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Administrative Review
05/01/2013-04/30/2014
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July 27, 2015

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Enforcement and Compliance

FROM: Christian Marsh *CMM*
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the
Antidumping Duty Administrative Review of Light-Walled
Rectangular Pipe and Tube from Turkey; 2013-2014

SUMMARY

The Department of Commerce (the Department) analyzed the comments submitted by the sole mandatory respondent, ÇINAR Boru Profil Sanayi ve Ticaret A.Ş. (CINAR), in the antidumping duty administrative review of light-walled rectangular pipe and tube from Turkey. We recommend making changes to the *Preliminary Results* for the final results in accordance with the positions described in the “Discussion of the Issue” section of this memorandum, below.

BACKGROUND

The Department published the *Preliminary Results* in the *Federal Register* on April 22, 2015.¹ The period of review (POR) is May 1, 2013, through April 30, 2014. CINAR was issued a supplemental questionnaire after the *Preliminary Results*.² CINAR responded to the Third Supplemental Questionnaire on April 24, 2015.³

¹ See *Light-Walled Rectangular Pipe and Tube from Turkey; Preliminary Results of Antidumping Duty Administrative Review; 2013–2014*, 80 FR 22475 (April 22, 2015) (*Preliminary Results*).

² See letter from Robert M. James to CINAR entitled, “Administrative Review of the Antidumping Duty Order on Light-Walled Rectangular Pipe and Tube from Turkey: Third Section C Supplemental Questionnaire,” dated April 8, 2015 (Third Supplemental Questionnaire).

³ See letter from CINAR to the Secretary of Commerce entitled, “Response of ÇINAR Boru Profil Sanayi ve Ticaret A.Ş. (“CINAR”) to the Third Section C Supplemental Questionnaire for the Administrative Review on Light-Walled Rectangular Pipe and Tube (LWRP) from Turkey,” dated April 24, 2015 (Third Supplemental Response).

In accordance with 19 CFR 351.309(c)(1)(i), we invited parties to comment on our *Preliminary Results*. On May 22, 2015, CINAR timely submitted its case brief.⁴ No other party entered an appearance in this segment of the proceeding.

SCOPE OF THE ORDER

The merchandise subject to this order is certain welded carbon quality light-walled steel pipe and tube, of rectangular (including square) cross section, having a wall thickness of less than 4 mm. The term carbon-quality steel includes both carbon steel and alloy steel which contains only small amounts of alloying elements. Specifically, the term carbon-quality includes products in which none of the elements listed below exceeds the quantity by weight respectively indicated: 1.80 percent of manganese, or 2.25 percent of silicon, or 1.00 percent of copper, or 0.50 percent of aluminum, or 1.25 percent of chromium, or 0.30 percent of cobalt, or 0.40 percent of lead, or 1.25 percent of nickel, or 0.30 percent of tungsten, or 0.10 percent of molybdenum, or 0.10 percent of niobium, or 0.15 percent vanadium, or 0.15 percent of zirconium. The description of carbon-quality is intended to identify carbon-quality products within the scope. The welded carbon-quality rectangular pipe and tube subject to this order is currently classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7306.61.50.00 and 7306.61.70.60. While HTSUS subheadings are provided for convenience and CBP's customs purposes, our written description of the scope of the order is dispositive.

DISCUSSION OF THE ISSUE

Comment 1: Use of CINAR's Revised Home Market Data Base

In the Third Supplemental Questionnaire, CINAR was asked to examine aspects of its sales databases and revise them as necessary.⁷ In the process of reviewing its sales databases, CINAR discovered a discrepancy in the calculation of its average payment days.⁸ CINAR recalculated its average payment days, submitting a worksheet depicting the revised calculations.⁹ CINAR also provided the supporting documents pertaining to its payment days from its accounts receivable records.¹⁰ CINAR revised the credit variable (CREDITH) of its home market database, resubmitting it without other changes.¹¹ In its case brief, CINAR requested that the Department use the revised home market sales listing for the Final Results.¹²

⁴ See letter from CINAR to the Secretary of Commerce entitled, "Case Brief of ÇINAR Boru Profil Sanayi ve Ticaret A.Ş. ("CINAR") to the Preliminary Determination on the Administrative Review on Light-Walled Rectangular Pipe and Tube (LWRP) from Turkey," dated May 22, 2015 (CINAR Case Brief).

⁷ See Third Supplemental Questionnaire at 4 and 5.

⁸ See Third Supplemental Response at 11.

⁹ *Id.*, at Exhibit 3SB-1.

¹⁰ *Id.*, at Exhibit 3SB-2.

¹¹ *Id.*, at Exhibit 3SB-3.

¹² See CINAR Case Brief at 1.

Department's Position:

The Third Supplemental Response and the CINAR Case Brief were properly and timely filed. The Department has carefully reviewed the Third Supplemental Response and all of its exhibits and finds them accurate. Therefore, the Department recalculated CINAR's margin using the last-submitted and corrected home market database.

CONCLUSION

We recommend using the corrected home market sales database for these final results.

Agree ✓ Disagree _____

Paul Piquado
Paul Piquado
Assistant Secretary
for Enforcement and Compliance

27 July 2015
Date