January 30, 2017

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

FROM: Gary Taverman
Associate Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Decision Memorandum for Preliminary Results of the Antidumping Duty Administrative Review: Prestressed Concrete Steel Wire Strand from Thailand

SUMMARY

The Department of Commerce is conducting an administrative review of the antidumping duty (AD) order on prestressed concrete steel wire strand (PC strand) from Thailand\(^1\) covering the period of review (POR) January 1, 2015, through December 31, 2015. The review covers one producer/exporter of the subject merchandise, The Siam Industrial Wire Co., Ltd. (SIW). We preliminarily determine that SIW did not make sales of the subject merchandise at prices below normal value (NV).

BACKGROUND

On January 28, 2004, the Department of Commerce (Department) published the *Order*. On January 4, 2016, we published a notice of opportunity to request an administrative review of the

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\(^1\) See Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from Thailand, 69 FR 4111 (January 28, 2004) (the *Order*).
On March 3, 2016, based on a timely request for administrative review, we initiated an administrative review of SIW.

On May 12, 2016, we sent the AD questionnaire to SIW. Between June 2, 2016, and July 2, 2016, SIW submitted its responses to sections A, B, C, and D of the Department’s questionnaire. The petitioners submitted comments on SIW’s questionnaire responses and requested that the Department conduct a verification of the factual information in SIW’s questionnaire responses. Between September 22, 2016, and November 10, 2016, we issued supplemental questionnaires regarding SIW’s responses to section A, B, C, and D, to which SIW timely responded.

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

**SCOPE OF THE ORDER**

For purposes of this Order, PC strand is steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-

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2 See Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity To Request Administrative Review, 81 FR 67 (January 4, 2016).
3 See letter from SIW, “Prestressed Concrete Steel Wire Strand from Thailand Request for Administrative Review and Entry of Appearance,” dated February 1, 2016.
5 See letter from the Department to SIW dated May 12, 2016.
6 See letters from SIW “Antidumping Duty Review of Prestressed Concrete Strand from Thailand; Response of The Siam Industrial Wire Company to Questionnaire Section A,” “Antidumping Duty Review of Prestressed Concrete Steel Wire Strand from Thailand; Replacement of Exhibit A-11 of The Siam Industrial Wire Company,” dated June 2, 2016; “Antidumping Duty Review of Prestressed Concrete Steel Wire Strand from Thailand; Response of The Siam Industrial Wire Company to Antidumping Questionnaire Sections B and C,” dated June 28, 2016 (June 28, 2016 QR); and “Antidumping Duty Review of Prestressed Concrete Steel Wire Strand from Thailand; Response of The Siam Industrial Wire Company to Antidumping Questionnaire Section D,” dated July 1, 2016.
7 American Spring Wire Corp., Insteel Wire Products Company, and Sumiden Wire Products Corp. (collectively, the petitioners).
8 See letters from the petitioners, “Prestressed Concrete (PC) Strand from Thailand-Petitioner’s Comments on SIW’s Section A Response,” dated June, 13, 2016, “Administrative Review of Prestressed Concrete Steel Wire Strand from Thailand-Petitioners’ Comments on SIW’s Section B & C Questionnaire Responses,” dated July 14, 2016, and “Administrative Review of Prestressed Concrete Steel Wire Strand from Thailand-Petitioners’ Comments on SIW’s Section D Response,” dated August 1, 2016.
tensioned) applications. The product definition encompasses covered and uncovered strand and all types, grades, and diameters of PC strand.

The merchandise subject to the Order is currently classifiable under subheadings 7312.10.3010 and 7312.10.3012 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise subject to the scope is dispositive.

DISCUSSION OF THE METHODOLOGY

Bona Fides Analysis

On July 14, 2016, the petitioners requested that the Department investigate whether SIW’s single U.S. sale during the POR was a bona fide sale.11 Although the Department normally conducts a bona fide sales analysis only in the context of a new shipper review,12 the Department has, when warranted, conducted a bona fide sale analysis in administrative reviews.13 Accordingly, we requested information regarding SIW’s single sale to which SIW and its unaffiliated customer responded.14 The petitioners submitted comments regarding SIW’s responses.15

In our bona fides analysis, we consider, inter alia, the “totality of the circumstances,” including whether the sale under consideration was atypical, distortive, or otherwise unrepresentative of normal business practices and, as such, whether the sale was structured in such a way that it can be replicated.16 We analyzed the information submitted by SIW, as well as information compiled by the Department, and preliminarily determine that SIW’s U.S. sale is bona fide.17


14 See September 29, 2016 QR, November 10, 2016 QR, and December 2, 2016 QR.


16 See, e.g., Honey from the People’s Republic of China: Rescission and Final Results of Antidumping Duty New Shipper Reviews, 71 FR 58579 (October 4, 2006) and accompanying Issues and Decision Memorandum at Comment lb; see also Shandong Chenhe Int’l Trading Co. v. United States, 34 C.I.T. 1472 (CIT 2010); and see Tianjin Tiancheng Pharm. Co. v. United States, 366 F. Supp. 2d 1246 (CIT 2005) (“In evaluating whether a sale is commercially reasonable or not, Commerce has considered, inter alia, such factors as (1) the timing of the sale, (2) the price and quantity, (3) the expenses arising from the transaction, (4) whether the goods were resold at a profit, (5) and whether the transaction was at an arms-length basis,” citing Am. Silicon Techs v. United States, 110 F. Supp. 2d 992, 995 (CIT 2000).

17 See memorandum, “Preliminary Results of Administrative Review of Prestressed Concrete Steel Wire Strand from Thailand: Bona Fide Sales Analysis,” dated concurrently with this memorandum (Bona Fides Analysis Memorandum).
Our analysis of the facts, which are subject to the administrative protective order of this administrative review, is provided in the *Bona Fides* Analysis Memorandum.\(^\text{18}\)

Comparisons to Normal Value

Pursuant to section 773(a) of the Act, 19 CFR 351.414(c)(1), and (d), in order to determine whether SIW’s sale of the subject merchandise from Thailand to the United States was made at less than NV, the Department compared the constructed export price (CEP) to the NV, as described in the “Constructed Export Price” and “Normal Value” sections of this memorandum.

A. Determination of Comparison Method

Pursuant to 19 CFR 351.414(c)(1), the Department calculates weighted-average dumping margins by comparing weighted-average NVs to weighted-average export prices (EPs) (or CEPs) *(i.e., the average-to-average method)* unless the Secretary determines that another method is appropriate in a particular situation. In less-than-fair-value investigations, the Department examines whether to compare weighted-average NVs with the EPs (or CEPs) of individual sales *(i.e., the average-to-transaction 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 the Department's examination of this question in the context of administrative reviews, the Department 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.\(^\text{19}\)

In certain investigations, the Department applied a “differential pricing” analysis for determining whether application of the average-to-transaction method is appropriate in a particular situation pursuant to 19 CFR 351.414(c)(1) and section 777A(d)(1)(B) of the Act.\(^\text{20}\) The Department finds that the differential pricing analysis used in certain investigations may be instructive for purposes of examining whether to apply an alternative comparison method in this administrative review. The Department will continue to develop its approach in this area based on comments received in this and other proceedings, and on the Department’s additional experience with addressing the potential masking of dumping that can occur when the Department uses the average-to-average method in calculating a respondent’s weighted-average dumping margin.

\(^{18}\) *Id.*

\(^{19}\) See *Ball Bearings and Parts Thereof from France, Germany, and Italy: Final Results of Antidumping Duty Administrative Reviews: 2010–2011*, 77 FR 73415 (December 10, 2012) and the accompanying *Issues and Decision Memorandum* at comment 1; see also *Apex Frozen Foods Private Ltd. v. United States*, 37 F. Supp. 3d 1286 (Ct. Int’l Trade 2014); see also *JBF RAK LLC v. United States*, 790 F.3d 1358, 1363-65 (Fed. Cir. 2015) ("{t\}he fact that the statute is silent with regard to administrative reviews does not preclude Commerce from filling gaps in the statute to properly calculate and assign antidumping duties") (citations omitted).

\(^{20}\) See, e.g., *Xanthan Gum From the People's Republic of China: Final Determination of Sales at Less Than Fair*, 78 FR 33351 (June 4, 2013); *Steel Concrete Reinforcing Bar From Mexico: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 79 FR 54967 (September 15, 2014); or *Welded Line Pipe From the Republic of Turkey: Final Determination of Sales at Less Than Fair Value*, 80 FR 61362 (October 13, 2015).
The differential pricing analysis 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 average-to-average 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 code) 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 period of review based upon the reported date of sale. For purposes of analyzing sales transactions by purchaser, region and time period, comparable merchandise is defined using the product control number and all characteristics of the U.S. sales, other than purchaser, region and time period, that the Department 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 average-to-transaction method to all sales as an alternative to the average-to-average 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 average-to-transaction method to those sales identified as passing the Cohen’s $d$ test as an alternative to the average-to-average method, and application of the average-to-average 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 average-to-average 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, the Department examines whether using only the average-to-average method can appropriately account for such differences. In considering this question, the Department 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 average-to-average method only. If the difference between the two calculations is meaningful, then this demonstrates that the average-to-average 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 average-to-average 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 average-to-average 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.

B. Results of Differential Pricing Analysis

For SIW, based on the results of the differential pricing analysis, the Department preliminarily finds that 0.00 percent of U.S. sales pass the Cohen’s $d$ test, and does not confirm the existence of a pattern of prices that differ significantly among purchasers, regions or time periods. Thus, the results of the Cohen’s $d$ and ratio tests do not support consideration of an alternative to the average-to-average method. Accordingly, the Department preliminarily determines to apply the average-to-average method for the U.S. sale to calculate the weighted-average dumping margin for SIW, in accordance with 19 CFR 351.414(b)(1).

C. Product Comparisons

In accordance with section 771(16) of the Act, we considered all products produced by SIW that meet the description in the “Scope of the Order” section, above, to be “foreign like products” for purposes of determining appropriate product comparisons to the U.S. sale. Pursuant to 19 CFR 351.414(f)(1), we compared SIW’s U.S. sale of PC strand to its sales of PC strand made in the home market in the same month. Where there were no contemporaneous sales within the same month, pursuant to 19 CFR 351.414(f)(2), we compared SIW’s U.S. sale of PC strand to its sales of PC strand made in the home market in the most recent of the three months prior to the month of the U.S. sale. Finally, if SIW did not make home market sales of PC strand during any of these months, pursuant to 19 CFR 351.414(f)(3), we compared SIW’s U.S. sale of PC strand to SIW’s home market sales of PC strand in the earlier of the two months following the month of the U.S. sale in which SIW made a home market sale of PC strand.
In making the product comparisons, we matched foreign like products based on the physical characteristics reported by SIW in the following order of importance: covering/coating, diameter, grade, strand, and type. SIW reported that, within the meaning of section 771(16)(A) of the Act, its U.S. sale during the POR was identical based on the product matching criteria (i.e., covering/coating, diameter, grade, strand, and type) to contemporaneous sales in the home market. Accordingly, in calculating SIW’s NV, we made product comparisons without having to account for cost differences associated with differences in the physical characteristics of the merchandise, pursuant to section 773(a)(6)(C)(ii) of the Act.

**Constructed Export Price**

Section 772(b) of the Act defines CEP as “the price at which the subject merchandise is first sold (or agreed to be sold) in the United States before or after the date of importation by or for the account of the producer or exporter of such merchandise or by a seller affiliated with the producer or exporter, to a purchaser not affiliated with the producer or exporter, as adjusted under subsections (c) and (d)” of section 772 of the Act.

The Department based the price of SIW’s U.S. sale on CEP, as defined in section 772(b) of the Act, for the subject merchandise sold, before importation, by a U.S.-based seller affiliated with the producer to an unaffiliated purchaser in the United States. We made deductions from the starting price for movement expenses (e.g., inland freight, warehousing, international freight, marine insurance, brokerage and handling, and U.S. duties), in accordance with section 772(c)(2) of the Act and 19 CFR 351.401(e). In accordance with section 772(d)(1) of the Act and 19 CFR 351.402(b), we deducted selling expenses associated with economic activities occurring in the United States, including direct selling expenses (i.e., imputed credit expenses) and indirect selling expenses (including inventory carrying costs). We also deducted from CEP an amount for profit, in accordance with section 772(d)(3) of the Act. In accordance with section 772(f) of the Act, we calculated the CEP profit rate using the expenses incurred by Tata Steel International (Americas) (TSIA), SIW’s U.S. affiliate, on its sale of the subject merchandise and the profit associated with the sale.

**Normal Value**

**A. Home Market Viability and Comparison Market**

To determine whether there is a sufficient volume of sales of PC strand in the home market to serve as a viable basis for calculating NV (i.e., the aggregate volume of home market sales of the foreign like product is equal to or greater than five percent of the aggregate volume of U.S. sales), we compared SIW’s volume of home market sales of the foreign like product to its U.S. sale of the subject merchandise, in accordance with section 773(a)(1)(C) of the Act.21 Based on this comparison, we determined that SIW had a viable home market during the POR. Consequently, pursuant to section 773(a)(1)(B)(i) of the Act and 19 CFR 351.404(c)(1)(i), we based NV on home market sales.

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21 See section 773(a)(1)(B) of the Act.
B. Level of Trade

Section 773(a)(1)(B)(i) of the Act states that, to the extent practicable, the Department will calculate NV based on sales of foreign like products at the same level of trade (LOT) as the EP or CEP. Sales are made at different LOTs if they are made at different marketing stages (or their equivalent). Substantial differences in selling activities are a necessary, but not sufficient, condition for determining that there is a difference in the stages of marketing. To determine whether the comparison market sales were at different stages in the marketing process than the U.S. sale, we reviewed the distribution system in each market (i.e., the chain of distribution), including selling functions, class of customer (customer category), and the level of selling expenses for each type of sale.

Pursuant to section 773(a)(1)(B)(i) of the Act, in identifying LOTs for EP and comparison market sales (i.e., where NV is based on either home market or third country prices), we consider the starting prices before any adjustments. For CEP sales, we consider only the selling activities reflected in the price after the deduction of expenses and profit under section 772(d) of the Act.

When the Department is unable to match U.S. sales of the foreign like product in the comparison market at the same LOT as the EP or CEP, the Department may compare the U.S. sales to sales at a different LOT in the comparison market. When this occurs and available data make it practicable, we make an LOT adjustment under section 773(a)(7)(A) of the Act. Finally, for CEP sales only, if the NV LOT is at a more advanced stage of distribution than the LOT of the CEP and there is no basis for determining whether the difference in LOTs between NV and CEP affects price comparability (i.e., no LOT adjustment was practicable), the Department grants a CEP offset, as provided in section 773(a)(7)(B) of the Act.

We obtained information from SIW regarding the marketing stages involved in making its reported home market and U.S. sales, including a description of the selling activities performed by the respondent for each channel of distribution. SIW reported two channels of distribution in the comparison market: direct sales to end users, and another channel which is business proprietary in nature. We preliminarily determine that the selling activities associated with the

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22 See 19 CFR 351.412(c)(2).
23 Id.; see also Notice of Final Determination of Sales at Less Than Fair Value: Certain Cut-to-Length Carbon Steel Plate from South Africa, 62 FR 61731, 61732 (November 19, 1997) (Plate from South Africa).
24 Where NV is based on constructed value (CV), we determine the NV LOT based on the LOT of the sales from which we derive selling expenses, general and administrative expenses, and profit for CV, where possible. See, e.g., Notice of Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination: Certain Frozen and Canned Warmwater Shrimp from Brazil, 69 FR 47081, 47086 (August 4, 2004), unchanged in Notice of Final Determination of Sales at Less Than Fair Value: Certain Frozen and Canned Warmwater Shrimp from Brazil, 69 FR 76910 (December 23, 2004).
26 See Plate from South Africa, 62 FR at 61732-33.
27 For complete discussion, see memorandum, “Antidumping Duty Administrative Review of Prestressed Concrete Steel Wire Strand from Thailand: The Siam Industrial Wire Co., Ltd. Preliminary Calculation Memorandum,” dated concurrently with this memorandum.
two channels of distribution did not differ and, therefore, we consider the two reported channels of distribution to constitute one LOT.28

In the U.S. market, SIW reported that its CEP sale occurred through one channel of distribution, which constitutes one LOT.29 We compared the selling activities at this CEP LOT (not including those activities corresponding to economic activities performed by TSIA in the United States) with the selling activities performed at the comparison market LOT, and found that the selling activities performed by SIW for home market customers are at a more advanced stage of distribution than those performed for its U.S. customer.30 That is, there are significantly more selling activities performed for home market sales than for the U.S. sale. Accordingly, we considered the CEP LOT to be different from the home market LOT. Therefore, because we could neither match U.S. CEP sales to sales at the same LOT in the home market, nor determine an LOT adjustment (because there is only one LOT in the home market), we made a CEP offset, in accordance with section 773(a)(7)(B) of the Act and 19 CFR 351.412.

C. Cost of Production Analysis

In accordance with section 773(b)(2)(A)(ii) of the Act,31 the Department requested CV and cost of production (COP) information from SIW. We examined SIW’s cost data, and determine that our quarterly cost methodology is not warranted. Therefore, we are applying our standard methodology of using annual costs based on the reported data.

1. Calculation of COP

In accordance with section 773(b)(3) of the Act, we calculated COP based on the sum of the costs of materials and fabrication for the foreign like product, plus amounts for general and administrative expenses and interest expenses.32 We relied on the COP data submitted by SIW.

2. Test of Comparison Market Sales Prices

On a product-specific basis, pursuant to section 773(a)(1)(B)(i) of the Act, we compared the weighted-average COPs to the home market sales prices of the foreign like product, in order to determine whether the sales prices were below the COPs. For purposes of this comparison, we used COPs exclusive of selling and packing expenses. The prices were exclusive of any applicable billing adjustments, movement charges, direct and indirect selling expenses, and packing expenses.

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28 Id.
29 Id.
30 Id.
32 See “Test of Comparison Market Sales Prices” section, below, for treatment of home market selling expenses.
3. Results of the COP Test

In determining whether to disregard home market sales made at prices below the COP, we examined, in accordance with sections 773(b)(1)(A) and (B) of the Act, whether: 1) within an extended period of time, such sales were made in substantial quantities; and 2) such sales were made at prices which permitted the recovery of all costs within a reasonable period of time in the normal course of trade. In accordance with sections 773(b)(2)(B) and (C) of the Act, where less than 20 percent of the respondent’s comparison market sales of a given product are at prices less than the COP, we do not disregard any below-cost sales of that product because we determine that in such instances the below-cost sales were not made within an extended period of time and in “substantial quantities.” Where 20 percent or more of a respondent’s sales of a given product are at prices less than the COP, we disregard the below-cost sales when: 1) they were made within an extended period of time in “substantial quantities,” in accordance with sections 773(b)(2)(B) and (C) of the Act; and, 2) based on our comparison of prices to the weighted-average COPs for the POR, they were at prices which would not permit the recovery of all costs within a reasonable period of time, in accordance with section 773(b)(2)(D) of the Act.

In this case, we found that for certain products, more than 20 percent of SIW’s home market sales were at prices less than the COP and, in addition, such sales did not provide for the recovery of costs within a reasonable period of time. We, therefore, excluded these sales and used the remaining sales, as the basis for determining NV, in accordance with section 773(b)(1) of the Act.

D. Calculation of Normal Value Based on Comparison Market Prices

We based NV for SIW on reported packed prices (delivered or ex-works) to unaffiliated customers in the home market.33 We adjusted, where appropriate, the starting price for billing adjustments, in accordance with 19 CFR 351.401(c). We made deductions, where appropriate, from the starting price for movement expenses, including inland freight, under section 773(a)(6)(B)(ii) of the Act. Pursuant to section 773(a)(6)(C) of the Act and 19 CFR 351.410, we made deductions for direct selling expenses (i.e., imputed credit). We also deducted home market packing costs and added U.S. packing costs, in accordance with sections 773(a)(6)(A) and (B) of the Act. Finally, as discussed in the “Level of Trade” section above, we made a CEP offset pursuant to section 773(a)(7)(B) of the Act and 19 CFR 351.412(f). We calculated the CEP offset as the lesser of the indirect selling expenses incurred on the home market sales or the indirect selling expenses deducted from the starting price in calculating CEP.

CURRENCY CONVERSION

Where appropriate, 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 date of the U.S. sale as certified by the Federal Reserve Bank.

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33 See June 28, 2016 QR, at 12.
RECOMMENDATION

We recommend applying the above methodology for these preliminary results.

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Agree                        Disagree

1/30/2017

Signed by: RONALD LORENTZEN

Ronald K. Lorentzen
Acting Assistant Secretary
for Enforcement and Compliance