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January 9, 2020

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

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

SUBJECT: Diamond Sawblades and Parts Thereof from the People's Republic of China: Decision Memorandum for Preliminary Results of Antidumping Duty Administrative Review and Preliminary Determination of No Shipments; 2017-2018

I. SUMMARY

The Department of Commerce (Commerce) is conducting an administrative review of the antidumping duty order on diamond sawblades and parts thereof (diamond sawblades) from the People's Republic of China (China) covering the period of review (POR) November 1, 2017 through October 31, 2018. Commerce preliminarily determines that sales of subject merchandise by the sole mandatory respondent subject to this review, Chengdu Huifeng New Material Technology Co., Ltd. (Chengdu Huifeng), were not made at prices below normal value (NV).

II. BACKGROUND

On November 4, 2009, Commerce published in the *Federal Register* an antidumping duty order on diamond sawblades from China.¹ On November 1, 2018, Commerce published in the *Federal Register* a notice of opportunity to request an administrative review of the order.²

Commerce exercised its discretion to toll all deadlines affected by the partial federal government closure from December 22, 2018 through the resumption of operations on January 29, 2019.³

¹ See *Diamond Sawblades and Parts Thereof from the People's Republic of China and the Republic of Korea: Antidumping Duty Orders*, 74 FR 57145 (November 4, 2009).

² See *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity To Request Administrative Review*, 83 FR 54912 (November 1, 2018).

³ See Memorandum to the Record from 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, "Deadlines Affected by the Partial Shutdown of the Federal Government," dated January 28, 2019. All deadlines in this segment of the proceeding have been extended by 40 days.

Because the deadlines in administrative reviews are determined based on the last day of the anniversary month, which, in this case, is November 30, 2018, prior to the beginning of the federal government closure, the tolling memo applies to this administrative review. As a result, the revised deadline for the preliminary results of this administrative review became September 11, 2019.

On February 6, 2019, based on timely requests for an administrative review, Commerce initiated an administrative review of forty-five exporters/producers.⁴ On April 12, 2019, we selected Chengdu Huifeng as the mandatory respondent for individual examination in this review.⁵

On August 14, 2019, Commerce extended the time limit for issuing the preliminary results of this review by 120 days, to no later than January 9, 2020.⁶

From October 21, 2019 through October 25, 2019, Commerce verified the information provided by Chengdu Huifeng using standard verification procedures, including on-site inspection of the producer/exporter's facilities, and examination of relevant sales and financial records.

On December 9, 2019, the petitioner, the Diamond Sawblades Manufacturers' Coalition, submitted comments concerning the preliminary results.⁷ On December 16, 2019, Chengdu Huifeng submitted rebuttal comments.⁸

We are conducting this review in accordance with section 751(a)(1)(B) and (a)(2)(A), of the Tariff Act of 1930, as amended (the Act), and 19 CFR 351.213.

III. SCOPE OF THE ORDER

The products covered by the order are all finished circular sawblades, whether slotted or not, with a working part that is comprised of a diamond segment or segments, and parts thereof, regardless of specification or size, except as specifically excluded below. Within the scope of the order are semifinished diamond sawblades, including diamond sawblade cores and diamond sawblade segments. Diamond sawblade cores are circular steel plates, whether or not attached to non-steel plates, with slots. Diamond sawblade cores are manufactured principally, but not exclusively, from alloy steel. A diamond sawblade segment consists of a mixture of diamonds (whether natural or synthetic, and regardless of the quantity of diamonds) and metal powders

⁴ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 84 FR 2159 (February 6, 2019) (*Initiation Notice*).

⁵ See Memorandum, "Antidumping Duty Administrative Review of Diamond Sawblades and Parts Thereof from the People's Republic of China: Respondent Selection," dated April 12, 2019 (Respondent Selection Memorandum).

⁶ See Memorandum, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Extension of Time Limit for Preliminary Results of Antidumping Duty Administrative Review, 2017-2018," dated August 14, 2019.

⁷ See Petitioner's Letter, "Diamond Sawblades' Sawblades and Parts Thereof from the People's Republic of China: Petitioner's Pre-Preliminary Comments," dated December 9, 2019.

⁸ See Chengdu Huifeng's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Rebuttal Comments to Petitioner's Pre-Preliminary Comments," dated December 16, 2019.

(including, but not limited to, iron, cobalt, nickel, tungsten carbide) that are formed together into a solid shape (from generally, but not limited to, a heating and pressing process).

Sawblades with diamonds directly attached to the core with a resin or electroplated bond, which thereby do not contain a diamond segment, are not included within the scope of the order. Diamond sawblades and/or sawblade cores with a thickness of less than 0.025 inches, or with a thickness greater than 1.1 inches, are excluded from the scope of the order. Circular steel plates that have a cutting edge of non-diamond material, such as external teeth that protrude from the outer diameter of the plate, whether or not finished, are excluded from the scope of the order. Diamond sawblade cores with a Rockwell C hardness of less than 25 are excluded from the scope of the order. Diamond sawblades and/or diamond segment(s) with diamonds that predominantly have a mesh size number greater than 240 (such as 250 or 260) are excluded from the scope of the order. Merchandise subject to the order is typically imported under heading 8202.39.00.00 of the Harmonized Tariff Schedule of the United States (HTSUS). When packaged together as a set for retail sale with an item that is separately classified under headings 8202 to 8205 of the HTSUS, diamond sawblades or parts thereof may be imported under heading 8206.00.00.00 of the HTSUS. On October 11, 2011, Commerce included the 6804.21.00.00 HTSUS classification number to the customs case reference file, pursuant to a request by U.S. Customer and Border Protection (CBP).⁹ Pursuant to requests by CBP, Commerce included to the customs case reference file the following HTSUS classification numbers: 8202.39.0040 and 8202.39.0070 on January 22, 2015, and 6804.21.0010 and 6804.21.0080 on January 26, 2015.

The tariff classification is provided for convenience and customs purposes; however, the written description of the scope of the order is dispositive.

IV. PRELIMINARY DETERMINATION OF NO SHIPMENTS

The following three companies that received separate rates in previous segments of the proceeding and are subject to this review reported that they did not have any exports of subject merchandise during the POR:¹⁰

Danyang Hantronic Import & Export Co., Ltd.
Danyang Weiwang Tools Manufacturing Co., Ltd.
Weihai Xiangguang Mechanical Industrial Co., Ltd.

We requested that CBP report any information contradicting their claims of no shipments.¹¹ To date, we have not received any contrary information from either CBP in response to our inquiry or any other sources that these companies had any shipments of the subject merchandise sold to the United States during the POR. Further, consistent with our practice, we find that it is not

⁹ See *Diamond Sawblades and Parts Thereof from the Republic of Korea: Preliminary Results of Antidumping Duty Administrative Review*, 76 FR 76128, 76130 (December 6, 2011).

¹⁰ See No-Shipment Letters from Weihai Xiangguang Mechanical Industrial Co., Ltd., dated March 5, 2019, from Danyang Hantronic Import & Export Co., Ltd., dated March 8, 2019, and Danyang Weiwang Tools Manufacturing Co., Ltd., dated March 8, 2019.

¹¹ See CBP message numbers 9352317, 9352319 and 9352320 dated December 18, 2019, available at <https://aceservices.cbp.dhs.gov/adcvdweb/>.

appropriate to rescind the review with respect to these companies but, rather, to complete the review and issue appropriate instructions to CBP based on the final results of review.¹²

A fourth company, Shanghai Starcraft Tools Company Limited¹³ (Shanghai Starcraft), filed comments stating that its shipments listed in the CBP import data placed on the record by Commerce were not subject merchandise and, therefore, Commerce should not select Shanghai Starcraft as a mandatory respondent in this proceeding.¹⁴ However, the submission did not include a signed no-shipment certification from a company official, and it did not include any documentation of Shanghai Starcraft's merchandise to support this assertion; therefore, we preliminarily determine to treat this company as part of the China-wide entity given that Shanghai Starcraft did not file a separate rate application or certification in this review. *See* the "China-Wide Entity" section of this memorandum.

V. VERIFICATION

As provided in section 782(i) of the Act, we verified the information provided by Chengdu Huifeng in this administrative review using standard verification procedures, including on-site inspection of the producer/exporter's facilities, and examination of relevant sales and financial records. Our verification results are outlined in the verification report for Chengdu Huifeng.¹⁵

VI. DISCUSSION OF THE METHODOLOGY

A. Non-Market Economy Country Status

Commerce considers China to be a non-market economy (NME) country.¹⁶ In accordance with section 771(18)(C)(i) of the Act, any determination that a country is an NME country shall remain in effect until revoked by the administering authority. None of the parties to this proceeding contested NME treatment for China. Therefore, for the preliminary results of this

¹² *See, e.g., Certain Steel Threaded Rod From the People's Republic of China: Preliminary Results of the Antidumping Duty Administrative Review and Preliminary Determination of No Shipments; 2018-2019*, 84 FR 249 (December 30, 2019).

¹³ In the *Initiation Notice*, this company is identified as "Shanghai Starcraft Tools Co. Ltd.," which is based on the petitioner's request for review. We have identified the company here as "Shanghai Starcraft Tools Company Limited" to reflect the company name Shanghai Starcraft used to identify itself in its submission and the company name on record in CBP's Automated Commercial Environment.

¹⁴ *See* Shanghai Starcraft Tools Company Limited's Letter, "Diamond Sawblades and Parts Thereof from China: Respondent Selection Comments," dated February 25, 2019).

¹⁵ *See* Memorandum, "Verification of the Sales Questionnaire Responses of Chengdu Huifeng New Material Technology Co., Ltd. in the Antidumping Administrative Review of Diamond Sawblades and Parts Thereof from The People's Republic of China," dated concurrently with this memorandum (Chengdu Huifeng Verification Report).

¹⁶ *See Antidumping Duty Investigation of Certain Aluminum Foil from the People's Republic of China: Affirmative Preliminary Determination of Sales at Less-Than-Fair Value and Postponement of Final Determination*, 82 FR 50858, 50861 (November 2, 2017) (citing Memorandum, "China's Status as a Non-Market Economy," dated October 26, 2017) (China NME Status Memo), unchanged in *Certain Aluminum Foil from the People's Republic of China: Final Determination of Sales at Less Than Fair Value*, 83 FR 9282 (March 5, 2018).

review, we treated China as an NME country and applied our current NME methodology in accordance with section 773(c) of the Act.

B. Surrogate Country

In antidumping proceedings involving NME countries, pursuant to section 773(c)(1) of the Act, we generally base NV on the value of the NME producer's factors of production (FOPs), valued in a surrogate ME country or countries considered to be appropriate by Commerce. In accordance with section 773(c)(4) of the Act, in valuing the FOPs, we use, to the extent possible, the prices or costs of FOPs in one or more ME countries that are: (1) at a level of economic development comparable to that of the NME country; and (2) significant producers of comparable merchandise.¹⁷

We determined that Brazil, Kazakhstan, Malaysia, Mexico, Romania, and Russia are countries whose *per capita* gross national incomes (GNI) are at the same level of economic development as the PRC.¹⁸ On April 15, 2019, we requested comments from interested parties regarding the selection of a surrogate country and surrogate values (SVs).¹⁹ In response, the petitioner recommended Thailand as the surrogate country, and Chengdu Huifeng recommended Mexico as the surrogate country.²⁰

1. Same Level of Economic Development

As a general rule, Commerce selects a surrogate country that is at the same level of economic development as the NME unless it is determined that none of the countries are viable options because (a) they either are not significant producers of comparable merchandise, (b) do not provide sufficient reliable sources of publicly available SV data, or (c) are not suitable for use based on other reasons. Surrogate countries that are not at the same level of economic development as the NME country, but still at a level of economic development comparable to the NME country, are selected only to the extent that data considerations outweigh the difference in levels of economic development.²¹

As stated above, we determined that Brazil, Kazakhstan, Malaysia, Mexico, Romania, and Russia are each at the same level of economic development as the PRC in terms of *per capita* GNI during the POR.²² Interested parties provided surrogate value information for Mexico and Thailand; however, we find that Thailand is not at the same level of economic development as

¹⁷ See Enforcement and Compliance Policy Bulletin 04.1: Non-Market Economy Surrogate Country Selection Process (March 1, 2004) (Policy Bulletin) available at <http://enforcement.trade.gov/policy/index.html>.

¹⁸ See Commerce's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Request for Surrogate Country and Surrogate Value Comments and Information," dated April 15, 2019 (Request Letter) at attached Commerce Memorandum, "List of Surrogate Countries for Antidumping Investigations and Reviews from the People's Republic of China," dated August 2, 2018 (Policy Memorandum).

¹⁹ See generally Request Letter.

²⁰ See Petitioner's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Comments on Surrogate Country List," dated April 29, 2019 at 3; and Chengdu Huifeng's Letter "Diamond Sawblades and Parts Thereof from China: Comments on Primary Surrogate Country Selection," at 3.

²¹ See Policy Memorandum.

²² *Id.*

China based on per capita GNI because its per capita GNI is lower than the lowest per capita GNI provided in the Policy Memorandum.

2. Producers of Identical or Comparable Merchandise

Section 773(c)(4)(B) of the Act requires Commerce to value FOPs in a surrogate country that is a significant producer of comparable merchandise. Neither the statute nor Commerce's regulations provide further guidance on what may be considered comparable merchandise. Given the absence of any definition in the statute or regulations, we look to other sources such as the Enforcement and Compliance Policy Bulletin 04.1: Non-Market Economy Surrogate Country Selection Process (Policy Bulletin 04.1), for guidance on defining comparable merchandise. The Policy Bulletin states that "in all cases, if identical merchandise is produced, the country qualifies as a producer of comparable merchandise."²³ If identical merchandise is not produced, then a country producing comparable merchandise is sufficient in selecting a surrogate country.²⁴ Further, when selecting a surrogate country, the statute requires us to consider the comparability of the merchandise, not the comparability of the industry.²⁵

The statute grants us discretion to examine various data sources for determining the best available information.²⁶ Moreover, while the legislative history provides that the term "significant producer" includes any country that is a significant "net exporter,"²⁷ it does not preclude reliance on additional or alternative metrics. In this review, because production data of comparable merchandise are not available, we first analyzed exports of comparable merchandise from the six potential surrogate countries, as a proxy for production data. In this review, we preliminarily determine that merchandise described under HTS code 8202.39 ("Circular Saw Blades Of Base Metal With Working Part Of Material Other Than Steel, And Parts") is identical or comparable to the merchandise covered by this review. This analysis shows that all six countries, identified in the Policy Memorandum as having the same level of economic development as China, have exports of HTS code 8202.39 during the POR. Additionally, Thailand, another country for which we received SV data, has exports of HTS code 8202.39 during the POR. We find that Brazil, Kazakhstan, Malaysia, Mexico, Romania, Russia, and Thailand are producers of comparable or identical merchandise.

²³ See Policy Bulletin 04.1, which is available on the Enforcement and Compliance website at <http://enforcement.trade.gov/policy/bull04-1.html>.

²⁴ The Policy Bulletin also states that "if considering a producer of identical merchandise leads to data difficulties, the operations team may consider countries that produce a broader category of reasonably comparable merchandise," *id.* at n.6.

²⁵ See *Sebacic Acid from the People's Republic of China; Final Results of Antidumping Duty Administrative Review*, 62 FR 65674, 65676 (December 15, 1997) ("Thus, to impose a requirement that merchandise must be produced by the same process and share the same end uses to be considered comparable would be contrary to the intent of the statute.").

²⁶ See section 773(c) of the Act; see also *Nation Ford Chem. Co. v. United States*, 166 F.3d 1373, 1377 (Fed. Cir. 1990).

²⁷ See Conference Report to the 1988 Omnibus Trade & Competitiveness Act, H.R. Rep. No. 100-576, at 590 (1988).

3. Data Considerations

When evaluating SV data, we consider several factors including whether the SV is publicly available, contemporaneous with the POR, representative of a broad-market average, from an approved surrogate country, tax- and duty-exclusive, and specific to the input.²⁸ There is no hierarchy among these criteria. It is our practice to consider carefully the available evidence in light of the particular facts of each industry when undertaking its analysis of valuing the FOPs.²⁹

As an initial matter, interested parties have only provided surrogate value data for Mexico and Thailand. However, only Mexico satisfies the full breadth of our surrogate country selection analysis. Specifically, among the countries listed in the Policy Memorandum, only Mexico is at the same level of economic development as China, is a significant producer of comparable or identical merchandise, and has useable data. There is information on the record which allows us to apply surrogate values from Mexico to all direct materials, packing materials, byproducts, and certain energy inputs.³⁰ We valued labor in Mexico using data from the International Labor Organization.³¹ Publicly available data from Mexico, which are on the record, provide for calculations of inland truck freight and domestic brokerage and handling (B&H). Finally, there are no financial statements of Mexican producers on the record. Therefore, we derived the surrogate financial ratios from the financial statement of a producer of comparable merchandise in Thailand, given that there are no financial statements on the record from producers of comparable merchandise from any of the other potential surrogate countries listed in the Policy Memorandum.

Additionally, we have considered whether the appropriate surrogate value for Diamond Powder is based on mesh-sized synthetic diamond powders or on individual stones. Record information indicates that Chengdu Huifeng purchases and consumes the former rather than the latter.³² For this reason, we have valued diamond powder using HTS 7105.10, which covers dust and powder of natural or synthetic diamond.

Where possible, we used information from a country at the same level of economic development as China, *i.e.*, Mexico, to value FOPs; however there was insufficient record evidence to value financial ratios in Mexico. The only other information available on the record for calculating financial ratios was information from Thailand. This information was useable for calculating financial ratios because Thailand was also identified as a producer of comparable or identical merchandise above.

²⁸ See Policy Bulletin 04.1.

²⁹ *Id.* See also, *e.g.*, *Certain Steel Threaded Rod From the People's Republic of China; Final Results of Third Antidumping Duty Administrative Review; 2011-2012*, 78 FR 66330 (November 5, 2013), and accompanying Issues and Decision Memorandum at 7.

³⁰ See Preliminary SV Memo at Exhibit 2.

³¹ *Id.*; see also Chengdu Huifeng's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Submission of Initial Surrogate Value information," dated July 12, 2019, at Exhibit 5.

³² See, *e.g.*, Chengdu Huifeng Verification Report at Exhibit 4D (The diamond powder recipe identifies certain mesh-sized diamond powders classifiable under the selected HTS category).

C. Separate Rates

In antidumping duty proceedings involving NME countries, Commerce relies on a rebuttable presumption that all companies within the country are subject to government control and, thus, should be assessed a single antidumping duty rate.³³ Thus, Commerce will assign all exporters this single rate unless an exporter can demonstrate that it is sufficiently independent from the government such that it is entitled to a separate rate. Commerce assigns separate rates in NME proceedings only if respondents can demonstrate the absence of both *de jure* and *de facto* government control over export activities under a test developed by Commerce.³⁴

In the *Initiation Notice*, Commerce notified parties of the application process by which exporters and producers may obtain separate rate status in NME proceedings.³⁵ Commerce received from the respondent selected for individual examination in this review information pertaining to the company's eligibility for a separate rate.³⁶ Commerce also received from five respondents not selected for individual examination in this review information pertaining to each company's eligibility for a separate rate.³⁷

1. Absence of *De Jure* Control

Commerce considers the following *de jure* criteria in determining whether an individual company may be granted a separate rate: (1) an absence of restrictive stipulations associated with an individual exporter's business and export licenses; (2) any legislative enactments

³³ See, e.g., *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); *Antidumping Duty Investigation of Certain Passenger Vehicle and Light Truck Tires from the People's Republic of China: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, In Part*, 80 FR 34893 (June 18, 2015), and accompanying IDM at Comment 35.

³⁴ 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*); see also *Notice of Final Determination of Sales at Less Than Fair Value: Silicon Carbide from the People's Republic of China*, 59 FR 22585, 22586-87 (May 2, 1994) (*Silicon Carbide*).

³⁵ See *Initiation Notice*, 84 FR at 2160.

³⁶ See Chengdu Huifeng's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Submission of Separate Rate Certification," dated March 6, 2019 (Chengdu Huifeng SRC); see also Chengdu Huifeng's section A response dated May 15, 2019 (AQR) at 2-10.

³⁷ See Xiamen ZL Diamond Technology Co., Ltd.'s Letter, "Diamond Sawblades from the People's Republic of China: Administrative Review 11/1/17-10/31/18 - Separate Rate Certification and Required Supporting Documents," dated February 25, 2019 (Xiamen ZL SRC); Zhejiang Wanli Tools Group Co., Ltd.'s Letter, "Diamond Sawblades and Parts Thereof from The People's Republic of China: Separate Rate Certification," dated March 4, 2019 (Zhejiang Wanli SRC); the Jiangsu Fengtai Single Entity's Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Submission of Separate Rate Certification," dated March 6, 2019 (Jiangsu Fengtai Single Entity SRC); Bosun Tools Co., Ltd.'s Letter, "Diamond Sawblades from the People's Republic of China - Separate Rate Certification," dated March 7, 2019 (Bosun Tools SRC); and Wuhan Wanbang Laser Diamond Tools Co., Ltd.'s Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Submission of Separate Rate Application," dated March 8, 2019 (Wuhan Wanbang SRA).

decentralizing control of companies; and (3) other formal measures by the government decentralizing control of companies.³⁸

The evidence provided by Bosun Tools Co., Ltd. (Bosun Tools), Chengdu Huifeng, the Jiangsu Fengtai Single Entity, Wuhan Wanbang Laser Diamond Tools Co., Ltd. (Wuhan Wanbang), Xiamen ZL Diamond Technology Co., Ltd. (Xiamen ZL), and Zhejiang Wanli Tools Group Co., Ltd. (Zhejiang Wanli), supports a preliminary finding of an absence of *de jure* government control based on the following: (1) an absence of restrictive stipulations associated with the individual exporter's business and export licenses; (2) legislative enactments decentralizing control of the companies; and (3) formal measures by the government decentralizing control of the companies.³⁹

2. Absence of *De Facto* Control

As stated in previous cases, there is some evidence that certain enactments of the Chinese central government have not been implemented uniformly among different sectors and/or jurisdictions in China.⁴⁰ Therefore, Commerce determined that an analysis of *de facto* control is critical in determining whether the respondents are, in fact, subject to a degree of government control which would preclude Commerce from assigning separate rates. Commerce typically considers the following four factors in evaluating whether a respondent is subject to *de facto* government control of its export functions: (1) whether the export prices are set by, or subject to the approval of, a government agency; (2) whether the respondent has the authority to negotiate and sign contracts and other agreements; (3) whether the respondent has autonomy from the government in making decisions regarding the selection of management; and (4) whether the respondent retains the proceeds of its export sales and makes independent decisions regarding the disposition of profits or financing of losses.⁴¹

Bosun Tools, Chengdu Huifeng, the Jiangsu Fengtai Single Entity, Wuhan Wanbang, Xiamen ZL, and Zhejiang Wanli, have each made the following assertions: (1) they establish their own export prices; (2) they negotiate contracts without guidance from any government entities or organizations; (3) they make their own personnel decisions; and (4) they retain the proceeds of their export sales, use profits according to their business needs, and have the authority to sell their assets and to obtain loans.⁴² Based on the information on the record of this review, Commerce preliminarily determines that there is an absence of *de facto* governmental control

³⁸ See *Sparklers*, 56 FR at 20589; see also *Freshwater Crawfish Tail Meat from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review, Rescission of Review in Part, and Preliminary Intent to Rescind New Shipper Review; 2015-2016*, 82 FR 26435 (June 7, 2017) (*15/16 FCTM Prelim*) and accompanying Preliminary Decision Memorandum (PDM) at 8-9 (unchanged in *15/16 FCTM Final*).

³⁹ See Bosun Tools SRC at 6-8, Chengdu Huifeng SRC at 4-5, and AQR at 3-10; the Jiangsu Fengtai Single Entity SRC at 4-6; Wuhan Wanbang SRA at 6-13; Xiamen ZL SRC at 4-5; and Zhejiang Wanli SRC at 4-5.

⁴⁰ See *Silicon Carbide*, 59 FR at 22586-87; see also *12/13 FCTM Prelim* and accompanying PDM at "Separate Rates" (unchanged in *12/13 FCTM Final*).

⁴¹ See *Notice of Final Determination of Sales at Less Than Fair Value: Furfuryl Alcohol from the People's Republic of China*, 60 FR 22544, 22545 n.3 (May 8, 1995); *Silicon Carbide*, 59 FR at 22586-87.

⁴² See Hubei Nature SRC at 5-6; Weishan Hongda SRC at 5-6; Xiping Opeck SRC at 5-6; Xuzhou Jinjiang SRC at 6; Yancheng Hi-King SRC at 5-6; Anhui Luan SRA at A-1 through A-8; Kunshan Xinrui SRA at A-1 through A-8.

over the export activities of Bosun Tools, Chengdu Huifeng, the Jiangsu Fengtai Single Entity, Wuhan Wanbang, Xiamen ZL, and Zhejiang Wanli.

Given that Commerce found that Bosun Tools, Chengdu Huifeng, the Jiangsu Fengtai Single Entity, Wuhan Wanbang, Xiamen ZL, Zhejiang Wanli, operate free of *de jure* and *de facto* governmental control, we preliminarily determine that they satisfy the criteria for a separate rate.⁴³

3. Separate Rate for Eligible Non-Selected Respondents

In accordance with section 777A(c)(2)(B) of the Act, we selected Chengdu Huifeng for individual examination because we did not have the resources to examine all companies for which a review was requested.⁴⁴

The statute and Commerce's regulations do not address the establishment of a rate to be applied to individual separate rate respondents not selected for examination when Commerce limits its examination in an administrative review pursuant to section 777A(c)(2) of the Act. Generally, Commerce looks to section 735(c)(5) of the Act, which provides instructions for calculating the all-others rate in a market economy investigation, for guidance when calculating the rate for separate rate respondents which were not individually examined in an administrative review. Section 735(c)(5)(A) of the Act provides that the estimated all-others rate in a market economy investigation shall be an amount equal to the weighted average of the estimated weighted average dumping margins established for exporters and producers individually examined, excluding any zero and *de minimis* margins, and any margins determined entirely under section 776 of the Act. Moreover, section 735(c)(5)(B) of the Act provides that, where all rates are zero, *de minimis*, or determined entirely under section 776 of the Act, we may use "any reasonable method" for assigning the rate to all other respondents not individually examined, "including averaging the estimated weighted average dumping margins determined for the exporters and producers individually investigated." The SAA explains that the "expected method" under section 735(c)(5)(B) of the Act "will be to weight-average the zero and *de minimis* margins and margins determined pursuant to the facts available, provided that volume data is available."⁴⁵ In this administrative review, the preliminary rate for Chengdu Huifeng is the only rate determined for an individually examined respondent. Given that Chengdu Huifeng's rate is zero for these preliminary results, we have assigned the preliminary rate for this company to the non-selected respondents eligible for a separate rate, consistent with the guidance in section 735(c)(5)(B) of the Act and our practice in NME cases.⁴⁶

⁴³ Jiangsu Fengtai Diamond Tool Manufacture Co., Ltd., Jiangsu Fengtai Tools Co., Ltd., and Jiangsu Fengtai Sawing Industry Co., Ltd., comprise the Jiangsu Fengtai Single Entity. See, e.g., *Diamond Sawblades and Parts Thereof from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2015-2016*, 83 FR 17527, 17528 n.7 (April 20, 2018) (7th Review Final).

⁴⁴ See Respondent Selection Memorandum.

⁴⁵ See Statement of Administrative Action Accompanying the Uruguay Round Agreements Act, H.R. Doc. 103-316, vol 1 (1994) at 883 (SAA).

⁴⁶ See *Albemarle Corp. v. United States*, 821 F.3d 1345 (Fed. Cir. 2016); see also *Freshwater Crawfish Tail Meat From the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review and New Shipper Reviews, and Rescission of Review in Part; 2016-2017*, 83 FR 52201 (October 16, 2018), and

On August 2, 2019, the petitioner submitted a request to withdraw their review request for two companies, *i.e.*, Bosun Tools, and Xiamen ZL.⁴⁷ However, because the petitioners filed the withdrawal request eighty-seven days after the deadline set in the *Initiation Notice* to file such requests, *i.e.*, May 7, 2019;⁴⁸ we have not granted the request. Because these companies timely filed SRCs, and we have received no timely withdrawal requests with respect to these companies, we have treated these companies as non-selected respondents eligible for a separate rate.

Accordingly, we assigned the preliminary rate for Chengdu Huifeng, *i.e.*, 0.00 percent, to the following non-selected respondents eligible for a separate rate:⁴⁹

Bosun Tools Co., Ltd.
Jiangsu Fengtai Single Entity
Wuhan Wanbang Laser Diamond Tools Co., Ltd.
Xiamen ZL Diamond Technology Co., Ltd.
Zhejiang Wanli Tools Group Co., Ltd.

4. China-Wide Entity

Upon the initiation of this review, we provided an opportunity for all companies listed in the *Initiation Notice* that wish to qualify for separate rate status in this review to complete, as appropriate, either an SRA or SRC.⁵⁰ We preliminarily find that thirty-six companies listed in the *Initiation Notice* are part of the China-wide entity because they did not submit an SRA, SRC, or no-shipment letter. The following companies are considered to be part of the China-wide entity:

ASHINE Diamond Tools Co., Ltd.
Danyang City Ou Di Ma Tools Co., Ltd.
Danyang Huachang Diamond Tool Manufacturing Co., Ltd.
Danyang Like Tools Manufacturing Co., Ltd.
Danyang NYCL Tools Manufacturing Co., Ltd.
Danyang Tsunda Diamond Tools Co., Ltd.
Guilin Tebon Superhard Material Co., Ltd.
Hangzhou Deer King Industrial and Trading Co., Ltd.

accompanying PDM at 10-11, unchanged in *Freshwater Crawfish Tail Meat From the People's Republic of China: Final Results of Antidumping Duty Administrative Review and New Shipper Reviews; 2016–2017*, 84 FR 2489 (February 7, 2019).

⁴⁷ See Petitioners' Letter, "Diamond Sawblades and Parts Thereof from the People's Republic of China: Request to Withdraw Review," dated August 2, 2019.

⁴⁸ See *Initiation Notice*, 84 FR at 2159.

⁴⁹ See *Albemarle*, 821 F.3d 1345. See also, *e.g.*, *Certain Frozen Fish Fillets from the Socialist Republic of Vietnam: Preliminary Results, Preliminary Determination of No Shipments, and Partial Rescission of the Antidumping Duty Administrative Review; 2015-2016*, 82 FR 42785 (September 12, 2017), and accompanying PDM at 9-10 n.52.

⁵⁰ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 83 FR 1329, 1331-32 (January 11, 2018) ("All firms listed below that wish to qualify for separate rate status in the administrative reviews involving NME countries must complete, as appropriate, either a separate rate application or certification, as described below.").

Hangzhou Kingburg Import & Export Co., Ltd.
Hebei XMF Tools Group Co., Ltd.
Henan Huanghe Whirlwind Co., Ltd.
Henan Huanghe Whirlwind International Co., Ltd.
Hong Kong Hao Xin International Group Limited
Hubei Changjiang Precision Engineering Materials Technology Co., Ltd.
Hubei Sheng Bai Rui Diamond Tools Co., Ltd.
Huzhou Gu's Import & Export Co., Ltd.
Jiangsu Huachang Diamond Tools Manufacturing Co., Ltd.
Jiangsu Inter-China Group Corporation
Jiangsu Youhe Tool Manufacturer Co., Ltd.
Orient Gain International Limited
Pantos Logistics (HK) Company Limited
Pujiang Talent Diamond Tools Co., Ltd.
Qingdao Hyosung Diamond Tools Co., Ltd.
Qingyuan Shangtai Diamond Tools Co., Ltd.
Qingdao Shinhan Diamond Industrial Co., Ltd.
Quanzhou Zhongzhi Diamond Tool Co., Ltd.
Rizhao Hein Saw Co., Ltd.
Saint-Gobain Abrasives (Shanghai) Co., Ltd.
Shanghai Jingquan Industrial Trade Co., Ltd.
Shanghai Starcraft Tools Co. Ltd.
Sino Tools Co., Ltd.
Wuhan Baiyi Diamond Tools Co., Ltd.
Wuhan Sadia Trading Co., Ltd.
Wuhan ZhaoHua Technology Co., Ltd.
ZL Diamond Technology Co., Ltd.
ZL Diamond Tools Co., Ltd.

Under Commerce's policy regarding conditional review of the China-wide entity,⁵¹ the China-wide entity will not be under review unless a party specifically requests, or Commerce self-initiates, a review of the entity. Because no party requested a review of the China-wide entity in this review, the entity is not under review, and the entity's rate of 82.05 percent is not subject to change.⁵²

D. Fair Value Comparisons

To determine whether sales of subject merchandise by Chengdu Huifeng were made at less than NV, we compared their export prices (EP) to NV, as described in the "Export Price" and "Normal Value" sections below.

⁵¹ See *Antidumping Proceedings: Announcement of Change in Department Practice for Respondent Selection in Antidumping Duty Proceedings and Conditional Review of the Nonmarket Economy Entity in NME Antidumping Duty Proceedings*, 78 FR 65963, 65970 (November 4, 2013).

⁵² See, e.g., *7th Review Final*, 83 FR at 17528.

1. Determination of Comparison Method

Pursuant to 19 CFR 351.414(c)(1), Commerce calculates weighted-average dumping margins by comparing weighted-average NVs to weighted-average EPs or constructed export prices (CEPs) (*i.e.*, the average-to-average (A-A) method) unless the Secretary determines that another method is appropriate in a particular situation. In less-than-fair-value investigations, Commerce determines whether to compare weighted-average NVs with the EPs or CEPs of individual sales (*i.e.*, the average-to-transaction (A-T) method) as an alternative comparison method using an analysis consistent with section 777A(d)(1)(B) of the Act. Although section 777A(d)(1)(B) of the Act does not strictly govern Commerce's examination of this question in the context of administrative reviews, Commerce nevertheless finds that the issue arising under 19 CFR 351.414(c)(1) in administrative reviews is, in fact, analogous to the issue in less-than-fair-value investigations.

In numerous investigations, Commerce applied a "differential pricing" analysis for determining whether application of the A-T method is appropriate in a particular situation pursuant to section 777A(d)(1)(B) of the Act and 19 CFR 351.414(c)(1).⁵³ Commerce finds that the differential pricing analysis used in recent investigations may be instructive for purposes of examining whether to apply an alternative comparison method in this administrative review. Commerce will continue to develop its approach in this area based on comments received in this and other proceedings, and on Commerce's additional experience with addressing the potential masking of dumping that can occur when Commerce uses the A-A method in calculating a respondent's weighted-average dumping margin.

The differential pricing analysis used in these preliminary results examines whether there exists a pattern of EPs or CEPs for comparable merchandise that differ significantly among purchasers, regions, or time periods. The analysis evaluates all export sales by purchaser, region and time period to determine whether a pattern of prices that differ significantly exists. If such a pattern is found, then the differential pricing analysis evaluates whether such differences can be taken into account when using the A-A method to calculate the weighted-average dumping margin. The analysis incorporates default group definitions for purchasers, regions, time periods, and comparable merchandise. Purchasers are based on the reported consolidated customer codes. Regions are defined using the reported destination code (*i.e.*, zip codes) and are grouped into regions based upon standard definitions published by the U.S. Census Bureau. Time periods are defined by the quarter within the POR based upon the reported date of sale. For purposes of analyzing sales transactions by purchaser, region, and time period, comparable merchandise is

⁵³ See, *e.g.*, *Polyethylene Terephthalate Resin from Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 83 FR 19696 (May 4, 2018), unchanged in *Polyethylene Terephthalate Resin from Taiwan: Final Determination of Sales at Less Than Fair Value, and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 48287 (September 24, 2018); *Large Diameter Welded Pipe from Canada: Preliminary Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 83 FR 43649 (August 27, 2018), unchanged in *Large Diameter Welded Pipe from Canada: Final Affirmative Determination of Sales at Less Than Fair Value*, 84 FR 6378 (February 27, 2019); and *Cast Iron Soil Pipe from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*, 83 FR 44567 (August 31, 2018), unchanged in *Cast Iron Soil Pipe from the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 84 FR 6767 (February 28, 2019).

defined using the product control number and all characteristics of the U.S. sales, other than purchaser, region, and time period, that Commerce uses in making comparisons between EP or CEP and NV for the individual dumping margins.

In the first stage of the differential pricing analysis used here, the “Cohen’s *d* test” is applied. The Cohen’s *d* coefficient is a generally recognized statistical measure of the extent of the difference between the mean (*i.e.*, weighted-average price) of a test group and the mean (*i.e.*, weighted-average price) of a comparison group. First, for comparable merchandise, the Cohen’s *d* coefficient is calculated when the test and comparison groups of data for a particular purchaser, region or time period each have at least two observations, and when the sales quantity for the comparison group accounts for at least five percent of the total sales quantity of the comparable merchandise. Then, the Cohen’s *d* coefficient is used to evaluate the extent to which the prices to the particular purchaser, region, or time period differ significantly from the prices of all other sales of comparable merchandise. The extent of these differences can be quantified by one of three fixed thresholds defined by the Cohen’s *d* test: small, medium or large (0.2, 0.5 and 0.8, respectively). Of these thresholds, the large threshold provides the strongest indication that there is a significant difference between the mean of the test and comparison groups, while the small threshold provides the weakest indication that such a difference exists. For this analysis, the difference is considered significant, and the sales in the test group are found to pass the Cohen’s *d* test, if the calculated Cohen’s *d* coefficient is equal to or exceeds the large (*i.e.*, 0.8) threshold.

Next, the “ratio test” assesses the extent of the significant price differences for all sales as measured by the Cohen’s *d* test. If the value of sales to purchasers, regions, and time periods that pass the Cohen’s *d* test account for 66 percent or more of the value of total sales, then the identified pattern of prices that differ significantly supports the consideration of the application of the A-T method to all sales as an alternative to the A-A method. If the value of sales to purchasers, regions, and time periods that pass the Cohen’s *d* test accounts for more than 33 percent and less than 66 percent of the value of total sales, then the results support consideration of the application of an A-T method to those sales identified as passing the Cohen’s *d* test as an alternative to the A-A method, and application of the A-A method to those sales identified as not passing the Cohen’s *d* test. If 33 percent or less of the value of total sales passes the Cohen’s *d* test, then the results of the Cohen’s *d* test do not support consideration of an alternative to the A-A method.

If both tests in the first stage (*i.e.*, the Cohen’s *d* test and the ratio test) demonstrate the existence of a pattern of prices that differ significantly such that an alternative comparison method should be considered, then in the second stage of the differential pricing analysis, Commerce examines whether using only the A-A method can appropriately account for such differences. In considering this question, Commerce tests whether using an alternative comparison method, based on the results of the Cohen’s *d* and ratio tests described above, yields a meaningful difference in the weighted-average dumping margin as compared to that resulting from the use of the A-A method only. If the difference between the two calculations is meaningful, this demonstrates that the A-A method cannot account for differences such as those observed in this analysis, and, therefore, an alternative comparison method would be appropriate. A difference in the weighted-average dumping margins is considered meaningful if: (1) there is a 25 percent relative change in the weighted-average dumping margins between the A-A method and the

appropriate alternative method where both rates are above the *de minimis* threshold; or (2) the resulting weighted-average dumping margins between the A-A method and the appropriate alternative method move across the *de minimis* threshold.

Interested parties may present arguments and justifications in relation to the above-described differential pricing approach used in these preliminary results, including arguments for modifying the group definitions used in this proceeding.

2. Results of the Differential Pricing Analysis

For Chengdu Huifeng, based on the results of the differential pricing analysis, Commerce preliminarily finds that 68.9 percent of the value of U.S. sales pass the Cohen's *d* test,⁵⁴ and confirms the existence of a pattern of prices for comparable merchandise that differ significantly among purchasers, regions, or time periods. Further, Commerce preliminarily determines that there is no meaningful difference between the weighted-average dumping margin calculated using the A-A method and the weighted-average dumping margin calculated using the alternative comparison method based on applying the A-T method to all U.S. sales. Thus, for these preliminary results, Commerce is applying the A-A method for all U.S. sales to calculate the weighted-average dumping margin for Chengdu Huifeng.

E. U.S. Price

For Chengdu Huifeng, in accordance with section 772(a) of the Act, we based U.S. prices on EP because the record information indicates that the first sales to unaffiliated purchasers were made prior to importation and CEP was not otherwise warranted. We calculated EPs based on the packed free-on-board (FOB)-China-port price to the first unaffiliated purchaser in the United States. In accordance with section 772(c) of the Act, we calculated net EPs by deducting foreign inland-freight expenses and foreign brokerage and handling expenses from the starting price (gross unit price) charged to the first unaffiliated customer in the United States. We based all movement expenses reported on surrogate values because a Chinese company provided the movement services.

Commerce's practice in NME cases is to adjust EP and CEP for the amount of any un-refunded (herein, "irrecoverable") value-added tax (VAT), in accordance with section 772(c)(2)(B) of the Act.⁵⁵ When an NME government imposes an export tax, duty, or other charge on subject merchandise, or on inputs used to produce subject merchandise, from which the respondent was not exempted, Commerce will reduce the respondent's EP and CEP prices accordingly, by the

⁵⁴ See Memorandum, "Administrative Review of the Antidumping Duty Order on Freshwater Crawfish Tail Meat from the People's Republic of China: Preliminary Results Analysis Memorandum for Hubei Nature Agriculture Industry Co., Ltd.," dated concurrently with this memorandum (Hubei Nature Preliminary Analysis Memorandum).

⁵⁵ See *Methodological Change for Implementation of Section 772(c)(2)(B) of the Tariff Act of 1930, as Amended, In Certain Non-Market Economy Antidumping Proceedings*, 77 FR 36481, 36483-84 (June 19, 2012) (*Methodological Change*).

amount of the tax, duty or charge paid, but not rebated.⁵⁶ Where the irrecoverable VAT is a fixed percentage of EP or CEP, Commerce explained that the final step in arriving at a tax neutral dumping comparison is to reduce the U.S. EP or CEP downward by this same percentage.⁵⁷

Commerce's methodology, as explained above and applied in this review, essentially amounts to performing two basic steps: (1) determining the amount (or rate) of the irrecoverable VAT tax on subject merchandise; and (2) reducing U.S. price by the amount (or rate) determined in step one. Information placed on the record of this review by Chengdu Huifeng indicates that, according to the Chinese VAT schedule, prior to May 1, 2018, the standard VAT levy is 17 percent and the rebate rate for subject merchandise is 9 percent and, starting on May 1, 2018, the standard VAT levy is 16 percent and the rebate for subject merchandise is 9 percent.⁵⁸ For the purposes of these preliminary results, therefore, we removed from U.S. price for each company the appropriate amount related to VAT.⁵⁹

F. Date of Sale

Section 351.401(i) of Commerce's regulations states that, in identifying the date of sale of the subject merchandise or foreign like product, Commerce normally will use the date of invoice, as recorded in the exporter or producer's records kept in the ordinary course of business. Additionally, Commerce may use a date other than the date of invoice if it is satisfied that a different date better reflects the date on which the exporter or producer establishes the material terms of sale.⁶⁰ Finally, Commerce has a long-standing practice of finding that, where the shipment date precedes the invoice date, the shipment date better reflects the date on which the material terms of sale are established.⁶¹ Chengdu Huifeng reported that the invoice date is the date at which the price and quantity are set with its customer.⁶² However, because certain Chengdu Huifeng U.S. sales had shipment dates that preceded the date of invoice, Chengdu Huifeng reported the earlier of the invoice date and shipment date as the date of sale, consistent with Commerce's practice.⁶³ Therefore, we preliminarily used the earlier of the invoice date or the shipment date as the date of sale, in accordance with our regulations and practice.

⁵⁶ *Id.*; see also *Chlorinated Isocyanurates from the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 2011-2012*, 79 FR 4875 (January 30, 2014) and accompanying IDM at Comment 5.A.

⁵⁷ See *Methodological Change*, 77 FR at 36483.

⁵⁸ See Chengdu Huifeng's supplemental response dated August 8, 2019 (1SQR); see also Chengdu Huifeng Verification Report at 20.

⁵⁹ For details on our price adjustments related to VAT, see Chengdu Huifeng Preliminary Analysis Memorandum, concurrently dated with this memorandum.

⁶⁰ See 19 CFR 351.401(i); see also *Allied Tube & Conduit Corp. v. United States*, 132 F. Supp. 2d 1087, 1090 (CIT 2001) (quoting 19 CFR 351.401(i)).

⁶¹ See, e.g., *Certain Polyester Staple Fiber from the Republic of Korea: Preliminary Results of the 2007/2008 Antidumping Duty Administrative Review*, 74 FR 27281, 27283 (June 9, 2009), unchanged in *Certain Polyester Staple Fiber from the Republic of Korea: Final Results of the 2007-2008 Antidumping Duty Administrative Review*, 74 FR 65517 (December 10, 2009).

⁶² See AQR at 14; see also Chengdu Huifeng's section C response dated June 7, 2019 (CQR) at C-15; and Chengdu Huifeng Verification Report at 9.

⁶³ See 1SQR at 12 and Appendix S1-2, and 2SQR at Appendix S2-10.

G. Normal Value

Section 773(c)(1) of the Act provides that Commerce shall determine NV using an FOP methodology if the merchandise is exported from an NME country and the available information does not permit the calculation of NV using home-market prices, third-country prices, or constructed value under section 773(a) of the Act. Commerce uses an FOP methodology because the presence of government controls on various aspects of NMEs render price comparisons and the calculation of production costs invalid under its normal methodologies.⁶⁴

In accordance with section 773(c) of the Act, we relied on the FOP data reported by Chengdu Huifeng for the POR. We calculated NV by adding together values for the FOPs, general expenses, profit, and packing costs. Specifically, we valued materials, labor, and packing by multiplying the reported per-unit rates for the FOPs consumed in producing the subject merchandise by the average per-unit surrogate values described below. We added freight costs for the material inputs. We calculated the freight costs by multiplying surrogate freight rates by the shorter of the reported distance from the domestic supplier to the factory that produced the subject merchandise or the distance from the nearest seaport to the factory that produced the subject merchandise, as appropriate. This adjustment is in accordance with the decision by the United States Court of Appeals for the Federal Circuit in *Sigma Corp. v. United States*, 117 F.3d 1401, 1407-1408 (Fed. Cir. 1997), which held that Commerce has discretion to choose a methodology to determine freight components if it does not substantially overvalue total freight expenses. We increased the calculated costs of the FOPs by adding surrogate general expenses and profit.⁶⁵

VII. CURRENCY CONVERSION

We made currency conversions into U.S. dollars in accordance with section 773A(a) of the Act and 19 CFR 351.415 based on the exchange rates in effect on the dates of the U.S. sales as certified by the Federal Reserve Bank. These exchange rates are available on the Enforcement and Compliance website at <http://enforcement.trade.gov/exchange/index.html>.

⁶⁴ See *Tapered Roller Bearings and Parts Thereof, Finished or Unfinished, from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review and Notice of Intent to Rescind in Part*, 70 FR 39744, 39754 (July 11, 2005) unchanged in *Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, from the People's Republic of China: Final Results of 2003-2004 Administrative Review and Partial Rescission of Review*, 71 FR 2517 (January 17, 2006).

⁶⁵ See Surrogate Value Memorandum.

VIII. RECOMMENDATION

We recommend applying the above methodology for these preliminary results.

Agree

Disagree

1/9/2020

X 

Signed by: JEFFREY KESSLER
Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance