UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

C-570-968
Administrative Review
POR: 01/01/2014 – 12/31/2014
Public Document
E&C AD/CVD OVI: DF, ARD

July 7th, 2015

RE: **Administrative Review of the Countervailing Duty Order on Aluminum Extrusions from the People's Republic of China; 2014**

SUBJECT: Issuance of Quantity and Value Questionnaire

To whom it may concern:

On July 1st, 2015, the Department of Commerce ("Department") initiated an administrative review of the countervailing duty ("CVD") order on aluminum extrusions from the People's Republic of China ("PRC").[1] In advance of the issuance of the initial CVD questionnaire, the Department asks that you respond to Attachment I to this letter by providing the requested information on the quantity and U.S. dollar sales value of all your sales to the United States during the period of review ("POR") (January 1, 2014, through December 31, 2014) of merchandise covered by the scope of the order that was produced in the PRC. The scope of the CVD order is included in Attachment II to this letter, and general instructions for responding to this letter are contained in Attachment III to this letter. Also, an electronic copy of the quantity and value ("Q&V") questionnaire may be found on the internet at the following address: http://www.trade.gov/enforcement/news.asp.

Please be advised that receipt of this letter does not indicate that you will be chosen as a mandatory respondent because the Department may find it is necessary to limit individual examination of respondents and conduct respondent selection under section 777A(e)(2) of the Tariff Act of 1930, as amended ("the Act"). Please note that your response to this letter may be subject to on-site verification by Department officials.

Your response to the Q&V questionnaire is due to the Department no later than **5:00 p.m. (EST) on July 22nd, 2015**. Please note that due to time constraints in this administrative review, the Department does not intend to extend the deadline for responding to the attached Q&V questionnaire. All responses to the attached questionnaire must be made electronically using the Department's IA ACCESS website at http://iaaccess.trade.gov (*see* "General Instructions" in Attachment III). In addition, all submissions to the Department must be accompanied by a Certificate of Accuracy from company officials and, if represented by legal counsel or other firm, a Certificate of Accuracy from the representative. Further, all submissions to the Department must be served on the appropriate interested parties. A list of interested parties may be found at http://web.ita.doc.gov/ia/webapotrack.nsf under "People's Republic of China" and "Aluminum Extrusions (C-570-968) Administrative Review 1/1/14-12/31/14." Blank copies of

[1] *See Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 80 FR 37588 (July 1st, 2015) ("*Initiation Notice*").

the certificates of service and accuracy are contained in Attachment IV.

If you fail to respond or fail to provide the requested quantity and value information, please be aware that the Department may find that you failed to cooperate by not acting to the best of your ability to comply with the request for information, and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

In the unlikely event that you have received this questionnaire *after* the deadline to respond, you MUST contact the Department official identified in the questionnaire within 5 days of receipt of the questionnaire to receive further instructions and a revised deadline for submission of the required information. Failure to do so may result in the presumption that you failed to cooperate by not acting to the best of your ability to comply with the request for information, and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

In general, the Department has found that determinations concerning whether particular companies should be considered cross-owned (*i.e.*, treated as a single entity for purposes of calculating CVD rates), require a substantial amount of detailed information and analysis, which often require follow-up questions and analysis. Accordingly, the Department will not conduct cross-ownership analyses at the respondent selection phase of this review and will not find companies cross-owned unless there has been a determination to find certain companies cross-owned in a previous segment of this CVD proceeding (*i.e.*, investigation, administrative review, new shipper review or changed circumstances review). For any company subject to this review, if the Department previously determined that a company was cross-owned with others, the Department will assume that such companies continue to operate in the same manner and will consider them cross-owned for respondent selection purposes. Otherwise the Department will not consider companies cross-owned for purposes of respondent selection.

A company responding to this Q&V questionnaire that the Department has not determined to be cross-owned with other companies, or not treated as cross-owned with other companies in the most recently completed segment of the proceeding should only report Q&V data for itself. Such a company should not include data for any other party, even if the company believes it should be treated as a single entity with other parties. If the Department has determined your company cross-owned with other companies in the most recently completed segment of this proceeding, or has treated your company as cross-owned with others in the most recently completed segment of this proceeding, please report the requested information for the cross-owned entity. Parties are requested to (a) identify which companies subject to review previously were treated as cross-owned, and (b) provide a citation to the proceeding in which they were treated as cross-owned.

To assist you in filing your response to this Q&V questionnaire, we have provided a checklist in Attachment V which covers many of the major filing requirements (*also see* "General Instructions" in Attachment III). The checklist should be submitted with your response to the Q&V questionnaire. Confirm that you have complied with the applicable items in the checklist by checking the appropriate item.

We appreciate your attention to these matters. Please contact Robert James (Robert.James@trade.gov) at 202-482-0649, or Davina Friedmann (Davina.Friedmann@trade.gov) at 202-482-0698, if you have any questions.

Sincerely,

Robert James
Program Manager
AD/CVD Operations, Office VI
Enforcement & Compliance

Attachments

AD/CVD OPERATIONS
QUANTITY AND VALUE QUESTIONNAIRE

CASE:	Countervailing Duty ("CVD") Administrative Review of Aluminum Extrusions from the People's Republic of China ("PRC") (C-570-968)
PERIOD OF REVIEW:	January 1, 2014, through December 31, 2014
DATE OF INITIATION:	July 1st, 2015
DUE DATE FOR Q&V RESPONSE:	July 22nd, 2015
OFFICIALS IN CHARGE:	Davina Friedmann Phone: 202-482-0698 Email: Davina.Friedmann@trade.gov Tyler Weinhold Phone: 202-482-1121 Email: Tyler.Weinhold@trade.gov

On July, 1st, 2015, the Department of Commerce ("Department") initiated the administrative review of the CVD order on aluminum extrusions from the PRC covering the period January 1, 2014, through December 31, 2014. *See Initiation of Antidumping and Countervailing Duty Administrative Reviews,* 80 FR 37588 (July, 1st, 2015).

Section 777A(e)(1) of the Tariff Act of 1930, as amended ("the Act"), directs the Department to calculate individual subsidy rates for each known exporter and producer of the subject merchandise. Where it is not practicable to examine all known producers/exporters of subject merchandise, as is the case in this administrative review, section 777A(e)(2) of the Act permits the Department to examine either (1) a sample of exporters, producers or types of products that is statistically valid based on the information available at the time of selection; or (2) exporters and producers accounting for the largest volume of the subject merchandise from the exporting country that can be reasonably examined.

In advance of the issuance of the comprehensive CVD subsidy questionnaire, we ask that you respond to Attachment I of this quantity and value ("Q&V") questionnaire requesting the quantity and U.S. dollar sales value of all sales to the United States during the period January 1, 2014, through December 31, 2014, of merchandise covered by the scope of the order (*see* Attachment II), produced in the PRC. A full and accurate response to the questionnaire is necessary to ensure that the Department has the requisite information to appropriately select mandatory respondents.

A definition of the scope of the merchandise subject to this review is included in Attachment II, and general instructions for responding to this questionnaire are contained in Attachment III. **Your response to this questionnaire may be subject to on-site verification by Department officials.**

ATTACHMENT I
QUANTITY AND VALUE QUESTIONNAIRE

In providing the information in the table below, please provide the total quantity in kilograms and total value (in U.S. dollars) of all your sales of merchandise covered by the scope of this review (*see* enclosed description of products under review in Attachment II), produced in the PRC, and exported/shipped to, or entered into, the United States during the period January 1, 2014, through December 31, 2014.

- Please include only information for subject merchandise exported by your company directly to the United States.
- However, if your company made sales to third-countries for which you have knowledge that the merchandise was ultimately destined for the United States, please separately report the requested information for these sales and the location (*i.e.*, countries) to which you made the sales.
- Please do not include shipments of aluminum extrusions <u>manufactured</u> in Hong Kong in your figures.

A company responding to this Q&V questionnaire which the Department has not determined to be cross-owned with other companies, or not treated as cross-owned with other companies, in the most recently completed segment of the proceeding should only report Q&V data for itself. Such a company should not include data for any other party, even if the company believes it should be treated as a single entity with other parties. If the Department has determined to that your company is cross-owned with other companies in the most recently completed segment of this proceeding, or has continued to treat your company as cross-owned with others in the most recently completed segment of this proceeding, please report the requested information for the cross-owned entity. Parties are requested to (a) identify which companies subject to review previously were cross-owned, and (b) provide a citation to the proceeding in which they were cross-owned.

Total Quantity in Kilograms	**Total Value[2] ($U.S.)**

[2] Values should be expressed in U.S. dollars. Indicate any exchange rates used and their respective dates and sources.

ATTACHMENT II
DESCRIPTION OF PRODUCTS UNDER REVIEW

The merchandise covered by this countervailing duty order is aluminum extrusions which are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by The Aluminum Association commencing with the numbers 1, 3, and 6 (or proprietary equivalents or other certifying body equivalents). Specifically, the subject merchandise made from aluminum alloy with an Aluminum Association series designation commencing with the number 1 contains not less than 99 percent aluminum by weight. The subject merchandise made from aluminum alloy with an Aluminum Association series designation commencing with the number 3 contains manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight. The subject merchandise is made from an aluminum alloy with an Aluminum Association series designation commencing with the number 6 contains magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight. The subject aluminum extrusions are properly identified by a four-digit alloy series without either a decimal point or leading letter. Illustrative examples from among the approximately 160 registered alloys that may characterize the subject merchandise are as follows: 1350, 3003, and 6060.

Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, other solid profiles, pipes, tubes, bars, and rods. Aluminum extrusions that are drawn subsequent to extrusion (drawn aluminum) are also included in the scope.

Aluminum extrusions are produced and imported with a variety of finishes (both coatings and surface treatments), and types of fabrication. The types of coatings and treatments applied to subject aluminum extrusions include, but are not limited to, extrusions that are mill finished (*i.e.*, without any coating or further finishing), brushed, buffed, polished, anodized (including bright-dip anodized), liquid painted, or powder coated. Aluminum extrusions may also be fabricated, *i.e.*, prepared for assembly. Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, knurled, swedged, mitered, chamfered, threaded, and spun. The subject merchandise includes aluminum extrusions that are finished (coated, painted, *etc.*), fabricated, or any combination thereof.

Subject aluminum extrusions may be described at the time of importation as parts for final finished products that are assembled after importation, including, but not limited to, window frames, door frames, solar panels, curtain walls, or furniture. Such parts that otherwise meet the definition of aluminum extrusions are included in the scope. The scope includes the aluminum extrusion components that are attached (*e.g.*, by welding or fasteners) to form subassemblies, *i.e.*, partially assembled merchandise unless imported as part of the finished goods 'kit' defined further below. The scope does not include the non-aluminum extrusion components of subassemblies or subject kits.

Subject extrusions may be identified with reference to their end use, such as fence posts, electrical conduits, door thresholds, carpet trim, or heat sinks (that do not meet the finished heat sink exclusionary language below). Such goods are subject merchandise if they otherwise meet the scope definition, regardless of whether they are ready for use at the time of importation.

The following aluminum extrusion products are excluded: aluminum extrusions made from aluminum alloy with an Aluminum Association series designations commencing with the number 2 and containing in excess of 1.5 percent copper by weight; aluminum extrusions made from aluminum alloy with an Aluminum Association series designation commencing with the number 5 and containing in excess of 1.0 percent magnesium by weight; and aluminum extrusions made from aluminum alloy with an Aluminum Association series designation commencing with the number 7 and containing in excess of 2.0 percent zinc by weight.

The scope also excludes finished merchandise containing aluminum extrusions as parts that are fully and permanently assembled and completed at the time of entry, such as finished windows with glass, doors with glass or vinyl, picture frames with glass pane and backing material, and solar panels. The scope also excludes finished goods containing aluminum extrusions that are entered unassembled in a "finished goods kit." A finished goods kit is understood to mean a packaged combination of parts that contains, at the time of importation, all of the necessary parts to fully assemble a final finished good and requires no further finishing or fabrication, such as cutting or punching, and is assembled 'as is' into a finished product. An imported product will not be considered a 'finished goods kit' and therefore excluded from the scope of the investigation merely by including fasteners such as screws, bolts, etc. in the packaging with an aluminum extrusion product.

The scope also excludes aluminum alloy sheet or plates produced by other than the extrusion process, such as aluminum products produced by a method of casting. Cast aluminum products are properly identified by four digits with a decimal point between the third and fourth digit. A letter may also precede the four digits. The following Aluminum Association designations are representative of aluminum alloys for casting: 208.0, 295.0, 308.0, 355.0, C355.0, 356.0, A356.0, A357.0, 360.0, 366.0, 380.0, A380.0, 413.0, 443.0, 514.0, 518.1, and 712.0. The scope also excludes pure, unwrought aluminum in any form.

The scope also excludes collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) length of 37 mm or 62 mm, (2) outer diameter of 11.0 mm or 12.7 mm, and (3) wall thickness not exceeding 0.13 mm.

Also excluded from the scope of the order are finished heat sinks. Finished heat sinks are fabricated heat sinks made from aluminum extrusions the design and production of which are organized around meeting certain specified thermal performance requirements and which have been fully, albeit not necessarily individually, tested to comply with such requirements.

Imports of the subject merchandise are provided for under the following categories of the Harmonized Tariff Schedule of the United States (HTS): 7610.10.00, 7610.90.00, 7615.10.30, 7615.10.71, 7615.10.91, 7615.19.10, 7615.19.30, 7615.19.50, 7615.19.70, 7615.19.90, 7615.20.00, 7616.99.10, 7616.99.50, 8479.89.98, 8479.90.94, 8513.90.20, 9403.10.00, 9403.20.00, 7604.21.00.00, 7604.29.10.00, 7604.29.30.10, 7604.29.30.50, 7604.29.50.30, 7604.29.50.60, 7608.20.00.30, 7608.20.00.90, 8302.10.30.00, 8302.10.60.30, 8302.10.60.60, 8302.10.60.90, 8302.20.00.00, 8302.30.30.10, 8302.30.30.60, 8302.41.30.00, 8302.41.60.15, 8302.41.60.45, 8302.41.60.50, 8302.41.60.80, 8302.42.30.10, 8302.42.30.15, 8302.42.30.65, 8302.49.60.35, 8302.49.60.45, 8302.49.60.55, 8302.49.60.85, 8302.50.00.00, 8302.60.90.00, 8305.10.00.50, 8306.30.00.00, 8418.99.80.05, 8418.99.80.50, 8418.99.80.60, 8419.90.10.00, 8422.90.06.40, 8479.90.85.00, 8486.90.00.00, 8487.90.00.80, 8503.00.95.20, 8516.90.50.00, 8516.90.80.50, 8708.29.50.60, 8708.80.65.90, 9401.90.50.81, 9403.90.10.40, 9403.90.10.50, 9403.90.10.85, 9403.90.25.40, 9403.90.25.80, 9403.90.40.05, 9403.90.40.10, 9403.90.40.60, 9403.90.50.05, 9403.90.50.10, 9403.90.50.80, 9403.90.60.05, 9403.90.60.10, 9403.90.60.80, 9403.90.70.05, 9403.90.70.10, 9403.90.70.80, 9403.90.80.10, 9403.90.80.15, 9403.90.80.20, 9403.90.80.30, 9403.90.80.41, 9403.90.80.51, 9403.90.80.61, 9506.51.40.00, 9506.51.60.00, 9506.59.40.40, 9506.70.20.90, 9506.91.00.10, 9506.91.00.20, 9506.91.00.30, 9506.99.05.10, 9506.99.05.20, 9506.99.05.30, 9506.99.15.00, 9506.99.20.00, 9506.99.25.80, 9506.99.28.00, 9506.99.55.00, 9506.99.60.80, 9507.30.20.00, 9507.30.40.00, 9507.30.60.00, 9507.90.60.00, and 9603.90.80.50.

The subject merchandise entered as parts of other aluminum products may be classifiable under the following additional Chapter 76 subheadings: 7610.10, 7610.90, 7615.19, 7615.20, and 7616.99 as well as under other HTS chapters. In addition, fin evaporator coils may be classifiable under HTS numbers: 8418.99.80.50 and 8418.99.80.60. While HTS subheadings are provided for convenience and customs purposes, the written description of the scope of the order is dispositive.

There have been numerous scope rulings issued with regard to this *Order*. For further information, refer to the listing of these scope rulings at the webpage entitled, *Final Scope Rulings* on the website of Enforcement and Compliance located at http://enforcement.trade.gov/download/prc-ae/scope/prc-ae-scope-index.html

ATTACHMENT III
GENERAL INSTRUCTIONS

The following instructions apply to all documents your company submits to the Department of Commerce ("Department") during the course of this administrative review.

A. Due Date

1. All submissions must be made electronically using the Department's IA ACCESS website at http://iaaccess.trade.gov. If an exception to the electronic filing requirement applies, you must address and manually submit your response to the address indicated on the cover page of this questionnaire. To determine if your response qualifies for manual filing, *see* "Manual Filing" below. All laws, regulations, and other descriptive materials that supplement your responses should be submitted on the same date as the initial response.

2. The **business proprietary** response should be submitted on the day specified on the cover page of this questionnaire. The **public version** of the response may be filed one business day after the proprietary response.

3. An electronically filed document must be received successfully in its entirety by IA ACCESS by 5 p.m. Eastern Time (ET) on the due date, unless an earlier time is specified. Where applicable, a submitter must manually file a document between the hours of 8:30 a.m. and 5 p.m. ET on the due date, unless an earlier time is specified.

B. Format

1. You are required to state in the upper right-hand corner of your cover letter the following information in the following format:

   a. on the first line, indicate the case number stated on the cover page to this questionnaire;

   b. on the second line, indicate the total number of pages in the document including cover pages, appendices, and any unnumbered pages;

   c. on the third line, indicate the specific segment of the proceeding, (*i.e.*, administrative review) and indicate the complete period covered (01/01/2014 – 12/31/2014);

   d. on the fourth line, indicate the Department office conducting the proceeding (*i.e.*, Office VI);

   e. on the fifth and subsequent lines, indicate whether any portion of the document contains business proprietary information and, if so, list the page numbers containing business proprietary information; and indicate the business proprietary/public status of the document and whether you agree or object to release of the submitted information under **administrative protective order** (APO) by stating one of the following:

- "Business Proprietary Document -- May Be Released Under APO,"
- "Business Proprietary Document -- May Not Be Released Under APO,"
- "Business Proprietary/APO Version-- May Be Released Under APO," as applicable,
- "Public Version," or
- "Public Document."

2. Please include a "Re:" line on the cover letter of your response, or any other submissions you make during this administrative review. In the Re: line, briefly summarize the purpose of your submission, *e.g.*, "Response to Quantity & Value Questionnaire."

3. Prepare your response in typed form and in English (*see* 351.303(d) and (e) for these and other formatting requirements). Include an original and translated version of all pertinent portions of non-English language documents that accompany your response, including financial statements.

4. It is your responsibility to contact the official in charge if subsequent to your filing there are events that affect your response (*e.g.*, changes as a result of an audit are relevant to the sales information).

C. Manual Filing

1. **All submissions must be filed electronically**. Only under the following four circumstances will the Department accept a hardcopy response that is manually filed:

   - Documents exceeding 500 pages in length may be filed manually (in paper form) in the APO/Dockets Unit. This is referred to as a "bulky document."

   - Data files greater than 20 MB must be filed manually on CD-ROM or DVD.

   - If the IA ACCESS system is unable to accept filings continuously or intermittently over the course of any period of time greater than one hour between 12:00 p.m. and 4:30 p.m. ET or for any duration of time between 4:31 p.m. and 5:00 p.m. ET, then a person may manually file the document in the APO/Dockets Unit. The Department will provide notice of such technical failures on the IA ACCESS Help Desk line at 202-482-3150 and on the Enforcement & Compliance website, which is http://www.trade.gov/enforcement/.

- Apart from the above, if you are unable to comply with the electronic filing requirement, as provided in § 351.103(c) of the Department's Regulations, and in accordance with section 782(c) of the Tariff Act of 1930, as amended ("Act"), you must promptly notify the official in charge and submit a full written explanation of the reasons you are unable to file the document electronically. You must also suggest alternative forms in which to submit the information. The Department will consider the ability of a submitter and may modify the electronic filing requirement on a case-by-case basis.

2. All manually filed documents must be accompanied by a cover sheet generated in IA ACCESS. For manually filed bulky documents, separator sheets must also be generated and used.

3. If your response qualifies as a bulky document and you opt to file it manually, you must file two identical paper copies of the document. For all other authorized manual submissions, only one paper copy is required.

4. Manual submissions must be addressed and submitted to:
Secretary of Commerce
APO/Dockets Unit
Room 1870
U.S. Department of Commerce
Fourteenth Street and Constitution Avenue, NW
Washington, D.C. 20230
Attn: Enforcement & Compliance
AD/CVD Operations, Office VI

D. Certification

1. Submit the required **certification of accuracy**. Providers of information and the person(s) submitting it, if different (*e.g.*, a legal representative), must certify that they have read the submission and that the information submitted is accurate and complete. The Department cannot accept a questionnaire response that does not contain the certification statements. Forms for such certification are included as an appendix to this questionnaire. You may photocopy this form and submit a completed copy with each of your submissions.

2. Provide the required **certificate of service** (included as an appendix) with each business proprietary document and public version submitted to the Department.

3. Signed certifications of accuracy and certificates of service should be scanned and appended to the appropriate electronic documents filed in IA ACCESS.

E. <u>Business Proprietary Information and Summarization of Business Proprietary Information</u>

1. Request business proprietary treatment for information submitted that you do not wish to be made publicly available. As a general rule, the Department places all correspondence and submissions received in the course of an antidumping or countervailing duty proceeding in a public reading file. However, information deemed to be proprietary information will not be made available to the public. If you wish to make a request for proprietary treatment for particular information, refer to sections 351.304, 351.305, and 351.306 of the Department's regulations. You must submit the request for proprietary treatment at the same time as the claimed business proprietary information is submitted to the Department.

2. Utilize the "one-day lag rule" under section 351.303(c)(2) of the Department's regulations if you wish an additional day to review the final bracketing of business proprietary information in a document and to prepare the required public version. The filing requirements under the one-day lag rule provide for a party to file only the business proprietary document within the applicable time limit (section 351.303(c)(2)(i)). By the close of business one business day after the date the business proprietary document is filed, the person must file the complete final business proprietary document (section 351.303(c)(2)(i)(ii)). The final business proprietary document must be identical to the original document except for any bracketing corrections.

3. By the close of business one business day after the date the business proprietary document is filed (refer to the "one-day lag rule" in the preceding paragraph), submit the public version of your response (section 351.303(c)(2)(i)(iii)). A public version must contain:

   (1) non-proprietary (public) version of your response that is in sufficient detail to permit a reasonable understanding of the information submitted in confidence, and/or

   (2) itemization of particular information that you claim are unable to be summarized. State the reasons why you cannot summarize each piece of information.

   <u>Please note</u>: The summarization requirement does not apply solely to the narrative portion of your response. It applies equally to worksheets and other appendices to your response, and even to sales and cost databases submitted in antidumping proceedings. Generally, numerical data, such as that provided in sales and cost databases in antidumping proceedings, are adequately summarized only if grouped or presented in terms of indices or figures ranged within 10 percent of the actual figure. If a particular portion of data is voluminous, use ranged figures for at least one percent of the voluminous portion.

Responses, or portions thereof, that are not adequately summarized may be rejected from the record of this proceeding.

4. Submit the statements required regarding limited release of business proprietary information under the provisions of an APO. U.S. law permits limited disclosure to representatives of parties (*e.g.*, legal counsel) of certain business proprietary information, including electronic business proprietary information, under an APO. (Note that data received under an APO cannot be shared with others who are not covered by the APO.) Under the provisions governing APO disclosure, you must submit either:

   (1) statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or

   (2) statement itemizing those portions of the information which you believe should not be released under APO, together with arguments supporting your objections to that release.

   We are required by our regulations to reject, at the time of filing, submissions of business proprietary information that do not contain one of these statements. As discussed above, you must state in the upper right-hand corner of the cover letter accompanying your questionnaire response whether you agree or object to release of the submitted information under APO (*e.g.*, May Be Released Under APO or May Not Be Released Under APO). (*See* section 351.304 of the Department's regulations for specific instructions.[3])

5. Place brackets ("[ ]") around information for which you request business proprietary treatment. Place double brackets ("[[ ]]") around information for which you request proprietary treatment and which you do not agree to release under APO.

6. Provide to all parties whose representatives have been granted APO access and who are listed on the Department's most recent APO Service List, a complete copy of the submission--proprietary document and public version, except for that information which you do not agree to release under APO. (APO service lists, as well as public service lists, are maintained at: http://web.ita.doc.gov/ia/webapotrack.nsf under "People's Republic of China" and "Aluminum Extrusions (C-570-968) Administrative Review 1/1/14-12/31/14."

   If you exclude information because you do not agree to release it under APO, you must submit the complete business proprietary version, wherein information in double brackets has been excluded. This version of the response must be marked

[3] If you do not agree to release under APO all or part of the proprietary information, but we determine that the information should be released, you will have the opportunity to withdraw the information (*see* section 351.304(d) of our regulations). However, any information which you withdraw will be taken out of the official record and will not be used in our determination.

"Business Proprietary/APO Version-- May Be Released Under APO" on the cover page. For parties that do not have access to information under APO, please provide a public version only.

Note: A chart summarizing AD/CVD document filing requirements can be found at http://enforcement.trade.gov/filing/index.html. Detailed and supplemental information concerning APOs, including the APO Handbook, a complete set of APO regulations, and APO application forms and service lists, can be found at http://enforcement.trade.gov/apo/index.html.

ATTACHMENT IV

CERTIFICATIONS OF FACTUAL ACCURACY AND CERTIFICATE OF SERVICE

CERTIFICATIONS OF FACTUAL ACCURACY

§ 351.303 Filing, document identification, format, translation, service, and certification of documents.
*** * * * ***
(g) *Certifications.* Each submission containing factual information must include the following certification from the person identified in paragraph (g)(1) of this section and, in addition, if the person has legal counsel or another representative, the certification in paragraph (g)(2) of this section. The certifying party must maintain the original signed certification for a period of five years from the date of filing the submission to which the certification pertains. The original signed certification must be available for inspection by U.S. Department of Commerce officials. Copies of the certifications must be included in the submission filed at the Department.

(1) For the person(s) officially responsible for presentation of the factual information:

(i) COMPANY CERTIFICATION:*

I, **(PRINTED NAME AND TITLE)**, currently employed by **(COMPANY NAME)**, certify that I prepared or otherwise supervised the preparation of the attached submission of (**IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }: {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)})**. I certify that the public information and any business proprietary information of **(CERTIFIER'S COMPANY NAME)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: ____________________
Date: ________________________

* For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, *e.g.*, "I" should be changed to "we" and "my knowledge" should be changed to "our knowledge."

(ii) GOVERNMENT CERTIFICATION:**

I, **(PRINTED NAME AND TITLE)**, currently employed by the government of **(COUNTRY)**, certify that I prepared or otherwise supervised the preparation of the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }: {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)})**. I certify that the public information and any business proprietary information of the government of **(COUNTRY)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: ______________________
Date: ________________________

** For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, *e.g.*, "I" should be changed to "we" and "my knowledge" should be changed to "our knowledge."

(2) For the legal counsel or other representative:

REPRESENTATIVE CERTIFICATION:***

I, **(PRINTED NAME)**, with **(LAW FIRM or OTHER FIRM)**, **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }: {COUNSEL TO} or {REPRESENTATIVE OF}) (COMPANY NAME, OR GOVERNMENT OF COUNTRY, OR NAME OF ANOTHER PARTY)**, certify that I have read the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }: {THE (ANTIDUMPING OR COUNTERVAILING DUTY) INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)})**. In my capacity as **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }: {COUNSEL} or {ADVISER, PREPARER, OR REVIEWER})** of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: ______________________
Date: __________________________

*** For multiple representative certifications, all representatives and their firms should be listed in the first sentence of the certification and all representatives should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, *e.g.*, “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

CERTIFICATE OF SERVICE

I, _________________________, hereby certify that a copy of the

(name of certifying official)

foregoing submission on behalf of ______________________________,

(company name)

dated __________________, was served by first class mail or by hand delivery (circle the method used) on the following parties:

(Business Proprietary Version)

<u>On Behalf of</u>

Name and address

(Public Version)

<u>On Behalf of</u>

Name and address

____

(Signature of Certifying Official)

ATTACHMENT V
CHECKLIST

General Items

1. ____ Confirm that you have provided all of the information requested in Attachment I to this questionnaire.

2. ____ You have listed in the table in Attachment I the full name of the company for which you reported data.

3. ____ Even if you believe that you should be treated as a single entity along with other companies, please do not report aggregate data for all of the companies that you believe should be treated as a single entity for reporting purposes but separately report your company's quantity and value data. Quantity and value data pertaining to other, possibly affiliated companies, that you believe should be treated together with your company as a single entity should be separately reported by those companies.

4. ____ **Do not** submit your response via email or facsimile. Your response must be electronically filed using IA ACCESS unless you meet one of the exceptions listed under the "Manual Filing" section of the General Instructions.

5. ____ You have filled out and included with your Q&V Questionnaire response the Certificate of Accuracy(ies) in Attachment IV to this Questionnaire.

6. ____ You have filled out and included with your Q&V Questionnaire response the Certificate of Service in Attachment IV to this Questionnaire.

7. ____ In addition to the above information, please provide the following contact information for the company for which you completed the table in Attachment I of this questionnaire:

   Full Company Name:
   Name of Contact Person at the Company (if not represented by legal counsel):
   Full Company Address, **Including Postal Code**:
   Telephone Number:
   Fax Number:
   Email Address:

Instructions relating to PUBLIC DOCUMENTS

If you are willing to allow **all** of the information contained in your Q&V Questionnaire response to be made publicly available, you must comply with items 1 through 4 below:

1. ____ You marked the upper-right hand corner of the cover letter of your questionnaire

response as follows:

Case No. C-570-968
Total Number of Pages: XX
Review: 01/01/2014 – 12/31/2014
Office VI
"Public Document"

2. ____ **Do not** place brackets ("[ ]") around any of the information provided in the public document.

3. ____ Your Certificate of Service lists each company on the Public Service list at [http://web.ita.doc.gov/ia/webapotrack.nsf.](http://web.ita.doc.gov/ia/webapotrack.nsf)

Instructions relating to PROPRIETARY DOCUMENTS

If you wish to treat any of the information contained in your Q&V Questionnaire response as proprietary information that you do not wish to be made publicly available, you must comply with items A and B below:

A. You submitted a proprietary version of the document which meets requirements 1 through 7 below:

1. ____ The upper-right hand corner of the cover letter of your questionnaire response contains the following information:

Case No. C-570-968
Total Number of Pages: XX
Review: 01/01/2014 – 12/31/2014
Office VI
"**Business Proprietary Document"**
Business Proprietary Information on pages XX

2. ____ In addition to the above markings, you **must** include one of the following statements on the "**Business Proprietary Document**" line that you include in the upper-right hand corner of the cover letter of your questionnaire response: (1) **May Be Released Under APO** *or* (2) **May Not be Released Under APO**. APO stands for Administrative Protective Order. Administrative Protective Orders permit limited disclosure of proprietary information to representatives of parties (*e.g.*, legal counsel to parties) who have been granted APO access. **You should note that most business proprietary information is usually released by the submitters of the information under APO.** However, if you object to the release under APO of certain information contained in your Q&V Questionnaire response, you **must** list the information which you believe should not be released under APO, together with arguments supporting your objections

to release under APO.

3. ____ You have included the statement "Business Proprietary Treatment Requested" on the top of each page containing business proprietary information.

4. ____ You have placed brackets ("[ ]") around the information that you consider proprietary which you do not wish to be made publicly available, but which may be released under APO.

5. ____ If you object to releasing certain proprietary information under APO, place double brackets ("[[ ]]") around such information and create a separate APO version of the business proprietary document. The upper-right hand corner of the cover letter of the APO version of your questionnaire response should contain the following information:

   Case No. C-570-968
   Total Number of Pages: XX
   Review: 01/01/2014 – 12/31/2014
   Office VI
   "Business Proprietary/APO Version - May be Released Under APO"
   Business Proprietary Information deleted from pages XX

6. ____ Information in double brackets should be removed from the APO version of your questionnaire response. Do not remove information in double brackets from the proprietary version of the questionnaire response filed with the Department.

7. ____ Your Certificate of Service lists each company on the APO Service list at http://web.ita.doc.gov/ia/webapotrack.nsf. If you created an APO version of your questionnaire response, provide the parties on the APO Service list with a copy of the **APO version** of your questionnaire response. If you **did not** create an APO version of your questionnaire response, provide the parties on the APO Service list with a copy of the **proprietary version** of your questionnaire response. **Do not** provide parties on the Public Service list with a copy of either the proprietary version or APO version of your questionnaire response.

B. You have created a public version of the proprietary document which meets requirements 1 through 3 below:

   1. ____ The upper-right hand corner of the cover letter of your questionnaire response contains the following information:

2. ____ In the public version of the Q&V Questionnaire response, you have summarized all of the numeric data in the proprietary version of the Q&V Questionnaire response that you placed in brackets ("[ ]"). An acceptable method of summarizing the proprietary numbers in the public version is to report numbers in the public version that differ from the numbers reported in the proprietary version by no more than 10 percent. For example if you reported [200] in the proprietary version, you may summarize this figure in the public version of that document by reporting a number between [220] and [180].

3. ____ Your Certificate of Service lists each company on the Public Service list at http://web.ita.doc.gov/ia/webapotrack.nsf.