



INTERNATIONAL
TRADE
ADMINISTRATION

ACCESS

Handbook on Electronic Filing Procedures
Enforcement and Compliance
International Trade Administration
U.S. Department of Commerce

Version 3.5

June 27, 2016

Help Desk
(202) 482-3150
access@trade.gov
<http://access.trade.gov>

TABLE OF CONTENTS

1. RECORD OF CHANGES	- 3 -
2. INTRODUCTION	- 5 -
3. ELECTRONIC FILING PROCEDURES	- 5 -
A. USER ACCOUNTS.....	- 5 -
B. ASSISTANCE.....	- 8 -
C. DOCUMENT SECURITY CLASSIFICATION	- 8 -
D. SUBMITTING BUSINESS PROPRIETARY AND ACCOMPANYING PUBLIC VERSION DOCUMENTS	- 9 -
E. SUBMITTING POTENTIALLY CLASSIFIED INFORMATION.....	- 10 -
F. DOCUMENT TYPE	- 11 -
G. BRACKETING NOT FINAL OR ONE DAY LAG RULE DOCUMENTS.....	- 11 -
H. DOCUMENTS	- 12 -
I. DOCUMENT FORMATS.....	- 12 -
J. DOCUMENT COMPRESSION	- 14 -
K. PUBLIC VERSIONS OF DOCUMENTS AND DATABASES	- 14 -
L. CERTIFICATIONS	- 14 -
M. DATABASES, OR DATA FILES	- 14 -
N. WHERE TO E-FILE.....	- 15 -
O. DOCUMENT RECEIPT	- 15 -
P. DOCUMENT ACCEPTANCE	- 16 -
Q. DEADLINE FOR ELECTRONIC DOCUMENT FILING.....	- 16 -
R. EXTENSION OF TIME LIMITS.....	- 17 -
S. TECHNICAL FAILURES.....	- 17 -
T. IMPROPERLY FILED DOCUMENTS	- 18 -
4. MANUAL FILING PROCEDURES.....	- 18 -
A. MANUAL SUBMISSION PROCEDURES.....	- 18 -
B. BULKY DOCUMENT SUBMISSIONS	- 18 -
C. MANUAL FILING RECEIPT	- 19 -
5. ACCESS TO PUBLIC DOCUMENTS AND PUBLIC VERSIONS.....	- 19 -
6. BPI DOCUMENT PROCEDURES.....	- 20 -
A. ACCESS TO BPI DOCUMENTS	- 20 -
B. BPI RELEASES.....	- 20 -
C. EXCEPTIONS TO ACCESS BPI RELEASE PROCESS	- 21 -
D. BPI FILE LOCATION AND STORAGE.....	- 22 -
7. DEFINITIONS.....	- 23 -
APPENDIX 1: ALLOWED FILE TYPES.....	- 25 -

1. Record of Changes

Version	Date	Changes
1.0	06/02/2011	Release 1 Handbook
1.1	10/27/2011	Added guidance for documents on CD Added more acceptable data and video file formats Changes in "Document Acceptance" <i>Note: See Table of Contents for current section numbers and page locations.</i>
2.0	6/14/2012	Inserted guidance on filing classified information. Clarification in "Bracketing Not Final or One Day Lag Rule Documents" to note that documents submitted on second day must be submitted in their entirety. Added websites to "Deadline for Electronic Document Filing". Added yellow separator sheet preference to "Bulky Document Submissions" and "Definitions". Modified "Allowable Document Types" to clarify that .xlsx is not an allowable document format. Stylistic and grammatical changes throughout. Clarified filing requirements in event of "Technical Failure". Updated link for parties to download ACCESS Technical Failure Manual Submission Cover Sheet. <i>Note: See Table of Contents for current section numbers and page locations.</i>
2.1	11/08/2012	Inserted language in Section O. and P. to further clarify e-filer responsibility to produce a copy of the on-screen electronic confirmation or email receipt as evidence of a successful filing.
2.2	07/24/2013	Inserted language in Section L. Certifications. 78 FR 42678 (July 17, 2013) (final rule)
3.0	03/24/2014	Revised Section 3.E to include updated information about Classified documents. Added Section 3.R. Extension of Time Limits/Auto Extension. Modified 5. Access to Documents. Added Section 6. BPI Document Procedures.
3.1	04/24/2014	Revised Sections 5 and 6 to clarify that courtesy copies of Department documents will not be emailed to interested parties and their representatives and to provide link to public and APO service lists. Modified Section 5 to explain entry of appearance requirement.
3.2	11/24/2014	IA ACCESS to ACCESS name change
3.3	3/12/2015	APO/Dockets Room Number changed to 18022

3.4	3/27/2015	Added .egp file type under allowed file types
3.5	06/27/2016	Revised Section 3.M and 4.A to clarify manual filing requirements for data files greater than 20 MB

2. **Introduction**

This Handbook provides instructions for persons who wish to file documents electronically with the United States Department of Commerce, International Trade Administration, Enforcement and Compliance, (“the Department”) pursuant to 19 CFR §§ 351.103(c) and 351.303(b) of the Department’s regulations addressing electronic filing.

All official electronic filings made to the Department must be made using its electronic system called ACCESS. Therefore, no other electronic submissions – such as submissions made by facsimile machine or electronic mail – will be accepted.

In event of a conflict between the Tariff Act of 1930, as amended (“the Act”), the Department’s regulations, and this Handbook, the applicable provisions of the Act and the Department’s regulations shall govern. This Handbook is designed to be read in conjunction with the Department’s regulations, 76 FR 39263 (“Final Rule”) and the ACCESS External User Guide. This Handbook does not alter or waive any provisions governing the filing of documents with entities and/or persons other than the Department.

This Handbook also provides instructions on how a registered user can access public documents and public versions submitted to and released by the Department in its Antidumping Duty (AD) and Countervailing Duty (CVD) proceedings. This Handbook also provides instructions on how E-Filers who are authorized under the Department’s Administrative Protective Orders (APOs) can access documents containing business proprietary information (BPI) released by the Department.

3. **Electronic Filing Procedures**

A. User Accounts

Persons wishing to file a document on the official record of an AD or CVD proceeding must become a registered E-Filer of ACCESS. Persons wishing to file documents with the Department need to register in ACCESS only once, regardless of the number of proceedings in which the person may be involved. A single account may be used to file documents in any number of AD or CVD proceedings and may also be used to view or download available documents. For more information about document access, please refer to “5. Access to Documents”. To register as an E-Filer, the user must go to the ACCESS website at: <http://access.trade.gov> and fill out and submit a registration form. The applicant must agree to the Terms of Use of the website. The registration form will require the applicant to identify his/her name,

title, work affiliation, password and security questions, which are used to identify the registrant and to assist in identifying the registrant for password recovery. Applicants must select their applicable association in the "Firm/Organization Name" drop down field. If the proper affiliation is not listed, select "Others" from the list and enter the Firm or Organization name in the field below it. The designated e-mail address must be a functioning official business e-mail address used by the individual responsible for the filing. Once the registration form is completed and submitted, the registration request will be reviewed and processed. Notice of approval or denial of a registration will be sent to the designated e-mail address within 48 business hours.

The user name and firm/organization associated with the registered E-Filer user will be recorded with the documents filed in ACCESS.

Note: registration in ACCESS does not satisfy the registered user's obligation under 19 CFR § 351.103(d) to enter an appearance as a representative of an interested party in an AD or CVD proceeding.

Registered E-Filers may authorize another person to file a document with the Department using the registered user's account. However, the registered user assumes responsibility for all use of his/her user account. The registered user and all parties who participate in the preparation of, or are signatories to, a submitted document shall retain responsibility for any duties or obligations associated with the document. Registered users must comply with applicable rules governing the protection and disclosure of business proprietary information pursuant to 19 CFR §§ 351.304, 351.305 and 351.306. A document filed using the registered user's ACCESS user account will be deemed to be signed by that registered user for the purposes of ACCESS. However, this does not satisfy the signature requirements for certifications and APO applications.

An E-Filer who is the lead attorney on the APO Service List for a segment may designate up to two E-Filers in his or her organization to act as Proxy users for the purpose of accessing BPI documents released by the Department on the record of the segment. This designation is made in the lead attorney's "User Profile" page and it applies to all segments in which the lead attorney is named as such in the APO service lists for those segments. The ACCESS External User Guide will contain step by step instructions on how to designate a Proxy user.

If the Proxy user is support staff, he or she must have signed the firm's internal Acknowledgment for Support Staff for each of the segments in which the lead

attorney has been granted APO access, before accessing third party BPI documents. If the Proxy user is an attorney or other authorized applicant, he or she must have filed an APO application and been granted APO access for every segment in which the lead attorney is an authorized applicant and designated as the lead attorney. Unauthorized access to third party BPI by a Proxy user constitutes an APO violation. Because the Proxy user must be authorized to have APO access in all the same segments in which the lead attorney is authorized, the Proxy system is best suited for those law firms where the same one or two support staff members are tasked with downloading all BPI documents for the same lead attorneys.

Proxy users will not receive email digest notifications of documents released by the Department in the segment. The My Service Lists feature can be used to confirm which E-Filers will receive email notifications for BPI and Public releases.

Should the E-Filer account be compromised, the registered user should change the password immediately and notify the Department of the breach and period of compromise by contacting the ACCESS Help Desk. If the registered user has disclosed his or her user account password to an employee of the registered user's organization, such as a paralegal, legal assistant or other employee assisting with filings who subsequently leaves the organization, it is the registered user's responsibility to change the password to the account at the time the employee leaves the firm. Unless there is a perceived breach of confidentiality, the registered user is not required to inform the Department of the departure.

The ACCESS Help Desk will periodically monitor the activity of registered user accounts to protect the ACCESS system from malicious activity. Should unexpected account activity arise, the Help Desk may deactivate the account and contact the registered user. In the event that a registered user changes his or her organization affiliation, or no longer requires the account, the registered user must contact the ACCESS Help Desk to update or deactivate the account, as appropriate.

Registered users are required to keep the account information up to date. All registered users must update the account information at least once each calendar year. Email reminders will be issued to those users who have not updated account information over the course of a calendar year. Accounts may be deactivated if the email reminders are returned as undeliverable, or if the account is not updated within a 12-month period and reminders are ignored. Should an account be deactivated, a registered user may contact the ACCESS Help Desk to reactivate the account.

E-Filers are asked to identify a Personal Identification Number (PIN) as part of the User Profile and which will be used in various parts of ACCESS for security reasons. The E-Filer should not share the PIN with others. The E-Filer User Profile also requires the identification of a phone number which will be used to verify the user when he or she accesses BPI documents in ACCESS. The phone number should preferably be the user's office number. Another organization number may be used as long as there is no phone extension needed. Rotary phones cannot be used in conjunction with ACCESS.

B. Assistance

The ACCESS Help Desk is available to all registered users and the public from Monday through Friday, from 8:30 a.m. to 5:00 p.m., Eastern time, on business days at (202) 482-3150 or access@trade.gov. The Help Desk will not be available on Federal Holidays or days in which the Government is closed due to hazardous weather.

The Help Desk can provide general information about ACCESS and assistance to users who are having trouble using the website. The Help Desk can provide information about the status of the ACCESS system should technical problems with the website arise. The Help Desk may also assist users with password reset or other technical problems. The Help Desk cannot extend document due dates or provide guidance concerning the content of a document. The Help Desk cannot provide information about the status of an AD/CVD proceeding. All questions relating to an AD/CVD proceeding, including extension requests must be directed to the AD/CVD Office responsible for the proceeding.

C. Document Security Classification

All submitters must adhere to the document classifications outlined in 19 CFR § 351.303(b)(4). Every document must include the proper security classification in the case "cluster" information at the top right hand part of the document. See 19 CFR § 351.303(b)(4) of the regulations for a complete description of the allowable classifications below.

Allowable document classifications:

"Public Document" - All information contained in the document is public and may be viewable by the public.

"Public Version" - A version of a document in which all of the business proprietary information ("BPI") within brackets has been removed and the

remaining information is viewable by the public. The removed business proprietary information is replaced with a public summary, where applicable.

“Business Proprietary Document – May Be Released Under APO” - This business proprietary document contains single-bracketed BPI for which a party agrees to release under APO. The proprietary information remains within brackets in the document.

“Business Proprietary Document – May Not Be Released Under APO” - This document may contain both single and double-bracketed BPI, but the submitter does not agree to the release of the double-bracketed information under APO. In this document, the information inside the single and double brackets is included.

“Business Proprietary/APO Version – May Be Released Under APO” - This document contains single-bracketed BPI. The submitter must omit the double-bracketed BPI from this version because this version will be released under APO.

Assigning the incorrect security classification to a document containing BPI may result in an APO violation and/or the public disclosure of BPI. There is no process for submitters to independently recall an incorrectly filed document. If you realize that you have uploaded a document under the incorrect security classification, or the document itself is incorrectly labeled, you must contact the ACCESS Help Desk immediately for assistance. If the error involves BPI and may result in an APO violation and/or public disclosure of BPI, you must also contact the APO/Dockets Unit.

D. Submitting Business Proprietary and Accompanying Public Version Documents

ACCESS assigns each document a barcode number which is displayed at the top of the electronic confirmation page for electronic submission or top of the cover sheet for manual submissions. ACCESS uses the barcode number to link a public version to the corresponding business proprietary document. A registered user filing a public version will be required to input the barcode number of the corresponding business proprietary document at the time of filing the public version. Therefore, submitters must properly file the business proprietary document before submitting the public version of a document.

Similarly, submitters must file the “Business Proprietary Document – May Not Be Released Under APO” document prior to submitting the corresponding public version or version that will be released under APO.

E. Submitting Potentially Classified Information

Although the official record of an antidumping or countervailing duty proceeding may contain classified information in accordance with 19 CFR § 351.104(a) of the Department's regulations, classified information must not be filed electronically in ACCESS under any circumstances. This prohibition applies also to classified information that has not been officially declassified, and Sensitive But Unclassified Information that has not been officially authorized for disclosure, whether obtained from a public website such as Wikileaks or other information sources. Note that classified information is not declassified automatically as a result of unauthorized disclosure of identical or similar information, such as its publication by Wikileaks. There is a specific process for declassifying classified information, including the use of standard markings, as specified in 32 CFR 2001.25. Submission of classified information to ACCESS may result in the suspension of the submitter's ACCESS E-Filer account, in accordance with the ACCESS Terms of Use Agreement, available at <https://access.trade.gov/TermsConditions.aspx>.

If a party believes certain information has been declassified and would like to submit that information on the record of the proceeding, he or she must contact the case analyst by telephone to determine whether the potentially classified information may be submitted to the Department manually. The party must inform the analyst of the classification markings on the document, the originating U.S. Government Agency and the source of the document. The information must not be emailed to the case analyst.

If the party obtained the information from a source other than the originating U.S. Government Agency (e.g., if it was sourced from Wikileaks), he or she must also provide documentation that the classified information was officially declassified or authorized for disclosure. If the submitter has such documentation, the analyst will grant a waiver letter or memorandum so that the party may file it manually. Under no circumstances may the submitter file such documentation electronically in ACCESS. The submission and accompanying declassification documentation must be filed manually at the APO/Dockets Unit, along with the waiver letter or memorandum. The party must not serve copies of this submission on other interested parties until directed to do so by the APO/Dockets Unit. These procedures apply to information marked as classified, and Sensitive But Unclassified (SBU).

If a party files a document with the Department containing classified or SBU information, without acknowledging the source of such information, or if it attempts to refile a "redacted" document that merely removes reference to Wikileaks or similar sources, such a submission could be considered a material omission or

misstatement to the government, in violation of the False Claims Act. See 18 U.S.C. §1001(a)(2).

F. Document Type

All filers must file documents and data in accordance with 19 CFR § 351.303. ACCESS will only accept documents and data files in the formats listed in the attached **Appendix 1**.

For all submissions, a document type must be selected from the drop down menu of the ACCESS submission form. In all cases, submitters should consider the primary purpose of the document when selecting the appropriate document type from the drop down menu. For example, if the document being submitted is part of a questionnaire response, "Response" should be selected as the document type. An exception applies for database submissions. When a database is submitted, the document type "Data" must be selected. If the submission is a database which is being submitted with a cover letter file explaining the circumstances of the database submission, the document and database may be submitted together using the document type "Data." The document type "Letter" should not be selected because the database is what is being submitted to the Department.

Special Instructions for Petitions. It is essential that filers of petitions obtain a user account in ACCESS prior to submitting a petition. Petition filers must also contact the APO Unit in advance of the filing to obtain case assignment information.

When filing a petition, filers must select the segment "INV – Investigation" when filling out the ACCESS submission form.

Document Type for petition should be "Petition". The one day lag rule does not apply to a petition. A business proprietary document and public version must be filed on the same day in their final form.

G. Bracketing Not Final or One Day Lag Rule Documents

A business proprietary document for which bracketing is not final for one business day after date of filing must be filed on the due date. Each page must be labeled "Bracketing of Business Proprietary Information Is Not Final For One Business Day After Date of Filing," in accordance with 19 CFR § 351.303(d)(2)(v) and the procedures described in the regulations. When completing the submission form in ACCESS, submitters must check the box labeled "Bracketing Not Final". On the next business day, the final document - whether corrected or not - must be filed in its entirety (not just the changed pages) as a new document in ACCESS.

H. Documents

Documents that are 500 pages or less in length must be filed electronically in a searchable portable document format (“PDF”). Documents that exceed 500 total pages may be filed manually in accordance with 19 CFR § 351.303(b)(2) and following the procedures described in this document under the heading “Bulky Document Submissions”.

The maximum individual file size allowable is four megabytes (4 MB). For documents larger than 4 MB, users may subdivide such documents into smaller sub-files, each less than 4 MB, and file them as a group. Each sub-file grouping may contain up to 5 files of up to 4 MB each, totaling no more than 20 MB for the group. If necessary, a document may be submitted in multiple groupings of 5 files until the document has been submitted in its entirety.

Large documents should be subdivided in a way that reflects the logical progression of the document(s). For example, each exhibit or group of smaller exhibits may be submitted individually or together as one file that is less than 4 MB. Files must be uploaded in sequential order as they appear in the larger document. (Do not upload Volume 3 before Volume 2, or add Exhibit 2 before Exhibit 1 in a file, for example.)

Whenever possible, users should select a Document Title that concisely describes the submitted document. For example, when submitting the exhibits to a questionnaire response, users should select the Document Type “Response” and sample document titles include: “Section A Exhibits 1-2”, “Supplemental Section A”, “Admin. Review Request” and so on.

I. Document Formats

All documents must be submitted as searchable PDFs. Documents submitted in other formats such as Microsoft Word, WordPerfect, etc. will not be accepted.

The Department requires all submitted documents to be searchable. Documents converted to PDF from word processed texts, or text-based PDF files will automatically be text searchable. PDF documents that are scanned or otherwise converted to PDF from images, or image-based PDF files, must be scanned or converted in such a way that they are searchable. This requirement includes highly formatted brochures, photographs or diagrams that should also be made to be text searchable. The optical character recognition (“OCR”) function is available on scanners, and PDF conversion software usually includes the OCR capability. Failure to convert a PDF into a text searchable document will result in the rejection of your submission.

Each page of an electronically filed document must be in letter-sized format (8½ by 11 inch pages when printed). Text should be legible.

When users prepare a PDF for filing, follow these guidelines to consolidate a document into smaller, and thus fewer, submitted files and to enhance the usability of your document:

- a. Create a PDF from a native electronic file format (*e.g.*, MS Word (.doc), Wordperfect (.wpd), etc.); if you must scan a document, select the OCR scanning setting,
- b. Set the resolution for scanning to PDF to 300 dpi whenever possible to produce readable images without producing unnecessarily large files,
- c. Create the PDF using the Adobe Acrobat or similar tools.

Instructions for how to create searchable small size PDF files are available in the Help section of the ACCESS website at: <http://access.trade.gov>.

PDF documents must comply with the following requirements:

- a. Use newer versions of Adobe Acrobat (Version 8 or higher). You are not required to use Adobe products; other similar tools can be used.
- b. Do not attach embedded files to your electronic documents for filing: this includes all comments, form actions, JavaScript actions, external cross references, Internet hyperlinks, embedded sounds or other multimedia.
- c. Website content or information referenced from an internet website must be included in the submitted document.
- d. Do not password protect the PDF document; set the document security setting to “None” or “No Security”.

J. Document Compression

The Department encourages you to “compress” the scanned PDF files that are scanned with 300+ DPI. Compressing the files allows you to fit more pages in a 4 MB file, resulting in fewer overall files being uploaded. Instructions for how to create and compress PDF files are available in the Help section of the ACCESS website at: <http://access.trade.gov>.

For a large document that is created from an application such as MS Word, we prefer that the document be split and not compressed into smaller files. Instructions for how to split documents is available in the Help section of the ACCESS website at: <http://access.trade.gov>.

K. Public Versions of Documents and Databases

When redacting BPI from a document, users should use a redaction procedure that completely removes the words within the brackets. Merely changing the font color of the bracketed information is not an acceptable redaction procedure. A BPI document must be redacted prior to conversion to a PDF document.

Public versions of databases must contain brackets around the summarized or redacted information and the database must be submitted in PDF format.

L. Certifications

The Department’s regulations at 19 CFR § 351.303(g) have been revised to include new requirements for certifications that must accompany a submission of factual information to the Department in AD/CVD proceedings. See 76 FR 7491 (February 10, 2011) (interim final rule) and 76 FR 54697 (September 2, 2011) (supplemental interim final rule), effective for ongoing proceedings; and 78 FR 42678 (July 17, 2013) (final rule), effective for investigations, reviews, and other segments initiated on or after August 16, 2013. The amended regulation requires a handwritten signature on certifications and the retention by the certifier of the signed original certifications. Therefore, in order to comply with this rule and electronic submission, the signed certification pages must be included within the document that is electronically submitted.

M. Databases, or Data Files

A database or data file less than 20 MB in size must be electronically submitted under the “Data” document type.

We recognize that in some situations a database is associated with another document, such as a questionnaire response. In these instances, the database may

be submitted with the associated document, and we recommend using the “Add More Files” feature in the E-File Confirmation Page and also selecting the “Data” document type for such a filing. If the database is being submitted separately from the document, the submitter should input the barcode of the associated document in the Comments field of the data submission form so that the database can be linked to its associated document in ACCESS.

In accordance with 19 CFR § 351.303(b)(2)(ii)(A), a database file that is greater than the data file size limit of 20 MB must be filed manually on CD-ROM or DVD with a cover sheet generated in ACCESS and submitted by the due date (see Manual Filing Procedures, below). If a separate letter with information pertaining to the data accompanies a database, the letter should be manually submitted with the CD-ROM or DVD and an ACCESS cover sheet. An ACCESS cover sheet must be filed with the manually submitted CD-ROM or DVD, however, if more than one file is contained on the CD or DVD, each file must be greater than 20 MB in size and an ACCESS generated separator sheet must be printed for each additional file so that all files in the submission are identified and share one barcode.

Submit BPI database files in their native format. Do not convert BPI databases into PDF unless the information is used for illustrative purposes in the text of a document, or the database is a public version. Refer to the Department’s request for information for guidance on the most appropriate database formats. A list of database formats that will be accepted by the ACCESS system is available in **Appendix 1** of this Handbook.

N. Where to E-File

Users may electronically file documents at the website <http://access.trade.gov> following the instructions on the site, ACCESS External User Guide and in this document.

O. Document Receipt

Upon completion of the electronic transmission of a document using ACCESS, users will be provided with an on-screen electronic confirmation page. A courtesy email notice of electronic receipt will also be sent to the email address of the registered user. Therefore, if a legal assistant submits the document using the ACCESS account of the representing attorney, the electronic receipt will be emailed to the attorney’s registered email account. If the on-screen electronic confirmation page does not appear or the submitter does not receive an electronic email notification of successful submission, then the submitter must assume that the transmission was not successful and the documents were not properly submitted. The user should

attempt to complete a successful transmission a second time. If the user suspects that a technical problem may be preventing a successful submission, he/she should contact the ACCESS Help Desk for additional information and assistance. The submitter is responsible for producing a copy of the on-screen electronic confirmation page or the email notice of electronic receipt as proof of a successful document submission.

P. Document Acceptance

An electronic submission confirmation page, email receipt, or stamped document for a manual submission, establishes the date and time (as applicable) the document was successfully submitted in ACCESS or delivered to APO/Dockets. The AD/CVD Office responsible for the proceeding determines whether the submission is timely and otherwise properly filed. If a submission is later rejected, submitters will promptly receive a memo from the Department stating the reason for such rejection and subsequent actions that the submitter should take for the retention or destruction of the submitted information, as appropriate. Therefore, unless the submitter receives communication from the Department that a document has been rejected, the submitter should assume that the document, for which a user received an on-screen electronic confirmation or email receipt, was successfully submitted and accepted. Print or electronically save (e.g. PDF) the on-screen confirmation page for personal record keeping.

The inability of any submitter to adhere to the guidance in this Handbook may result in the rejection of a document. All questions or concerns about the information contained in this Handbook should be directed to the ACCESS Help Desk.

Q. Deadline for Electronic Document Filing

When a deadline is imposed on the filing of a document, the Department will consider the document timely filed electronically only if it is received in its entirety by ACCESS by the time and date specified. For deadlines identified as “close of business,” 5:00 p.m., Eastern time on the day the document is due will apply. Prior to that time, you may electronically submit documents to ACCESS at any time of the day and on any day of the week (including weekends and holidays). Users should allow ample time to complete a filing. The filing time and date are determined at the time the submission is complete, not at the time the submission process begins. Therefore, we do not recommend starting any filing after 4:00 p.m. on a business day.

You should preserve a copy of the on-screen confirmation page or email notice of electronic receipt for your records to confirm the date and time of electronic

submission in case there is any question about the timeliness of the submission. ACCESS may be occasionally unavailable for routine maintenance. When maintenance is anticipated, a notice and schedule will be posted on the ACCESS website at <http://access.trade.gov>. If the ACCESS site cannot be accessed because of an unanticipated outage, a notice announcing the outage will appear on the Enforcement and Compliance website at <http://www.trade.gov/enforcement>. We will do our best to schedule routine maintenance during non-business hours.

R. Extension of Time Limits

In general, an extension request for a submission will be considered untimely if it is filed after the applicable time limit expires. Pursuant to 19 CFR § 351.303(b), a submission must be received in its entirety by ACCESS by 5:00 p.m. Eastern time on the date the submission is due. Parties should not assume they will receive extensions of time before receiving written notification from the Department on the disposition of the extension request. Because of the time it takes for the Department to consider extension requests and decide on their disposition, the likelihood of receiving an extension decreases for requests that are filed close to 5:00 p.m. In circumstances where the Department is not able to notify the requesting party of the disposition of the request by 5:00 p.m., the submission in question would be due by the opening of business (8:30 a.m.) on the next workday. Link to [Extension of Time Limits](#); Final Rule Small Entity Compliance Guide (78 FR 5790, September 20, 2013).

S. Technical Failures

The Department will declare the ACCESS system to be unavailable due to a technical failure on a given day if the website <http://access.trade.gov> is unable to accept filings continuously or intermittently over the course of any period of time greater than one hour between 12:00 noon and 4:30 p.m. Eastern time, or if the system is unable to accept filings for any duration of time between 4:31 p.m. and 5:00 p.m. Eastern time. Should a technical failure occur on the due date, the submitter may manually file two copies of the document in the APO/Dockets Unit or manually file a request for extension of the due date. Any electronic submissions that are postponed due to a technical failure of the ACCESS system may not be made without having first obtained an extension of the due date from the applicable AD/CVD Office. The Department will provide notice of any technical failures on its Help Desk line and on E&C's website at <http://www.trade.gov/enforcement>.

Filers who manually file a document due to a technical failure must fill out a cover sheet that can be printed from the E&C website at:

<http://enforcement.trade.gov/download/access/home.html> and follow the procedures below in Section 4. Manual Submission Procedures, as appropriate.

T. Improperly Filed Documents

If you discover that the labeling of the document you filed is incorrect, you should contact the ACCESS Help Desk to receive information about the procedures to follow to resubmit a replacement document or otherwise correct the error. If the error involves BPI and may result in an APO violation and/or public disclosure of BPI, you must also contact the APO/Dockets Unit immediately.

4. Manual Filing Procedures

A. Manual Submission Procedures

If an allowable exemption applies under 19 CFR § 351.303(b) and a document may be submitted manually, a cover sheet must be generated in ACCESS and placed on top of the document. Manual submissions missing a cover sheet will be rejected. As noted in “Databases, or Data Files” above, a cover sheet must accompany the database or data file being submitted on CD-ROM or DVD. If more than one file is contained on the CD-ROM or DVD, each file must be greater than 20 MB in size and ACCESS separator sheets must be provided for each additional file, so that all files are identified and share one barcode for the data submission. Only one copy of the document, CD-ROM or DVD need be filed except in the case of a bulky document, which requires two copies. (Note: In the event of a qualifying technical failure by the ACCESS System, two copies of all manual submissions are required.) Manual submissions must be received to the APO/Dockets Unit in Room 18022 of the main Commerce building by any applicable deadline, and between the hours of 8:30 a.m. and 5:00 p.m. Eastern time.

B. Bulky Document Submissions

Documents that contain 500 or more 8½ by 11 pages may be filed manually. Database files are not part of a bulky document submission and should not be counted in the page count to qualify a document as a bulky document.

The Department will scan and submit the bulky document into ACCESS. Therefore, in addition to the requirements stated in 19 CFR § 351.303(b)(3), when making a bulky document submission, submitters must do the following:

- Place an ACCESS generated cover sheet on top of the submission.
- Place ACCESS generated separator sheets, used for all bulky document submissions, at the beginning of all subsequent exhibit groupings that contain no more than 500 pages, or other natural breaks in the submission

that are no more than 500 pages in length. If there are no natural breaks, the separator sheets must be placed every 500 pages.

- It is recommended to use a non-white paper (preferably yellow) for separator sheets.
- Submit high quality, legible prints.
- Submit the unbound hard copy, with the separator sheets, in the order requested by the Department.

Two identical hard copies including cover sheet and separator sheet(s) are required when submitting a bulky document; one set will be used by the Department to manually scan the document into ACCESS, and the additional set will be used by the Department as a guide in the event that problems occur in the scanning process.

C. Manual Filing Receipt

For all manual submissions, the completion and display of the ACCESS cover sheet does not relieve the submitter of his or her obligation to manually submit the document to the Department's APO/Dockets Unit during business hours (adhering to any applicable deadline times) on the due date or the next business day if the due date falls on a holiday or weekend, according to the procedures set forth above and in the regulations for manual submissions.

Manual submissions must be delivered in their entirety to the APO/Dockets Unit, Room 18022 of the main Commerce building by any applicable deadline, or between the hours of 8:30 a.m. and 5:00 p.m. Eastern time.

5. Access to Public Documents and Public Versions

Public documents and public versions of BPI documents are available on ACCESS once they are approved for release by the Department. ACCESS will send email notification digests to E-Filers who are identified as the lead individual on the Department's public service lists. The Department's official service lists can be found at <http://enforcement.trade.gov/apo/apo-svc-lists.html>. The email notification digests will list all public documents and public versions released by the Department for each of the case segments in which the E-Filer is designated as the lead individual in the public service list.

The public digests will be emailed from ACCESS at approximately noon and 5:00 p.m. Eastern time each business day. These email digests constitute official notice to an interested party or its representative that a document is available in ACCESS. The Department will not email courtesy copies of public documents or public versions to interested parties or their representatives.

An interested party who is currently not on the public service list for a segment of a proceeding but wishes to participate in the segment and receive ACCESS notifications of public documents and public versions released by the Department must file on the record of that case segment a letter entering its appearance and explaining how it qualifies as an interested party. After the interested party is added to the public service list, it will begin receiving the email digests.

Access to these documents will require users to log-in with an authorized E-Filer or Guest User ACCESS user name and password. E-Filers should log in using their E-Filer user name and password and do not require a separate Guest User account. Anyone wishing solely to view or download the public documents or public versions must register as a Guest User. A user account can either be an E-Filer or Guest User type, but users may not be registered as both types at the same time. If a Guest User would like to change the account to E-Filer, the request should be e-mailed to access@trade.gov.

All public documents and public versions submitted in ACCESS will remain available to the public in the Central Records Unit ("CRU"), Public File Room, in Room 7046 of the main Commerce building between 8:30 a.m. and 5:00 p.m. Eastern time, Monday through Friday on business days. For a printing fee, users may print documents from computers connected to ACCESS in the CRU. To facilitate storage of electronic documents in portable media, approved one time use CD-ROMs and thumb drives may be purchased from the CRU.

6. **BPI Document Procedures**

A. Access to BPI Documents

Training is mandatory for all APO-authorized E-filers who wish to download BPI documents released by the Department. This includes those E-Filers who are the designated lead attorney that appear on the APO Service list for the relevant segment, as well as those E-Filers who are designated as Proxy users by the lead attorney in his or her User Profile. The Department's official service lists can be found at <http://enforcement.trade.gov/apo/apo-svc-lists.html>. Information about available training classes may be obtained from the ACCESS Help Desk or the ACCESS website at: <http://access.trade.gov> under Notices. The ACCESS External User Guide will contain information about Release 3 features and how to download BPI documents.

B. BPI Releases

All BPI documents generated by the Department will be released using ACCESS.

Representatives of a party are expected to log into ACCESS and download documents containing their client's BPI as well as those documents containing third party BPI that are released under APO.

It is the responsibility of the lead attorney or his or her Proxy to retrieve the BPI documents. The Department will not email courtesy copies of documents containing an interested party's own BPI to it or its representative. The Department will only provide documents to an interested party by email or through the APO Unit under the exceptions discussed in Section 6.C, below.

Similar to the email notifications with daily digests of public documents and public versions released by the Department, email notifications for BPI documents generated by the Department will also be sent to lead attorney E-Filer accounts twice each day when documents have been approved for release. BPI digests will be emailed at approximately 12:00 noon and 5:00 p.m. Eastern time. These email digests constitute official notice to the lead attorney that a BPI document is available in ACCESS. Note that Proxy users will not receive email notifications. The My Service Lists feature, introduced in Release 3, can be used to verify the designated recipients of email notifications. Contact the APO Unit immediately if a name is omitted from the email notification list, or if changes to the list are warranted.

BPI documents will be available for download for 14 calendar days from the document Filed Date. Authorized applicants who are added to the APO service list for a relevant segment after BPI documents have been released by the Department in that segment must contact the analyst if they wish to obtain copies of those documents that were previously released. The analyst will release those documents manually in paper or on CD-ROM through the APO Unit if they contain third party BPI. If they contain the BPI of the authorized applicant's client, they may be released directly to the representative by the analyst. The BPI Release List feature, introduced in Release 3, provides a complete listing of BPI documents released during the segment and should be used to determine if any documents have been missed.

C. Exceptions to ACCESS BPI Release Process

Department-generated BPI documents will not be released using ACCESS in the following circumstances.

If an analyst seeks bracketing comments from an interested party in a non-final BPI document, the analyst will contact the party that is the owner of the BPI or its representative to directly transmit to it the non-final BPI document and request bracketing comments. When bracketing is finalized and the document is approved

and released in ACCESS, the document will be available in ACCESS and the lead attorneys on the APO service list will receive an email notification with the BPI daily digest.

Pro se parties are not granted APO access. Therefore, analysts will release documents containing the *pro se* party's own BPI directly to the *pro se* party.

Similar to the *pro se* party exception, if an interested party's representative declines to file an APO application and instead only files an entry of appearance, that representative will not receive BPI daily digest notifications, nor will he or she be able to download any BPI documents from ACCESS. If the representative wishes to obtain copies of the BPI documents generated by the Department that contain only his or her client's BPI, then the representative must contact the analyst directly to obtain Department-generated documents containing his or her own client's BPI.

D. BPI File Location and Storage

BPI documents and data files should be accessed using the approved system of the E-Filer's organization, using his or her own ACCESS account credentials. Documents must be downloaded to a secure location per the E-Filer's organization's procedures.

The E-Filer must protect the files from unauthorized disclosure in accordance with the terms of the APO and the Department's regulations at 19 CFR Parts 351 and 354. Note that in most internet browsers, simply clicking on the document link to view it in ACCESS will automatically download the document to a temporary location in the E-Filer's hard drive. The E-Filer must ensure that the temporary file is properly deleted in order to comply with the destruction requirements in the APO under 19 CFR 351.305(a)(3).

If a BPI document or data file is to be shared with other APO-authorized colleagues, remove the user PIN that was used to download the file from ACCESS. Assign a password known to you and your colleagues to protect the document internally.

7. **Definitions**

APO – Administrative Protective Order.

Barcode – Unique numeric code used to identify a submission.

Business Day – A day that the Department is open for business: Monday through Friday, excluding Federal Holidays.

Cover Sheet – The ACCESS generated page that contains the barcode and other information to identify the submission. It must be placed on top of all manual submissions.

Document – In the ACCESS system, the information being submitted. For purposes of the Department’s regulations, a document is synonymous with a submission, defined below.

Document Title – The name of the document. Ex: “Section A Exhibits 1-3”.

Document Type – Describes the document being filed. Examples include: letter, brief, response, petition, etc.

Electronic Submission – Document electronically filed in ACCESS includes the ACCESS submission form and the attached files. When applicable, a submission includes multiple sub-files identified by a common barcode.

ACCESS – Antidumping and Countervailing Duty Centralized Electronic Service System managed by Enforcement and Compliance, International Trade Administration.

Manual Submission – Paper document or CD-ROM/ DVD that is submitted to APO/Dockets Unit with ACCESS cover sheet and any separator sheets, as necessary, identified by common barcode.

Optical Character Recognition (OCR) – The electronic translation of scanned images into machine encoded text. It is used to make it possible to edit the text of a document or search for a word or phrase in a document.

Proxy – An E-Filer who has been designated by the lead attorney to access BPI documents on the segments of the proceeding in which the attorney is listed as the lead attorney on the APO service list.

Portable Document Format (PDF) - An open standard document format originally developed by Adobe Systems in 1993 that is used for representing documents in a manner independent of application software, hardware, and operating systems.

Separator Sheet – Unique page generated in ACCESS to be inserted by the submitter in logical breaks of no more than 500 pages for documents submitted using the bulky document exception. It is recommended to use a non-white paper (preferably yellow) for separator sheets. Once a cover sheet or separator sheet is generated, an option to create new or additional separator sheets with a barcode will be available.

Submission – The entirety of what is transmitted to the Department identified by a common barcode.

Submission Form – The ACCESS document information form that must be filled out when submitting a document. The information requested in the form identifies the AD/CVD segment and determine the metadata, or keywords, to be associated with the document being submitted.

Sub-File – An electronic file that represents a portion of a larger file. A file that is too large to be submitted in ACCESS as one file (more than 4MB) may be subdivided into smaller files, or sub-files, and submitted together as a group.

Appendix 1: Allowed File Types

Document Files:

.pdf - Portable Document Format

Data Files:

.accdb - Data (MS Access)

.csv - Comma Separated Values

.dat - Data

.dbf - dBase

.egp - Enterprise Guide Project

.log - SAS log file

.lst - SAS output file

.mda - Data (MS Access)

.mdb - Database (MS Access)

.prn - Printer Text File

.SAS - SAS Program

.sas7bcats - SAS System file catalog

.sas7bdat - SAS System data set

.sas7bndx - SAS System index

.sas7bpgm - SAS System Stored Program

.sas7bview - SAS Data Set View

.sas7mdb - SAS System multidimensional database

.SD2 - Version 6 SAS dataset

.ss2 - Version 6 SAS stored program

.ss7 - Version 7 and Version 8 SAS stored program

.txt - Text File

.xls - MS Excel

.xlsx - MS Excel new format

.zip - Compressed Archive File (may only be used to compress **one data file** that is larger than 20 MB.)

Video Files:

.mp4 - MPEG-4

.mpg - MPEG 1 System Stream

.wmv - Windows Media File