



Administrative Review
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April 13, 2015

MEMORANDUM TO: Ronald K. Lorentzen
Acting Assistant Secretary
for Antidumping and Countervailing Duty Operations

THROUGH: James Maeder
Senior Director, Office I
AD/CVD Operations

FROM: Mary Kolberg
International Trade Compliance Analyst, Office I
Antidumping and Countervailing Duty Operations

RE: Helical Spring Lock Washers from the People's Republic of
China: Decision Memorandum for the Amended Final Results of
Antidumping Duty Administrative Review; 2012-2013

I. Summary

On March 9, 2015, the Department of Commerce (the Department) disclosed to interested parties its calculations for the *Final Results* of the antidumping duty administrative review (2012-2013) of helical spring lock washers from the People's Republic of China (PRC).¹ On March 16, 2015, we received an allegation from Jiangsu RC Import & Export Co., Ltd. (Jiangsu RC), a respondent in the review, that the calculations contained a ministerial error and that its margin had been incorrectly calculated.² Jiangsu RC contends that the Department inadvertently double-counted certain factors of production in its calculation of normal value.³ In particular, Jiangsu RC states that the Department double-counted two of the five inputs used in calculating its labor costs.⁴

¹ See *Helical Spring Lock Washers from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2012-2013*, 80 FR 13833 (March 17, 2015) (*Final Results*) and accompanying "Issues and Decision Memorandum for the Final Results of Antidumping Duty Administrative Review: Helical Spring Lock Washers from the People's Republic of China; 2012-2013" (Issues and Decision Memorandum). See also Memorandum, "Final Results of the Eighteenth Administrative Review of Helical Spring Lock Washers from the People's Republic of China: Analysis of the Preliminary Results Margin Calculation for Jiangsu RC Import & Export Co., Ltd." dated March 9, 2015 (Calculation Memorandum).

² See letter from Jiangsu RC, "RC Final Results Ministerial Error Comments: Antidumping Duty Order on Helical Spring Lock Washers from the People's Republic of China" dated March 16, 2015 (Ministerial Error Allegation).

³ *Id.*

⁴ *Id.*

We have analyzed Jiangsu RC's submission and agree that, in the *Final Results*, the Department committed a ministerial error in its calculation of labor costs by double-counting the value of two of the five labor inputs. Accordingly, we have corrected our calculation of Jiangsu RC's labor value and used the recalculated surrogate value to calculate a revised weighted-average dumping margin for Jiangsu RC of 189.91 percent.⁵

II. Definition of Ministerial Error

A "ministerial error" is defined under section 735(e) of the Act as including:

errors in addition, subtraction, or other arithmetic function, clerical errors resulting from inaccurate copying, duplication, or the like, and any other type of unintentional error which {the Department} considers ministerial.

See also 19 CFR 351.224(f).

III. Jiangsu RC's Allegation

Jiangsu RC argues that the Department erred in its calculation of surrogate value by double-counting the value of two of the inputs used to calculate the value for labor.⁶ The incorrect surrogate value was then used to calculate the dumping margin.⁷

No other interested parties commented on this issue.

IV. Department Position

We agree with Jiangsu RC that in the surrogate value calculation for the *Final Results* the Department double-counted two of the five inputs for labor costs. Therefore, we have corrected our calculation of Jiangsu RC's labor costs, surrogate value, and dumping margin. These corrections resulted in a revised weighted-average dumping margin for both Jiangsu RC and the PRC-wide rate from 192.88 percent to 189.91 percent. As noted in the Issues and Decision Memorandum, this margin is higher than the highest rate previously determined for the PRC-wide entity, *i.e.*, 128.63 percent. Because the PRC-wide entity remains under review, the Department has assigned the PRC-wide entity a rate of 189.91 percent, the highest rate determined for the PRC-wide entity in this proceeding, in these amended final results.⁸

⁵ *See* memorandum, "Calculation Memorandum for the Amended Final Results of Antidumping Duty Administrative Review; 2012-2013" concurrently dated with this memorandum (Calculation Memorandum)

⁶ *See* Ministerial Error Allegation.

⁷ *Id.*

⁸ *See* Issues and Decision Memorandum.

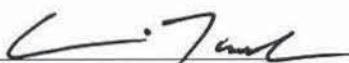
V. Recommendation

We recommend finding that it is necessary to amend the *Final Results* because the error alleged by Jiangsu RC constitutes a ministerial error; the correction of this ministerial error results in a change to the weighted-average dumping margin for Jiangsu RC and the PRC-wide rate.

✓

Agree

Disagree



Christian Marsh
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

4/10/15

(Date)