



A-570-932
Administrative Review
POR: 4/1/2018 - 3/31/2019
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December 19, 2019

MEMORANDUM TO: Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance

FROM: James Maeder
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Decision Memorandum for the Preliminary Results of the 2018-2019 Antidumping Duty Administrative Review: Certain Steel Threaded Rod from the People's Republic of China

I. SUMMARY

The Department of Commerce (Commerce) is conducting an administrative review of the antidumping duty (AD) order on certain steel threaded rod (STR) from the People's Republic of China (China) covering the period of review (POR) April 1, 2018 through March 31, 2019.¹ This administrative review covers 175 companies.² We selected IFI & Morgan Ltd. for individual examination. We preliminarily find that mandatory respondent IFI & Morgan Ltd. and RMB Fasteners Ltd. (collectively, RMB/IFI)³ had no shipments of subject merchandise during the POR. We also preliminarily determine that Certified Products International Inc. (CPI) had no shipments of subject merchandise during the POR, and that the 172 companies for which a review was initiated, have not demonstrated their eligibility for separate rate and are therefore, part of the China-wide entity.

II. BACKGROUND

On April 30, 2019, Commerce received a request from the petitioner⁴ to conduct an

¹ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 84 FR 27587 (June 13, 2019) (*Initiation Notice*).

² See Petitioner's Letter, "Certain Steel Threaded Rod from the People's Republic of China: Request for Administrative Review," dated April 30, 2019 (Review Request).

³ During the investigation, Commerce found RMB/IFI to be a single entity and, because there were no changes to the facts that supported that determination, we continue to find that these companies are a part of a single entity for this administrative review. See *Certain Steel Threaded Rod from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value*, 73 FR 58931 (October 8, 2008), unchanged in *Certain Steel Threaded Rod from the Peoples Republic of China: Final Determination of Sales at Less Than Fair Value*, 74 FR 8907 (February 27, 2009).

⁴ Vulcan Threaded Products, Inc. (the petitioner).

administrative review of 175 companies.⁵ On June 13, 2019, Commerce published in the *Federal Register* the notice of initiation of the administrative review of the AD order on STR from China with respect to 175 companies.⁶ On June 19, 2019, Commerce released data from Customs and Border Protection (CBP) data for respondent selection purposes.⁷ No interested party provided comments on the CBP Data. On June 21, 2019, CPI reported that it had no shipments of subject merchandise during the POR.⁸ On July 12, 2019, we selected IFI & Morgan Ltd. as the mandatory respondent in this administrative review.⁹ On July 15, 2019, RMB/IFI submitted a no shipments certification and a separate rate certification.¹⁰ On July 23, 2019, the petitioner submitted comments regarding RMB/IFI's no shipments certification.¹¹

On August 6, 2019, RMB/IFI stated that it would have difficulty responding to the original questionnaire and requested that Commerce suspend deadlines for the questionnaire until CBP entry documentation could be obtained and examined.¹² On September 11, 2019, Commerce placed CBP entry packages for certain RMB/IFI entries listed in the CBP data on the record of this review, and offered interested parties an opportunity to comment.¹³ RMB/IFI provided comments regarding the CBP entry documentation.¹⁴ No other interested party submitted comments.

III. SCOPE OF THE ORDER

The merchandise covered by the *Order* is steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon quality steel, having a solid, circular cross section, of any diameter, in any straight length, that have been forged, turned, cold-drawn, cold-rolled, machine straightened, or otherwise cold-finished, and into which threaded grooves have been applied. In addition, the steel threaded rod, bar, or studs subject to the order are non-headed and threaded along greater than 25 percent of their total length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (*i.e.*, galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

⁵ See Review Request.

⁶ See *Initiation Notice*, 84 FR 27587, 27588.

⁷ See Memorandum, "2018-2019 Administrative Review of the Antidumping Duty Order on Certain Steel Threaded Rod from the People's Republic of China: CBP for Respondent Selection," dated June 19, 2019 (CBP Data).

⁸ See CPI's Letter, "No Shipment Letter for Certified Products International Inc.: Tenth Annual Administrative Review of the Antidumping Duty Order on Certain Steel Threaded Rod from the People's Republic of China, A-570-932 (POR: 04/01/18-03/31/19)," dated June 21, 2019.

⁹ See Memorandum, "Administrative Review of Certain Steel Threaded Rod from the People's Republic of China: Respondent Selection," dated July 12, 2019.

¹⁰ See RMB/IFI's Letter, "Steel Threaded Rod from the People's Republic of China – No Sales Certification and Separate Rate Certification," dated July 15, 2019 (RMB/IFI's No Shipment/SRC).

¹¹ See Petitioner's Letter, "Certain Steel Threaded Rod from the People's Republic of China: Comments IFI & Morgan's No Sales Certifications," dated July 23, 2019.

¹² See RMB/IFI's Letter, "Steel Threaded Rod from the People's Republic of China – Notice of Difficulty Responding to the Questionnaire," dated August 6, 2019.

¹³ See Memorandum, "Certain Steel Threaded Rod from the People's Republic of China: Placing Entry Documents on the Record," dated September 11, 2019 (CBP Entry Documentation).

¹⁴ See RMB/IFI's Letter, "Steel Threaded Rod from the People's Republic of China – Comments on CBP Data," dated September 23, 2019 (RMB/IFI's CBP Data Comments).

Included in the scope of the order are steel threaded rod, bar, or studs, in which: (1) iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 1.80 percent of manganese, or
- 1.50 percent of silicon, or
- 1.00 percent of copper, or
- 0.50 percent of aluminum, or
- 1.25 percent of chromium, or
- 0.30 percent of cobalt, or
- 0.40 percent of lead, or
- 1.25 percent of nickel, or
- 0.30 percent of tungsten, or
- 0.012 percent of boron, or
- 0.10 percent of molybdenum, or
- 0.10 percent of niobium, or
- 0.41 percent of titanium, or
- 0.15 percent of vanadium, or
- 0.15 percent of zirconium.

Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, 7318.15.5090, and 7318.15.2095 of the United States Harmonized Tariff Schedule (HTSUS). Although the HTSUS subheading is provided for convenience and customs purposes, the written description of the merchandise is dispositive.

Excluded from the scope of the order are: (a) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total length; and (b) threaded rod, bar, or studs made to American Society for Testing and Materials (ASTM) A193 Grade B7, ASTM A193 Grade B7M, ASTM A193 Grade B16, or ASTM A320 Grade L7.

IV. DISCUSSION OF THE METHODOLOGY

Preliminary Determination of No Shipments

On July 15, 2019, RMB/IFI simultaneously filed a no-shipment certification indicating that it did not export subject merchandise to the United States during the POR and a separate rate certification in the event CBP data indicated that it had sales during the POR.¹⁵ In order to examine RMB/IFI's claim, and because the CBP entry data showed that RMB/IFI had entries, we placed certain entry packages for shipments identified in the CBP Data on the record. We offered interested parties an opportunity to comment.¹⁶ RMB/IFI commented on the CBP data and provided information consistent with its no shipment certification.¹⁷

¹⁵ See RMB/IFI's No Shipment/SRC at 1.

¹⁶ See CBP Entry Documentation

¹⁷ See RMB/IFI's CBP Data Comments.

Based on the record evidence submitted, we preliminarily determine that RMB/IFI had no shipments during the POR. Specifically, a review of the CBP entry documentation, as well as RMB/IFI's responses, indicates that the entries attributed to it during the POR pertain to non-subject merchandise.

With respect to CPI, Commerce sent an inquiry to CBP requesting that CBP inform Commerce if it had any information contrary to the company's no shipment claim. CBP provided no information contrary to CPI's statement that it made no shipments of subject merchandise during the POR. Accordingly, we preliminarily determine that CPI had no shipments during the POR.

Consistent with Commerce's practice in non-market economy (NME) cases, it is not appropriate to rescind the review with respect to RMB/IFI and CPI but, rather, we will complete the review and issue instructions to CBP based on the final results of the review.¹⁸ Should evidence contrary to these companies' no shipment claims arise, we will revisit this issue in the final results.

Non-Market Economy Country Status

Commerce considers China to be a NME country.¹⁹ In accordance with section 771(18)(C)(i) of the Act, any determination that a foreign country is an NME country shall remain in effect until revoked by Commerce. Therefore, we continue to treat China as an NME country for purposes of these preliminary results.

Separate Rates

Commerce maintains a rebuttable presumption that all companies within an NME are subject to government control, and thus, should be assessed a single AD rate.²⁰ In the *Initiation Notice*, Commerce notified parties of the application process by which exporters and producers may obtain separate rate status in NME proceedings.²¹ It is Commerce's policy to assign all exporters of the merchandise subject to review in NME countries a single rate unless an exporter can affirmatively demonstrate an absence of government control, both in law (*de jure*) and in fact (*de facto*), with respect to exports. To establish whether a company is sufficiently independent to be entitled to a separate, company-specific rate, Commerce analyzes each exporting entity in an NME country under the test established in *Sparklers*,²² as developed further in *Silicon Carbide*.²³

¹⁸ See *Non-Market Economy Antidumping Proceedings: Assessment of Antidumping Duties*, 76 FR 65694, 65694-65695 (October 24, 2011).

¹⁹ *Id.*

²⁰ See *Notice of Final Determination of Sales at Less than Fair Value, and Affirmative Critical Circumstances, in Part: Certain Lined Paper Products from the People's Republic of China*, 71 FR 53079, 53082 (September 8, 2006); see also *Final Determination of Sales at Less than Fair Value and Final Partial Affirmative Determination of Critical Circumstances: Diamond Sawblades and Parts Thereof from the People's Republic of China*, 71 FR 29303, 29307 (May 22, 2006).

²¹ See *Initiation Notice*.

²² See *Final Determination of Sales at Less Than Fair Value: Sparklers from the People's Republic of China*, 56 FR 20588 (May 6, 1991) (*Sparklers*), as amplified by *Notice of Final Determination of Sales at Less than Fair Value: Silicon Carbide from the People's Republic of China*, 59 FR 22585 (May 2, 1994) (*Silicon Carbide*), and 19 CFR 351.107(d).

²³ See *Silicon Carbide*, 59 FR at 22586.

Commerce continues to evaluate its practice with regard to the separate rates analysis in light of the diamond sawblades from China AD proceeding, and its determinations therein.²⁴ In particular, in litigation involving the diamond sawblades from China proceeding, the Court of International Trade (CIT) found Commerce's existing separate rates analysis deficient in the circumstances of that case, in which a government-owned and controlled entity had significant ownership in the respondent exporter.²⁵ Following the CIT's reasoning, in recent proceedings, we have concluded that where a government entity holds a majority ownership share, either directly or indirectly, in the respondent exporter, the majority ownership holding in and of itself means that the government exercises, or has the potential to exercise, control over the company's operations generally.²⁶ This may include control over, for example, the selection of management, a key factor in determining whether a company has sufficient independence in its export activities to merit a separate rate. Consistent with normal business practices, we would expect any majority shareholder, including a government, to have the ability to control, and an interest in controlling, the operations of the company, including the selection of management and the profit distribution of the company. However, if Commerce determines that a company is wholly foreign-owned by individuals or companies located in a market economy (ME), then a separate rate analysis is not necessary to determine whether it is independent from government control.²⁷

Companies Not Receiving a Separate Rate

²⁴ See Final Results of Redetermination pursuant to *Advanced Technology & Materials Co., Ltd., et al. v. United States*, 885 F. Supp. 2d 1343 (CIT 2012) (*Advanced Technology I*), and available at <http://enforcement.trade.gov/remands/12-147.pdf>, *aff'd* *Advanced Technology & Materials Co., Ltd., et al. v. United States*, 938 F. Supp. 2d 1342 (CIT 2013), *aff'd* *Advanced Technology & Materials Co., Ltd., et al. v. United States*, Case No. 2014-1154 (Fed. Cir. 2014) (*Advanced Technology II*); see also *Diamond Sawblades and Parts Thereof from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review; 2011-2012*, 78 FR 77098 (December 20, 2013) and accompanying Preliminary Decision Memorandum at 7, unchanged in *Diamond Sawblades and Parts Thereof from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2011-2012*, 79 FR 35723 (June 24, 2014), and accompanying Issues and Decision Memorandum at Comment 1.

²⁵ See, e.g., *Advanced Technology I*, 885 F. Supp. 2d at 1349 (CIT 2012) ("The court remains concerned that Commerce has failed to consider important aspects of the problem and offered explanations that run counter to the evidence before it."); see also *id.* at 1351 ("Further substantial evidence of record does not support the inference that SASAC's [state-owned assets supervision and administration commission] 'management' of its 'state-owned assets' is restricted to the kind of passive-investor de jure 'separation' that Commerce concludes.") (footnotes omitted); *id.*, at 1355 ("The point here is that 'governmental control' in the context of the separate rate test appears to be a fuzzy concept, at least to this court, since a 'degree' of it can obviously be traced from the controlling shareholder, to the board, to the general manager, and so on along the chain to 'day-to-day decisions of export operations,' including terms, financing, and inputs into finished product for export."); and *id.* at 1357 ("AT&M itself identifies its 'controlling shareholder' as CISRI {owned by SASAC} in its financial statements and the power to veto nomination does not equilibrate the power of control over nomination.") (footnotes omitted).

²⁶ See *Carbon and Certain Alloy Steel Wire Rod from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances, in Part*, 79 FR 53169 (September 8, 2014), and accompanying Preliminary Decision Memorandum at 5-9.

²⁷ See, e.g., *Certain New Pneumatic Off-the-Road Tires from the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*, 73 FR 9278, 9284 (February 20, 2008), unchanged in *Certain New Pneumatic Off-The-Road Tires from the People's Republic of China: Final Affirmative Determination of Sale at Less than Fair Value and Partial Affirmative Determination of Critical Circumstances*, 73 FR 40485 (July 15, 2008).

Because no company under review, other than RMB/IFI, submitted a separate rate application or certification, Commerce preliminarily determines that these companies have not demonstrated their eligibility for a separate rate.²⁸ As such, we have not granted any company a separate rate.

All companies subject to this review, with the exception of the three companies for which we made preliminary no shipment determinations, are preliminarily considered part of the China-wide entity for their exports of subject merchandise exported to the United States during the POR. These companies are listed in the Attachment to this memorandum. Because no review was requested of the China-wide entity, the pre-existing China-wide rate of 206.00 percent²⁹ will apply to these companies' entries of the subject merchandise into the U.S. during the POR.

V. RECOMMENDATION

We recommend applying the above methodology for these preliminary results.



Agree

Disagree

12/19/2019

X 

Signed by: JEFFREY KESSLER

ATTACHMENT

Companies Not Granted a Separate Rate

1. Aerospace Precision Corp. (Shanghai) Industry Co., Ltd
2. Aihua Holding Group Co. Ltd.
3. Autocraft Industry (Shanghai) Ltd.
4. Autocraft Industry Ltd.
5. Billion Land Ltd.
6. Billion Technology Ltd
7. Billiongold Hardware Co. Ltd
8. BOLT Mfg. Trade Ltd.
9. Brighton Best International (Taiwan) Inc.
10. Brother Holding Group Co. Ltd.
11. C and H International Corporation
12. Catic Fujian Co., Ltd.
13. Cci International Ltd.
14. Century Distribution Systems Inc
15. Changshu City Standard Parts Factory
16. China Friendly Nation Hardware Technology Limited
17. D.M.D. International Co. Ltd.
18. Da Cheng Hardware Products Co., Ltd.
19. Dalian Xingxin Steel Fabrication
20. Dongxiang Accuracy Hardware Co., Ltd.
21. Ec International (Nantong) Co. Ltd.
22. Fastco (Shanghai) Trading Co., Ltd.
23. Fasten International Co., Ltd.
24. Fastenal Canada Ltd.
25. Fastwell Industry Co. Ltd.
26. Fook Shing Bolts & Nuts Co. Ltd.
27. Fuda Xiongzheng Machinery Co., Ltd.
28. Fuller Shanghai Co. Ltd.
29. Gem-Year Industrial Co. Ltd.
30. Guangdong Honjinn Metal & Plastic Co., Ltd.
31. Hainan Zhongyan United Development Co.
32. Haining Hifasters Industrial Co.
33. Haining Shende Imp. & Exp. Co. Ltd.
34. Haining Zhongda Fastener Co., Ltd.
35. Haiyan Ai&Lun Standard Fastener Co.
36. Haiyan Chaoqiang Standard Fastener
37. Haiyan Dayu Fasteners Co., Ltd.

38. Haiyan Evergreen Standard Parts Co. Ltd.
39. Haiyan Fuxin High Strength Fastener
40. Haiyan Hatehui Machinery Hardware
41. Haiyan Hurras Import & Export Co. Ltd.
42. Haiyan Jianhe Hardware Co. Ltd.
43. Haiyan Julong Standard Part Co. Ltd.
44. Haiyan Shangchen Imp. & Exp. Co.
45. Haiyan Yuxing Nuts Co. Ltd.
46. Hangzhou Everbright Imp. & Exp. Co. Lt
47. Hangzhou Grand Imp. & Exp. Co., Ltd.
48. Hangzhou Great Imp. & Exp. Co. Ltd.
49. Hangzhou Lizhan Hardware Co. Ltd.
50. Hangzhou Prostar Enterprises Ltd.
51. Hangzhou Tongwang Machinery Co., Ltd.
52. Hilti (China) Ltd.
53. Hong Kong Sunrise Fasteners Co. Ltd.
54. Hong Kong Yichen Co. Ltd.
55. Honoble Precision (China) Mfg.
56. Intech Industries Shanghai Co., Ltd.
57. Jiangsu Innovo Precision Machinery
58. Jiangsu Jinhuan Fastener Co., Ltd.
59. Jiangsu Zhongweiyu Communication Equipment Co. Ltd.
60. Jiashan Steelfit Trading Co. Ltd.
61. Jiashan Zhongsheng Metal Products Co., Ltd.
62. Jiaxing Allywin Mfg. Co., Ltd.
63. Jiaxing Brother Standard Part Co., Ltd
64. Jiaxing Chinafar Standard
65. Jiaxing Jinhua Import & Export Co., Ltd.
66. Jiaxing Sini Fastener Co., Ltd.
67. Jiaxing Xinyue Standard Part Co. Ltd.
68. Jiaxing Yaoliang Import & Export Co. Ltd.
69. Jinan Banghe Industry & Trade Co., Ltd.
70. Kinfast Hardware (Shenzhen) Ltd.
71. King Socket Screw Company Ltd.
72. L&W Fasteners Company
73. Macropower Industrial Inc.
74. Mai Seng International Trading Co., Ltd.
75. MB Services Company
76. Midas Union Co., Ltd.
77. Nanjing Prosper Import & Export Corporation Ltd.
78. Nantong Runyou Metal Products

79. New Pole Power System Co. Ltd.
80. Ningbiao Bolts & Nuts Manufacturing Co.
81. Ningbo Abc Fasteners Co., Ltd.
82. Ningbo Beilun Milfast Metalworks Co. Ltd.
83. Ningbo Beilun Pingxin Hardware Co., Ltd.
84. Ningbo Dexin Fastener Co. Ltd.
85. Ningbo Dongxin High-Strength Nut Co., Ltd.
86. Ningbo Exact Fasteners Co., Ltd.
87. Ningbo Fastener Factory
88. Ningbo Fengya Imp. and Exp. Co. Ltd.
89. Ningbo Fourway Co., Ltd.
90. Ningbo Haishu Holy Hardware Import and Export Co. Ltd.
91. Ningbo Haishu Wit Import & Export Co. Ltd.
92. Ningbo Haishu Yixie Import & Export Co. Ltd.
93. Ningbo Jinding Fastening Piece Co., Ltd.
94. Ningbo MPF Manufacturing Co. Ltd.
95. Ningbo Panxiang Imp. & Exp. Co. Ltd.
96. Ningbo Qianjiu Instrument Case Factory
97. Ningbo Seduno Imp. Exp. Co., Ltd.
98. Ningbo Yili Import & Export Co., Ltd.
99. Ningbo Yinzhou Dongxiang Accuracy Hardware Co., Ltd.
100. Ningbo Yinzhou Foreign Trade Co., Ltd.
101. Ningbo Yinzhou Woafan Industry & Trade Co., Ltd.
102. Ningbo Zhenghai Yongding Fastener Co., Ltd.
103. Ningbo Zhenhai Beisuda Equipment Co.
104. Ningbo Zhenhai Dingli Fastener Screw Co., Ltd.
105. Ningbo Zhenhai Jinhuan Fasteners
106. Ningbo Zhongjiang High Strength Bolts Co. Ltd.
107. Ningbo Zhongjiang Petroleum Pipes & Machinery Co. Ltd.
108. Orient International Holding Shanghai Rongheng Intl Trading Co. Ltd.
109. Orient Rider Corporation Ltd.
110. Panxiang Imp. & Exp. Co., Ltd.
111. Pol Shin Fastener (Zhejiang) Co.
112. Prosper Business and Industry Co., Ltd.
113. Qingdao Free Trade Zone Health Intl.
114. Qingdao Top Steel Industrial Co. Ltd.
115. Sampulse Industrial Co., Ltd.
116. Shaanxi Succeed Trading Co., Ltd.
117. Shanghai Autocraft Co., Ltd.
118. Shanghai Beitra Fasteners Co., Ltd.
119. Shanghai East Best Foreign Trade Co.

120. Shanghai East Best International Business Development Co., Ltd.
121. Shanghai E-Heng Imp. & Exp. Co. Ltd.
122. Shanghai Fortune International Co. Ltd.
123. Shanghai Furen International Trading
124. Shanghai Hunan Foreign Economic Co., Ltd.
125. Shanghai Jiabao Trade Development Co. Ltd.
126. Shanghai Nanshi Foreign Economic Co.
127. Shanghai Overseas International Trading Co. Ltd.
128. Shanghai Prime Machinery Co. Ltd.
129. Shanghai Printing & Dyeing and Knitting Mill
130. Shanghai Printing & Packaging Machinery Corp
131. Shanghai Recky International Trading Co., Ltd.
132. Shanghai Sinotex United Corp. Ltd.
133. Shanghai Strong Hardware Co. Li
134. Shanghai Wisechain Fasteners Ltd.
135. Shenzhen Fenda Technology Co., Ltd.
136. Shenzhen Haozhenghao Technology Co.
137. Shijiazhuang Huitongxiang Li Trade
138. Soyoung Industrial Co., Ltd.
139. SRC Metal (Shanghai) Co. Ltd.
140. Suntec Industries Co., Ltd.
141. Suzhou Henry International Trading Co., Ltd.
142. T and C Fastener Co. Ltd.
143. T and L Industry Co. Ltd.
144. Taizhou Maixing Machinery Co.
145. Telsto Development Co., Ltd.
146. The Hoffman Group International
147. Tianjin Port Free Trade Zone Tianjin Star International Trade Co., Ltd.
148. Tong Ming Enterprise Co., Ltd.
149. Tong Win International Co., Ltd.
150. Tri Steel Co., Ltd.
151. Wisechain Trading Limited
152. Wuxi Metec Metal Co. Ltd.
153. Xiamen Hua Min Imp. and Exp. Co. Ltd.
154. Xiamen Rongxinda Industry Co., Ltd.
155. Xiamen Yuhui Import & Export Co., Ltd.
156. Yogendra International
157. Yuyao Hualun Imp. & Exp. Co., Ltd.
158. Zhangjiagang Ever Faith Industry Co.
159. Zhejiang Heirrmu Mechanical and Electrical Equipment Manufacturing Co Ltd.
160. Zhejiang Heiter Industries Co., Ltd,

161. Zhejiang Heiter Mfg & Trade Co. Ltd.
162. Zhejiang Jin Zeen Fasteners Co. Ltd.
163. Zhejiang Junyue Standard Part Co., Ltd.
164. Zhejiang Junyue Standard Parts Co., Ltd.
165. Zhejiang Laibao Precision Technology Co. Ltd.
166. Zhejiang Metals & Minerals Imp & Exp Co. Ltd.
167. Zhejiang Morgan Brother Technology Co. Ltd.
168. Zhejiang New Century Imp & Exp Co. Ltd.
169. Zhejiang New Oriental Fastener Co., Ltd.
170. Zhejiang Zhenglian Industry Development Co., Ltd.
171. Zhongsheng Metal Co., Ltd.
172. Zhoushan Zhengyuan Standard Parts Co., Ltd.