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Administrative Review
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March 2, 2021

MEMORANDUM TO: Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

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

SUBJECT: Issues and Decision Memorandum for the Final Results of the 2018-2019 Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the Republic of Korea

I. SUMMARY

The Department of Commerce (Commerce) analyzed the case and rebuttal briefs submitted by interested parties[1] in the administrative review of the antidumping duty order on certain steel nails (nails) from the Republic of Korea (Korea) covering the period of review (POR), July 1, 2018, through June 30, 2019.

Based on our analysis of the comments received, we have made changes to the *Preliminary Results*.[2] We determine that Daejin and Kowire[3] made sales at less than normal value. We recommend that you approve the positions described in the "Discussion of Comments" section of this memorandum. Below is the complete list of issues for which we received comments and rebuttal comments from interested parties.

[1] The petitioner is Mid Continent Steel & Wire, Inc. The mandatory respondents in this review are Daejin Steel Company (Daejin) and Korea Wire Co., Ltd. (Kowire).
[2] *See Certain Steel Nails from the Republic of Korea: Preliminary Results of Antidumping Duty Administrative Review and Partial Rescission of Antidumping Duty; 2018-2019,* 85 FR 69576 (November 3, 2020) (*Preliminary Results*), and accompanying Preliminary Decision Memorandum (PDM).
[3] Commerce initiated the administrative review of nails from Korea on September 9, 2019. *See Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 84 FR 47244 (September 9, 2019) (*Initiation Notice*) and selected Daejin and Kowire as mandatory respondents on October 4, 2019. *See* Memorandum, "2018-2019 Antidumping Duty Administrative Review of Certain Steel Nails from the Republic of Korea: Issuance of Questionnaire," dated October 4, 2019.

II. LIST OF COMMENTS

Comment 1: Whether Commerce Should Reallocate Certain Common Expenses from General & Administrative (G&A) Expenses
Comment 2: Whether Commerce Should Reallocate Daejin's Credit Card Expenses Completely to G&A Expenses
Comment 3: Whether Commerce Should Adjust Differential Pricing
Comment 4: Whether Daejin's Interest Expense Offset for Interest Revenue Should Be Denied
Comment 5: Whether Commerce Should Correct the Currency for Commissions
Comment 6: Whether Commerce Should Correct the Spelling of Kowire in Draft Liquidation Instructions

III. BACKGROUND

On November 3, 2020, Commerce published the *Preliminary Results* in the *Federal Register*.[4] In accordance with 19 CFR 351.309(b), we invited interested parties to comment on our *Preliminary Results*. On December 3, 2020, Commerce received case briefs from the petitioner[5] and the mandatory respondents.[6] The petitioner and Daejin submitted rebuttal briefs on December 10, 2020.[7] Commerce has conducted this administrative review in accordance with section 751 of the Tariff Act of 1930, as amended (the Act).

IV. Scope of the Order

The merchandise covered by this order is certain steel nails having a nominal shaft length not exceeding 12 inches. Certain steel nails include, but are not limited to, nails made from round wire and nails that are cut from flat-rolled steel. Certain steel nails may be of one piece construction or constructed of two or more pieces. Certain steel nails may be produced from any type of steel, and may have any type of surface finish, head type, shank, point type and shaft diameter. Finishes include, but are not limited to, coating in vinyl, zinc (galvanized, including but not limited to electroplating or hot dipping one or more times), phosphate, cement, and paint. Certain steel nails may have one or more surface finishes. Head styles include, but are not limited to, flat, projection, cupped, oval, brad, headless, double, countersunk, and sinker. Shank styles include, but are not limited to, smooth, barbed, screw threaded, ring shank and fluted. Screw-threaded nails subject to this proceeding are driven using direct force and not by turning the nail using a tool that engages with the head. Point styles include, but are not limited to, diamond, needle, chisel and blunt or no point. Certain steel nails may be sold in bulk, or they may be collated in any manner using any material.

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[4] *See Preliminary Results*.
[5] *See* Petitioner's Letters, "Certain Steel Nails from Korea: Case Brief," dated December 3, 2020.
[6] *See* Daejin's Letter, "Administrative Review of the Antidumping Order on Certain Steels Nails from Korea – Case Brief of Daejin Steel Company," dated December 3, 2020 (Daejin's Case Brief); *see also* Kowire's Letter, "Steel Nails from the Republic of Korea – Case Brief," dated December 3, 2020 (Kowire's Case Brief).
[7] *See* Petitioner's Letter, "Certain Steel Nails from Korea: Rebuttal Brief," dated December 10, 2020; *see also* Daejin's Letter, "Administrative Review of the Antidumping Order on Certain Steels Nails from Korea – Rebuttal Brief of Daejin Steel Company," dated December 10, 2020.

Excluded from the scope of this order are certain steel nails packaged in combination with one or more non-subject articles, if the total number of nails of all types, in aggregate regardless of size, is less than 25. If packaged in combination with one or more non-subject articles, certain steel nails remain subject merchandise if the total number of nails of all types, in aggregate regardless of size, is equal to or greater than 25, unless otherwise excluded based on the other exclusions below.

Also excluded from the scope are certain steel nails with a nominal shaft length of one inch or less that are (a) a component of an unassembled article, (b) the total number of nails is sixty (60) or less, and (c) the imported unassembled article falls into one of the following eight groupings: (1) builders' joinery and carpentry of wood that are classifiable as windows, French-windows and their frames; (2) builders' joinery and carpentry of wood that are classifiable as doors and their frames and thresholds; (3) swivel seats with variable height adjustment; (4) seats that are convertible into beds (with the exception of those classifiable as garden seats or camping equipment); (5) seats of cane, osier, bamboo or similar materials; (6) other seats with wooden frames (with the exception of seats of a kind used for aircraft or motor vehicles); (7) furniture (other than seats) of wood (with the exception of (i) medical, surgical, dental or veterinary furniture; and (ii) barbers' chairs and similar chairs, having rotating as well as both reclining and elevating movements); or (8) furniture (other than seats) of materials other than wood, metal, or plastics (e.g., furniture of cane, osier, bamboo or similar materials). The aforementioned imported unassembled articles are currently classified under the following Harmonized Tariff Schedule of the United States (HTSUS) subheadings: 4418.10, 4418.20, 9401.30, 9401.40, 9401.51, 9401.59, 9401.61, 9401.69, 9403.30, 9403.40, 9403.50, 9403.60, 9403.81 or 9403.89.

Also excluded from the scope of this order are steel nails that meet the specifications of Type I, Style 20 nails as identified in Tables 29 through 33 of ASTM Standard F1667 (2013 revision).

Also excluded from the scope of this order are nails suitable for use in powder-actuated hand tools, whether or not threaded, which are currently classified under HTSUS subheadings 7317.00.20.00 and 7317.00.30.00.

Also excluded from the scope of this order are nails having a case hardness greater than or equal to 50 on the Rockwell Hardness C scale (HRC), a carbon content greater than or equal to 0.5 percent, a round head, a secondary reduced-diameter raised head section, a centered shank, and a smooth symmetrical point, suitable for use in gas-actuated hand tools.

Also excluded from the scope of this order are corrugated nails. A corrugated nail is made up of a small strip of corrugated steel with sharp points on one side.

Also excluded from the scope of this order are thumb tacks, which are currently classified under HTSUS subheading 7317.00.10.00.

Certain steel nails subject to this order are currently classified under HTSUS subheadings 7317.00.55.02, 7317.00.55.03, 7317.00.55.05, 7317.00.55.07, 7317.00.55.08, 7317.00.55.11, 7317.00.55.18, 7317.00.55.19, 7317.00.55.20, 7317.00.55.30, 7317.00.55.40, 7317.00.55.50, 7317.00.55.60, 7317.00.55.70, 7317.00.55.80, 7317.00.55.90, 7317.00.65.30, 7317.00.65.60 and

7317.00.75.00. Certain steel nails subject to this order also may be classified under HTSUS subheadings 7907.00.60.00, 8206.00.00.00 or other HTSUS subheadings.

While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this order is dispositive.

V. CHANGES MADE SINCE THE *PRELIMINARY RESULTS*

Based on our analysis of the comments received from parties, we have made changes to the margin calculations of Daejin and Kowire. For Daejin, we allocated all credit card entertainment expenses to general and administrative (G&A) expenses.[8] Also, we adjusted the indirect selling expense rate based on the allocation of non-compensation based expenses wholly to G&A expenses.[9] For Kowire, we converted commission expenses from Korean won (KRW) to United States dollars (USD).[10]

VI. ANALYSIS OF COMMENTS

In the *Preliminary Results*, we determined that certain non-compensation expenses, such as travel expenses; entertainment expenses; communication expenses; taxes and dues, *etc.*, should be allocated as G&A expenses because neither Daejin nor Kowire were able to explain why this methodology of allocating the non-salary expenses based on the ratio of salaries and bonuses was reasonable or non-distortive.

Comment 1: Whether Commerce Should Reallocate Certain Common Expenses from G&A Expenses

Daejin's Comments:[11]

- Commerce stated that because those common expenses could not be directly identified as either selling or G&A expenses, "it is more indicative that these expenses are of a general nature and thus should be completely allocated to G&A." However, by Commerce's own admission, there is no evidence that those expenses are, in fact, G&A expenses.
- Commerce's practice was to allocate Daejin's common expenses between indirect selling and G&A expenses in previous administrative reviews of this case.
- Expenses related to developing customer relationships, such as travel to visit customers, entertainment for customers, and credit card expenses for customer-related activities, are better categorized as indirect selling expenses.
- Expenses related to both sales and administrative personnel, such as office supplies and expenses for the building that houses both sales and administrative personnel (*i.e.*, repairs, maintenance, depreciation, insurance premiums, and taxes) apply equally to

[8] *See* Memorandum, "Final Results Analysis Memorandum for Daejin Steel Company," dated concurrently with this memorandum (Daejin Final Analysis Memorandum)
[9] *Id.*
[10] *See* Memorandum, "Final Results Analysis Memorandum for Korea Wire Co., Ltd. (Kowire); 2018 – 2019," dated concurrently with this memorandum (Kowire Final Analysis Memorandum).
[11] *See* Daejin's Case Brief at 1-3.

selling and administrative activities. As a result, Commerce should revise the allocation of Daejin's common expenses to selling and G&A expenses in its final results.

Petitioner's Rebuttal:

- For the final results, Commerce should continue to allocate Daejin's certain common expenses entirely to G&A expenses, because these expenses are of a general nature and should be treated as G&A expenses.
- Commerce requested Daejin explain the nature of the allocated expenses, which Daejin failed to do.
- The fact that there is no reasonable basis to allocate a particular expense item means that this expense is of a general nature and, thus, should be assigned to G&A expenses. Daejin's additional descriptions of these expense items (travel expenses, entertainment expenses, communication expenses, taxes and dues, depreciation expenses, repairs expenses, insurance premium, vehicle maintenance expenses, publication expenses, supplies expenses, fees, and credit card entertainment expenses) in its 4th supplemental questionnaire response also demonstrate that they are of a general nature and should be treated as G&A expenses.

Commerce's Position: We agree with the petitioner. We continue to find that, because Daejin claims that the non-salary expenses cannot be directly identified with selling or G&A activities,[12] it is more indicative that these expenses are of a general nature and thus should be completely allocated to G&A. Daejin argues that in a previous review of this proceeding Commerce allocated Daejin's non-compensation-based expenses between both G&A and selling expenses and because Commerce has done so in the past, it should continue to do so here. We note that each segment of the proceeding is independent of each other and stands on its own record. In this review and on this record, Commerce had concerns with Daejin's proposed allocation methodology because it was unable to confirm that Daejin's method is non-distortive, notwithstanding its use in prior segments of the proceeding. Multiple times, we asked Daejin to "explain the nature of each expense item," listed in the SG&A expense chart provided in D-11, and based on those descriptions, to explain why they should be allocated between indirect selling and G&A based on a ratio of salaries and bonuses, but Daejin failed to provide an explanation for why these expenses, based on their description, should be allocated based on a ratio of salaries and bonuses.[13] In response to our supplemental questionnaire, Daejin failed to explain why its methodology of allocating the non-salary expenses based on the ratio of salaries and bonuses was reasonable or non-distortive. Because Daejin failed to explain these expenses, or why the methodology based on the ratio of salaries or bonuses was reasonable or non-distortive, and because Daejin claims that the non-salary expenses cannot be directly identified with selling or G&A activities indicates that these expenses are of a general nature, for the final results, we have allocated travel expenses, entertainment expenses, communication expenses, taxes and

[12] *See* Daejin's Letter, "Third [Fourth] Administrative Review of the Antidumping Duty Order on Certain Steel Nails from Korea – Response to February 7 Supplemental Questionnaire," dated March 16, 2020 (Daejin's First Supplemental Response) at 8.

[13] *See* Daejin's First Supplemental Response at 8-10 and at Appendix SD-10; *see also* Daejin's Letter, "Response of Daejin Steel Company to Commerce's September 4 Supplemental Questionnaire," dated September 18, 2020 (Daejin's Fourth Supplemental Response) at 3-4 and at Appendix S2D-5.

dues, depreciation expenses, repairs expenses, insurance premiums, vehicles maintenance expenses, publication expenses; supplies expenses; fees, and credit card expenses to G&A.[14]

Comment 2: Whether Credit Card Entertainment Expenses Should Be Treated The Same Way As Entertainment Expenses And Allocated Completely To G&A Expenses

Petitioner's Comments:

- Daejin's G&A expenses included two entertainment expense accounts – "Entertainment expenses" and "Credit card entertainment expenses," of which Commerce allocated only one – "Entertainment expenses" – completely to G&A expenses. However, the only difference between the two accounts is the method of payment, which does not affect the nature of the expenses. Therefore, Commerce should treat "Credit card entertainment expenses" the same way as it treated "Entertainment expenses" and allocate them all to G&A expenses.

Daejin's Rebuttal:

- There were no differences between the credit card entertainment expense and entertainment expense categories other than the means of payment.[15] In these circumstances, recharacterizing Daejin's credit card entertainment expenses (and other common expenses) without any evidence that these expenses should now be wholly-classified as G&A expenses is arbitrary and clearly improper.
- Daejin's common expenses, including entertainment expenses, could not be directly identified as either selling or G&A expenses. In such circumstances, Commerce's practice is to allocate Daejin's common expenses between indirect selling and G&A expenses.[16]
- Mid Continent itself has previously agreed that an allocation of Daejin's entertainment expenses between G&A and indirect selling expenses is appropriate.[17]
- Commerce should revise the allocation of Daejin's other common expenses to indirect selling and G&A expenses in its final results.
- Commerce should revise the allocation of Daejin's other common expenses to indirect selling and G&A expenses in its final results.

Commerce's Position: We agree with the petitioner. We have determined that, based on the record evidence, all of Daejin's credit card expenses should be allocated under G&A expenses because the record demonstrates that Daejin's credit card entertainment expenses are just

[14] *See* Daejin Final Analysis Memorandum.
[15] *See* Daejin's First Supplemental Response at 28.
[16] *See, e.g.*, Certain Steel Nails from the Republic of Korea: Final Results of Antidumping Duty Administrative Review; 2014-2016, 83 FR 4028 (January 29, 2018), and accompanying Issues and Decision Memorandum at comment 4 (finding that allocating expenses that "could not be readily classified as selling or G&A" to both G&A and indirect selling expenses is appropriate for Daejin and noting that "Commerce has accepted similar expense allocations in the past.").
[17] *Id.* ("…Petitioner asserts that Daejin's allocation methodology… is appropriate for certain items, such as travel expenses, entertainment expenses and communication expenses.").

entertainment expenses paid for using a credit card.[18] Daejin's argument that we should allocate non-compensation–based expenses between selling and G&A expenses based on their method of allocating on the ratio of salaries and bonuses have been addressed and rejected as explained under Comment 1. Daejin reported both entertainment expenses and credit card entertainment expenses as non-salary expense items, along with other expenses which Commerce allocated under G&A. Because we have allocated all entertainment expenses under G&A expenses, likewise credit card entertainment expenses should also be allocated under G&A expenses because there are no differences between these expenses. Accordingly, for the final results, we have allocated entertainment expenses and credit card entertainment expenses to G&A.[19]

Comment 3: Whether Commerce Should Adjust Differential Pricing

Daejin's Comments

- Commerce has failed to justify the numerical thresholds used in the differential pricing analysis based on substantial evidence on the record. Because these thresholds were not adopted pursuant to notice-and-comment requirements of the Administrative Procedure Act (APA), Commerce must justify these thresholds in every case, and must provide substantial evidence on the record showing that the analysis is appropriate under the facts of this particular case.
- In the absence of any theoretical or empirical justification, the use of those cut-offs in Commerce's analysis is arbitrary and unsustainable. For example, Commerce has not provided evidence or analysis for why the 0.8 cut-off used for the "Cohen's *d*" test and the 33- and 66-percent cut-offs used for the "ratio test" — are appropriate for this case. Commerce has taken a statistical tool and used it for a purpose and in a situation that the Commerce acknowledges Professor Cohen never intended. As a result, there is no basis for Commerce's assertion that the "wide adoption" of his "effect size" analysis supports Commerce's claim that the cut-offs used are "fixed thresholds" or can provide justification for Commerce's use of the *d* statistic in its "differential pricing analysis" in situations that are not consistent with the limitations of the "Cohen's *d*" test.
- Commerce never explained why a ratio between 33 and 66 percent calls for consideration of the average-to-transaction methodology only for the sales that "pass" the Cohen's *d* test, while a ratio of 66 percent or more calls for the application of the average-to-transaction methodology for all sales.
- Commerce fails to explain why any patterns of price differences were not, or could not be, taken into account using an average-to-average (A-to-A) comparison. Demonstrating that dumping margins are different under an alternative methodology does not amount to an explanation of why an A-to-A price comparison is inappropriate.
- There is no reason to believe that the price differences that give rise to a finding of "targeted dumping" are the cause of the divergent results across the comparison methodologies. Instead, the divergent margin calculations are primarily a function of the different treatment of negative dumping margins under Commerce's standard

[18] *See* Daejin's Letter, "Third [Fourth] Administrative Review of the Antidumping Duty Order on Certain Steel Nails from Korea – Response to February 7 Supplemental Questionnaire," dated March 16, 2020 (Daejin's First Supplemental Response) at 28.
[19] *See* Daejin Final Analysis Memorandum

methodology (where zeroing is not used) and its alternate methodologies (where negative margins are zeroed). Differences in dumping margins generated by the application of "zeroing" are not the same as differences in dumping margins caused by patterns of price differences by customer, region, or time period.

- Commerce has not provided any support for its assertion that the difference in weighted-average dumping margins is "meaningful" when there is at least a 25 percent change in margin between the average-to-average and alternative calculation method.
- Neither the petitioner nor Commerce has established, based on substantial evidence on the record, that there is, in Daejin's U.S. sales, a pattern of U.S. prices for comparable merchandise that differ significantly among purchasers, regions, or periods of time. Commerce's "differential pricing analysis" would not explain why such differences could not be taken into account using either the average-to-average or transaction-to-transaction comparison methods and the exception set forth in section 777A(d)(1)(B) of the Act. Therefore, Commerce is required by statute to calculate dumping margins using the average-to-average methodology for all of Daejin's U.S. sales in its final results.

Petitioner's Rebuttal

- Daejin's arguments against the various thresholds of the differential pricing analysis and the meaningful difference test are without merit and have been repeatedly rejected by courts. Courts have affirmed Commerce's differential pricing analysis as consistent with the statute and supported by substantial evidence. For the final results, Commerce should continue to apply its differential pricing analysis to Daejin.
- The courts have repeatedly upheld the use of the numerical thresholds used in the differential pricing analysis, *i.e.*, the 0.8 cut-off used for the "Cohen's *d*" test and the 33 and 66 percent cut-offs used for the "ratio test."[20] Furthermore, the Court of International Trade (CIT) rejected the claim that (0.8) thresholds are arbitrary and held that the 0.8 threshold gauges "relative differences" and as such, it is necessarily a case-by-case determination because it is applied to a respondent's U.S. prices on the record of the segment at issue.[21]
- The courts have also held in previous cases that Cohen's *d* test "is an accepted statistical test, employed by ITA to discern a pricing pattern"[22] and found that Commerce adequately explained that the Cohen's *d* test "may be reasonably employed to measure pricing behavior, an element of economic analysis that may not be quantified in easily understood variables in the manner of a strictly 'hard' science."[23] Therefore the courts have already rejected Daejin's allegation that Cohen's *d* test can only be used where samples have been randomly and independently drawn from normal populations, and where the two samples do not have substantially unequal variances or substantially unequal sample sizes.
- In *Steel Nails from China*, Commerce has already rejected the issue that Daejin raises regarding the application of Cohen's *d* test to an entire population instead of a sample,

[20] *See* Petitioner Rebuttal Brief at 5 and 10 (citing *Tri Union Frozen Products, Inc. v. United States*, 163 F.Supp.3d 1255, 1301 (CIT 2016); and *Mid Continent Steel & Wire, Inc. v. United States*, 219 F.Supp.3d 1326, 1339 (CIT 2017)).
[21] *See Mid Continent Steel & Wire, Inc. v. United States*, 219 F.Supp.3d at 1339-1340 (CIT 2017).
[22] *See Xi'an Metals & Minerals Import & Export Co., Ltd. v. United States*, 256 F.Supp.3d 1346, 1363 (CIT 2017).
[23] *See The Stanley Works (Langfang) Fastening Systems Co., Ltd. v. United States*, 279 F.Supp.3d 1172, 1186 (CIT 2017).

explaining that the use of a simple average in determining the pooled standard deviation equally weighs a respondent's pricing practices to each group and the magnitude of the sales to one group does not skew the outcome.[24] In addition, the CIT agreed with Commerce's decision to use a simple average instead of a weighted average to calculate the pooled standard deviation, and held that it "does not run afoul of any statutory provision and is reasonable on its face.[25] The CIT found that there is nothing in the statute that mandates how Commerce measures whether there is a pattern of prices that differ significantly, and that Commerce's use of the Cohen's *d* test (including the use of a simple average for the calculation of the pooled standard deviation) was reasonable for this purpose.[26]

- The CIT has also found that the 33 percent and 66 percent thresholds used in the ratio test to determine the extent of the significant price differences and the extent to which the alternative A-T method can be applied were lawful and reasonable.[27]
- The CIT has also upheld the meaningful difference test and the use of zeroing in the differential pricing analysis.[28] It also found that Commerce's application of the meaningful difference test, and the different result obtained through each method, *i.e.*, the margin obtained through the A-to-A method and the margin obtained through the A-to-T method, demonstrates why the A-to-A method cannot account for the pattern of significant price differences.[29]

Commerce's Position: We disagree with Daejin's assertion that Commerce has not justified the numerical thresholds used in our differential pricing analysis. We also disagree with Daejin's assertion that Commerce failed to provide an explanation of why an A-to-A price comparison is inappropriate here. Accordingly, for the final results, we continue to apply our standard differential pricing analysis in these final results and continue to calculate Daejin's margin using the A-to-T methodology.

As an initial matter, Commerce notes that there is nothing in section 777A(d) of the Act that mandates how Commerce measures whether there is a pattern of prices that differ significantly or explains why the A-to-A method cannot account for such differences. On the contrary, carrying

[24] *See Certain Steel Nails from the People's Republic of China: Final Results of Antidumping Duty Administrative Review, Final Determination of No Shipments and Final Partial* Rescission; 2014-2015, 82 FR 14344 (March 20, 2017), and accompanying Issues and Decision Memorandum at 12.
[25] *See Tri Union Frozen Products, Inc. v. United States*, 163 F.Supp.3d at 1306.
[26] *See Tri Union*, 163 F.Supp.3d at 1307-1308 (citing *Motor Vehicle Mfrs. Ass'n of U.S. v. State Farm Mut. Auto. Ins. Co*., 463 U.S. 29, 48-49 (1983); *Fujitsu Gen. Ltd. v. United States*, 88 F.3d 1034, 1039 (Fed. Cir. 1996); and *Ceramica Regiomontana, S.A. v. United States*, 636 F.Supp. 961, 966 (CIT 1986), aff'd, 810 F.2d 1137, 1139 (Fed. Cir. 1987)).
[27] *See Tri Union*, 163 F.Supp.3d at 1308-1309.
[28] *See, e.g., The Timken Co. v. United States, 179 F.Supp.3d 1168, 1180-1181, 1184-1185 (CIT 2016).*
[29] *See Apex Frozen Foods Private Ltd v. United States, 144 F.Supp.3d 1308, 1332-1335 (CIT 2016) (citations omitted), aff'd, Apex Frozen Foods Private Ltd v. United States, 862 F.3d 1337, 1346, 1348-1349 (Fed. Cir. 2017); accord Apex, 208 F.Supp.3d at 1414-1415.*

out the purpose of the statute,[30] here is a gap filling exercise properly conducted by Commerce.[31] As explained in the *Preliminary Results*, as well as in various other proceedings,[32] Commerce's differential pricing analysis, including the use of the Cohen's *d* test as a component in this analysis, is reasonable and is in accordance with law.

We note that the U.S. Court of Appeals for the Federal Circuit (Federal Circuit) has upheld key aspects of Commerce's differential pricing analysis, including the application of the "meaningful difference" standard, which compares the rate calculated using the A-to-A method not using zeroing and the rate calculated using an alternative comparison method based on the A-to-T method using zeroing; the reasonableness of Commerce's comparison method in fulfilling the relevant statute's aim; Commerce's use of a "benchmark" to illustrate a meaningful difference between the A-A and A-T rates; Commerce's justification for applying the A-to-T methodology to all sales instead of just those that pass the Cohen's *d* test; Commerce's use of zeroing in applying the A-to-T methodology to all transactions; that the statute does not directly apply to reviews; that Congress did not dictate how Commerce should determine if the A-to-A method accounts for targeted or masked dumping; that Commerce may consider all sales in its "meaningful difference" analysis and consider all sales when calculating a final rate using the A-to-T method; and that it is acceptable to apply zeroing when using the A-to-T method.[33] In *NEXTEEL,* the CIT rejected a party's challenge to our differential pricing analysis and held that "the steps underlying the differential pricing analysis as applied by Commerce {are} reasonable."[34] In carrying out this statutory objective, Commerce determines whether "there is a pattern of export prices (or constructed export prices) for comparable merchandise that differs

[30] *See Koyo Seiko Co., Ltd. v. United States*, 20 F. 3d 1156, 1159 (Fed. Cir. 1994) ("The purpose of the antidumping statute is to protect domestic manufacturing against foreign manufacturers who sell at less than fair market value. Averaging U.S. prices defeats this purpose by allowing foreign manufacturers to offset sales made at less-than-fair value with higher priced sales. Commerce refers to this practice as 'masked dumping.' By using individual U.S. prices in calculating dumping margins, Commerce is able to identify a merchant who dumps the product intermittently—sometimes selling below the foreign market value and sometimes selling above it. We cannot say that this is an unfair or unreasonable result." (internal citations omitted).)

[31] *See Chevron U.S.A., Inc. v. Natural Res. Def. Council, Inc.,* 467 U.S. 837, 842-43 (1984) (Chevron) (recognizing deference where a statute is ambiguous and an agency's interpretation is reasonable); *see also Apex Frozen Foods Private Limited v. United States*, 37 F. Supp. 3d 1286, 1302 (*Apex I*) (applying Chevron deference in the context of Commerce's interpretation of section 777A(d)(1) of the Act).

[32] *See, e.g.*, *Welded Line Pipe from the Republic of Korea: Final Determination of Sales at Less Than Fair Value,* 80 FR 61366 (October 13, 2015), and accompanying IDM at Comment 1; *Circular Welded Non-Alloy Steel Pipe from the Republic of Korea: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 80 FR 32937 (June 10, 2015), and accompanying IDM at Comments 1 and 2*; Welded ASTM A–312 Stainless Steel Pipe from the Republic of Korea: Final Results of Antidumping Duty Administrative Review; 2013–2014,* 81 FR 46647 (July 18, 2016), and accompanying IDM at Comment 4; and *Certain Hot-Rolled Steel Flat Products from Japan: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 81 FR 53409 (August 12, 2016), and accompanying IDM at Comment 8.

[33] *See APEX Frozen Foods Private Ltd. v. United States*, 144 F. Supp. 3d 1308, 1314-37 (CIT 2016) (*Apex II*); *Apex Frozen Foods Private Ltd. v. United States,* 862 F. 3d 1322 (Fed. Cir. 2017) (*Apex III*); *Apex Frozen Foods Private Lt. v. United States*, 862 F. 3d 1337, 1344-51 (Fed. Cir. 2017) (*Apex IV*); *Mid Continent Steel & Wire, Inc. v. United States*, 940 F. 3d 662 (Fed. Cir. 2017) (*Mid Continent*).

[34] *See NEXTEEL Co. v. United States*, 392 F. Supp. 3d 1276, 1294-97 (CIT) (*NEXTEEL II*).

significantly among purchasers, regions, or periods of time, and…. why such differences cannot be taken into account using {the A-to-A or T-to-T comparison method}."[35]

Daejin contends that Commerce must explain why the numerical thresholds used in this case are appropriate given the specific record because Commerce has not promulgated a rule regarding the numerical thresholds for its differential pricing analysis through notice-and-comment procedures. We disagree. Commerce normally makes these types of changes in practice (*e.g.*, the change from the targeted dumping analysis to the current differential pricing analysis) in the context of our proceedings, on a case-by-case basis. As the Federal Circuit has recognized, Commerce is entitled to make changes and adopt a new approach in the context of its proceedings, provided it explains the basis for the change, and provided the change is a reasonable interpretation of the statute.[36] Moreover, the CIT held in *Apex II* that Commerce's change in practice from targeted dumping to its differential pricing analysis was exempt from the APA's rule making requirements, stating:

> Commerce explained that it continues to develop its approach with respect to the use of A-to-T as it gains greater experience with addressing potentially hidden or masked dumping that can occur when the Department determines weighted-average dumping margins using the {A-to-A} comparison method. Commerce additionally explained that the new approach is a more precise characterization of the purpose and application of {19 U.S.C. § 1677f(d)(1)(B) and is the product of Commerce's experience over the last several years . . . further research, analysis and consideration of the numerous comments and suggestions on what guidelines, thresholds, and tests should be used in determining whether to apply an alternative comparison method based on the {A-to-T} method. Commerce developed its approach over time, while gaining experience and obtaining input. Under the standard described above, Commerce's explanation is sufficient. Therefore, Commerce's adoption of the differential pricing analysis was not arbitrary.[37]

Moreover, the CIT acknowledged in *Apex II* that as Commerce "gains greater experience with addressing potentially hidden or masked dumping that can occur when {Commerce} determines weighted-average dumping margins using the {A-to-A} comparison method, {Commerce} expects to continue to develop its approach with respect to the use of an alternative comparison

[35] See section 777A(d)(1)(B) of the Act (emphasis added); see also Tri Union, 163 F. Supp. 3d 1255, 1302 ("{h}ad Congress intended to impose upon Commerce a requirement to ensure statistical significance, Congress presumably would have used language more precise than 'differ significantly.'").

[36] *See Saha Thai Steel Pipe Company v. United States*, 635 F. 3d 1335, 1341 (CAFC 2011); *Washington Red Raspberry Commission. v. United States,* 859 F. 2d 898, 902-03 (Fed. Cir. 1988) (Washington Raspberries); *see also Carlisle Tire v. United States*, 634 F. Supp. 419, 423 (CIT 1986) (*Carlisle Tire*) (discussing exceptions to the notice and comment requirements of the APA).

[37] *See Apex Frozen Foods Private Ltd v. United States*, 144 F.Supp.3d 1308, 1332-1335, at 1330 ("Commerce is not restricted in what type of sales it may consider in assessing the existence of such a pattern so long as its methodological choice enables Commerce to reasonably determine whether application of A-to-T is appropriate.") (internal citations and quotations omitted) (*Apex II*).

method."[38] Further developments and changes, along with further refinements, are expected in the context of our proceedings based upon an examination of the facts and the parties' comments in each case.

The CIT's holding in *Apex II* has since been upheld by the Federal Circuit.[39] Thus, we find that the numerical thresholds used in Commerce's standard differential pricing analysis are reasonable and consistent with the requirements of section 777A(d)(1)(B) of the Act. Accordingly, Commerce's development of the differential pricing analysis and the application of this analysis in this case, including the thresholds relied upon herein, are consistent with established law. Daejin has submitted no factual evidence or argument that demonstrates that these thresholds should be modified for Daejin for the purposes of this review.

We disagree with Daejin's contention that Commerce has not adequately explained the 33- and 66-percent thresholds used in the ratio test. Specifically, in *OCTG from India*, we addressed the establishment of the 33- and 66-percent thresholds as follows:

> In the differential pricing analysis, {Commerce} reasonably established a 33 percent threshold to establish whether there exists a pattern of prices that differ significantly. {Commerce} finds that when a third or less of a respondent's U.S. sales are not at prices that differ significantly, then these significantly different prices are not extensive enough to satisfy the first requirement of the statute…
>
> Likewise, {Commerce} finds reasonable, given its growing experience of applying section 777A(d)(1)(B) of the Act and the application of the A-to-T method as an alternative to the A-to-A method, that when two thirds or more of a respondent's sales are at prices that differ significantly, then the extent of these sales is so pervasive that it would not permit {Commerce} to separate the effect of the sales where prices differ significantly from those where prices do not differ significantly. Accordingly, {Commerce} considered whether, as an appropriate alternative comparison method, the A-to-T method should be applied to all U.S. sales. Finally, when {Commerce} finds that between one third and two thirds of U.S. sales are at prices that differ significantly, then there exists a pattern of prices that differ significantly, and that the effect of this pattern can reasonably be separated from the sales whose prices do not differ significantly. Accordingly, in this situation, {Commerce} finds that it is appropriate to address the concern of masked dumping by considering the application of the A-to-T method as an alternative to the A-to-A method for only those sales which constitute the pattern of prices that differ significantly.[40]

Next, Daejin asserts that Commerce failed to explain why the A-to-A method cannot account for

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[38] *Id*.
[39] *See Apex Frozen Foods Private Ltd*, 862 F.3d at 1337.
[40] *See Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances: Certain Oil Country Tubular Goods from India*, 79 FR 41981 (July 18, 2014), and accompanying IDM at Comment 1.

any pattern of price differences observed. We disagree. Commerce finds that the comparison of each of the calculated weighted-average dumping margins using the standard and alternative comparison methodologies exactly quantifies the extent of the masked dumping. As the CIT has explained,

> where the amount of uncovered masked dumping results in an A-T calculated margin that is not *de minimis*, and the A-A calculated margin would be *de minimis*, it is reasonable for Commerce to presume that A-A cannot account for the pattern of significant price differences because, unlike A-T, A-A cannot uncover the dumping that was masked by the differentially priced sales. The fact that A-A was unable to calculate more than a negligible dumping margin while A-T was able to is reason enough to demonstrate that A-A could not account for the pattern of significant price differences here.[41]

Here, the A-to-A and A-to-T methodologies calculated different dumping margins. This result demonstrates that the A-to-A method cannot account for the pattern of significant price differences.

Further, the difference in the calculated results specifically reveals the extent of the masked, or "targeted," dumping which is being concealed when applying the A-to-A method.[42] The difference in these two results is caused by higher U.S. prices offsetting lower U.S. prices where the dumping, which may be found on lower priced U.S. sales, is hidden or masked by higher U.S. prices,[43] such that the A-to-A method would be unable to account for such differences.[44] Such masking or offsetting of lower prices with higher prices may occur implicitly within the averaging groups or explicitly when aggregating the A-to-A comparison results. Therefore, in order to understand the impact of the unmasked "targeted dumping," Commerce finds that the comparison of each of the calculated weighted-average dumping margins using the standard and alternative comparison methodologies exactly quantifies the extent of the unmasked "targeted dumping."

The simple comparison of the two calculated results belies the complexities in calculating and aggregating individual dumping margins (*i.e.*, individual results from comparing EP, or CEP, with NV). It is the interaction of these many comparisons of EP or CEP with NV, and the aggregation of these comparison results, which determine whether there is a meaningful difference in these two calculated weighted-average dumping margins. When using the A-to-A

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[41] *See Apex II*, 144 F.Supp.3d 1308 at 1332-1335.

[42] *See Koyo Seiko Co., Ltd. v. United States*, 20 F. 3d 1156, 1159 (Fed. Cir. 1994) ("The purpose of the antidumping statute is to protect domestic manufacturing against foreign manufacturers who sell at less than fair market value. Averaging U.S. prices defeats this purpose by allowing foreign manufacturers to offset sales made at less-than-fair value with higher priced sales. Commerce refers to this practice as 'masked dumping.' By using individual U.S. prices in calculating dumping margins, Commerce is able to identify a merchant who dumps the product intermittently—sometimes selling below the foreign market value and sometimes selling above it. We cannot say that this is an unfair or unreasonable result." (internal citations omitted)).

[43] *See* SAA at 842.

[44] *See Union Steel v. United States*, 713 F. 3d 1101, 1108 (Fed. Cir. 2013) ("{the A-to-A} comparison methodology masks individual transaction prices below normal value with other above normal value prices within the same averaging group.")

method, lower-priced U.S. sales (*i.e.*, sales which may be dumped) are offset by higher-priced U.S. sales. Congress was concerned about offsetting and that concern is reflected in the SAA, which states that "targeted dumping" is a situation where "an exporter may sell at a dumped price to particular customers or regions, while selling at higher prices to other customers or regions."[45] The comparison of a weighted-average dumping margin based on comparisons of weighted-average U.S. prices that also reflects offsets for non-dumped sales, with a weighted average dumping margin based on comparisons of individual U.S. prices without such offsets (*i.e.*, with zeroing) precisely examines the impact on the amount of dumping which is hidden or masked by the A-to-A method. Both the weighted-average U.S. price and the individual U.S. prices are compared to an NV that is independent from the type of U.S. price used for comparison, and the basis for NV will be constant because the characteristics of the individual U.S. sales remain constant, whether weighted-average U.S. prices or individual U.S. prices are used in the analysis.

Consider the simple situation where there is a single, weighted-average U.S. price, and this average is made up of a number of individual U.S. sales which exhibit different prices, and the two comparison methods under consideration are the A-to-A method with offsets (*i.e.*, without zeroing) and the A-to-T method with zeroing. The NV used to calculate a weighted-average dumping margin for these sales will fall into one of five scenarios with respect to the range of these different, individual U.S. sale prices:

1) the NV is less than all U.S. prices and there is no dumping;
2) the NV is greater than all U.S. prices and all sales are dumped;
3) the NV is nominally greater than the lowest U.S. prices such that there is a minimal amount of dumping and a significant amount of offsets from non-dumped sales;
4) the NV is nominally less than the highest U.S. prices, such that there is a significant amount of dumping and a minimal amount of offsets generated from non-dumped sales;
5) the NV is in the middle of the range of individual U.S. prices, such that there is both a significant amount of dumping and a significant amount of offsets generated from non-dumped sales.

Under scenarios (1) and (2), either there is no dumping, or all U.S. sales are dumped such that there is no difference between the weighted-average dumping margins calculated using offsets or zeroing and there is no meaningful difference in the calculated results and the A-to-A method will be used. Under scenario (3), there is a minimal (*i.e.*, *de minimis*) amount of dumping, such that the application of offsets will result in a zero or *de minimis* amount of dumping (*i.e.*, the A to-A method with offsets and the A-to-T method with zeroing both result in a weighted-average dumping margin which is either zero or *de minimis*) and which also does not constitute a meaningful difference and the A-to-A method will be used. Under scenario (4), there is a significant (*i.e.*, non-*de minimis*) amount of dumping with only a minimal amount of non-dumped sales, such that the application of the offsets for non-dumped sales does not change the calculated results by more than 25 percent or cause the weighted-average dumping margin to be *de minimis*, and again there is not a meaningful difference in the weighted-average dumping margins calculated using offsets or zeroing and the A-to-A method will be used. Lastly, under scenario (5), there is a significant, non-*de minimis* amount of dumping and a significant amount

[45] *See* SAA at 842.

of offsets generated from non-dumped sales, such that there is a meaningful difference in the weighted-average dumping margins calculated using offsets or zeroing. Only under the fifth scenario can Commerce consider the use of an alternative comparison method.

Only under scenarios (3), (4) and (5) are the granting or denial of offsets relevant to whether dumping is being masked, as there are both dumped and non-dumped sales. Under scenario (3), there is only a *de minimis* amount of dumping, such that the extent of available offsets will only make this *de minimis* amount of dumping even smaller and have no impact on the outcome. Under scenario (4), there exists an above-*de minimis* amount of dumping, and the offsets are not sufficient to meaningfully change the results. Only with scenario (5) is there an above-*de minimis* amount of dumping with a sufficient amount of offsets such that the weighted-average dumping margin will be meaningfully different under the A-to-T method with zeroing as compared to the A-to-A / A-to-T method with offsets. This difference in the calculated results is meaningful in that a non-*de minimis* amount of dumping is now masked or hidden to the extent where the dumping is found to be zero or *de minimis* or to have decreased by 25 percent of the amount of the dumping with the applied offsets.

This example demonstrates that there must be a significant and meaningful difference in U.S. prices in order to resort to an alternative comparison method. These differences in U.S. prices must be large enough, relative to the absolute price level in the U.S. market, where not only is there a non-*de minimis* amount of dumping, but there also is a meaningful amount of offsets to impact the identified amount of dumping under the A-to-A method with offsets. Furthermore, the NV must fall within an even narrower range of values (*i.e.*, narrower than the price differences exhibited in the U.S. market) such that these limited circumstances are present (*i.e.*, scenario (5) above). This required fact pattern, as represented in this simple situation, must then be repeated across multiple averaging groups in the calculation of a weighted-average dumping margin in order to result in an overall weighted-average dumping margin which changes to a meaningful extent.

Further, for each A-to-A comparison result which does not result in the set of circumstances in scenario (5), the "meaningfulness" of the difference in the weighted-average dumping margins between the two comparison methods will be diminished. This is because for these A-to-A comparisons which do not exhibit a meaningful difference with the A-to-T comparisons, there will be little or no change in the amount of dumping (*i.e.*, the numerator of the weighted-average dumping margin) but the U.S. sales value of these transactions will nonetheless be included in the total U.S. sales value (*i.e.*, the denominator of the weighted-average dumping margin). The aggregation of these intermediate A-to-A comparison results where there is no "meaningful" difference will, thus, dilute the significance of other A-to-A comparison results where there is a "meaningful" difference, which the A-to-T method avoids.

Therefore, we find that the meaningful difference test reasonably fills the gap in the statute to consider why, or why not, the A-to-A method (or T-to-T method) cannot account for the significant price differences in Daejin's pricing behavior in the U.S. market. Congress's intent of addressing "targeted dumping," when the requirements of section 777A(d)(1)(B) of the Act are satisfied,[46] would be thwarted if the A-to-T method without zeroing were applied since this

[46] *See* SAA at 842-843.

will always produce the identical results when the standard A-to-A method without zeroing is applied. Under that scenario, both methods would inherently mask dumping. It is for this reason that we find that the A-to-A method cannot take into account the pattern of prices that differ significantly for Daejin, *i.e.*, Commerce identified conditions where "targeted" or masked dumping "may be occurring" in satisfying the pattern requirement, and Commerce demonstrated that the A-to-A method could not account for the significant price differences, as exemplified by the pattern of prices that differ significantly. Thus, we continue to find that application of the A-to-T method, with zeroing, is an appropriate tool to address masked "targeted dumping."[47]

As set forth in the *Preliminary Results* and as further discussed in these final results, Commerce's differential pricing analysis for Daejin in this administrative review is both lawful, reasonable, and completely within Commerce's discretion in executing the trade statute.

Comment 4: Whether Daejin's Interest Expense Offset for Interest Revenue Should Be Denied

In the *Preliminary Results*, Commerce denied an interest expense offset for certain interest income that Daejin claimed it received based on short-term loans.

Daejin's Comments

- The reported interest income amounts included interest income generated from ordinary Korean-Won-denominated or foreign currency deposits in Daejin's company bank account used in its normal operations.[48] Daejin provided a copy of the account description confirming that the interest revenue was generated from the Daejin's company bank account that is protected by the Korea Deposit Insurance Corporation.
- Commerce has recognized that interest-bearing accounts that companies normally maintain are working capital accounts, and interest generated from these accounts should be treated as short-term and allowed as an offset to interest expenses.[49]

Petitioner's Rebuttal

- Daejin's argument is not supported by substantial evidence on the record and should be rejected.
- Commerce requested the details and documentary support for the claimed interest income offset four times throughout this administrative review, and Daejin's responses were not adequate to prove the short-term nature of the assets.[50]

Commerce's Position: We disagree with Daejin. For the final results, we continue to deny Daejin's interest expense offset for certain interest income that Daejin claimed it received based on short-term loans. We requested multiple times for Daejin to provide evidence showing that

[47] *See Apex I*, 37 F. Supp. 3d at 1296.
[48] *See* Daejin's Fourth Supplemental Response at 5.
[49] *See Notice of Final Determination of Sales at Less Than Fair Value: Live Swine from Canada*, 70 FR 12181 (March 11, 2005) at Comment 2.
[50] *See* Daejin's First Supplemental Response at 17; *see also* Daejin's Letter, "Response of Daejin Steel Company To Commerce's June 19 Supplemental Questionnaire," dated July 7, 2020 (Daejin's Second Supplemental Response) at 20; Daejin's Letter, "Response of Daejin Steel Company To Commerce's July 20 Supplemental Questionnaire," dated July 23, 2020 (Daejin's Third Supplemental Response) at 2; and Daejin's Fourth Supplemental Response at 5.

these were short term loans.[51] We have determined that even though Commerce provide multiple opportunities for Daejin to provide an explanation and documentary support for its claimed interest income offset, Daejin could not establish the short-term nature of its interest revenue.[52] The documents that Daejin provided only showed information such as bank account number, bank name, and the fact that Daejin is the account holder, and no other identifying information that showed whether the loans were short-term loans.

Comment 5: Whether Commerce Should Correct the Currency for Commissions

Kowire's Comments:[53]

- Commerce should correct an inadvertent clerical error in which it treated Kowire's per-unit commission fees reported in the field "COMM2U" as reported in USD when, in fact, these commission expenses were incurred and reported in Korean Won (KRW).
- While Kowire mistakenly reported that COMM2U was reported in USD in its U.S. sales database summary, this was a typographical error as evidenced by numerous other instances on the record where it demonstrated that COMM2U was denominated in KRW.

The petitioner did not comment on this issue.

Commerce's Position: We agree with Kowire and have made an adjustment for the final results to treat COMMU2U as an expense denominated in KRW and converted to USD. However, as stated above, we note that Kowire itself reported the currency for COMM2U as USD in its U.S. sales database summary. Nevertheless, after reviewing the administrative record, [54] we found supporting documentation for Kowire's assertion that COMM2U is reported in KRW.[55]

Comment 6: Whether Commerce Should Correct the Spelling of Kowire in Commerce's Draft Liquidation Instructions

Kowire's Comments:

- Commerce should correct the spelling of Kowire's name in the liquidation instructions that will be issued to U.S. Customs Border Protection (CBP) for the final results. [56]

[51] *See* Commerce's Letters, "Certain Steel Nails from the Republic of Korea: Supplemental Questionnaire," dated February 10, 2020 (First Supplemental Questionnaire); "Fourth Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the Republic of Korea: Sections BCD Second Supplemental Questionnaire," dated June 19, 2020 (Second Supplemental Questionnaire); "Fourth Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the Republic of Korea: Section D Third Supplemental Questionnaire," dated July 20, 2020; and " Fourth Administrative Review of the Antidumping Duty Order on Certain Steel Nails from the Republic of Korea: Sections A and D Fourth Supplemental Questionnaire," dated September 4, 2020.
[52] *See* Daejin's First Supplemental Response at 17 and Appendix SD-13; *see also* Daejin's Second Supplemental Response) at Appendix S2D-7; Daejin's Third Supplemental Response at Appendix S3D-1; and Daejin's Fourth Supplemental Response) at 5 and Appendix S4D-2.
[53] *See* Kowire's Case Brief at 2-6.
[54] *See* Exhibit C-17 of Kowire's November 22, 2019 section C questionnaire response, where Kowire submitted an invoice with COMM2U denominated in KRW.
[55] *See* Kowire Final Analysis Memorandum.
[56] *See* Kowire's Case Brief at 6.

- Kowire's full name is Korea Wire Co., Ltd. However, Commerce spelled its name as Korea Wire Co., Ld. in the draft CBP liquidation instructions that were released in conjunction with the *Preliminary Results*.

The petitioner did not comment on this issue.

Commerce's Position: We agree with Kowire and will correct its name to Korea Wire Co., Ltd. in the liquidation instructions that are issued to CBP in conjunction with these final results.

VII. RECOMMENDATION

Based on our analysis of the comments received, we recommend adopting the above positions. If accepted, we will publish the final results of this review and the final weighted-average dumping margins in the *Federal Register*.

☒	☐
Agree	Disagree

3/2/2021

X

Signed by: CHRISTIAN MARSH

Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance