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International Trade Administration
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DATE: June 2, 2014

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Enforcement and Compliance

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

SUBJECT: Decision Memorandum for Preliminary Results of Antidumping
Duty Administrative Review; 2012-2013: Narrow Woven Ribbons
With Woven Selvedge from the People's Republic of China

Summary

In response to requests from interested parties, the Department of Commerce ("the Department") is conducting an administrative review of the antidumping duty order on narrow woven ribbon with woven selvedge ("NWR") from the People's Republic of China ("PRC") for the period September 1, 2012, through August 31, 2013. The Department preliminarily finds that Yangzhou Bestpak Gifts & Crafts Co., Ltd. ("Bestpak"), a company for which an administrative review ("AR") was requested, failed to respond to the Department's requests for information, and, therefore, has not established its eligibility for a separate rate. Accordingly, the Department preliminarily finds that Bestpak is part of the PRC-wide entity. Because the PRC-wide entity failed to cooperate to the best of its ability in complying with our requests for information, we determined an estimated weighted-average dumping margin for the PRC-wide entity based on facts available with an adverse inference ("AFA").

If these preliminary results are adopted in our final results of review, we will instruct U.S. Customs and Border Protection ("CBP") to assess antidumping duties on all appropriate entries of subject merchandise during the period of review. Interested parties are invited to comment on these preliminary results. We intend to issue final results no later than 120 days from the date of publication of this notice, pursuant to section 751(a)(3)(A) of the Tariff Act of 1930, as amended ("the Act").



Background

On September 1, 2010, the Department published in the Federal Register the antidumping duty order on NWR from the PRC.¹ On September 3, 2013, the Department notified interested parties of their opportunity to request an administrative review, covering the period September 1, 2012, through August 31, 2013, of the antidumping duty order on NWR from the PRC.² On September 30, 2013, the Department received a request for review of 15 exporters from Berwick Offray LLC and its wholly-owned subsidiary Lion Ribbon Company, Inc. (“Petitioner”).³

The Department initiated the administrative review on November 8, 2013, and issued quantity and value questionnaires to the 15 companies identified in the Initiation Notice.⁴ The Department received responses to its quantity and value questionnaires from 14 of the 15 companies that received questionnaires. On December 6, 2013, the Department selected Papillon Ribbon & Bow (H.K.) Ltd. (“Papillon HK”) as the sole mandatory respondent in this review, and issued its antidumping questionnaire to Papillon HK.⁵ On December 24, 2013, Papillon HK notified the Department in writing of its decision to withdraw from active participation as a mandatory respondent in the ongoing administrative review.⁶ Subsequently, Petitioner submitted a timely withdrawal of its administrative review request for Papillon HK, and 13 of the 14 other exporters identified in the Initiation Notice.⁷ Petitioner did not withdraw its review request of Bestpak, the sole company that did not respond to the Department’s quantity and value questionnaire.

Period of Review

The period of review (“POR”) is September 1, 2012, through August 31, 2013.

Scope of the Order

The scope of the order covers narrow woven ribbons with woven selvedge, in any length, but with a width (measured at the narrowest span of the ribbon) less than or equal to 12 centimeters, composed of, in whole or in part, man-made fibers (whether artificial or synthetic, including but

¹ See Notice of Antidumping Duty Orders: Narrow Woven Ribbons With Woven Selvedge From Taiwan and the People's Republic of China: Antidumping Duty Orders, 75 FR 53632 (September 1, 2010), as amended in Narrow Woven Ribbons With Woven Selvedge From Taiwan and the People's Republic of China: Amended Antidumping Duty Orders, 75 FR 56982 (September 17, 2010) (“Order”).

² See Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation: Opportunity To Request Administrative Review, 78 FR 54235 (September 3, 2013).

³ The public record of the review, including all public or public versions of correspondence filed by parties or the Department, may be accessed electronically via Enforcement and Compliance’s Antidumping and Countervailing Duty Centralized Electronic Service System (“IA ACCESS”). IA ACCESS is available to registered users at <http://iaaccess.trade.gov>; the public record is also available to all parties in the Central Records Unit, room 7046 of the main Department of Commerce building.

⁴ See Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part, 78 FR 67104 (November 8, 2013) (“Initiation Notice”).

⁵ See Memorandum to The File from Robert Bolling, Program Manager, and Karine Gziryan, Financial Analyst, E&C/AD/Office 4, regarding “Respondent Selection in the Third Antidumping Administrative Review of Narrow Woven Ribbons with Woven Selvedge from the People’s Republic of China,” dated December 6, 2013 (“Respondent Selection Memorandum”).

⁶ See Papillon HK’s December 24, 2013, submission to the Department.

⁷ See Petitioner’s February 6, 2014, submission to the Department.

not limited to nylon, polyester, rayon, polypropylene, and polyethylene terephthalate), metal threads and/or metalized yarns, or any combination thereof. Narrow woven ribbons subject to the order may:

- also include natural or other non-man-made fibers;
- be of any color, style, pattern, or weave construction, including but not limited to single-faced satin, double-faced satin, grosgrain, sheer, taffeta, twill, jacquard, or a combination of two or more colors, styles, patterns, and/or weave constructions;
- have been subjected to, or composed of materials that have been subjected to, various treatments, including but not limited to dyeing, printing, foil stamping, embossing, flocking, coating, and/or sizing;
- have embellishments, including but not limited to appliqué, fringes, embroidery, buttons, glitter, sequins, laminates, and/or adhesive backing;
- have wire and/or monofilament in, on, or along the longitudinal edges of the ribbon;
- have ends of any shape or dimension, including but not limited to straight ends that are perpendicular to the longitudinal edges of the ribbon, tapered ends, flared ends or shaped ends, and the ends of such woven ribbons may or may not be hemmed;
- have longitudinal edges that are straight or of any shape, and the longitudinal edges of such woven ribbon may or may not be parallel to each other;
- consist of such ribbons affixed to like ribbon and/or cut-edge woven ribbon, a configuration also known as an “ornamental trimming;”
- be wound on spools; attached to a card; hanked (*i.e.*, coiled or bundled); packaged in boxes, trays or bags; or configured as skeins, balls, bateaus or folds; and/or
- be included within a kit or set such as when packaged with other products, including but not limited to gift bags, gift boxes and/or other types of ribbon.

Narrow woven ribbons subject to the order include all narrow woven fabrics, tapes, and labels that fall within this written description of the scope of the antidumping duty order.

Excluded from the scope of the order are the following:

- (1) formed bows composed of narrow woven ribbons with woven selvedge;
- (2) “pull-bows” (*i.e.*, an assemblage of ribbons connected to one another, folded flat and equipped with a means to form such ribbons into the shape of a bow by pulling on a length of material affixed to such assemblage) composed of narrow woven ribbons;
- (3) narrow woven ribbons comprised at least 20 percent by weight of elastomeric yarn (*i.e.*, filament yarn, including monofilament, of synthetic textile material, other than textured yarn, which does not break on being extended to three times its original length and which returns, after being extended to twice its original length, within a period of five minutes, to a length not greater than one and a half times its original length as defined in the (HTSUS, Section XI, Note 13) or rubber thread;
- (4) narrow woven ribbons of a kind used for the manufacture of typewriter or printer ribbons;
- (5) narrow woven labels and apparel tapes, cut-to-length or cut-to-shape, having a length (when measured across the longest edge-to-edge span) not exceeding eight centimeters;

(6) narrow woven ribbons with woven selvedge attached to and forming the handle of a gift bag;

(7) cut-edge narrow woven ribbons formed by cutting broad woven fabric into strips of ribbon, with or without treatments to prevent the longitudinal edges of the ribbon from fraying (such as by merrowing, lamination, sono-bonding, fusing, gumming or waxing), and with or without wire running lengthwise along the longitudinal edges of the ribbon;

(8) narrow woven ribbons comprised at least 85 percent by weight of threads having a denier of 225 or higher;

(9) narrow woven ribbons constructed from pile fabrics (*i.e.*, fabrics with a surface effect formed by tufts or loops of yarn that stand up from the body of the fabric);

(10) narrow woven ribbon affixed (including by tying) as a decorative detail to non-subject merchandise, such as a gift bag, gift box, gift tin, greeting card or plush toy, or affixed (including by tying) as a decorative detail to packaging containing non-subject merchandise;

(11) narrow woven ribbon that is (a) affixed to non-subject merchandise as a working component of such non-subject merchandise, such as where narrow woven ribbon comprises an apparel trimming, book marker, bag cinch, or part of an identity card holder, or (b) affixed (including by tying) to non-subject merchandise as a working component that holds or packages such non-subject merchandise or attaches packaging or labeling to such non-subject merchandise, such as a “belly band” around a pair of pajamas, a pair of socks or a blanket;

(12) narrow woven ribbon(s) comprising a belt attached to and imported with an item of wearing apparel, whether or not such belt is removable from such item of wearing apparel; and

(13) narrow woven ribbon(s) included with non-subject merchandise in kits, such as a holiday ornament craft kit or a scrapbook kit, in which the individual lengths of narrow woven ribbon(s) included in the kit are each no greater than eight inches, the aggregate amount of narrow woven ribbon(s) included in the kit does not exceed 48 linear inches, none of the narrow woven ribbon(s) included in the kit is on a spool, and the narrow woven ribbon(s) is only one of multiple items included in the kit.

The merchandise subject to the order is classifiable under the HTSUS statistical categories 5806.32.1020; 5806.32.1030; 5806.32.1050 and 5806.32.1060. Subject merchandise also may enter under subheadings 5806.31.00; 5806.32.20; 5806.39.20; 5806.39.30; 5808.90.00; 5810.91.00; 5810.99.90; 5903.90.10; 5903.90.25; 5907.00.60; and 5907.00.80 and under statistical categories 5806.32.1080; 5810.92.9080; 5903.90.3090; and 6307.90.9889. The HTSUS statistical categories and subheadings are provided for convenience and customs purposes; however, the written description of the merchandise covered by the order is dispositive.

Respondent Selection

Section 777A(c)(1) of the Act directs the Department to calculate an individual weighted-average dumping margin for each known exporter and producer of the subject merchandise.

Among all companies that responded to the Department's quantity and value questionnaire, only one company, Papillon HK, reported that it sold subject merchandise in the United States during the POR. Therefore, we selected Papillon HK as the only mandatory respondent in the instant administrative review.⁸

Partial Rescission of Review

For those exporters named in the Initiation Notice that are not considered to be part of the PRC-wide entity for export purposes for which all review requests have been withdrawn, the Department is rescinding this administrative review, in accordance with 19 CFR 351.213(d)(1). The exporters for which we are rescinding this review are: Hubscher Ribbon Corp., Ltd. d/b/a Hubschercorp ("Hubscher"),⁹ and Yama Ribbons and Bows Co., Ltd, ("Yama Ribbons").¹⁰ Antidumping duties shall be assessed at rates equal to the required cash deposit of estimated antidumping duties required at the time of entry, or withdrawal from warehouse, for consumption, in accordance with 19 CFR 351.212(c)(2).

Intent Not To Rescind Review, In Part

The following exporters responded to the Department's quantity and value questionnaires by indicating that they did not ship subject merchandise to the United States during the POR: (1) Apex Trimmings Inc. d/b/a Papillon Ribbon & Bow (Canada); (2) Cheng Hsing Ribbon Factory; (3) Hen Hao Trading Co., Ltd. a.k.a. Taiwan Tulip Ribbons and Braid Co. Ltd; (4) Hsien Chan Enterprise Co., Ltd; (5) King Young Enterprises Co., Ltd; (6) Multicolor; (7) Novelty Handicrafts Co., Ltd; (8) Papillon Ribbon & Bow (H.K.) Ltd; (9) Papillon Ribbon & Bow (Shanghai) Ltd; (10) Rong Shu Industry Corporation a.k.a Cheng Hsing Ribbon Factory (11) Shienq Huong Enterprise Co., Ltd; and, (12) Yu Shin Development Co. Ltd. However, there is no evidence on the record that indicates that these exporters are separate from the PRC-wide entity for export purposes, nor did these exporters establish their eligibility for a separate rate in a prior administrative review. While the requests for review were timely withdrawn, these exporters remain part of the PRC-wide entity for purposes of the administrative review, consistent with the Department's practice. The PRC-wide entity is under review for these

⁸ See Respondent Selection Memorandum, dated December 6, 2013.

⁹ In a prior administrative review, the Department determined that Hubscher Ribbons Corp., Ltd. (d/b/a Hubschercorp) is a third-country reseller from Canada. See Narrow Woven Ribbons With Woven Selvedge From the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2010-2011, 78 FR 10130 (February 13, 2013). The Department assigned this company a rate of 247.65 percent based on AFA. See id. The Department's assignment of this AFA rate to Hubscher was recently affirmed by the Court of International Trade as supported by substantial evidence and otherwise in accordance with law. See Hubscher Ribbon Corp. v. United States, Slip Op. 14-38 (CIT April 25, 2014).

¹⁰ Yama Ribbons and Bows Co. Ltd., participated in the Department's antidumping duty investigation of NWR from the PRC, and as a result of that investigation, merchandise both produced and exported by Yama is excluded from the Order. See Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order/Pursuant to Court Decision: Wooden Bedroom Furniture From the People's Republic of China, 71 FR 67099 (November 20, 2006). Accordingly, this rescission applies only to merchandise that is either produced, but not exported by Yama, or exported, but not produced by Yama.

preliminary results. Accordingly, the Department will not rescind the administrative review with respect to these exporters.¹¹

Separate Rates Determination

In proceedings involving a NME, such as the PRC, the Department begins with the rebuttable presumption that all companies within the NME are subject to government control, and, thus, their entries should be assessed at a single antidumping duty rate.¹² In the Initiation Notice, the Department notified parties of the application process by which exporters may obtain separate rate status in an NME proceeding.¹³ It is the Department's policy to assign all exporters of the merchandise subject to review in an NME country a single rate unless an exporter can affirmatively demonstrate an absence of government control, both in law (de jure) and in fact (de facto), with respect to exports. To establish whether a company is sufficiently independent to be entitled to a separate, company-specific rate, the Department analyzes each exporting company in an NME country under the test established in Sparklers,¹⁴ as amplified by Silicon Carbide.¹⁵ However, if the Department determines that a company is wholly foreign-owned or located in a market economy country, then an analysis of the de jure and de facto criteria is not necessary to determine whether it is independent from government control.¹⁶

The Department issued Bestpak, a company for which an AR was requested, a quantity and value questionnaire. Bestpak received the Department's quantity and value questionnaire but did not respond to the questionnaire.¹⁷ Further, Bestpak did not file a separate-rate certification which was required for it to maintain its eligibility for a separate rate, which was due on January 7, 2014.¹⁸ Because Bestpak did not continue to establish that its export activities are separate from that of the PRC-wide entity during this POR, in accordance with 19 CFR 351.107(d), we preliminarily find that Bestpak is part of the PRC-wide entity.

The PRC-Wide Entity

As discussed above, we find that Bestpak is no longer eligible for a separate rate, and, therefore, is part of the PRC-wide entity. Further, the exporters which were not eligible for a separate rate

¹¹ See, e.g., Small Diameter Graphite Electrodes from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2011-2012, 78 FR 55680 (September 11, 2013).

¹² See Notice of Final Determination of Sales at Less Than Fair Value, and Affirmative Critical Circumstances, In Part: Certain Lined Paper Products From the People's Republic of China, 71 FR 53079, 53082 (September 8, 2006); Final Determination of Sales at Less Than Fair Value and Final Partial Affirmative Determination of Critical Circumstances: Diamond Sawblades and Parts Thereof From the People's Republic of China, 71 FR 29303, 29307 (May 22, 2006).

¹³ See Initiation Notice, 78 FR 67104.

¹⁴ See Final Determination of Sales at Less Than Fair Value: Sparklers From the People's Republic of China, 56 FR 20588 (May 6, 1991) ("Sparklers").

¹⁵ See Notice of Final Determination of Sales at Less Than Fair Value: Silicon Carbide From the People's Republic of China, 59 FR 22585 (May 2, 1994) ("Silicon Carbide").

¹⁶ See, e.g., Final Results of Antidumping Duty Administrative Review: Petroleum Wax Candles From the People's Republic of China, 72 FR 52355, 52356 (September 13, 2007).

¹⁷ See memorandum to The File from Drew Jackson, International Trade Compliance Analyst, AD/CVD Operations, Office 4, regarding, "Results of Quantity and Value Questionnaire Delivery Tracking Query," dated concurrently with this notice.

¹⁸ See Initiation Notice, 78 FR 67104.

at the beginning of this POR and for which the request for review were timely withdrawn continue to be considered to be part of the PRC-wide entity. Thus, the PRC-wide entity is under review and is subject to the results of this review.

Rate for the PRC-Wide Entity

Section 776(a)(2) of the Act provides that, if an interested party (A) withholds information that has been requested by the Department, (B) fails to provide such information in a timely manner or in the form or manner requested, subject to subsections 782(c)(1) and (e) of the Act, (C) significantly impedes a proceeding under the antidumping statute, or (D) provides such information but the information cannot be verified, the Department shall, subject to subsection 782(d) of the Act, use facts otherwise available in reaching the applicable determination. As noted above, the PRC-wide entity, which includes Bestpak, withheld information (i.e., quantity and value data) requested by the Department. As a result, pursuant to section 776(a)(2)(A) of the Act, we find it appropriate to base the weighted-average dumping margin for the PRC-wide entity on facts available.¹⁹

Section 776(b) of the Act provides that, in selecting from among the facts otherwise available, the Department may employ an adverse inference if an interested party fails to cooperate by not acting to the best of its ability to comply with requests for information.²⁰ Because Bestpak, as part of the PRC-wide entity, did not respond to the Department's request for information, the Department has concluded that the PRC-wide entity has failed to cooperate to the best of its ability. Therefore, the Department preliminarily finds that, in selecting from among the facts available, an adverse inference is appropriate for the PRC-wide entity.

Section 776(b) of the Act and 19 CFR 351.308(c)(1) provide that the Department's adverse inference "may include reliance on information derived from (1) the petition, (2) a final determination in the investigation, (3) any previous review or determination, or (4) any other information placed on the record." In selecting a rate for use as AFA, the Department selects a rate that is sufficiently adverse "as to effectuate the purpose of the facts available rule to induce respondents to provide the Department with complete and accurate information in a timely manner."²¹ Furthermore, it is the Department's practice to ensure "that the party does not obtain a more favorable result by failing to cooperate than if it had cooperated fully"²² and to select "the highest rate on the record of the proceeding"²³ that can be corroborated, to the extent

¹⁹ See Notice of Preliminary Determination of Sales at Less Than Fair Value, Affirmative Preliminary Determination of Critical Circumstances and Postponement of Final Determination: Certain Frozen Fish Fillets From the Socialist Republic of Vietnam, 68 FR 4986, 4991-4992 (January 31, 2003), unchanged in Notice of Final Antidumping Duty Determination of Sales at Less Than Fair Value and Affirmative Critical Circumstances: Certain Frozen Fish Fillets from the Socialist Republic of Vietnam, 68 FR 37116, 37120 (June 23, 2003).

²⁰ See Notice of Final Determination of Sales at Less Than Fair Value: Certain Cold-Rolled Flat-Rolled Carbon-Quality Steel Products From the Russian Federation, 65 FR 5510, 5518 (February 4, 2000); see also "Statement of Administrative Action," accompanying the URAA, H.R. Rep. No. 103-316, 870 (1994) ("SAA").

²¹ See Notice of Final Determination of Sales at Less Than Fair Value: Static Random Access Memory Semiconductors From Taiwan, 63 FR 8909, 8932 (February 23, 1998).

²² See SAA at 870; Brake Rotors From the People's Republic of China: Final Results and Partial Rescission of the Seventh Administrative Review; Final Results of the Eleventh New Shipper Review, 70 FR 69937, 69939 (November 18, 2005).

²³ See Certain Frozen Warmwater Shrimp from Brazil: Final Results and Partial Rescission of Antidumping Duty Administrative Review, 73 FR 39940, 39942 (July 11, 2008).

practicable.²⁴ Therefore, as AFA, the Department has preliminarily assigned the PRC-wide entity a weighted-average dumping margin of 247.65 percent, which was the dumping margin calculated in the petition, as subsequently adjusted by the Department in its Amended Final LTFV Determination, and which is the highest dumping margin on the record of this proceeding.²⁵

Section 776(c) of the Act provides that, when the Department relies on secondary information rather than on information obtained in the course of an investigation or review, it shall, to the extent practicable, corroborate that information from independent sources that are reasonably at its disposal. Secondary information is defined as information derived from the petition that gave rise to the investigation or review, the final determination concerning the subject merchandise, or any previous review under section 751 of the Act concerning the subject merchandise.²⁶

“Corroborate” means that the Department will satisfy itself that the secondary information to be used has probative value.²⁷ To corroborate secondary information, the Department will, to the extent practicable, examine the reliability and relevance of the information to be used.²⁸

Independent sources used to corroborate such information may include, for example, published price lists, official import statistics and customs data, and information obtained from interested parties during the particular investigation or review.²⁹

To corroborate the petition rate, the Department first revisited its pre-initiation analysis of the information in the petition. During the initiation of the less-than-fair-value investigation of NWR from the PRC, the Department examined evidence supporting the calculations in the petition and the supplemental information provided by the petitioner to determine the probative value of the dumping margins alleged in the petition.³⁰ During the Department’s pre-initiation analysis, it examined the information used as the basis of export price (“EP”) and normal value (“NV”) in the petition, and the calculations used to derive the alleged dumping margins.³¹ Also during its pre-initiation analysis, the Department examined information from various independent sources provided either in the petition or in the supplements to the petition, which corroborated key elements of the EP and NV calculations. Subsequently, the Department adjusted the petition

²⁴ See Fujian Lianfu Forestry Co., Ltd. v. United States, 638 F. Supp. 2d 1325, 1336 (Ct. Int’l Trade 2009).

²⁵ See Narrow Woven Ribbons with Woven Selvedge from the People’s Republic of China: Amended Final Determination of Sales at Less Than Fair Value, 75 FR 51979 (August 24, 2010) (“Amended Final LTFV Determination”).

²⁶ See SAA at 870.

²⁷ Id.

²⁸ See Tapered Roller Bearings and Parts Thereof, Finished and Unfinished From Japan, and Tapered Roller Bearings Four Inches or Less in Outside Diameter, and Components Thereof, From Japan: Preliminary Results of Antidumping Duty Administrative Reviews and Partial Termination of Administrative Reviews, 61 FR 57391, 57392 (November 6, 1996), unchanged in Tapered Roller Bearings and Parts Thereof, Finished and Unfinished From Japan, and Tapered Roller Bearings, Four Inches or Less in Outside Diameter, and Components Thereof, From Japan: Final Results of Antidumping Duty Administrative Reviews and Termination in Part, 62 FR 11825, 11826 (March 13, 1997).

²⁹ See Notice of Preliminary Determination of Sales at Less Than Fair Value: High and Ultra-High Voltage Ceramic Station Post Insulators from Japan, 68 FR 35627, 35628-35629 (June 16, 2003), unchanged in Notice of Final Determination of Sales at Less Than Fair Value: High and Ultra-High Voltage Ceramic Station Post Insulators from Japan, 68 FR 62560-62561 (November 5, 2003); Notice of Final Determination of Sales at Less Than Fair Value: Live Swine From Canada, 70 FR 12181, 12183-84 (March 11, 2005).

³⁰ See Narrow Woven Ribbons with Woven Selvedge from the People’s Republic of China and Taiwan: Initiation of Antidumping Duty Investigations, 74 FR 39291 (August 6, 2009).

³¹ Id.

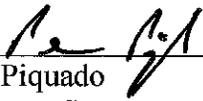
rates, and corroborated these adjusted rates using information on the record of the investigation.³² This highest adjusted petition rate is 247.65 percent.³³ Furthermore, the Court of International Trade affirmed the use of 247.65 percent as the AFA rate in the first administrative review, finding that it was corroborated by the transaction-specific dumping margins of another respondent from the investigation.³⁴

As noted above, the PRC-wide entity, which includes Bestpak, has not responded to the Department's request for information in this proceeding. The Department preliminarily finds that there is no information on the record that calls into question the reliability or relevance of the adjusted petition rate of 247.65 percent. For these reasons, the Department has preliminarily determined that 247.65 percent, the highest alleged petition rate (as adjusted), has probative value, and, therefore, is corroborated to the extent practicable, in accordance with section 776(c) of the Act.

Recommendation

We recommend applying the above methodology for these preliminary results.

Agree Disagree



Paul Piquado
Assistant Secretary
for Enforcement and Compliance

2 JUNE 2014
Date

³² See Amended Final LTFV Determination, 75 FR 51979 (August 24, 2010).

³³ Id.

³⁴ See Hubscher Ribbon Corp. v. United States, Slip Op. 14-38 (CIT April 25, 2014).