

MEMORANDUM TO: Ronald K. Lorentzen  
Acting Assistant Secretary  
for Enforcement and Compliance

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

SUBJECT: Issues and Decision Memorandum for the Expedited Second  
Sunset Review of the Antidumping Duty Order on Non-Malleable  
Cast Iron Pipe Fittings from the People’s Republic of China

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## Summary

In the sunset review of the antidumping duty order covering non-malleable cast iron pipe fittings from the People’s Republic of China (“PRC”), Ward Manufacturing and Anvil International, LLC (collectively, “Petitioners”), domestic producers of non-malleable cast iron pipe fittings, submitted a substantive response. No other respondent interested party submitted a substantive response. Accordingly, we conducted an expedited (120-day) sunset review. We recommend adopting the positions described below. The following is a complete list of issues in this sunset review for which we received substantive responses:

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

## Background

On July 1, 2013, the Department of Commerce (“Department”) published the notice of initiation of the sunset review of the antidumping duty order on non-malleable cast iron pipe fittings from the PRC, pursuant to section 751(c) of the Tariff Act of 1930, as amended (the “Act”).<sup>1</sup> Between July 9 and July 11, 2013, pursuant to 19 CFR 351.218(d)(1), the Department received timely and complete notices of intent to participate in the sunset review from Petitioners.<sup>2</sup> On July 31, 2013, pursuant to 19 CFR 351.218(d)(3), the Petitioners filed a timely and adequate substantive

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<sup>1</sup> See Initiation of Five-Year (“Sunset”) Review, 78 FR 39256 (July 1, 2013) (“Sunset Initiation”).

<sup>2</sup> See Letter Ward Manufacturing regarding “Non-Malleable Cast Iron Pipe Fittings from China, Second Sunset Review” dated July 9, 2013; see also Letter from Anvil International, LLC regarding “Five-Year (“Sunset”) Review of Antidumping Duty Order On Non-Malleable Cast Iron Pipe Fittings From The People’s Republic of China: Notice Of Intent To Participate Of Anvil International, LLC,” dated July 11, 2013.

response within 30 days after the date of publication of the Sunset Initiation.<sup>3</sup> The Department received no substantive responses from any respondent interested party. 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 an expedited (120-day) sunset review of the antidumping duty order on non-malleable cast iron pipe fittings from the PRC.

As explained in the memorandum from the Assistant Secretary for Enforcement and Compliance, the Department has exercised its discretion to toll deadlines for the duration of the closure of the Federal Government from October 1, through October 16, 2013.<sup>4</sup> Therefore, all deadlines in this segment of the proceeding have been extended by 16 days. The revised deadline for the final results of this sunset review is now November 14, 2013.

### History of the Order

On February 18, 2003, the Department published its final determination in the less than fair value (“LTFV”) investigation of non-malleable cast iron pipe fittings from the PRC.<sup>5</sup> On April 7, 2003, the Department published an antidumping duty order on imports of non-malleable cast iron pipe fittings from the PRC.<sup>6</sup> The Department found the following weighted-average percentage dumping margins in the LTFV investigation:

Exporter	Producer	Weighted-Average Percentage Margin
Jinan Meide Casting Co., Ltd.	Jinan Meide Casting Co., Ltd.	7.08
Shanghai Foreign Trade Enterprises Co., Ltd.	Shanghai Foreign Trade Enterprises Co., Ltd.	6.34
PRC-Wide Entity		75.50

### *Administrative Reviews and New Shipper Reviews*

Since the issuance of the antidumping duty order, the Department has completed three administrative reviews. On December 1, 2006, the Department published the final results for the 2004-2005 administrative review.<sup>7</sup> In that review, the Myland Industrial Co., Ltd., and Myland Buxin Foundry Ltd. (collectively, “Myland”) was assigned a dumping margin of 75.50 percent. On July 13, 2007, the Department published the final results for the 2005-2006 administrative

<sup>3</sup> See Letter from Anvil International, LLC and Ward Manufacturing regarding “Non-Malleable Cast Iron Pipe Fittings from China, Second Sunset Review,” dated July 31, 2013.

<sup>4</sup> See Memorandum for the Record from Paul Piquado, Assistant Secretary for Enforcement and Compliance, “Deadlines Affected by the Shutdown of the Federal Government” (October 18, 2013).

<sup>5</sup> See Notice of Final Determination of Sales at Less Than Fair Value: Non-Malleable Cast Iron Pipe Fittings from the People’s Republic of China, 68 FR 7765 (February 18, 2003) (“Final Determination”).

<sup>6</sup> See Notice of Antidumping Duty Order: Non-Malleable Cast Iron Pipe Fittings From the People’s Republic of China, 68 FR 16765 (April 7, 2003) (“Antidumping Duty Order”).

<sup>7</sup> See Non-Malleable Cast Iron Pipe Fittings from the People’s Republic of China: Final Results of Antidumping Duty Administrative Review, 71 FR 69546 (December 1, 2006).

review.<sup>8</sup> In that subsequent review, Myland was found to be ineligible for a separate rate and was assigned the PRC-wide entity rate of 75.50 percent. Finally, on June 2, 2011, the Department published the final results of the 2009-2010 administrative review.<sup>9</sup> In that review, it was found that the sole respondent, NEP (Tianjin) Machinery Company, did not sell subject merchandise at less than normal value during the period of review. The Department has not completed any new shipper reviews since the issuance of the antidumping duty order.

### *Scope Inquiries, Changed Circumstances Reviews, and Duty Absorption*

On May 29, 2012, the Department published the final results of a changed circumstances review.<sup>10</sup> In that changed circumstances review, the Department determined that it was necessary to revoke part of the antidumping duty order and to modify the language of the scope to include an exclusion for a particular type of brake fluid tube connector. The Department has issued three scope rulings on non-malleable cast iron pipe fittings from the PRC.<sup>11</sup>

### **Scope of the Order**

The products covered by the order are finished and unfinished non-malleable cast iron pipe fittings with an inside diameter ranging from 1/4 inch to 6 inches, whether threaded or unthreaded, regardless of industry or proprietary specifications. The subject fittings include elbows, ells, tees, crosses, and reducers as well as flanged fittings. These pipe fittings are also known as "cast iron pipe fittings" or "gray iron pipe fittings." These cast iron pipe fittings are normally produced to ASTM A-126 and ASME B.16.4 specifications and are threaded to ASME B1.20.1 specifications. Most building codes require that these products are Underwriters Laboratories (UL) certified. The scope does not include cast iron soil pipe fittings or grooved fittings or grooved couplings.

Fittings that are made out of ductile iron that have the same physical characteristics as the gray or cast iron fittings subject to the scope above or which have the same physical characteristics and are produced to ASME B.16.3, ASME B.16.4, or ASTM A-395 specifications, threaded to ASME B1.20.1 specifications and UL certified, regardless of metallurgical differences between gray and ductile iron, are also included in the scope of the order. These ductile fittings do not include grooved fittings or grooved couplings. Ductile cast iron fittings with mechanical joint ends (MJ), or push on ends (PO), or flanged ends and produced to the American Water Works Association ("AWWA") specifications AWWA C110 or AWWA C153 are not included. Additionally, certain brake fluid tube connectors are excluded from the scope of this order.<sup>12</sup>

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<sup>8</sup> See Non-Malleable Cast Iron Pipe Fittings from the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 72 FR 38563 (July 13, 2007).

<sup>9</sup> See Non-Malleable Cast Iron Pipe Fittings From the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 76 FR 31936 (June 2, 2011).

<sup>10</sup> See No-Malleable Cast Iron Pipe Fittings From the People's Republic of China: Final Results of Antidumping Duty Changed Circumstances Review, and Revocation of Order, in Part, 77 FR 31577 (May 29, 2012).

<sup>11</sup> See Notice of Scope Rulings, 70 FR 24533 (May 10, 2005); see also Notice of Scope Rulings, 73 FR 72771 (December 1, 2008); see also Notice of Scope Rulings, 78 FR 59653 (September 27, 2013).

<sup>12</sup> To be excluded, the connector must meet the following description: The connector is a "joint block" for brake fluid tubes and is made of non-malleable cast iron to Society of Automotive Engineers (SAE) automotive standard

Imports of subject merchandise are currently classifiable in the Harmonized Tariff Schedule of the United States (“HTSUS”) under item numbers 7307.11.00.30, 7307.11.00.60, 7307.19.30.60, 7307.19.30.85, 7326.90.8588. HTSUS subheadings are provided for convenience and customs purposes. The written description of the scope of the order is dispositive.<sup>13</sup>

## Discussion of the Issues

### *Legal Framework*

In accordance with section 751(c)(1) of the Act, the Department is conducting this sunset review to determine whether revocation of the antidumping duty order would be likely to lead to 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 periods before, and the periods after, the issuance of the antidumping duty order.

As explained in the Statement of Administrative Action (“SAA”) accompanying the Uruguay Round Agreements Act, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when: (a) dumping continued at any level above de minimis after issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.<sup>14</sup> Alternatively, the Department normally will determine that revocation of an antidumping duty order is not likely to lead to continuation or recurrence of dumping where dumping was eliminated after issuance of the order and import volumes remained steady or increased.<sup>15</sup> In addition, as a base period for import volume comparison, it is the Department’s practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level

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J431. The tubes have an inside diameter of 3.44 millimeters (0.1355 inches) and the inside diameters of the fluid flow channels of the connector are 3.2 millimeters (0.1260 inches) and 3.8 millimeters (0.1496 inches). The end of the tube is forced by pressure over the end of a flared opening in the connector also known as “flared joint.” The flared joint, once made fast, permits brake fluid to flow through channels that never exceed 3.8 millimeters (0.1496 inches) in diameter.

<sup>13</sup> On April 21, 2009, in consultation with CBP, the Department added the following HTSUS classification to the AD/CVD module for pipe fittings: 7326.90.8588. See Memorandum from Abdelali Elouaradia, Office Director, Import Administration, Office 4 to Stephen Claeys, Deputy Assistant Secretary, Import Administration regarding the Final Scope Ruling on Black Cast Iron Cast, Green Ductile Flange and Twin Tee, antidumping duty order on non-malleable iron cast pipe fittings from China, dated September 19, 2008. See also Memorandum to the file from Karine Gziryan, Financial Analyst, Office 4, regarding Module Update adding Harmonized Tariff Schedule Number for twin tin fitting included in the scope of antidumping order on non-malleable iron cast pipe fittings from China, dated April 22, 2009.

<sup>14</sup> See SAA at 889-90, House Report at 63-64, and Senate Report at 52.

<sup>15</sup> See SAA, H.R. Rep. No. 103-316, Vol. 1 (1994), at 889-90.

of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew comparison.<sup>16</sup>

Further, section 752(c)(3) of the Act states 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. Generally, the Department selects the margin(s) from the final determination in the original investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an order in place.<sup>17</sup> However, the Department may use a rate from a more recent review where the dumping margin increased, as this rate may be more representative of a company’s behavior in the absence of an order (e.g., where a company increases dumping to maintain or increase market share with an order in place).<sup>18</sup> Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of “zero or de minimis shall not by itself require” the Department to determine that revocation of an antidumping duty order would not be likely to lead to a continuation or recurrence of sales at less than fair value.

In the Final Modification for Reviews, the Department announced that in five-year (“sunset”) reviews, it will not rely on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be World Trade Organization (WTO)-inconsistent.<sup>19</sup> The Department also noted that “*only in the most extraordinary circumstances* will the Department rely on margins other than those calculated and published in prior determinations.”<sup>20</sup>

Below we address the comments submitted by the Domestic Producers.

## 1. Likelihood of continuation or recurrence of dumping

### Domestic Producers’ Comments

- A determination of continuation or recurrence of dumping is warranted based on either (a) continuation of dumping at any level above de minimis after the issuance of the order, or (b) cessation of imports of the subject merchandise after issuance of the order.
- As there have been no administrative reviews requested by respondents from the original investigation, PRC exporters of subject merchandise have continued to dump at the rates assigned in the investigation (i.e., at 7.08% for Jinan Meide Casting Co., Ltd, 6.34% for Shanghai Foreign Trade Enterprises Co., Ltd., and 75.50% for the PRC-wide entity.)
- Continuation of the order is further warranted because imports declined following issuance of the Antidumping Duty Order. The volume of imports for 2001, the year prior to the filing of

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<sup>16</sup> See, e.g., Stainless Steel Bar from Germany; Final Results of the Sunset Review of the Antidumping Duty Order, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

<sup>17</sup> See SAA at 890; see also Persulfates From the People’s Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

<sup>18</sup> See SAA, at 890-91.

<sup>19</sup> See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification, 77 FR 8101 (February 14, 2012) (“Final Modification for Reviews”).

<sup>20</sup> See id. (emphasis added).

the petition, was 19,206 tons. From 2008 to 2012, the volume of imports has decreased significantly compared to pre-petition levels: 10,101 tons in 2008, 8,681 tons in 2010, 10,900 tons in 2011, and 11,399 tons in 2012.

- The Department should report the rates from the original investigation, rather than recalculated rates, because the Final Modification for Reviews does not state that the Department has changed its practice to recalculate margins by removing zeroing. Furthermore, it states that the Department would continue to rely on rates that were not inconsistent with the WTO, such as rates that are based on the use of adverse facts available. In this case, the PRC-wide rate is based on partial adverse facts available. Therefore, the Department should only report the original rates from the LTFV investigation.

**Department's Position:** As explained in the Legal Framework section above, the Department's determination concerning whether revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping is based, in part, upon guidance provided by the legislative history accompanying the Uruguay Round Agreements Act (*i.e.*, the SAA; House Report, H. Rep. No. 103-826, pt. 1 (1994) ("House Report"); and Senate Report, S. Rep. No. 103-412 (1994)). Consistent with the SAA, the Department will make its likelihood determination on an order-wide basis.<sup>21</sup> Further, when determining whether revocation of the order would be likely to lead to continuation of dumping, sections 752(c)(1)(A) and (B) of the Act instruct the Department to consider: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; and (2) the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order. Thus, one consideration is whether the Department has continued to find dumping above de minimis levels in administrative reviews subsequent to imposition of the antidumping duty order.<sup>22</sup> According to the SAA and the House Report, "if companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed."<sup>23</sup> Moreover, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.<sup>24</sup> For the reasons discussed below, we find that revocation of the antidumping duty order on non-malleable cast iron pipe fittings from the PRC would likely result in the continuation or recurrence of dumping in the United States.

Pursuant to section 752(c)(1)(A) of the Act, the Department first considered the weighted-average dumping margins determined in the investigation and subsequent proceedings. As stated above, in the investigation, the Department found dumping margins of 7.08 percent for Jinan Meide Casting Co., Ltd, 6.34 percent for Shanghai Foreign Trade Enterprises Co., Ltd., and 75.50 percent for the PRC-wide entity.<sup>25</sup> The rates for Jinan Meide Casting Co., Ltd. and Shanghai Foreign Trade Enterprises Co., Ltd. were calculated using the zeroing methodology, but the rate for the PRC-wide entity was the highest alleged rate in the petition and was not based

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<sup>21</sup> See SAA, at 879.

<sup>22</sup> See *id.*, at 890.

<sup>23</sup> See *id.*; see also House Report, at 63-64.

<sup>24</sup> See sections 752(c)(1)(A) and (B) of the Act

<sup>25</sup> See Final Determination, 68 FR 7765; see also Antidumping Duty Order, 68 FR at 16765.

on zeroing.<sup>26</sup> In the final results for the 2004-2005 administrative review,<sup>27</sup> however, Myland was assigned a dumping margin of 75.50 percent, which was not based on zeroing.<sup>28</sup> In the Final Modification for Reviews, the Department announced that in sunset reviews, it will not rely on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be WTO-inconsistent.<sup>29</sup> Accordingly, the Department is not relying on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be WTO-inconsistent. However, Myland's weighted-average dumping margin of 75.50 percent, which was not based on zeroing, demonstrates that the dumping continued at an above de minimis level after the issuance of the antidumping duty order.

Pursuant to section 752(c)(1)(B) of the Act, the Department also considered the volume of imports of the subject merchandise in determining whether revocation of the antidumping duty order is likely to lead to continuation or recurrence of dumping. As discussed above, it is the Department's practice to compare the volume of imports for the one-year period preceding the initiation of the LTFV investigation to the volume of imports during the period of review. Since the issuance of the Antidumping Duty Order, import volumes of non-malleable cast iron pipe fittings into the United States from the PRC have declined significantly and remain below pre-investigation levels. In analyzing import volumes for the period of this sunset review, based on U.S. Bureau of Census HTSUS import data, as reported by U.S. ITC Dataweb, the Department has determined that imports from the PRC under HTSUS numbers listed in the scope of the Antidumping Duty Order have been at levels significantly lower than the year immediately preceding the initiation of the LTFV investigation (i.e., 2001).<sup>30</sup> Specifically, the volume of imports for 2001, the year prior to the filing of the petition, was 19,206 tons. From 2008 to 2012, the volume of imports has decreased significantly compared to pre-petition levels: 10,101 tons in 2008, 8,681 tons in 2010, 10,900 tons in 2011, and 11,399 tons in 2012.<sup>31</sup> Thus, while imports have not ceased, record evidence shows that the imports are significantly lower in the last five years when compared to pre-initiation import volumes. This indicates that PRC

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<sup>26</sup> See Notice of Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination: Non-Malleable Cast Iron Pipe Fittings From the People's Republic of China, 67 FR at 60214, upheld in the Final Determination, 68 FR 7765.

<sup>27</sup> See Non-Malleable Cast Iron Pipe Fittings from the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 71 FR 69546 (December 1, 2006).

<sup>28</sup> In that subsequent review, Myland was found to be ineligible for a separate rate and was assigned the PRC-wide entity rate of 75.50 percent. See Non-Malleable Cast Iron Pipe Fittings from the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 72 FR 38563 (July 13, 2007). As stated above, the only other margin calculated in any administrative review was during the 2009-2010 administrative review where the sole respondent, NEP (Tianjin) Machinery Company, was found to have not sold subject merchandise at less than normal value during the period of review and was therefore granted a margin of de minimis.

<sup>29</sup> See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification, 77 FR 8101 (February 14, 2012) ("Final Modification for Reviews").

<sup>30</sup> See Letter from Anvil International, LLC and Ward Manufacturing regarding Non-Malleable Cast Iron Pipe Fittings from China, Second Sunset Review; Revisions to Substantive Response to Notice of Initiation, date September 30, 2013, at 3.

<sup>31</sup> See id.

exporters have not been able to maintain pre-investigation import levels without selling merchandise at dumped prices.<sup>32</sup>

Therefore, pursuant to section 752(c)(1) of the Act, because above de minimis dumping margins applied to post-order entries of subject merchandise, and the Department has found import volumes in the years covered by this sunset review are significantly lower in comparison to import volumes prior to issuance of the Antidumping Duty Order, we find that dumping is likely to continue or recur if the Antidumping Duty Order is revoked.

## 2. Magnitude of the Dumping Margin Likely to Prevail

### Domestic Producers' Comments

- The SAA, at 890, provides that the Department will normally select a margin determined in the investigation “because that is the only calculated rate that reflects the behavior of exporters... without the discipline of an order.” It is also the Department’s policy to normally provide to the ITC the margin that was determined in the investigation “regardless of whether the margin was calculated using a company’s own information or based on best information available or the facts available,” citing Sunset Policy Bulletin, 63 FR at 18873.
- The Department should report the margins from the original LTFV investigation to the ITC, i.e., 7.08% for Jinan Meide Casting Co., Ltd, 6.34% for Shanghai Foreign Trade Enterprises Co., Ltd., and 75.50% for the PRC-wide entity.
- The Final Modification for Reviews does not indicate that the margins from the LTFV investigation should be recalculated to remove zeroing. It only states that it will not rely upon margins that include the zeroing methodology when determining whether dumping would continue, but it does not state a change in practice to recalculate margins that are reported to the ITC.
- Furthermore, the Final Modification for Reviews states that it would continue to rely on margins from the original investigations without recalculating to remove the zeroing methodology if the margins were based on adverse facts available. In the LTFV investigation, the PRC-wide entity margin was calculated on partial adverse facts available.

**Department’s Position:** Section 752(c)(3) of the Act provides that the administering authority shall provide 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 weighted-average dumping margin from the investigation for each company.<sup>33</sup> The Department’s preference for selecting a rate from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of manufacturers, producers, and exporters without the discipline of an order or suspension agreement in place.<sup>34</sup> Under certain circumstances, however, we may select a more recently calculated rate to report to the ITC. For

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<sup>32</sup> See, e.g., Certain Activated Carbon From the People's Republic of China: Final Results of Expedited Sunset Review of the Antidumping Duty Order, 77 FR 33420 (June 6, 2012), and accompanying Issues & Decision Memo at Comment 1.

<sup>33</sup> See Eveready Battery Co., Inc. v. United States, 77 F. Supp. 2d 1327, 1333 (CIT 1999).

<sup>34</sup> See SAA at 890 and Policies Regarding the Conduct of five-year (“Sunset”) Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin, at section II.B.1.

companies not investigated individually, or for companies that did not begin shipping until after the order was issued, the Department will normally provide a rate based on the “All-Others” rate from the investigation. However, the Department considers the PRC to be a nonmarket economy (“NME”) under section 771(18) of the Act, and thus the Department does not have an “All-Others” rate. Thus, in PRC cases, instead of an “All-Others” rate, the Department uses a rate established for the PRC-wide entity, which it applies to all imports from an exporter that has not established its eligibility for a separate rate.<sup>35</sup>

As indicated in the “Legal Framework” section above, the Department’s current practice is to not rely on weighted-average dumping margins calculated using the zeroing methodology modified in the Final Modification for Reviews. Instead, we may rely on other rates that may be available, or we may recalculate weighted-average dumping margins using our current offsetting methodology if necessary.<sup>36</sup>

In the LTFV Investigation, Jinan Meide Casting Co., Ltd. and Shanghai Foreign Trade Enterprises Co., Ltd. were assigned dumping margins.<sup>37</sup> The Department notes that these margins were calculated using the zeroing methodology. As discussed above and following our current practice, the Department has determined that these rates should be recalculated without using the zeroing methodology. Upon recalculating these rates without the zeroing methodology, the Department has determined that the recalculated rate for Jinan Meide Casting Co., Ltd is 3.32 percent and the recalculated rate for Shanghai Foreign Trade Enterprises Co., Ltd. is de minimis. The dumping margin for the PRC-wide entity in the antidumping investigation was based on the dumping margin from the petition and, therefore, does not include zeroing and is consistent with the Final Modification for Reviews. Therefore, the Department agrees in part with Domestic Producers and has determined that the margin for the PRC-wide entity originally calculated in the LTFV investigation does not need to be recalculated and will be reported to the ITC without modification.

## **Final Results of Review**

We determine that revocation of the antidumping duty order on non-malleable cast iron pipe fittings from the PRC would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be weigh average margins up to 75.50 percent.

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<sup>35</sup> See Paper Clips from the People’s Republic of China: Final Results of Expedited Sunset Review of Antidumping Duty Order, 76 FR 26242 (May 6, 2011), and accompanying Issues and Decision Memorandum at Comment 2; see also 19 CFR 351.107(d).

<sup>36</sup> See Final Modification for Reviews.

<sup>37</sup> See Final Determination, 68 FR at 31973.

## Recommendation

Based on our analysis of the substantive response received, we recommend adopting the above positions. If these recommendations are accepted, we will publish these final results of this expedited sunset review in the Federal Register and notify the ITC of our determination.

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Agree

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Disagree

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Ronald K. Lorentzen  
Acting Assistant Secretary  
for Enforcement and Compliance

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Date

