

70 FR 45655, August 8, 2005

A-427-816
A-533-817
A-560-805
A-475-826
A-588-847
A-580-836
Sunset Reviews
Public Document

August 1, 2005

MEMORANDUM TO: Joseph A. Spetrini
Acting Assistant Secretary
for Import Administration

FROM: Barbara E. Tillman
Acting Deputy Assistant Secretary
for Import Administration

SUBJECT: Issues and Decision Memorandum for the Expedited Sunset Reviews
of the Antidumping Duty Orders on Certain Cut-To-Length Carbon-
Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the
Republic of Korea; Final Results

Summary

We have analyzed the substantive responses of the interested parties in the sunset reviews of the Antidumping Duty Orders (“AD Orders”) covering Certain Cut-To-Length Carbon-Quality Steel Plate (“CTL Plate”) from France, India, Indonesia, Italy, Japan, and the Republic of Korea. We recommend that you approve the positions we have developed in the “Discussion of the Issues” section of this memorandum. Below is the complete list of the issues in these sunset reviews for which we received a substantive response:

1. Likelihood of continuation or recurrence of dumping
2. Magnitude of the margin likely to prevail

History of the Orders

On February 10, 2000, the Department published its final amended determinations and AD Orders on CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea. See Notice of Amendment of Final Determinations of Sales at Less Than Fair Value and Antidumping Duty Orders: Certain Cut-To- Length Carbon-Quality Steel Plate Products From France, India, Indonesia, Italy, Japan, and the Republic of Korea, 65 FR 6585 (February 10, 2000).

Since the issuance of the AD Orders regarding imports of CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea, the Department has conducted: one administrative review with respect to CTL Plate from the Republic of Korea¹ and one changed circumstances review with respect to CTL Plate from Japan². Any other administrative reviews or new shipper reviews initiated by the Department since the imposition of the AD Orders were subsequently rescinded.³ The Department has conducted no duty absorption reviews.

On January 3, 2005, in accordance with section 751(c) of the Tariff Act of 1930, as amended (“the Act”), the Department automatically initiated sunset reviews of the AD Orders on CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea. See Initiation of Five-Year (Sunset) Reviews, 70 FR 75 (January 3, 2005).

The Department received notices of intent to participate from the following domestic parties: Mittal Steel USA ISG Inc.⁴, IPSCO Steel Inc., Nucor Corporation, and United States

¹ See Certain Cut-To-Length Carbon-Quality Steel Plate Products from the Republic of Korea: Final Results and Rescission in Part of Antidumping Duty Administrative Review, 69 FR 26361 (May 12, 2004).

² See Notice of Final Results of Changed Circumstances Antidumping Duty Administrative Review, and Determination To Revoke the Order in Part: Certain Cut-To-Length Carbon-Quality Steel Plate Products From Japan, 68 FR 9975 (March 3, 2003).

³ See Certain Cut-To-Length Carbon-Quality Steel Plate from Italy: Rescission of Antidumping Duty Administrative Review, 66 FR 23003 (May 7, 2001); Certain Cut-To-Length Carbon-Quality Steel Plate from the Republic of Korea: Rescission of Antidumping Duty Administrative Review, 66 FR 20235 (April 20, 2001); Certain Cut-To-Length Carbon-Quality Steel Plate Products Indonesia: Notice of Rescission of Antidumping and Countervailing Duty New Shipper Reviews, 66 FR 33661 (June 25, 2001); Certain Cut-To-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, and Japan: Rescission of Antidumping Duty Administrative Review, 67 FR 36855 (May 28, 2002); Certain Cut-To-Length Carbon-Quality Steel Plate from the Republic of Korea: Rescission of Antidumping Administrative Review, 67 FR 51821 (August 9, 2002); Certain Cut-To-Length Carbon-Quality Steel Plate from the Republic of Korea: Preliminary Results and Rescission in Part of Antidumping Duty Administrative Review, 68 FR 62770 (November 6, 2003); Certain Cut-To-Length Carbon-Quality Steel Plate Products from the Republic of Korea: Final Results and Rescission in Part of Antidumping Duty Administrative Review, 69 FR 26361 (May 12, 2004); Certain Cut-To-Length Carbon-Quality Steel Plate from Japan: Notice of Rescission of Antidumping Duty Administrative Review, 69 FR 47866 (August 6, 2004); and Certain Cut-To-Length Carbon-Quality Steel Plate from the Republic of Korea: Rescission of Antidumping Duty Administrative Review, 69 FR 43971 (July 23, 2004).

⁴ Bethlehem Steel Corporation was one of the original petitioners in the investigation. International Steel Group Inc. was the successor company to Bethlehem Steel Corporation. See Letters from Nucor Corporation, International Steel Group Inc. (Mittal Steel USA ISG Inc.), and IPSCO Steel Inc. to the Secretary of Commerce re: Five-year (“sunset”) review(s) pursuant to Section 751(c) of the Tariff Act of 1930 of the Antidumping Duty Order(s) on Cut-to-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea – Substantive Response(s) to Notice of Initiation (February 1, 2005) (separate letters were simultaneously submitted for each country). International Steel Group Inc. was later acquired and its name changed to Mittal Steel USA ISG Inc. See Letters from Mittal Steel USA ISG Inc. to the Secretary of Commerce re: Sunset Review(s) of Certain Cut-To-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea: Notice of Change in International Steel Group Inc.’s Name (April 20, 2005) (separate letters were simultaneously submitted for each country), and Letters from Mittal Steel USA ISG Inc. to the Secretary of Commerce re: Antidumping Duty Sunset Review(s) of Certain Cut-To-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea: Clarification of Mittal Steel USA ISG’s name (May 6, 2005) (separate letters were

Steel Corp. within the deadline specified in 19 CFR 351.218(d)(1)(i). These four parties claimed interested party status under section 771(9)(C) of the Act and 19 CFR 351.102(b), as domestic manufacturers and producers of the domestic like product. The Department received a collective substantive response from Mittal Steel USA ISG Inc., IPSCO Steel Inc., and Nucor Corporation (collectively “the domestic interested parties”) within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i). The Department received no substantive responses from any of the respondent interested parties to these proceedings.⁵ As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department conducted expedited sunset reviews of these AD Orders.

On May 3, 2005, in accordance with section 751(c)(5)(C) of the Act, the Department extended the time limit until August 1, 2005, for its final results in the expedited sunset reviews of the antidumping and countervailing duty orders on CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea. See Certain Cut-To-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea: Extension of Final Results of Expedited Sunset Reviews of the Antidumping and Countervailing Duty Orders, 70 FR 22843 (May 3, 2005).

Discussion of the Issues

In accordance with section 751(c)(1) of the Act, the Department conducted these sunset reviews to determine whether revocation of the AD Orders would likely lead to the continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews and the volume of imports of the subject merchandise for the period before and the period after the issuance of the AD Orders. In addition, section 752(c)(3) of the Act provides that the Department shall provide to the International Trade Commission (“ITC”) the magnitude of the margin of dumping likely to prevail if the order were revoked. Below we address the comments of the interested parties.

1. Likelihood of Continuation or Recurrence of Dumping:

Interested Party Comments

The domestic interested parties believe that revocation of these AD Orders would likely lead to a continuation or recurrence of dumping by the French, Indian, Indonesian, Italian, Japanese, and Korean manufacturers, producers, and exporters of the subject merchandise. See Letters from Nucor Corporation, International Steel Group Inc. (Mittal Steel USA ISG Inc.), and IPSCO Steel Inc. to the Secretary of Commerce re: Five-year (“sunset”) reviews pursuant to Section 751(c) of the Tariff Act of 1930 of the Antidumping Duty Order(s) on Cut-To-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea

simultaneously submitted for each country).

⁵ GTS Industries S.A., a French producer of subject merchandise, submitted a waiver of participation in the sunset review of CTL Plate from France. See Letter to Gary S. Taverman re: Antidumping Duty Sunset Review of Certain Cut-To-Length Carbon-Quality Steel Plate from France; Statement of Waiver (February 2, 2005).

– Substantive Response(s) to Notice of Initiation (February 1, 2005) (separate letters were simultaneously submitted for each country) (“Substantive Response”). The domestic interested parties contend that revocation of the AD Orders under review would have the effect of continuation of sales at less than fair value by margins equivalent to or greater than those found in the original investigation. See Substantive Response (India and Indonesia) at page 3; Substantive Response (France, Italy, Japan, and Korea) at page 4.

France: Domestic interested parties state that since the imposition of the AD Order, imports of subject merchandise into the United States have decreased significantly. See Substantive Response (France) at page 4. Imports of the subject merchandise from France to the United States in 1998, the last year before the initiation of the investigation, totaled 79,441 tons. After the issuance of the AD Order, imports from France fell by over 67 percent to 26,115 tons in 2001, and fell by over 77 percent to 18,177 tons in 2002. In 2004, the peak year for French imports since the imposition of the AD Order, import volumes were down by 65 percent from 1998 volumes. See Substantive Response (France) at page 5. Thus, the domestic interested parties conclude, the significant decrease in imports of the subject merchandise from France after imposition of the AD Order indicates a strong likelihood of recurrence of dumping should the AD Order be revoked. See Substantive Response (France) at page 5.

India: Domestic interested parties show that in 1998 imports from India totaled 135,158 tons. See Substantive Response (India) at page 3. Provisional measures of 58.80 percent were implemented against Indian producers and exporters on July 29, 1999, after which the imports from India decreased dramatically from the 1998 levels to 6,353 tons in 1999. Imports from India continued to decrease after the imposition of the AD Order. Indian producers could not maintain pre-order levels of imports with the imposition of antidumping measures, and imports fell to 364 short tons in 2000, 70 short tons in 2001, 20 short tons in 2002, and no imports in 2003. See Substantive Response (India) at page 4. Although imports from India totaled 1,048 tons through November 2004, this figure is insignificant when compared to the volumes shipped prior to the AD Order. Thus, the domestic interested parties conclude, the significant decrease and near elimination of imports of subject merchandise from India since the imposition of the AD Order indicates a strong likelihood of a recurrence of dumping should the AD Order be revoked. Such dumping would injure the domestic industry, and the AD Order under review should therefore not be terminated. See Substantive Response (India) at page 5.

Indonesia: Domestic interested parties show that in 1998 imports from Indonesia totaled 150,472 short tons. See Substantive Response (Indonesia) at page 4. Provisional measures were implemented against Indonesian producers and exporters on July 29, 1999, after which the imports from Indonesia decreased dramatically from the 1998 levels to 35,919 tons in 1999. Imports from Indonesia continued to decrease after the imposition of the AD Order. Indonesian producers could not maintain pre-order levels of imports, and after the imposition of antidumping measures there were no imports in 2000, 2002, and 2003, and only 95 short tons in 2001. See Substantive Response (Indonesia) at page 4. Thus, the domestic interested parties conclude, the significant decrease and near elimination of imports of subject merchandise from Indonesia since

the imposition of the order indicates a strong likelihood of a recurrence of dumping should the AD Order be revoked. Such dumping would injure the domestic industry, and the AD Order under review should therefore not be terminated. See Substantive Response (Indonesia) at page 5.

Italy: The domestic interested parties assert that import volumes of CTL Plate have declined significantly since the initiation of the investigation in 1999 and the issuance of the AD Order in February 2000. Imports in 1998 totaled 88,613 short tons, then dropped to 11,998 short tons in 1999, 2,539 short tons in 2000, and 1,177 short tons in 2001. By 2002 and 2003, imports had virtually left the United States market altogether. See Substantive Response (Italy) at page 6. Thus, the domestic interested parties conclude, the significant decrease in imports of the subject merchandise since the imposition of the order indicates a strong likelihood of a recurrence of dumping should the AD Order be revoked. Such dumping would injure the domestic industry, and the AD Order under review should therefore not be terminated. See Substantive Response (Italy) at page 6.

Japan: The domestic interested parties contend that import volumes for CTL Plate from Japan have declined significantly since the issuance of the AD Order in February 2000. Imports in 1998 totaled 225,300 short tons, then dropped to 91,203 short tons in 1999, 66,030 short tons in 2000, 48,569 short tons in 2001, 65,922 short tons in 2002, and 39,154 short tons in 2003. See Substantive Response (Japan) at page 6. Thus, the significant decrease in imports of the subject merchandise since the imposition of the order indicates a strong likelihood of a recurrence of dumping should the AD Order be revoked. Such dumping would injure the domestic industry, and the AD Order under review should therefore not be terminated. See Substantive Response (Japan) at page 6. Furthermore, the domestic interested parties state, the subject merchandise has continued to enter the United States at cash deposit rates ranging from 10.78 percent to 59.12 percent, which meets the Department's "continued dumping" factor. See Substantive Response (Japan) at pages 6-7

Republic of Korea: The domestic interested parties state that the Department calculated a final weighted-average dumping margin of 2.98 percent for Dongkuk Steel Mill Co., Ltd ("Dongkuk"), as well as for all other Korean producers. In a subsequent administrative review, the Department determined that a 0.85 percent dumping margin should be applied to Dongkuk. See Substantive Response (Korea) at pages 3-4. Imports of subject merchandise from the Republic of Korea to the United States surged prior to the imposition of the AD Order, reaching 347,123 tons in 1998. However, imports declined significantly during each year of the post-order period, dropping to 181,964 tons in 2001, 100,320 tons in 2002, 22,259 tons in 2003, and 32,201 tons in 2004 year-to-date. See Substantive Response (Korea) at page 5 and Exhibit 2. The domestic interested parties conclude that the substantial decrease in imports of subject merchandise from the Republic of Korea after the imposition of the AD Order indicates a strong likelihood of recurrence of dumping if the AD Order were revoked. Thus, the Department should find that revocation of the AD Order under review would likely lead to continuation or

recurrence of dumping and should therefore conclude that the orders not be terminated. See Substantive Response (Korea) at page 5.

Department's Position

Consistent with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action (“SAA”), H.R. Doc. No. 103-316, vol. 1 (1994), the House Report, H. Rep. No. 103-826, pt. 1 (1994), and the Senate Report, S. Rep. No. 103-412 (1994), the Department’s determinations of likelihood will be made on an order-wide basis. In addition, the Department normally will determine that revocation of an AD Order is likely to lead to continuation or recurrence of dumping where (a) dumping continued at any level above *de minimis* after the issuance of the order, (b) imports of the subject merchandise ceased after the issuance of the order, or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly. Pursuant to section 752(c)(1)(B) of the Act, the Department considers the volume of imports of the subject merchandise for the period before and after the issuance of the AD Order.

France: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of French CTL Plate declined in every year since the imposition of the AD Order, except in 2004, when 29,094 short tons entered into the United States, an import level which was well below pre-order levels of 205,304 short tons in 1998. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

India: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of Indian CTL Plate declined in every year since the imposition of the AD Order, except in 2004, when 1,585 short tons entered into the United States, an import level which was well below pre-order levels of 137,735 short tons in 1998. In 2003, there were no Indian imports of subject merchandise into the United States. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Indonesia: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of Indonesian CTL Plate declined in every year since the imposition of the AD Order, except in 2004. In 2004, 646 short tons entered into the United States, an import level which was well below pre-order levels of 165,481 short tons in 1998. In 2000, 2002, and 2003, there were no Indonesian imports of subject merchandise into the United States. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Italy: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of Italian CTL Plate declined in every year since the imposition of the AD Order, except in 2004, when 29,636 short tons entered into the United States, an import level which was below pre-order levels of 88,613 short tons in 1998. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Japan: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of Japanese CTL Plate declined in every year since the imposition of the AD Order, except in 2002, when 66,377 short tons entered into the United States and in 2004, when 45,489 short tons entered into the United States. Both of these import figures remain below pre-order levels of 247,675 short tons in 1998. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

Republic of Korea: Using statistics provided by the ITC Dataweb (see attached), the Department finds that imports of Korean CTL Plate declined in every year since the imposition of the AD Order, except in 2004, when 47,471 short tons entered into the United States. Pre-order levels of subject merchandise totaled 349,384 short tons in 1998. Given that dumping continues at above *de minimis* levels, as discussed below, and imports are below pre-order levels, the Department determines that dumping is likely to continue or recur if the order were revoked.

2. Magnitude of the Margin Likely to Prevail:

Interested Party Comments

France: The domestic interested parties suggest that if the AD Order were revoked, the dumping margin likely to prevail would be no less than the rate calculated for all French producers in the original investigation. In accordance with the SAA, they recommend that the Department report to the ITC the margins that were calculated in the final determination reached in the original investigation because they are the only calculated rates that reflect the behavior of the exporters without the discipline of an order in place. The domestic interested parties recommend the following: See Substantive Response (France) at page 6.

Usinor	10.41 percent
All Others	10.41 percent

India: In their substantive responses, the domestic interested parties state that revocation of the AD Order would likely lead to the recurrence of dumping of Indian subject merchandise into the United States market, at margins equal to or greater than those found in the original investigation. In accordance with the SAA, because the margins from the original investigation are the only calculated rates that reflect the behavior of the exporters without the discipline of an order in place, the domestic interested parties recommend the Department report these margins,

as subsequently revised in accordance with a World Trade Organization Dispute Settlement Panel report, to the ITC. See Notice of Determination under Section 129 of the Uruguay Round Agreements Act: Antidumping Measure on Certain Cut-To-Length Carbon-Quality Steel Plate Products From India, 68 FR 7967 (February 19, 2003) and Substantive Response (India) at page 4.

Steel Authority of India, Ltd.	42.39 percent
All Others	42.39 percent

Indonesia: The domestic interested parties state that revocation of the AD Order would likely lead to the recurrence of dumping of Indonesian subject merchandise into the United States market, at margins equal to or greater than those found in the original investigation. In accordance with the SAA, they recommend that the Department report to the ITC the margins that were calculated in the final determination reached in the original investigation because they are the only calculated rates that reflect the behavior of the exporters without the discipline of an order in place. The domestic interested parties recommend the Department report to the ITC the following dumping margins: See Substantive Response (Indonesia) at page 5-6.

PT Gunawan Dianjaya/PT Jaya Pari Steel Corp.	50.80 percent
PT Krakatau Steel	52.42 percent
All Others	50.80 percent

Italy: The domestic interested parties contend that revocation of the AD Order would likely lead to dumping at margins equal to or greater than those found in the original investigation. In accordance with the SAA, they recommend that the Department report to the ITC the margins that were calculated in the final determination reached in the original investigation because they are the only calculated rates that reflect the behavior of the exporters without the discipline of an order in place. The domestic interested parties recommend that the dumping margin likely to prevail upon revocation is as follows: See Substantive Response (Italy) at page 7.

Palini and Bertoli S.p.A.	7.85 percent
All Others	7.85 percent

Japan: The domestic interested parties contend that revocation of the AD Order would likely lead to dumping at margins equal to or greater than those found in the original investigation. In accordance with the SAA, they recommend that the Department report to the ITC the margins that were calculated in the final determination reached in the original investigation because they are the only calculated rates that reflect the behavior of the exporters without the discipline of an order in place. The domestic interested parties recommend that the Department find the dumping margins likely to prevail upon revocation are those which were determined in the original investigation, and are as follows: See Substantive Response (Japan) at page 7.

Kawasaki Steel Corporation	10.78 percent
Kobe Steel, Ltd.	59.12 percent
Nippon Steel Corporation	59.12 percent
NKK Corporation	59.12 percent
Sumitomo Metal Industries, Ltd.	59.12 percent
All Others	10.78 percent

Republic of Korea: The domestic interested parties state that if the AD Order were revoked, the dumping margin likely to prevail would be no less than the rate calculated for “all other” Korean producers in the original investigation: 2.98 percent. Because there has been only one administrative review and recalculation of the dumping margin for Dongkuk, the Department has no other margins on which to rely. Therefore, the domestic interested parties request that the Department find that the magnitude of the margin of dumping that is likely to prevail is identical to the margin determined to exist in the original investigation, and is as follows: See Substantive Response (Korea) at pages 3-6.

Dongkuk Steel Mill Co., Ltd	2.98 percent
All Others	2.98 percent

Department's Position

The investigation margins, in addition to being the margins based on a time period for which the orders were not yet in place, are the only margins we can examine because, with the exception of the AD Order on the Republic of Korea, there have been no administrative reviews of the AD Orders.⁶ It is reasonable to assume that if the respondents had reduced or eliminated their dumping practices they would have completed a review to reduce their cash deposit and assessment rates. Because no review was completed, we assume that the respondents would continue to dump at the same rates. Even in the case of the Republic of Korea, the post-order administrative review conducted for one company resulted in an above *de minimis* margin. These factors, in conjunction with our analysis of declining import volumes, as detailed above, provide the Department with the basis for finding that dumping would likely continue in the absence of the orders.

Section 752(c)(3) of the Act provides that the Department will report to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Normally, the Department will provide to the ITC the company-specific margin from the investigation for each company. For companies not investigated specifically or for companies that did not begin shipping until after the order was issued, the Department normally will provide a margin based on the “all others” rate from the investigation. The Department’s preference for selecting a margin from the investigation is based on the fact that it is the only calculated rate that

⁶ As discussed in the “History of the Order” section above, any administrative (or new shipper) reviews initiated after the imposition of the orders were subsequently rescinded.

reflects the behavior of manufacturers, producers, and exporters without the discipline of an order or suspension agreement in place. See SAA at page 890.

The Department must determine the appropriate rates to report to the ITC regarding CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea. The Department finds that it is appropriate to provide the ITC with the rates from the investigation because these are the only calculated rates that reflect the behavior of manufacturers, producers, and exporters without the discipline of an order in place. However, in the case of CTL Plate from India, the Department will report to the ITC the investigation rates as revised in accordance with the WTO Panel, as discussed above. Thus, the Department will report to the ITC these same margins as listed in the “Final Results of Reviews” section.

Final Results of Reviews

For the reasons stated above, we determine that revocation of the AD Orders on CTL Plate from France, India, Indonesia, Italy, Japan, and the Republic of Korea would likely lead to continuation or recurrence of dumping at the following weighted-average percentage margins:

Manufacturers/Exporters/Producers	Weighted-Average Margin (percent)
France	
Usinor, S.A.	10.41
All Others	10.41
India	
Steel Authority of India, Ltd.	42.39
All Others	42.39
Indonesia	
PT Gunawan Dianjaya/PT Jaya Pari Steel Corporation	50.80
PT Krakatau Steel	52.42
All Others	50.80
Italy	
Palini and Bertoli S.p.A	7.85
All Others	7.85

Japan

Kawasaki Steel Corporation	10.78
Kobe Steel, Ltd.	59.12
Nippon Steel Corporation	59.12
NKK Corporation	59.12
Sumitomo Metal Industries, Ltd.	59.12
All Others	10.78

Republic of Korea

Dongkuk Steel Mill Co., Ltd.	2.98
All Others	2.98

Recommendation

Based on our analysis of the substantive responses received, we recommend adopting all of the above positions. If these recommendations are accepted, we will publish the final results of review in the *Federal Register*.

AGREE _____

DISAGREE _____

Joseph A. Spetrini
Acting Assistant Secretary
for Import Administration

(Date)

ATTACHMENT

U.S. General Import Volume of CTL Plate in short tons¹

	1997	1998	1999	2000	2001	2002	2003	2004
France	200,108	205,304	150,679	38,729	26,115	18,177	15,913	29,094
India	130,061	137,735	6,462	1,673	1,262	20	0	1,585
Indonesia	59,853	165,481	39,553	0	123	0	0	646
Italy	85,483	88,613	11,998	2,539	1,177	370	666	29,636
Japan	77,056	247,675	91,057	67,999	48,569	66,377	37,125	45,489
Rep. of Korea	25,433	349,384	218,155	214,622	181,944	100,321	22,259	47,471

Source: ITC Dataweb / Trade Database

¹ We used the following conversion formula: Short Ton = Kilograms/907.1847.