



C-570-019
Investigation
POI 1/1/13 – 12/31/13
Public Document
E&C/V: PW

TO ALL INTERESTED PARTIES

Re: Quantity and Value Questionnaire for the Countervailing Duty Investigation of Boltless Steel Shelving Units Prepackaged for Sale from the People's Republic of China

September 15, 2014

On September 15, 2014, the Department of Commerce (the "Department") initiated a countervailing duty ("CVD") investigation on boltless steel shelving units prepackaged for sale ("boltless steel shelving") from the People's Republic of China ("PRC").

In advance of the issuance of the CVD questionnaire, the Department asks that you respond to the questions in Attachment I to this letter, requesting information on the quantity and U.S. dollar sales value of all your sales to the United States during the period of investigation ("POI"), January 1, 2013 through January 31, 2013, of merchandise covered by the scope of this investigation, produced in the PRC. A definition of the scope of the investigation is included in Attachment II to this letter. **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(c)(2) of the Tariff Act of 1930, as amended (the "Act"). Your response to this letter may be subject to on-site verification by Department officials.**

Your response is due to the Department no later than **5 pm Eastern Standard Time, September 26, 2014**. Please note that, due to time constraints in this investigation, the Department will be limited in its ability to extend the deadline for the response to the attached Quantity and Value ("Q&V") Questionnaire. 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. Additionally, 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 the PRC and the boltless steel shelves (C-570-019) investigation. Certificates of service and accuracy are in Attachment IV. General instructions for responding to this Q&V Questionnaire are contained in Attachment III.

Companies that had no exports, sales, or entries of subject merchandise during the POI, January 1, 2013 – December 31, 2013, to which the Department issued the Q&V Questionnaire, should properly file a timely Q&V Questionnaire response that indicates that the company had no exports, sales, or entries of subject merchandise during the POI.

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



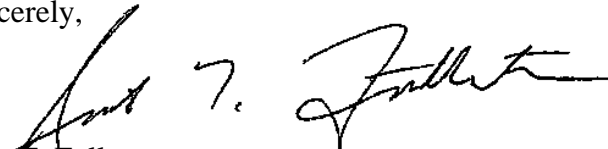
the best of your ability to comply with the request for information, and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

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 three 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 the Department 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 investigation and will not find companies cross-owned until there has been a determination to find certain companies cross-owned. A company responding to this Q&V Questionnaire should only report Q&V data for itself. You should not include data for any other party, even if the company believes it should be treated as a single entity with other parties.

We appreciate your attention to these matters. Please contact Paul Walker at 202.482.0413 (paul.walker@trade.gov), if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scot T. Fullerton", written over a faint, larger version of the same signature.

Scot T. Fullerton
Program Manager, Office V
Enforcement and Compliance

Attachments

**OFFICE OF AD/CVD ENFORCEMENT
QUANTITY AND VALUE QUESTIONNAIRE**

REQUESTER(S): {insert name of company}
 {company address}
 {contact name and title}
 {contact telephone number}
 {contact fax number}
 {contact e-mail address}

REPRESENTATION: {insert name of counsel and law firm and contact info}

CASE: **Boltless Steel Shelving from the People’s Republic of China**

PERIOD OF INVESTIGATION: January 1, 2013 – January 31, 2013

DATE OF INITIATION: September 15, 2014

DUE DATE FOR Q&V RESPONSE: September 26, 2014

OFFICIALS IN CHARGE:

Paul Walker
Senior International Trade Analyst, Office V
Enforcement and Compliance
202.482.0413

Susan Pulongbarit
Senior International Trade Analyst, Office V
Enforcement and Compliance
202.482.4031

As noted in the cover letter, on September 15, 2014, the Department initiated a CVD investigation on boltless steel shelving from the PRC.

If you are not a producer or exporter of boltless steel shelves, please respond to the Department’s questionnaire and state that you are not a producer or exporter of boltless steel shelves. Failure to respond could result in the application of adverse facts available which could potentially have an impact on PRC companies that are producers and exporters of boltless steel shelves. Section 777A(e)(1) of 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 may be the case in this investigation, 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 Q&V Questionnaire requesting the quantity and U.S. dollar sales value of all exports to the United States of merchandise covered by the scope of the investigation (*see* Attachment II), produced in the PRC during the POI, January 1, 2013 – December 31, 2013. 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 investigation 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 chart below, please provide the total quantity in **kilograms**, **number of units**, **number of add-on kits**, and total value (in U.S. dollars) of all your sales to the United States, during the POI (January 1, 2013 – December 31, 2013), of merchandise covered by the scope of this investigation (see Attachment II), produced in the PRC.¹

- Please include only sales 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 identify these sales quantities and the location (i.e., countries) to which you made the sales.
- Please do not include any sales of merchandise under consideration manufactured in Hong Kong in your figures.

As noted in the cover letter, the Department will not conduct cross-ownership analyses at the respondent selection phase of this investigation and will not find companies cross-owned until there has been a determination to find certain companies cross-owned. As a result, a company responding to this Q&V Questionnaire should only report Q&V data for itself. You should not include data for any other party, even if the company believes it should be treated as a single entity with other parties.

Market: United States	Total Quantity (in kilograms) ²	Quantity (in number of units) ³	Quantity (in number of add- on kits) ⁴	Terms of Sale ⁵	Total Value ⁶ (U.S.\$)
1. Total					

¹ Please use the invoice date when determining which sales to include within the period noted above. Generally, the Department uses invoice date as the date of sale, as that is when the essential terms of sale are set. If you believe that another date besides the invoice date would provide a more accurate representation of your company's sales during the designated period, please report sales based on that date and provide a full explanation.

² Report the total quantity in kilograms of all sales during the period of investigation ("POI") of merchandise meeting the scope of this investigation (i.e., standalone units and add-on kits).

³ Report the total quantity of sales during the POI of standalone units meeting the scope of this investigation.

⁴ Report the total quantity of sales during the POI of add-on kits as defined in the scope of this investigation (Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements (e.g., two posts)).

⁵ To the extent possible, sales values should be reported based on the same terms (e.g., FOB).

⁶ 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 INVESTIGATION

The scope of this investigation covers boltless steel shelving units prepackaged for sale, with or without decks (“boltless steel shelving”). The term “prepackaged for sale” means that, at a minimum, the steel vertical supports (i.e., uprights and posts) and steel horizontal supports (i.e., beams, braces) necessary to assemble a completed shelving unit (with or without decks) are packaged together for ultimate purchase by the end-user. The scope also includes add-on kits. Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements (e.g., two posts). The term “boltless” refers to steel shelving in which the vertical and horizontal supports forming the frame are assembled primarily without the use of nuts and bolts or screws. The vertical and horizontal support members for boltless steel shelving are assembled by methods such as, but not limited to, fitting a rivet, punched or cut tab or other similar connector on one support into a hole, slot or similar receptacle on another support. The supports lock together to form the frame for the shelving unit, and provide the structural integrity of the shelving unit separate from the inclusion of any decking. The incidental use of nuts and bolts or screws to add accessories, wall anchors, tie-bars or shelf supports does not remove the product from scope. Boltless steel shelving units may also come packaged as partially assembled, such as when two upright supports are welded together with front-to-back supports, or are otherwise connected, to form an end unit for the frame. The boltless steel shelving covered by this investigation may be commonly described as rivet shelving, welded frame shelving, slot and tab shelving, and punched rivet (quasi-rivet) shelving as well as by other trade names. The term “deck” refers to the shelf that sits on or fits into the horizontal supports (beams or braces) to provide the horizontal storage surface of the shelving unit.

The scope includes all boltless steel shelving meeting the description above, regardless of (1) vertical support or post type (including but not limited to open post, closed post and tubing); (2) horizontal support or beam/brace profile (including but not limited to Z-beam, C-beam, L-beam, step beam and cargo rack); (3) number of supports; (4) surface coating (including but not limited to paint, epoxy, powder coating, zinc and other metallic coating); (5) number of levels; (6) weight capacity; (7) shape (including but not limited to rectangular, square, and corner units); (8) decking material (including but not limited to wire decking, particle board, laminated board or no deck at all); or (9) the boltless method by which vertical and horizontal supports connect (including but not limited to keyhole and rivet, slot and tab, welded frame, punched rivet and clip).

Specifically excluded from the scope are:

- wall-mounted shelving, defined as shelving that is hung on the wall and does not stand on, or transfer load to, the floor;⁷
- wire shelving units, which consist of shelves made from wire that incorporates both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create the finished shelving unit;

⁷The addition of a wall bracket or other device to attach otherwise freestanding subject merchandise to a wall does not meet the terms of this exclusion.

- bulk-packed parts or components of boltless steel shelving units; and
- made-to-order shelving systems.

Subject boltless steel shelving enters the United States through Harmonized Tariff Schedule of the United States (“HTSUS”) statistical subheadings 9403.20.0018 and 9403.20.0020, but may also enter through HTSUS 9403.10.0040. While HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of this investigation is dispositive.

ATTACHMENT III GENERAL INSTRUCTIONS

Instructions for Filing the Response

The following instructions apply to all documents you submit to the Department during the course of this proceeding.

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 the section on "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.

For your convenience, the Department has made the following resources available online to assist you in complying with these electronic filing procedures:

IA ACCESS: Help Link
<https://iaaccess.trade.gov/help.aspx>

IA ACCESS: External User Guide
<https://iaaccess.trade.gov/help/IA%20ACCESS%20User%20Guide.pdf>

IA ACCESS: Handbook on Electronic Filing Procedures
<https://iaaccess.trade.gov/help/Handbook%20on%20Electronic%20Filing%20Procedures.pdf>

Federal Register notice: Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures, 76 FR 39263 (July 6, 2011)
<http://www.gpo.gov/fdsys/pkg/FR-2011-07-06/pdf/2011-16352.pdf>

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, (e.g., investigation, administrative review, scope inquiry, suspension agreement, etc.) and, if applicable, indicate the complete period covered (MM/DD/YY - MM/DD/YY);
 - d. on the fourth line, indicate the Department office conducting the proceeding;
 - 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 proceeding. In the Re: line, briefly summarize the purpose of your submission, e.g., “response to Quantity & Value questionnaire,” “case brief.”
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 in your cost accounting system are relevant to antidumping proceedings, and changes as a result of an audit are relevant to both antidumping and CVD proceedings).

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 IA website, which is <http://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 (the 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, N.W.
Washington, D.C. 20230
Attn: Enforcement and Compliance
AD/CVD Operations, Office V

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 questionnaire responses that do not contain the certification statements. Forms for such certification are included as appendices 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. Business Proprietary Information and Summarization of Business Proprietary Information

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) a 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) an itemization of particular information that you believe you are unable to summarize. State the reasons why you cannot summarize each piece of information.

Please note: 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) a statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or
 - (2) a 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.⁸)

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.⁹
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 the People's Republic of China and the boltless steel shelving units prepackaged for sale (A-570-018) Investigation. 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 “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>.

⁸ 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.

⁹ The Department will not disclose proprietary customer names under APO during an antidumping or countervailing duty investigation until either an order is published or the investigation is suspended. To ensure that proprietary customer names are properly treated in this case, place double brackets (“[[]]”) around all proprietary customer names in your submissions to the Department during the course of this investigation.

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)

On Behalf of

Name and address

(Public Version)

On Behalf of

Name and address

(signature of certifying official)

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."

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."