battery Co., Inc. v. United States*, 77 F. Supp. 2d 1327, 1333 n.9 (CIT 1999).

⁴⁸ See *Final Modification for Reviews*, 77 FR at 8103.

⁴⁹ See SAA at 890 and House Report at 64.

⁵⁰ See section 752(c)(3) of the Act and *Final Results of Full Sunset Review: Aramid Fiber Formed of Poly Para-Phenylene Terephthalamide from the Netherlands*, 65 FR 65294 (November 1, 2000), and accompanying Issues and Decision Memorandum at “Magnitude of the Margin Likely to Prevail,” Comment 3 (citing SAA at 890-91 and House Report at 64).

RECOMMENDATION

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



Agree



Disagree

5/3/2017

X Ronald K. Lorentzen

Signed by: RONALD LORENTZEN

Ronald K. Lorentzen

Acting Assistant Secretary

For Enforcement and Compliance