



A-557-816
Administrative Review
POR: 7/01/2018-6/30/2019
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March 22, 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
Administrative Review of the Antidumping Duty Order on Certain
Steel Nails from Malaysia; 2018-2019

I. SUMMARY

The Department of Commerce (Commerce) analyzed the case and rebuttal briefs submitted by interested parties in the administrative review of the antidumping duty order on certain steel nails (steel nails) from Malaysia covering the period of review (POR) July 1, 2018, through June 30, 2019. This administrative review covers Inmax Sdn. Bhd. and Inmax Industries Sdn. Bhd. (collectively, Inmax), and Region System Sdn. Bhd. and Region International Co. Ltd (collectively, Region).

As a result of our analysis of the comments received, we have made certain changes since the *Preliminary Results*.¹ We recommend that you approve the positions described in the “Discussion of the Issues” section of this memorandum. Below is a list of the issues in this administrative review for which we received comments from interested parties:

- Comment 1: Interest Income Offset
- Comment 2: Programming Errors
- Comment 3: Scrap Offset
- Comment 4: Labor Costs

¹ See *Certain Steel Nails from Malaysia: Preliminary Results of Antidumping Duty Administrative Review and Preliminary Determination of No Shipments; 2018-2019*, 85 FR 74674 (November 23, 2020) (*Preliminary Results*), and accompanying Preliminary Decision Memorandum.



II. BACKGROUND

On November 23, 2020, Commerce published the *Preliminary Results* of this administrative review.² On December 23, 2020, we received a request for a hearing from Inmax,³ and on February 18, 2021, Inmax withdrew the request.⁴ Therefore, no hearing was held.

We invited interested parties to comment on the *Preliminary Results*.⁵ On January 6, 2021, we received timely case briefs from Inmax,⁶ Mid Continent Steel & Wire, Inc. (the petitioner),⁷ and interested party PrimeSource Building Products Inc. (PrimeSource).⁸ We received timely rebuttal briefs, on January 19, 2021, from Inmax,⁹ and from Region.¹⁰ We also received a letter in lieu of a rebuttal brief from PrimeSource, on January 19, 2021.¹¹

III. SCOPE OF THE ORDER

The merchandise covered by the antidumping duty order is certain steel nails having a nominal shaft length not exceeding 12 inches.¹² 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.

² *Id.*

³ See Inmax's Letter, "Steel Nails from Malaysia – Hearing Request," dated December 23, 2020.

⁴ See Inmax's Letter, "Steel Nails from Malaysia – Withdrawal of Hearing Request," dated February 18, 2021.

⁵ See *Preliminary Results*, 85 FR at 74676.

⁶ See Inmax's Letter, "Steel Nails from Malaysia – Case Brief," dated January 6, 2021 (Inmax Case Brief).

⁷ See Petitioner's Letter, "Certain Steel Nails from Malaysia: Case Brief," dated January 6, 2021 (Petitioner Case Brief).

⁸ See PrimeSource's Letter, "Antidumping Duty Administrative Review of Steel Nails From Malaysia: Letter in Lieu of Case Brief," dated January 6, 2021. PrimeSource stated that it "supports and incorporates by reference the arguments made by Inmax Sdn. Bhd. and Inmax Industries Sdn. Bhd. in its respective case brief."

⁹ See Inmax's Letter, "Steel Nails from Malaysia – Rebuttal Case Brief," dated January 19, 2021 (Inmax Rebuttal Brief).

¹⁰ See Region's Letter, "Steel Nails from Malaysia," dated January 19, 2021 (Region Rebuttal Brief).

¹¹ See PrimeSource's Letter, "Antidumping Duty Administrative Review of Steel Nails From Malaysia: Letter in Lieu of Rebuttal Case Brief," dated January 19, 2021.

¹² The shaft length of certain steel nails with flat heads or parallel shoulders under the head shall be measured from under the head or shoulder to the tip of the point. The shaft length of all other certain steel nails shall be measured overall.

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, 7806.00.80.00, 7318.29.00.00, 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.

IV. CHANGES SINCE THE PRELIMINARY RESULTS

Based on our analysis of the comments received from interested parties, we made certain changes to our margin calculation for Inmax. Specifically: we corrected for certain clerical errors.¹³

V. DISCUSSION OF THE ISSUES

Comment 1: Interest Income Offset

Petitioner's Comments

- Commerce should deny Inmax's claimed interest income offset, because Inmax's claim that it included only short-term interest earned is untrue.¹⁴
- Inmax failed to respond to Commerce's request to show how interest income was earned and to reconcile the interest income to the financial statements.¹⁵
- Information submitted by Inmax concerning bank accounts also fails to support the reported interest income offset.¹⁶
- In its October 6, 2020 supplemental response,¹⁷ Inmax reported bank accounts which it had not previously disclosed.¹⁸
- Inmax's failure to support its year-end bank balances is irrelevant, because the company failed to demonstrate the claimed interest income offset was generated by the same bank balances; therefore, Commerce should deny the claimed offset.¹⁹

Inmax's Comments

- Inmax substantiated its claimed interest income offset with supporting documentation and complied fully with Commerce's requests.²⁰
- Inmax provided a summary of the interest and other income items that are included as short-term offsets as part of its March 3, 2020 supplemental response.²¹

¹³ See Comment 2, *infra*.

¹⁴ See Petitioner Case Brief at 5-6.

¹⁵ *Id.* at 6-8.

¹⁶ *Id.* at 8-9.

¹⁷ See Inmax's Letter "Steel Nails from Malaysia – Fourth Supplemental Questionnaire Response," dated October 6, 2020 (Fourth Supplemental Response).

¹⁸ *Id.* at 9.

¹⁹ *Id.* at 10.

²⁰ See Inmax Rebuttal Brief at 1.

²¹ *Id.*

- Inmax also reported corresponding general ledgers for each claimed income offset account, which demonstrated that the income was derived from current bank account balances.²²
- In its April 6, 2020 supplemental response, Inmax provided supporting documentation, in response to Commerce’s request, to demonstrate that the assets which generated the income are not long-term assets.²³
- In the Fourth Supplemental Response, Inmax indicates that auditors reclassified certain fixed deposit income (which was regarded as derived from short-term assets) to non-current assets, and that Inmax provided a reconciliation summary of all short-term assets which yielded interest income during the POR.²⁴
- Inmax explains that in the Fourth Supplemental Response it felt that the short-term interest calculation was correct, but nevertheless provided an alternative finance expense ratio calculation which resulted in a higher finance expense ratio of 0.355 percent.²⁵
- In the *Preliminary Results*, Commerce used the higher finance expense ratio of 0.355 percent.²⁶
- Commerce should continue to use the revised finance expense ratio of 0.355 percent, because the interest income generated by the fixed deposit balance was excluded from this revised ratio (making the petitioner’s claim irrelevant).²⁷
- Inmax previously reported all bank accounts; the accounts mentioned by the petitioner are samples and not an exhaustive list of the bank accounts held by Inmax.²⁸
- Inmax provided evidence to support its reported bank accounts and tied those balances to the financial statements.²⁹

Commerce’s Position: We agree with Inmax and will continue to use the revised finance expense ratio of 0.355 percent. We examined the Fourth Supplemental Response, and specifically examined the responses with respect to the claimed interest income offset. We requested that Inmax tie certain bank accounts to its financial balance sheets,³⁰ and Inmax provided the requested reconciliations.³¹ In addition, Inmax explained that auditors reclassified certain line items on the balance sheet as non-current assets.³² Because of this reclassification, Inmax recalculated the income offset to exclude these assets from the finance expense ratio.³³ Commerce used this recalculated finance expense ratio in the *Preliminary Results*.³⁴

²² *Id.* at 1-2.

²³ *Id.* at 2.

²⁴ *Id.*

²⁵ *Id.* at 3.

²⁶ *Id.*

²⁷ *Id.* at 3-4.

²⁸ *Id.* at 4.

²⁹ *Id.* at 4-5.

³⁰ See Commerce’s Letter, “2018-2019 Administrative Review of the Antidumping Duty Order on Certain Steel Nails from Malaysia: Fourth Supplemental Questionnaire,” dated September 28, 2020 (Fourth Supplemental Questionnaire), at Question 4.

³¹ See Fourth Supplemental Response at 3-4, Exhibits S4-6, S4-7, S4-8, S4-9, and S4-10.

³² *Id.* at 3.

³³ *Id.* at Exhibit S4-10.

³⁴ See Memorandum, “Analysis Memorandum for Inmax Sdn. Bhd. and Inmax Industries Sdn. Bhd. in the Preliminary Results of the 2018/2019 Administrative Review of the Antidumping Duty Order on Certain Steel Nails from Malaysia,” dated November 16, 2020, at 9.

Our examination of the information in the Fourth Supplemental Response shows that Inmax provided support for the recalculated finance expense ratio. Additionally, we examined Inmax's supplemental questionnaire response of March 3, 2020,³⁵ and found that Inmax previously reported the bank accounts which the petitioner claimed were reported for the first time in the Fourth Supplemental Response.³⁶ Therefore, we determine that record evidence supports Inmax's reported revised finance expense ratio, and we continue to use that ratio in our calculation of interest expense for these final results of review.

Comment 2: Programming Errors

1. Quantity

Inmax's Comments

- Commerce used the incorrect home market sales quantity variable in the *Preliminary Results*.³⁷
- Specifically, Commerce used the variable QTYH, which is the quantity in cartons, rather than QTY2H, which is the quantity in kilograms.³⁸
- In previous administrative reviews, Commerce calculated margins based on weight rather than on cartons, and should continue to do so in this administrative review.³⁹

The petitioner did not comment on this issue.

Commerce's Position: We agree with Inmax and we have changed the variable for quantity in the home market program to reflect quantity in kilograms, rather than cartons. *See* the Final Analysis Memorandum for further information.⁴⁰

2. Cost of Manufacture

Inmax's Comments

- Commerce used the incorrect variable for the total cost of manufacture in the *Preliminary Results*.⁴¹
- Commerce requested a revised cost of manufacture for certain cost elements in the Fourth Supplemental Questionnaire, and Inmax reported a revised total cost of manufacture under the field TCOMCOP in the Fourth Supplemental Response.⁴²

³⁵ See Inmax's Letter, "Steel Nails from Malaysia – Section A-D Supplemental Questionnaire Response," dated March 3, 2020.

³⁶ *Id.* at Exhibit S1-34.

³⁷ See Inmax Case Brief at 1.

³⁸ *Id.* at 1-2.

³⁹ *Id.* at 2.

⁴⁰ See Memorandum, "Analysis Memorandum for Inmax Sdn. Bhd. and Inmax Industries Sdn. Bhd. in the Final Results of the 2018/2019 Administrative Review of the Antidumping Duty Order on Certain Steel Nails from Malaysia," dated concurrently this memorandum (Final Analysis Memorandum).

⁴¹ See Inmax Case Brief at 3.

⁴² *Id.*

- Rather than using the revised TCOMCOP, Commerce instead inadvertently used the original and unadjusted costs in the *Preliminary Results*.⁴³
- Commerce should thus use the variable TCOMCOP, rather than the variable TOTCOM, to calculate total cost of production.⁴⁴

The petitioner did not comment on this issue.

Commerce’s Position: We agree with Inmax and have revised the calculation of the total cost of manufacture. See the Final Analysis Memorandum for further information.

Comment 3: Scrap Offset

Petitioner’s Comments

- Region used its scrap revenues as the basis for the reported scrap offset.⁴⁵
- Region is incorrect that Commerce’s practice is to treat revenues from scrap sales as the scrap offset. The scrap offset should be based on the quantity of scrap generated, not on the revenue from the sale of scrap. In addition, parties requesting the offset have the burden of presenting the supporting information.⁴⁶
- Region’s Exhibit D-7, which the company misleadingly referred to as “inventory movement schedule,” is simply a listing of monthly sales of scrap. This makes it clear that Region does not keep track of the scrap generated and records only the quantity and value of scrap sold.⁴⁷
- In Exhibit D-8, what Region misleadingly called “Scrap Generated” is actually the difference between the raw material input and finished goods output. Such a difference represents the full yield loss and not scrap generated, because scrap generated represents only scrap collected and made available for sale. The quantity of scrap collected will always be less than the full yield loss because it is not possible to collect 100 percent of the scrap.⁴⁸
- There is substantial evidence that the quantity of scrap sold is not representative of the quantity of scrap generated because the monthly quantities of scrap sold in Exhibit D-7 do not correlate with the monthly quantities of wire rod consumed in Exhibit D-3.⁴⁹
- Region confirmed that it did not record the scrap generated, but instead relied on the quantity and value of the scrap sold to support its claimed offset in supplemental questionnaire responses.⁵⁰

⁴³ *Id.* at 3-4.

⁴⁴ *Id.* at 4.

⁴⁵ See Petitioner Case Brief at 2 (citing Region’s Letter, “Steel Nails from Malaysia,” dated January 13, 2020 (Region’s Sections B-D Response) at D-17).

⁴⁶ *Id.* at 2-3 (citing, e.g., *Certain Steel Nails From the Sultanate of Oman: Final Results of Antidumping Duty Administrative Review; 2014-2016*, 83 FR 4030 (January 29, 2018), and accompanying Issues and Decision Memorandum (IDM) at Comment 11).

⁴⁷ *Id.* at 3 (citing Region’s Sections B-D Response at D-18).

⁴⁸ *Id.* at 3-4 (citing Region’s Sections B-D Response).

⁴⁹ *Id.* at 4 (citing Region’s Sections B-D Response).

⁵⁰ *Id.* (citing Region’s Letter, “Steel Nails from Malaysia,” dated June 24, 2020 (Region’s Third Supplemental Response), at 9).

- Therefore, Region's claimed scrap offset lacks the required support. Thus, for the final results, Commerce should deny this offset.⁵¹

Region's Rebuttal Comments

- The petitioner objects to Commerce's accepted scrap offset in the *Preliminary Results*; however, Commerce correctly followed its practice.⁵²
- Region's case is the same as that of Kokuyo Riddhi Paper Products Pvt. Ltd. (Kokuyo) in *Paper Products*. Like Kokuyo, Region demonstrated that the scrap offset was warranted. Region demonstrated that the scrap generated in the production process has commercial value and that Region sold all the scrap it generated during the POR.⁵³
- Further, Region's Exhibit D-8 compared the input quantities consumed and output quantities produced during the POR, to document generated scrap, since Region (like Kokuyo) does not maintain a record of scrap inventory in the normal course of business. Exhibit D-8 demonstrates that the quantity of scrap sold during the POR approximates the quantity of scrap generated during the POR.⁵⁴
- Region fully answered Commerce's questions. Commerce allowed the scrap offset in the *Preliminary Results*, and it should continue to do so.⁵⁵

Commerce's Position: We disagree with the petitioner. Commerce's practice is to allow offsets to the reported costs based on the amount of scrap generated during production.⁵⁶ However, we recognize that, in certain situations, a respondent's normal accounting system does not track scrap generated, and only tracks the quantities of scrap sold. In such instances, Commerce's policy is to allow the offset for scrap sold if a respondent can show a reasonable link between the quantities of scrap sold and scrap generated.⁵⁷ Furthermore, where a respondent does not keep track of scrap generated, Commerce has found the tracking of scrap sales to be an acceptable proxy for its generated scrap given frequent sales of scrap during the POR.⁵⁸

⁵¹ *Id.*

⁵² See Region Rebuttal Brief at 1 (citing, e.g., *Certain Lined Paper Products From India: Final Results of Antidumping Duty Administrative Review; 2016-2017*, 84 FR 23017 (May 21, 2019) (*Paper Products*), and accompanying IDM at Comment 3).

⁵³ *Id.* at 2.

⁵⁴ *Id.* (citing Region's Sections B-D Response).

⁵⁵ *Id.* at 2-3.

⁵⁶ See *Certain Oil Country Tubular Goods from the Republic of Korea: Final Results of Antidumping Duty Administrative Review; 2016-2017*, 84 FR 24085 (May 24, 2019), and accompanying IDM at Comments 16 and 17; see also *Certain Steel Nails from Taiwan: Final Results of Antidumping Duty Administrative Review and Partial Rescission of Administrative Review; 2016-2017*, 84 FR 11506 (March 27, 2019) (*Nails from Taiwan*), and accompanying IDM at Comment 6; and *Certain Crystalline Silicon Photovoltaic Products from Taiwan: Final Results of Antidumping Duty Administrative Review; 2014-2016*, 82 FR 31555 (July 7, 2017), and accompanying IDM at Comment 12.

⁵⁷ See *Certain Steel Nails from the Sultanate of Oman: Final Results of Antidumping Duty Administrative Review; 2014-2016*, 83 FR 4030 (January 29, 2018), and accompanying IDM at Comment 11.

⁵⁸ See *Nails from Taiwan* IDM at Comment 6.

In this case, Region explained that, although it does not track scrap generated during production, it based its reported scrap offset on scrap sold during the POR.⁵⁹ Specifically, Region records the monthly quantity of scrap collected and sold, and it used these revenues to report a scrap offset to its direct material cost.⁶⁰ To demonstrate that the reported scrap offset was reasonable, Region compared its raw material input and finished goods output.⁶¹ This difference, when compared to the quantity of scrap sold, demonstrates that the quantity of scrap sold approximates the quantity of scrap generated during the POR.⁶²

We find that the method Region used to report its scrap sales is reasonable and consistent with the manner in which the company maintains its books and records. Further, we find that the scrap generated by Region was sold on a regular basis throughout the POR and that the quantity of scrap sold approximates the quantity of scrap generated. Accordingly, we conclude that Region has adequately demonstrated that it qualifies for a scrap offset. Therefore, we continue to grant Region a scrap offset, as reported, for the final results.

Comment 4: Labor Costs

Petitioner's Comments

- Region has not adequately explained and reconciled the discrepancy between the labor cost per its payroll report and the labor cost per its general ledger.⁶³
- Contrary to its explanation that the discrepancy between the labor cost per Region's payroll report and the labor cost per the general ledger was because certain labor costs are directly booked in the general ledger and do not pass through the payroll report, the amount per the payroll report is greater than the amount per the general ledger.⁶⁴
- Region failed to explain and justify the difference and did not explain why it is appropriate to exclude the difference. Therefore, for the final results, Commerce should include the difference in the reported costs.⁶⁵

Region's Rebuttal Comments

- The petitioner claims that Commerce should include the difference between labor costs in Region's payroll report and its general ledger in the reported costs. But that is what Commerce already did in the *Preliminary Results*.⁶⁶
- As Commerce recognized in the *Preliminary Results*, Region explained in Region's Third Supplemental Response that difference and how it does not relate to production labor.⁶⁷
- Region further explained this difference in Region's Fourth Supplemental Response.⁶⁸

⁵⁹ See Region's Sections B-D Response at D-17-18; and Region's Letter, "Steel Nails from Malaysia," dated March 25, 2020, at S2-29-30.

⁶⁰ See Region's Sections B-D Response at D-17 and Exhibit D-7.

⁶¹ *Id.* at Exhibit 8.

⁶² *Id.* at Exhibits 7-8.

⁶³ See Petitioner Case Brief at 5.

⁶⁴ *Id.* (citing Region's Third Supplemental Response at 11).

⁶⁵ *Id.* (citing Region's Third Supplemental Response at 11-12).

⁶⁶ See Region Rebuttal Brief at 3.

⁶⁷ *Id.* (citing Region's Third Supplemental Response at 11-12).

⁶⁸ *Id.* (citing Region's Letter, "Steel Nails from Malaysia," dated September 23, 2020 (Region's Fourth Supplemental Response), at S4-1-2).

- As Commerce already recognized in the *Preliminary Results*, this demonstrates that the difference that the petitioner discusses is included in the reported costs, as general and administrative (G&A) expenses.⁶⁹
- Thus, no addition to the reported costs is required. Region's reported costs were fully reconciled with Region's financial statements. Commerce was correct in the *Preliminary Results* and should reject the petitioner's claim otherwise.⁷⁰

Commerce's Position: We agree with Region. In Region's Third Supplemental Response, Region explained that the difference between the labor cost per its payroll report and the labor cost per its general ledger primarily related to the company's directors' remuneration.⁷¹ Specifically, Region clarified that its payroll report included salaries provided to its directors, as well as incentive provisions paid through the payroll report, which accounts for the difference between labor costs in its payroll report and its general ledger.⁷² Further, Region demonstrated that its directors' remuneration and the incentive provisions are already included in its reported costs as G&A expenses.⁷³ Therefore, we find that record evidence supports Region's reported labor costs. Accordingly, we will continue to rely upon these costs for the final results.

VI. RECOMMENDATION

Based on our analysis of the comments received, we recommend adopting the above positions. If this recommendation is accepted, we will publish the final results of this administrative review in the *Federal Register*.

☒

☐

Agree

Disagree

3/22/2021

X



Signed by: CHRISTIAN MARSH

Christian Marsh
Acting Assistant Secretary
for Enforcement and Compliance

⁶⁹ *Id.* at 4.

⁷⁰ *Id.*

⁷¹ See Region's Third Supplemental Response at 11-12.

⁷² *Id.* at 11-12 and Exhibit S3-6.a.

⁷³ See Region's Fourth Supplemental Response at S4-1-2.