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Remand Redetermination
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Xinjiamei Furniture (Zhangzhou) Co., Ltd. v. United States
Court No. 11-00456; Slip Op. 13-30 (CIT March 11, 2013)

FINAL RESULTS OF REDETERMINATION PURSUANT TO COURT REMAND

A. Summary

The Department of Commerce ("Department") has prepared these final results of redetermination pursuant to the remand order of the U.S. Court of International Trade ("CIT" or the "Court"), issued on March 11, 2013, in *Xinjiamei Furniture (Zhangzhou) Co., Ltd. v. United States*, Court No. 11-00456, Slip Op. 13-30 (CIT 2013) ("*Xinjiamei*"). The Court's opinion and remand order have been issued with regard to *Folding Metal Tables and Chairs from the People's Republic of China: Final Results of the Antidumping Duty Administrative Review and New Shipper Review, and Revocation of the Order in Part*, 76 FR 66036 (October 25, 2011) ("*Final Results*"), and accompanying Issues and Decision Memorandum ("IDM") at Comment 1.

The Court remanded to the Department the final results of the review to re-examine the surrogate value for cold-rolled steel coil and, if the Department continues using Global Trade Atlas ("GTA") data used for the *Final Results*, to provide an adequate explanation regarding its determination that the surrogate value is reliable and non-aberrational. On May 24, 2013, the Department released the draft results of redetermination pursuant to Court remand ("Draft Results"). In the Draft Results, we examined all the data on the record and continued to value Xinjiamei Furniture (Zhangzhou) Co., Ltd. ("Xinjiamei")'s cold-rolled steel using GTA data because we determined that GTA Indian import data are the best available information on the record and determined that the data are non-aberrational and reliable. The Department also invited Xinjiamei to comment on the Draft Results and gave Xinjiamei until May 31, 2013, to submit comments. Xinjiamei provided no comments to our Draft Results. As such, we have

determined not to alter the conclusions of our Draft Results and continue to find that the GTA Indian import data are the best available information for valuing Xinjiamei's cold-rolled steel coil and that the data are reliable and non-aberrational.

B. Background

In the preliminary results of review,[1] the Department selected GTA Indian Harmonized Tariff Schedule ("HTS") category 7211.2990, "Other Flat-Rolled Products of Iron/Non-Alloy Steel Not Further Worked Than Cold-Rolled (Excel 721123)," to value cold-rolled steel coil (approximately $2.01/kilogram ("kg"))[2]. After the *Preliminary Results*, Xinjiamei alleged that the GTA Indian import data were aberrationally high, and proposed using a simple average of the monthly advertised prices of cold-rolled steel coil from JSW Steel Limited ("JSW"), an Indian steel producer (approximately $0.76/kg).[3] Xinjiamei also provided the following benchmark prices for cold-rolled steel coil that were obtained from metalprices.com: (1) Brazil export prices covering nine months of the period of review ("POR"); (2) Northern Europe (ex-works), covering a two-month period prior to the POR; and, (3) "world export market," covering a six-month period following the POR.[4] Finally, Xinjiamei submitted an average sales price of approximately $0.74/kg, based on JSW's actual cold-rolled steel coils/sheets sales of 624,030,000 kg during the 2009-2010 fiscal year. Xinjiamei also claimed that the quantity of the

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[1] *See Folding Metal Tables and Chairs from the People's Republic of China: Preliminary Results of the Antidumping Duty Administrative Review and New Shipper Review, and Intent to Revoke Order in Part*, 76 FR 35832 (June 20, 2011) ("*Preliminary Results*").

[2] The surrogate value for cold-rolled steel coil that was used in the *Preliminary Results* was 94.09 rupees/kg. The Department used 46.76 rupees/USD as the exchange rate for the period of review ("POR"). The exchange rate is an average of the daily exchange rates during the POR. The exchange rates are provided on the Department's website. The Department is using USD/kg instead of USD/MT because the unit of measurement for official GTA import and export data is based on kgs.

[3] This value reflects the published prices during the POR, not Xinjiamei's suggested adjusted price. According to JSW's advertisement, the published prices do not include a Central Excise Duty. As such, we did not deduct an 8.24 percent excise tax.

[4] *See* Letter from Xinjiamei to the Secretary of Commerce, "Folding Metal Tables and Chairs from the People's Republic of China: Rebuttal Comments Selection of the Primary Surrogate Country," dated July 11, 2011.

GTA Indian import data was unreliable because it represented a small percentage when compared with JSW's production.

In the *Final Results*, we selected GTA Indian import data to value cold-rolled steel coil over the advertised prices for Indian steel producer, JSW, because the latter represented prices for a single company rather than a broad industry average like the GTA Indian import data. We also found that the export prices for Brazil, Northern Europe, and the "world export market" placed on the record by Xinjiamei were not suitable benchmarks because: (1) none of the sources covered the entire POR; and (2) export prices, particularly those from non-potential surrogate countries, are not representative of the domestic or import prices paid by producers of the like product in India, the surrogate country.

The Court found that the Department failed to provide a rational explanation for our selection of the GTA data as the best available information on the record given the low volume of imports compared to JSW's production and the disparity between the values derived from JSW compared with those obtained from the GTA data.[5] The Court ordered that if we continue using the GTA data, we must provide an adequate explanation, supported by substantial evidence, as to why the data are reliable and non-aberrational. The Court also ordered that the Department may reopen the record to solicit any information deemed necessary to make our determination.[6]

On April 10, 2013, we placed on the record: (1) GTA import data from the other potential surrogate countries covering the POR; (2) Brazilian GTA export data for cold-rolled steel coil covering the POR; and (3) Brazilian GTA export data from June 2009 to February

[5] *See Xinjiamei*, at 10.
[6] *See id.*, at 15-16.

2010, the period selected by Xinjiamei based on information from metalprices.com.[7] On April 17, 2013, Xinjiamei placed on the record a chart obtained from London Metal Exchange Free Data Service showing prices for steel billet in the Far East market during the POR.[8] Xinjiamei claimed this further supports using the JSW prices. On May 24, 2013, the Department invited Xinjiamei to comment on the Draft Results and gave Xinjiamei until May 31, 2013, to submit comments. Xinjiamei did not provide any comments.

C. Analysis

1. POR GTA Import Data from the Other Potential Surrogate Countries

Pursuant to the Court's instructions, the Department has reexamined its determination with respect to the surrogate value for cold-rolled steel coil in accordance with the best available information standard. For the reasons discussed in the *Final Results*, we continue to find that GTA Indian import data of HTS 7211.2990 are publicly available, broad market averages, contemporaneous with the POR, tax-exclusive, meet our preference for data from a single surrogate country,[9] and are the most specific HTS category to the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs. Moreover, we find that GTA Indian import data are reliable because they are comprised of official government import statistics.

In *Xinjiamei*, the Court held that "the Department points to no evidence, let alone market evidence, that the GTA data yields a value within a reasonable range, and has chosen to disregard evidence that the value is outside of this range."[10] The Department placed GTA import

[7] *See* Memorandum from Trisha Tran to the File, "2009-2010 Folding Metal Tables and Chairs from the People's Republic of China: Memorandum Placing Data on the Record," dated April 10, 2013 ("Memorandum Placing Data on the Record") at Attachment 2-5.
[8] *See* Letter from Xinjiamei to Secretary of Commerce, "Folding Metal Tables and Chairs from China; Submission of Surrogate Value Datac" dated April 17, 2013 ("Xinjiamei's New Data Submission").
[9] The Department selected India at the primary surrogate country for the *Final Results*.
[10] *See Xinjiamei*, at 13.

data from other potential surrogate countries on the record,[11] and considered both the average unit values ("AUVs") and import quantities for each of the potential surrogate countries. The GTA Indian import value used in the *Final Results* is $2.01 and the corresponding import quantity is 716,835 kg.

With respect to values, the GTA import AUVs covering the POR for the HTS category of cold-rolled steel that is most specific to Xinjiamei's inputs from four of the other potential surrogate countries (*i.e.*, Indonesia, Peru, Thailand, and Ukraine) ranged from $1.22/kg to $8.26 kg.[12] We note that the other potential surrogate countries' HTS categories are not the same HTS category as the GTA Indian import data. The GTA Indian import data are contained in a basket category and the category descriptions differ for each country after the 6-digit level. (The Department notes that the GTA import AUV in this data set for the fifth surrogate country, the Philippines, is $0.73/kg. However, the corresponding import quantity is only 2,100 kg.) Because $2.01 falls within the range of **$1.22/kg to $8.26/kg** (or the range of $0.73/kg to $8.26/kg with the inclusion of the Philippines), we find that the GTA Indian import value used in the *Final Results* is non-aberrational since it falls within the range of AUVs for the other potential surrogate countries for the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs.

With respect to quantities, we determine that the GTA Indian import quantity is non-aberrational because it is representative of significant quantities of imports (*i.e.*, 716,835 kg). Furthermore, the Indian import quantity is within the range of the other potential surrogate

[11] We determined the potential surrogate countries based on the Memorandum from Carole Showers, Director, Office of Policy to Wendy J. Frankel, Director, Office 8, AD/CVD Operations entitled, "Request for a List of Surrogate Countries for New Shipper Review of the Antidumping Duty Order on Folding Metal Tables and Chairs ("FMTC") from the People's Republic of China," dated January 20, 2011. According to the memorandum, the following six countries are economically comparable to the PRC and likely to have good data availability and quality: India, Indonesia, Peru, the Philippines, Thailand, and Ukraine.

[12] *See* Memorandum Placing Data on the Record at Attachment 2.

countries since the import quantities for these countries (excluding the Philippines) range from **57,070 kg to 2,301,882 kg**. Thus, pursuant to the Court's order, we point to specific evidence that demonstrates that the GTA Indian import data fall within a reasonable range of AUVs and import quantities for other potential surrogate countries.

To further corroborate the determination to use GTA data, the Department took additional steps to compare the GTA Indian import data used in the *Final Results* with GTA import data from the POR for HTS category 7211.29, "Flat-Rolled Iron Or Nonalloy Steel Products Nesoi, Under 600 Mm Wide, Hot-Rolled, Not Clad, Plated Or Coated, Under 4.75 Mm Thick" covering cold-rolled steel from India and the other potential surrogate countries (Indonesia, Peru, the Philippines, Thailand, and Ukraine). The Department notes that this six-digit HTS category is less specific than both the eight-digit HTS category used in the *Final Results* and the other potential surrogate countries' HTS categories from the previous data set. Nevertheless, this data set is helpful because HTS category 7211.29 is harmonized at this six-digit level, allowing for a comparison of the identical HTS category for the six potential surrogate countries (including India). The Department notes that the AUVs for this additional data set ranged from **$1.56/kg to $2.95/kg**, while the import quantities ranged from **2,808 kg to 11,500,005 kg**. The GTA Indian AUV and import quantity used in the *Final Results* (*i.e.*, $2.01/kg and 716,835 kg) fall within these two respective ranges. Accordingly, this additional data set further confirms that the GTA Indian import data used in the *Final Results* are non-aberrational because they fall within the range of AUVs and import quantities for the other potential surrogate countries. For these reasons, we have determined that the GTA Indian import data are reliable and non-aberrational.[13]

[13] *See Xinjiamei*, at 15.

2. JSW's Advertised Data for Cold-Rolled Steel Coil

Pursuant to the Court's order, we have also reexamined JSW's advertised prices based on the best available information standard. We found that JSW's advertised data (approximately $.76/kg) are not the best available information because the data are less specific than GTA Indian import data and do not represent a broad industry-average price.[14] Additionally, JSW advertised data are less reliable because they are unsupported by other record evidence in comparison to GTA import data for five of the six potential surrogate countries, the lone exception being the Philippine value for imports of the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs; however, as previously noted, this value of $0.73/kg is based on only 2,100 kg of imports, which we do not find as reliable when compared with the other record evidence described above.

With respect to specificity, Xinjiamei described the type of cold-rolled steel coil it used to produce subject merchandise as "width=150 mm; thickness is 0.45mm no process other than cold-rolled was used."[15] JSW's advertisements do not specify the width of the cold-rolled steel coil it sells. In contrast, the GTA Indian HTS category 7211.2990 specifies the width of the cold-rolled steel coil it covers (*i.e.*, of a width less than 600 mm).

In addition to specificity, the JSW advertised data are not as reliable as GTA Indian import data used in the *Final Results*. GTA Indian data represent data collected from an official government source, the Indian Ministry of Commerce,[16] and reflect numerous transactions between many buyers and sellers. In contrast, we find that JSW's advertised data, even if they

[14] *See Certain Frozen Fish Fillets From the Socialist Republic of Vietnam: Final Results of Antidumping Duty Administrative Review and New Shipper Reviews; 2010-2011*, 78 FR 17350 (March 21, 2013), and accompanying IDM at C. Data Considerations—Whole Live Fish.

[15] *See* Letter from Xinjiamei to the Secretary of Commerce, "Folding Metal Tables and Chairs from the People's Republic of China: Submission of Surrogate Value Information for Use in the Preliminary Results," dated March 8, 2011 at 2.

[16] *See* Memorandum Placing Data on the Record, at Attachment 6.

are confirmed by the JSW sales data from its financial statements, do not represent a broad industry average price because they are based on the price from a single factory (*i.e.*, "ex-our Vijayanagar works"). Rather than representing the price of steel coil in the surrogate country as a whole, the JSW data indicate the price for only one factory from one company.

Further, the JSW advertised data appear to be the sole outlier when compared to the import data from the other surrogate countries (with the exception of the Philippines, which must be disregarded due to the low import quantity). For instance, we note that none of the potential surrogate countries' AUVs is below $1.22/kg, except for the Philippines, which has an import quantity of only 2,100 kg.

3. JSW's sales data from JSW's Annual Report

Pursuant to the Court's order, we have reexamined JSW's sales data taken from JSW's Annual Report for fiscal year April 1, 2009 - March 31, 2010.[17] According to JSW's sales data from JSW's Annual Report, the quantity sold during the fiscal year is 624,303,000 kg. However, JSW's sales data may be distortive because the sales quantity covers *all* cold-rolled steel coil and sheets. As a result, JSW's sales quantity for cold-rolled coils/sheets may be significantly greater because the cold-rolled coils/sheets fall under multiple HTS categories that cover cold-rolled steel products: 7209.15, 7209.16, 7209.17, 7209.18, 7209.25, 7209.26, 7209.27, 7209.28, 7209.90, 7211.23, 7211.29, and 7211.90.[18] In contrast, the import quantities for the GTA Indian HTS category 721129.90 are significantly less (*i.e.*, 716,835 kg) because they cover a smaller, more specific, subset of cold-rolled steel coil that is specific to the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs.

[17] *See Xinjiamei*, at 16.
[18] *See* Memorandum Placing Data on the Record, at Attachment 1.

In addition to re-examining JSW's sales quantity, we reviewed JSW's average unit sales price from JSW's Annual Report. We find that JSW's sales price (approx. $0.74/kg) is aberrational in comparison to other potential surrogate countries in that it does not fall within the range of AUVs for the other potential surrogate countries. More specifically, $0.74 is not within the range of AUVs for the other potential surrogate countries (*i.e.*, $1.22/kg to $8.26/kg excluding the Philippines).

Finally, as explained above, JSW's sales data are less representative than the GTA Indian import data used in the *Final Results* because they do not represent a broad industry average price and are based on the price from a single company. Thus, the JSW sales data used to corroborate JSW's advertised data may be distortive and are less specific and less representative than GTA Indian import data.

4. June 2009 - February 2010 Brazilian export price

Pursuant to the Court's remand, we have reconsidered the Brazilian export data derived from metalprices.com that was submitted by Xinjiamei as a benchmark price.[19] As an initial matter, the Department continues to find that "...country-specific export data . . . are not suitable comparative price benchmarks to test the validity of selected {surrogate values}"[20] because they do not necessarily reflect prices paid by producers of the like product in the surrogate country. Nevertheless, in compliance with the Court's order, we have considered the Brazilian data placed on the record by Xinjiamei. The Brazilian GTA export data for cold-rolled steel coil that the Department placed on the record of this remand shows that, during the POR, the average Brazilian export value was $2.10/kg. Additionally, for the nine months selected by Xinjiamei,

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[19] *See Xinjiamei* at 16. The Department is conducting the remand on this issue respectfully under protest. *See Viraj Group, Ltd. v. United States*, 343 F.3d 1371 (Fed. Cir. 2003) ("*Viraj Group*").

[20] *See Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People's Republic of China: Final Results of the 2008-2009 Antidumping Duty Administrative Review*, 76 FR 3086 (January 19, 2011) ("*TRBs Final*"), and accompanying IDM at Comment 14-B.

the Department also placed on the record of this remand the average Brazilian GTA export value that was $2.05/kg. In contrast, the Brazilian export value submitted by Xinjiamei derived from metalprices.com was significantly less (*i.e.*, $0.59/kg). We find the Brazilian GTA data, derived from official government statistics, to be more reliable than the information obtained from metalprices.com, for which there is no evidence as to how the information was gathered. As such, we find that the Brazilian GTA export value validates the GTA Indian import value (*i.e.*, $2.01/kg) used for the *Final Results*, and undermines the reliability of the data included in metalprices.com.

Similarly, with respect to quantities, we find that the POR Brazilian GTA export quantity (*i.e.*, 1,557,553 kg) validates the GTA Indian import quantity under HTS 721129.90 and calls into question the reliability of JSW's sales data from JSW's Annual Report. Additionally, we note that the June 2009 - February 2010 Brazilian export data submitted by Xinjiamei do not include the corresponding export quantities. As such, the Department is unable to compare the export quantity against the POR Brazilian GTA export data and determine whether the prices are based on commercially significant quantities.

Pursuant to the Court's order, we have also reexamined the Brazilian export data from metalprices.com using the best available information standard. Based on the standard, we find that this data set is not the best available information on the record to value cold-rolled steel because the data are from Brazil, not India. Because India is the primary surrogate country and we have a preference for data from a single surrogate country,[21] we find that these Brazilian data

[21] *See TRBs Final*, and accompanying IDM at Comment 14B; *see also Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, from the People's Republic of China; Extension of Time Limit for the Final Results of the 2007-2008 Administrative Review of the Antidumping Duty Order*, 74 FR 52948 (December 28, 2009), and accompanying IDM at Comment 2; *see also Silicon Metal from the People's Republic of China: Notice of Final Results of 2005/2006 New Shipper Reviews*, 72 FR 58641 (October 16, 2007); *see also Notice of Final Results of Antidumping Duty Administrative Review and Final Partial Rescission: Certain Cut-to-Length Carbon Steel Plate from Romania*, 72 FR 6522 (February 12, 2007), and accompanying IDM at Comment 3.

are not the best available surrogate value information for cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs. Additionally, we find that these export data are not the best available surrogate value information because they are not representative of the domestic or import prices paid by producers of cold-rolled steel products in India.[22] The Brazilian export data from metalprices.com are less reliable than official GTA data and may be aberrational in comparison to GTA Indian import data, which are well supported by record evidence.

5. Non-Contemporaneous Northern Europe and World Export Data

Pursuant to the Court's order, we have also re-considered the Northern Europe and world export data obtained from metalprices.com that were submitted by Xinjiamei as benchmark prices.[23] For the reasons discussed in the *Final Results*, we continue to find that the use of certain sources for benchmarking purposes remains inconsistent with longstanding Department practice and policy.[24] Xinjiamei submitted cold-rolled steel coil prices from Northern Europe from February 23, 2009 - April 27, 2009, immediately prior to the POR. The average ex-works Northern European price for cold-rolled steel coil was $0.62/kg.[25] Additionally, Xinjiamei placed on the record monthly pricing data for world export market "benchmark" prices for cold-rolled steel coil for July 2010 – December 2010, immediately after the POR. The average world

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[22] *See Certain Hot-Rolled Carbon Steel Flat Products from Romania: Final Results of Antidumping Duty Administrative Review*, 70 FR 34448 (June 14, 2005), and accompanying IDM at Comment 2 ("...the purpose of the surrogate values is to calculate the cost to producers in the {non-market economy} country by applying the price for factor inputs from the designated surrogate country to the {factor of production} to produce the product. Export prices from the surrogate country are not relevant to the prices paid by producers of similar merchandise in that country.").

[23] *See Xinjiamei*, at 16. The Department is conducting the remand on this issue respectfully under protest. *See Viraj Group*.

[24] *See Final Results*, and accompanying IDM at Comment 1.

[25] According to Xinjiamei's July 11, 2011, submission, the average ex-works Northern European price for cold-rolled steel coil ranged between $688.39 and $566.87 per gross ton. In order to compare these values with the GTA Indian import data and the other potential surrogate countries, we averaged the prices and converted these values from gross tons to kgs.

export market "benchmark" price was $0.71/kg.[26] Record evidence does not explain how metalprices.com compiles its pricing data. For instance, we cannot determine whether the prices are based on commercial and actual transactions between unaffiliated buyers and sellers. Additionally, we cannot determine whether these quantities are commercially significant quantities. Furthermore, we continue to find that the export data are not suitable because neither of the data sets covers any portion of the POR and export prices, as explained above, are not representative of the domestic or import prices paid by producers of the like product in India. Finally, we find that these data sets are particularly unreliable as benchmarks; the Department is unable to compare and verify the export prices and quantities using other sources because the descriptions "Northern Europe" and "world export market" are vague and undefined, and the data, unlike GTA data, do not include any export quantities. The countries which are included within "Northern Europe" and "world export market" are not described on the website. Therefore, we find that these export data are not reliable benchmarks.

Pursuant to the Court's order, we have also reexamined the Northern Europe and world export data based on the best available information standard. Based on the standard, we find that these data sets are not the best available information on the record to value cold-rolled steel coil because, as explained above, the export data are non-contemporaneous with the POR and export data, particularly those from surrogate countries that we cannot even identify, are not representative of the domestic or import prices paid by producers of the like product in India. More specifically, $0.62 and $0.71 are not within the range of AUVs for the other potential surrogate countries (*i.e.*, $1.22/kg to $8.26/kg excluding the Philippines). Finally, the export

[26] According to Xinjiamei's July 11, 2011, submission, these prices ranged from $695 per metric ton in July 2010 to $743 per metric ton in December 2010, with an average price of $713 per metric ton. In order to compare these values with the GTA Indian import data and the other potential surrogate countries, we averaged the prices and converted these values from metric ton to kgs.

data for Northern Europe and world export data obtained from metalprices.com are less reliable than official GTA data and may be aberrational in comparison to GTA Indian import data, which is corroborated by record evidence.

6. Far East Data

Pursuant to the Court's order, we are examining all of the data sets on the record, including the Far East data obtained from London Metal Exchange that was submitted by Xinjiamei as a benchmark price during the remand proceeding.[27] Xinjiamei provided the cash buyer price of steel billet, not cold-rolled steel coil, in Far East markets during the POR. According to Xinjiamei, the average price of steel billet used to fabricate cold-rolled steel sheets used to product subject merchandise during the POR was approximately $475 per metric ton, or $0.47/kg. However, Xinjiamei provides no explanation (*e.g.*, width, thickness, carbon level content, and processing method of the steel billet) supported by evidence to substantiate this claim. Without such evidence, we find that these values are aberrational in comparison to the prices of cold-rolled steel from Indian and the other potential surrogate countries: More specifically, $0.47/kg is not within the range of AUVs for India and the other potential surrogate countries (*i.e.*, $1.22/kg to $8.26/kg excluding the Philippines). Therefore, we find that this price is not a relevant benchmark price. Moreover, if Xinjiamei's explanation is correct, the prices for steel billet should be lower because the price does not account for the additional processing necessary to produce cold-rolled steel sheets.[28] Additionally, we find that the Far East data are

[27] *See* Xinjiamei's New Data Submission.

[28] *See, e.g., Notice of Final Determination of Sales at Less Than Fair Value: Carbon and Certain Alloy Steel Wire Rod from Ukraine*, 67 FR 55785 (August 30, 2002), and accompanying IDM at Comment 4 (the Department determined that "valuing the inputs which go into producing iron ore, electricity, argon, nitrogen, and oxygen, would result in an improper undervaluation of the inputs, and understatement of normal value"). In that case, iron ore was an input in the production of subject steel wire rod. Similarly, if steel billet is an input into the production of cold-rolled steel sheet (or coil), itself an input into production of folding metal tables and chairs, valuing the steel billet instead of the actual input used by Xinjiamei to produce folding metal tables and chairs would improperly undervalue Xinjiamei's inputs and normal value.

an inappropriate benchmark because the Department is unable to compare and verify the price using other sources because the data do not identify which countries London Metal Exchange considers to be a part of the Far East region and the data do not include export quantities. Unlike GTA data, we cannot determine if the steel billet price submitted by Xinjiamei is based on commercially significant quantities. Finally, and most importantly, Xinjiamei reported using cold-rolled steel coil to produce folding metal tables and chairs. Thus, the prices for steel billet placed on the record by Xinjiamei, even if ultimately proven to be reliable, are irrelevant for our purposes, because steel billet is not the input used by Xinjiamei and the price of steel billet has no bearing on our determination as to the best available information with which to value the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs.

Pursuant to the Court's order, we have also considered the Far East steel billet data based on the best available information standard. Based on the standard, we find that these data are not the best available information to value cold-rolled steel coil because the data are not specific to the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs. Moreover, the Far East data do not satisfy our preference for data from a single surrogate country, unlike GTA Indian import data used in the *Final Results*. Finally, the data from London Metal Exchange are less reliable than official GTA data and may be aberrational in comparison to GTA Indian import data under HTS 7211.29.90, which is corroborated by record evidence.

D. Conclusion

Based on the foregoing, we continue to find the GTA Indian import data under HTS 7211.2990 are the best available information on the record to value cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs. As established in the *Final Results*, GTA Indian import data under this HTS category are the best available information because the data

meet our preference for data from a single surrogate country, are publicly available, represent a broad market average, are contemporaneous with the POR, are tax exclusive, and are the most specific HTS category to the type of cold-rolled steel used by Xinjiamei to produce folding metal tables and chairs. Additionally, the GTA Indian import AUVs and quantities under HTS 7211.2990 are corroborated by GTA data from potential surrogate countries and official Brazilian export data. Cold-rolled steel export prices from Brazil, northern Europe and the world market are not the "best available information" because the export prices do not necessarily reflect prices paid by producers of the like product in the surrogate country, are from non-potential surrogate countries, and do not meet our preference for data from a single surrogate country. Steel billet prices from the Far East are not the "best available information" to value cold-rolled steel coil because the data are not specific to the type of cold-rolled steel coil used by Xinjiamei to produce folding metal tables and chairs and do not satisfy our preference for data from a single surrogate country. Furthermore, the Department finds that the JSW advertised and sales prices do not satisfy the best available information standard because they are less specific and less representative than GTA Indian import data under HTS 7211.2990.

Paul Piquado
Assistant Secretary
for Import Administration

14 JUNE 2013
Date