



A-201-842  
Administrative Review  
2/1/2016 – 1/31/2017  
Public Document  
E&C OII/RRB/RMJ

DATE: October 31, 2017

MEMORANDUM TO: Gary Taverman  
Deputy Assistant Secretary  
for Antidumping and Countervailing Duty Operations  
performing the non-exclusive functions and duties of the  
Assistant Secretary for Enforcement and Compliance

FROM: James Maeder  
Senior Director  
Performing the duties of Deputy Assistant Secretary  
for Antidumping and Countervailing Duty Operations

SUBJECT: Decision Memorandum for the Preliminary Results of the  
2016-2017 Administrative Review of the Antidumping Duty Order  
on Large Residential Washers from Mexico

---

## I. SUMMARY

The Department of Commerce (the Department) is conducting an administrative review of the antidumping duty (AD) order on large residential washers (LRWs) from Mexico. The review covers one producer/exporter of the subject merchandise, Electrolux Home Corp. NV. and Electrolux Home Products de Mexico S.A. de C.V. (collectively, Electrolux). The period of review (POR) is February 1, 2016, through January 31, 2017. Because Electrolux did not file a timely response to the Department's questionnaire, we preliminarily find that Electrolux failed to provide information within the established deadlines, thereby significantly impeding this administrative review. Accordingly, we preliminarily assigned a margin to Electrolux based on adverse facts available (AFA).

## II. BACKGROUND

In February 2013, the Department published in the *Federal Register* an AD order on LRWs from Mexico.<sup>1</sup> On February 8, 2017, the Department published in the *Federal Register* a notice of

---

<sup>1</sup> See *Large Residential Washers from Mexico and the Republic of Korea: Antidumping Duty Orders*, 78 FR 11148 (February 15, 2013) (*Orders*).



opportunity to request an administrative review of the AD order on LRWs from Mexico for the period February 1, 2016, through January 31, 2017.<sup>2</sup>

Pursuant to section 751(a)(1) of the Tariff Act of 1930, as amended (the Act), and 19 CFR 351.213(b)(1), in February 2017, the Department received requests to conduct an administrative review from both Electrolux and Whirlpool Corporation, the petitioner in this proceeding.<sup>3</sup> On April 10, 2017, in accordance with 19 CFR 351.221(c)(1)(i), we published a notice of initiation of administrative review for Electrolux.<sup>4</sup> For a description of the events that occurred subsequent to initiation, *see* “Use of Facts Available,” below.

### III. SCOPE OF THE ORDER

The products covered by this order are all large residential washers and certain subassemblies thereof from Mexico.

For purposes of this order, the term “large residential washers” denotes all automatic clothes washing machines, regardless of the orientation of the rotational axis, except as noted below, with a cabinet width (measured from its widest point) of at least 24.5 inches (62.23 cm) and no more than 32.0 inches (81.28 cm).

Also covered are certain subassemblies used in large residential washers, namely: (1) all assembled cabinets designed for use in large residential washers which incorporate, at a minimum: (a) at least three of the six cabinet surfaces; and (b) a bracket; (2) all assembled tubs<sup>5</sup> designed for use in large residential washers which incorporate, at a minimum: (a) a tub; and (b) a seal; (3) all assembled baskets<sup>6</sup> designed for use in large residential washers which incorporate, at a minimum: (a) a side wrapper;<sup>7</sup> (b) a base; and (c) a drive hub;<sup>8</sup> and (4) any combination of the foregoing subassemblies.

Excluded from the scope are stacked washer-dryers and commercial washers. The term “stacked washer-dryers” denotes distinct washing and drying machines that are built on a unitary frame and share a common console that controls both the washer and the dryer. The term “commercial washer” denotes an automatic clothes washing machine designed for the “pay per use” market meeting either of the following two definitions:

---

<sup>2</sup> *See Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity to Request Administrative Review*, 82 FR 9709 (February 8, 2017).

<sup>3</sup> *See* Electrolux Letter re: Large Residential Washers from Mexico: Request for Administrative Review (2/1/16-1/31/17), dated February 9, 2017 (Electrolux Request for Review); and Petitioner Letter re: Large Residential Washers from Mexico: Request for Administrative Review of Antidumping Duty Order, dated February 27, 2017 (Petitioner Request for Review).

<sup>4</sup> *See Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 82 FR 17188 (April 10, 2017), corrected by *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 82 FR 21513 (May 9, 2017).

<sup>5</sup> A “tub” is the part of the washer designed to hold water.

<sup>6</sup> A “basket” (sometimes referred to as a “drum”) is the part of the washer designed to hold clothing or other fabrics.

<sup>7</sup> A “side wrapper” is the cylindrical part of the basket that actually holds the clothing or other fabrics.

<sup>8</sup> A “drive hub” is the hub at the center of the base that bears the load from the motor.

(1) (a) it contains payment system electronics;<sup>9</sup> (b) it is configured with an externally mounted steel frame at least six inches high that is designed to house a coin/token operated payment system (whether or not the actual coin/token operated payment system is installed at the time of importation); (c) it contains a push button user interface with a maximum of six manually selectable wash cycle settings, with no ability of the end user to otherwise modify water temperature, water level, or spin speed for a selected wash cycle setting; and (d) the console containing the user interface is made of steel and is assembled with security fasteners;<sup>10</sup> or

(2) (a) it contains payment system electronics; (b) the payment system electronics are enabled (whether or not the payment acceptance device has been installed at the time of importation) such that, in normal operation,<sup>11</sup> the unit cannot begin a wash cycle without first receiving a signal from a *bona fide* payment acceptance device such as an electronic credit card reader; (c) it contains a push button user interface with a maximum of six manually selectable wash cycle settings, with no ability of the end user to otherwise modify water temperature, water level, or spin speed for a selected wash cycle setting; and (d) the console containing the user interface is made of steel and is assembled with security fasteners.

Also excluded from the scope are automatic clothes washing machines with a vertical rotational axis and a rated capacity of less than 3.70 cubic feet, as certified to the U.S. Department of Energy pursuant to 10 CFR § 429.12 and 10 CFR § 429.20, and in accordance with the test procedures established in 10 CFR Part 430.

The products subject to this order are currently classifiable under subheading 8450.20.0090 of the Harmonized Tariff System of the United States (HTSUS). Products subject to this order may also enter under HTSUS subheadings 8450.11.0040, 8450.11.0080, 8450.90.2000, and 8450.90.6000. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise subject to this scope is dispositive.

#### **IV. APPLICATION OF FACTS AVAILABLE AND ADVERSE INFERENCES**

In accordance with sections 776(a) and (b) of the Act, we determine that the use of AFA is appropriate for these preliminary results. Therefore, for the reasons discussed below, we are preliminarily assigning a dumping margin of 72.41 percent to Electrolux.

##### **A. Use of Facts Available**

Section 776(a)(1) and (2) of the Act provide that if necessary information is not available on the record or an interested party: (A) withholds information requested by the Department; (B) fails to provide such information by the deadlines for submission of the information, or in the form

---

<sup>9</sup> “Payment system electronics” denotes a circuit board designed to receive signals from a payment acceptance device and to display payment amount, selected settings, and cycle status. Such electronics also capture cycles and payment history and provide for transmission to a reader.

<sup>10</sup> A “security fastener” is a screw with a non-standard head that requires a non-standard driver. Examples include those with a pin in the center of the head as a “center pin reject” feature to prevent standard Allen wrenches or Torx drivers from working.

<sup>11</sup> “Normal operation” refers to the operating mode(s) available to end users (*i.e.*, not a mode designed for testing or repair by a technician).

and manner requested, subject to subsections (c)(1) and (e) of section 782 of the Act; (C) significantly impedes a proceeding; or (D) provides such information but the information cannot be verified as provided in section 782(i) of the Act, the Department shall, subject to section 782(d) of the Act, use facts otherwise available in reaching the applicable determination. Section 782(c)(1) of the Act states that if an interested party, “promptly after receiving a request from {the Department} for information, notifies {the Department} that such party is unable to submit the information requested in the requested form and manner,” then the Department shall consider the ability of the interested party and may modify the requirements to avoid imposing an unreasonable burden on that party. Section 782(e) of the Act states further that the Department shall not decline to consider submitted information if all of the following requirements are met: (1) the information is submitted by the established deadline; (2) the information can be verified; (3) the information is not so incomplete that it cannot serve as a reliable basis for reaching the applicable determination; (4) the interested party has demonstrated that it acted to the best of its ability; and (5) the information can be used without undue difficulties.

On April 18, 2017, we issued the AD questionnaire to Electrolux.<sup>12</sup> In the questionnaire, we established due dates of May 9, 2017, and May 25, 2017, for Electrolux’s responses to section A and sections B through D of the AD questionnaire, respectively. However, Electrolux failed to respond to section A of the Department’s AD questionnaire by the established May 9, 2017, deadline.

On May 24, 2017, Electrolux submitted a letter requesting that the Department extend the deadline to submit its responses to section A and sections B through D of the AD questionnaire until June 13, 2017, and June 29, 2017, respectively.<sup>13</sup> On May 26, 2017, we denied Electrolux’s section A extension request because it was untimely filed pursuant to 19 CFR 351.302(c); as a result, we informed Electrolux that we could not consider its request for an extension to submit sections B through D of the AD questionnaire response because of its failure to timely respond to section A of the AD questionnaire.<sup>14</sup> On May 30, 2017, Electrolux submitted a second request for an extension to submit its response to the Department’s AD questionnaire,<sup>15</sup> and on June 5, 2017, we again denied the request for the same reasons stated in our May 26, 2017, letter.<sup>16</sup>

Nonetheless, on June 8, 2017, Electrolux filed a response to section A of the AD questionnaire, and, on June 9, 2017, we rejected Electrolux’s untimely submission pursuant to 19 CFR 351.302(d) and removed it from the official record pursuant to 19 CFR 351.104(a)(2)(iii).<sup>17</sup> On

---

<sup>12</sup> See Department Letter re: Request for Information, Antidumping Duty Administrative Review, Electrolux Home Products Corp. N.V., Electrolux Home Products de Mexico, S.A. de C.V., dated April 18, 2017 (AD questionnaire).

<sup>13</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Request for Extension for Response to Initial Questionnaire, dated May 24, 2017 (Electrolux Initial Extension Request).

<sup>14</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated May 26, 2017.

<sup>15</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Request for Extension for Response to Initial Questionnaire, dated May 30, 2017.

<sup>16</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated June 5, 2017.

<sup>17</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated June 9, 2017 (Section A Rejection Letter) (explaining that the Department rejected and removed the untimely submission from the record of this proceeding).

June 13, 2017, Electrolux requested that the Department accept its untimely-filed section A response and grant its request to file the remaining sections of the AD questionnaire by June 29, 2017.<sup>18</sup> On June 14, 2017, we denied Electrolux's request to accept its untimely-filed section A response, which, as explained above, rendered the extension request for its sections B through D response moot.<sup>19</sup>

On June 22, 2017, Electrolux filed responses to sections B through D of the AD questionnaire. On June 23, 2017, as with the section A response, we rejected this submission as untimely pursuant to 19 CFR 351.302(d) and removed it from the official record pursuant to 19 CFR 351.104(a)(2)(iii).<sup>20</sup> On July 18, 2017, Electrolux requested that the Department accept its untimely-filed responses to sections A through D of the AD questionnaire or authorize Electrolux to resubmit them.<sup>21</sup> On July 28, 2017, we denied Electrolux's request, noting that Electrolux's counsel had not provided the Department with any information regarding revised procedures to ensure its filings would be timely in the future.<sup>22</sup>

On August 28, 2017, Electrolux repeated its request that the Department accept its responses or authorize Electrolux to resubmit them; however, in this request, counsel for Electrolux outlined the revised procedures it had implemented to ensure that future filings would be timely submitted.<sup>23</sup> The Department met with counsel to Electrolux on August 30, 2017, to discuss the Department's requirements that parties file their submissions by the appropriate deadlines, the responsibility of counsel to file entries of appearance, and the revised procedures counsel for Electrolux implemented to ensure that its future filings would be timely.<sup>24</sup> Counsel acknowledged that the Department would not accept any future untimely submissions from counsel's firm in the future.<sup>25</sup> We also requested that counsel to Electrolux file a letter on the record of this administrative review to explain that it understood the Department's requirements and to detail the internal steps it had undertaken to meet the Department's filing requirements. On August 30, 2017, counsel for Electrolux filed the requested letter.<sup>26</sup> Therefore, on

---

<sup>18</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Request to Accept Response to Section A of the Initial Questionnaire and for Extension for Response to Sections B, C, and D, dated June 13, 2017.

<sup>19</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated June 14, 2017.

<sup>20</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated June 23, 2017 (explaining that the Department rejected and removed the untimely submission from the record of this proceeding).

<sup>21</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Request to Accept or Authorize the Resubmission of Responses to Sections A through D of the Initial Questionnaire, dated July 18, 2017.

<sup>22</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated July 28, 2017.

<sup>23</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Change in Procedures and Request to Accept or Authorize the Resubmission of Responses to Sections A through D of the Initial Questionnaire, dated August 28, 2017.

<sup>24</sup> See Memorandum, "Large Residential Washers from Mexico, 2016-2017 Administrative Review: Ex Parte Meeting with Representative of, and Counsel to, Electrolux," dated August 31, 2017.

<sup>25</sup> *Id.*

<sup>26</sup> See Electrolux Letter re: Large Residential Washers from Mexico: Response to the Department's Request of August 30, 2017, dated August 30, 2017.

September 1, 2017, we allowed Electrolux to resubmit its responses to the Department's AD questionnaire.<sup>27</sup>

After Electrolux refiled its responses to the Department's AD questionnaire, the petitioner requested that we reconsider our determination to accept this information.<sup>28</sup> While analyzing the petitioner's request, we discovered that the Department had accepted untimely-filed information from the law firm representing Electrolux prior to our acceptance of the untimely filed information in this administrative review. Specifically, on August 9, 2017, the Department accepted untimely-filed information from this law firm in the AD investigation of softwood lumber from Canada, and, at that time, we instructed the law firm that "from this point forward, all late submissions from you (or your firm)" would be rejected, unless a timely extension request was filed.<sup>29</sup> Accordingly, because the Department had already afforded the firm representing Electrolux a second opportunity to submit untimely-filed information in another proceeding, we could not subsequently accept untimely-filed information from this firm in this proceeding. As a result, pursuant to our practice and regulations, we rejected and removed Electrolux's AD questionnaire response from the record of this segment of the proceeding.<sup>30</sup>

As noted above, Electrolux failed to respond to the Department's AD questionnaire in this administrative review within the established deadlines. Thus, Electrolux failed to timely provide the requested information necessary for the Department to calculate a dumping margin for it in this administrative review. Consequently, we preliminarily find that Electrolux failed to provide information by the specified deadlines, within the meaning of section 776(a)(2)(B) of the Act. Further, Electrolux significantly impeded this proceeding within the meaning of section 776(a)(2)(C) of the Act. Because Electrolux failed to submit its AD questionnaire response within the established deadlines for its submission, section 782(e) of the Act is not applicable. Accordingly, pursuant to sections 776(a)(2)(B) and (C) of the Act, we relied upon the facts otherwise available in determining the preliminary dumping margin for Electrolux.

#### B. Application of Facts Available with an Adverse Inference

Section 776(b) of the Act provides that, if the Department finds that an interested party has failed to cooperate by not acting to the best of its ability to comply with a request for information, the

---

<sup>27</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated August 31, 2017.

<sup>28</sup> See Petitioner Letter re: Large Residential Washers from Mexico: Request for Reconsideration of the Department's August 31, 2017 Memoranda Accepting Electrolux's Untimely Filed Questionnaire Responses and Request for a Meeting, dated September 7, 2017; *see also* Memorandum, "2016-2017 Administrative Review on Large Residential Washers from Mexico: Ex Parte Meeting with Counsel for Whirlpool Corporation," dated September 18, 2017, and Petitioner Letter re: Large Residential Washers from Mexico: Submission of Legal Authorities Referred to in September 15 Ex Parte Meeting, dated September 15, 2017.

<sup>29</sup> See Department Letter re: Request for Extension of Time to Submit Response to the Department of Commerce's Revised Database Request in the Antidumping Duty Investigation of Certain Softwood Lumber Products from Canada (A-122-857), dated August 9, 2017.

<sup>30</sup> See Department Letter re: Large Residential Washers from Mexico: 2016-2017 Administrative Review, dated September 25, 2017 (noting, *inter alia*, that "it is the Department's practice to make the above-mentioned 'second chance' opportunity available only once for a law firm, and the Department will not allow the firm another opportunity to file untimely information").

Department may use an inference adverse to the interests of that party in selecting the facts otherwise available. In applying adverse inferences, the Department is not required to determine, or make any adjustments to, a weighted-average dumping margin based on any assumptions about information an interested party would have provided if the interested party had complied with the request for information. In addition, the Statement of Administrative Action accompanying the Uruguay Round Agreements Act (SAA) explains that the Department may employ an adverse inference “to ensure that the party does not obtain a more favorable result by failing to cooperate than if it had cooperated fully.”<sup>31</sup> Furthermore, affirmative evidence of bad faith on the part of a respondent is not required before the Department may make an adverse inference in selecting from the facts available.<sup>32</sup>

We preliminarily find that Electrolux did not act to the best of its ability to comply with the Department’s request for information. Electrolux requested this fourth administrative review,<sup>33</sup> fully participated in the three prior segments of this proceeding,<sup>34</sup> and was aware of the consequences of its failure to respond within the established deadline.<sup>35</sup> Nonetheless, Electrolux failed to timely file its response to section A of the AD questionnaire or timely file a request for an extension of the deadline. Electrolux did not request an extension of time to file its section A response until 15 days after the established deadline.<sup>36</sup> Therefore, we preliminarily determine that Electrolux failed to cooperate to the best of its ability in providing the necessary information for the Department to conduct this administrative review.<sup>37</sup> Accordingly, we preliminarily find that the application of facts available with an adverse inference, pursuant to section 776(b) of the Act, is warranted.<sup>38</sup>

---

<sup>31</sup> See Statement of Administrative Action Accompanying the Uruguay Round Agreements Act, H.R. Doc. 103-316, vol 1 (1994) (SAA) at 870; see also *Certain Polyester Staple Fiber from Korea: Final Results of the 2005-2006 Antidumping Duty Administrative Review*, 72 FR 69663, 69664 (December 10, 2007).

<sup>32</sup> See, e.g., *Nippon Steel Corp. v. United States*, 337 F.3d 1373, 1382-83 (Fed. Cir. 2003); *Notice of Final Determination of Sales at Less Than Fair Value: Circular Seamless Stainless Steel Hollow Products from Japan*, 65 FR 42985 (July 12, 2000); and *Antidumping Duties; Countervailing Duties; Final Rule*, 62 FR 27295, 27340 (May 19, 1997).

<sup>33</sup> See Electrolux Request for Review.

<sup>34</sup> See generally, e.g., *Large Residential Washers from Mexico: Final Results of Antidumping Duty Administrative Review; 2015-2016*, 82 FR 32169 (July 12, 2017), and accompanying Issues and Decision Memorandum (IDM); *Large Residential Washers from Mexico: Final Results of the Antidumping Duty Administrative Review; 2014-2015*, 81 FR 62714 (September 12, 2016), and accompanying IDM; and *Large Residential Washers from Mexico: Final Results of the Antidumping Duty Administrative Review; 2012-2014*, 80 FR 55335 (September 15, 2015), and accompanying IDM, amended by *Large Residential Washers from Mexico: Amended Final Results of the Antidumping Duty Administrative Review; 2012-2014*, 80 FR 68510 (November 5, 2015).

<sup>35</sup> See the AD questionnaire cover letter, at 3 (“If the Department does not receive either the requested information or a written extension request before 5 p.m. ET on the established deadline, we may conclude that your company has decided not to cooperate in this proceeding . . . {which} may result in the application of partial or total facts available, pursuant to section 776(a) of the Act, which may include adverse inferences, pursuant to section 776(b) of the Act.”).

<sup>36</sup> See Electrolux Initial Extension Request.

<sup>37</sup> See *Hardwood and Decorative Plywood from the People’s Republic of China: Final Affirmative Countervailing Duty Determination; 2011*, 78 FR 58283 (September 23, 2013), and accompanying IDM at 5-6 (applying AFA to the China-wide entity because several respondents that were a part of the China-wide entity did not respond to the Department’s quantity and value questionnaire).

<sup>38</sup> See, e.g., *Notice of Final Determination of Sales at Less Than Fair Value: Circular Seamless Stainless Steel Hollow Products from Japan*, 65 FR 42985, 42986 (July 12, 2000) (where the Department applied total AFA

### C. Selection and Corroboration of Adverse Facts Available Rate

Section 776(b) of the Act states that the Department, when employing an adverse inference, may rely upon information derived from the petition, the final determination from the less-than-fair-value (LTFV) investigation, a previous administrative review, or any other information placed on the record.<sup>39</sup> In selecting a rate based on AFA, the Department selects a rate that is sufficiently adverse to ensure that the uncooperative party does not obtain a more favorable result by failing to cooperate than if it had fully cooperated.<sup>40</sup>

As AFA, we are preliminarily assigning Electrolux a dumping margin of 72.41 percent, which is the AFA rate that we previously assigned to non-cooperative respondents in a prior segment of this proceeding. Specifically, the Department assigned Samsung Electronics Mexico S.A. de C.V. and Whirlpool International S. de R.L. de C.V. a dumping margin of 72.41 percent in the LTFV investigation of this proceeding.<sup>41</sup>

Section 776(c) of the Act provides that where the Department relies on secondary information rather than information obtained during the course of a review, it must corroborate that information using independent sources that are reasonably at its disposal. However, section 776(c) also states that the Department shall not be required to corroborate any dumping margin applied in a separate segment of the same proceeding. Because we are applying as the AFA rate a dumping margin applied in a prior segment of this proceeding, it is unnecessary to corroborate this margin pursuant to section 776(c)(2) of the Act.

Accordingly, we are preliminary assigning Electrolux an AFA dumping margin of 72.41 percent.

### V. DUTY ABSORPTION

On February 27, 2017, the petitioner requested that the Department determine whether antidumping duties have been absorbed by Electrolux during the POR.<sup>42</sup> Section 751(a)(4) of the Act provides that, if requested during an administrative review initiated two or four years after the publication of the order, the Department will determine whether antidumping duties have been absorbed by a foreign producer or exporter, if the subject merchandise is sold in the United States through an affiliated importer. Because this review was initiated four years after the publication of the order,<sup>43</sup> we are making a duty absorption determination in this segment of the proceeding within the meaning of 19 CFR 351.213(j). As explained above, we have determined a margin for Electrolux on the basis of facts available with an adverse inference because Electrolux failed to timely respond to the Department's AD questionnaire. Similarly,

---

because the respondent failed to respond to the questionnaire); *see also Nippon Steel Corp. v. United States*, 337 F.3d 1373, 1382-83 (Fed. Cir. 2003).

<sup>39</sup> *See also* 19 CFR 351.308(c).

<sup>40</sup> *See* SAA at 870.

<sup>41</sup> *See Notice of Final Determination of Sales at Less Than Fair Value: Large Residential Washers from Mexico*, 77 FR 76288 (December 27, 2012).

<sup>42</sup> *See* Petitioner Request for Review.

<sup>43</sup> *See Initiation Notice*; and *Orders*.



we have applied an adverse inference to preliminarily find that duty absorption exists on all of U.S. sales of the subject merchandise exported by Electrolux.<sup>44</sup>

## VI. CONCLUSION

We recommend applying the above methodology for these preliminary results.



\_\_\_\_\_  
Agree

\_\_\_\_\_  
Disagree

10/31/2017

X



Signed by: GARY TAVERMAN