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EFFECTIVE DATE: COURT CASE #:

PERIOD OF REVIEW: TO

PERIOD COVERED: 07/09/1993 TO

Notice of Lifting of Suspension Date:

TO: { Directors Of Field Operations, Port Directors }

FROM: { Director AD/CVD & Revenue Policy & Programs }

RE: CLARIFICATION OF THE ANTIDUMPING ORDER ON CUT-TO-LENGTH CARBON STEEL PLATE FROM VARIOUS COUNTRIES

MESSAGE NO: 4066112 DATE: 03 07 1994

CATEGORY: ADA TYPE: INF

REFERENCE: REFERENCE DATE:

CASES: A - 351 - 817 A - 122 - 823

A - 201 - 809 - -

- - - -

PERIOD COVERED: 07 09 1993 TO

LIQ SUSPENSION DATE:

TO: REGIONAL DIRECTORS, COMMERCIAL OPERATIONS
DISTRICT DIRECTORS, AREA AND PORT DIRECTORS

FROM: DIRECTOR, TRADE COMPLIANCE DIVISION

RE: CLARIFICATION OF THE ANTIDUMPING ORDER ON CUT-TO-LENGTH CARBON STEEL PLATE FROM VARIOUS COUNTRIES

1. ON JULY 9, 1993, THE DEPARTMENT OF COMMERCE (THE DEPARTMENT) PUBLISHED IN THE FEDERAL REGISTER THE DEPARTMENT'S FINAL DETERMINATION THAT CERTAIN CARBON STEEL FLAT PRODUCTS FROM VARIOUS COUNTRIES ARE BEING, OR ARE LIKELY TO BE, SOLD AT LESS THAN FAIR VALUE. ON AUGUST 19, 1993, THE DEPARTMENT PUBLISHED NOTICES OF ITS ANTIDUMPING DUTY ORDERS OF CERTAIN COLD-ROLLED CARBON STEEL FLAT PRODUCTS, CORROSION-RESISTANT CARBON STEEL FLAT

PRODUCTS, AND CUT-TO-LENGTH CARBON STEEL PLATE FROM VARIOUS

COUNTRIES. PARAGRAPHS 2-3 OF THESE INSTRUCTIONS ARE UNALTERED. THE REMAINING PARAGRAPHS CLARIFY THOSE PREVIOUSLY ISSUED.

2. ONE OF THE FOUR CLASSES OR KINDS OF PRODUCTS COVERED BY THESE ORDERS IS CERTAIN CUT-TO-LENGTH CARBON STEEL PLATE PRODUCTS. THESE PRODUCTS INCLUDE HOT-ROLLED CARBON STEEL UNIVERSAL MILL PLATES (I.E., FLAT-ROLLED PRODUCTS ROLLED ON FOUR FACES OR IN A CLOSED BOX PASS, OF A WIDTH EXCEEDING 150 MILLIMETERS BUT NOT EXCEEDING 1,250 MILLIMETERS AND OF A THICKNESS OF NOT LESS THAN 4 MILLIMETERS, NOT IN COILS AND WITHOUT PATTERNS IN RELIEF), OF RECTANGULAR SHAPE, NEITHER CLAD, PLATED NOR COATED WITH METAL, WHETHER OR NOT PAINTED, VARNISHED, OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES; AND CERTAIN HOT-ROLLED CARBON STEEL

FLAT-ROLLED PRODUCTS IN STRAIGHT LENGTHS, OF RECTANGULAR SHAPE, HOT ROLLED, NEITHER CLAD, PLATED, NOR COATED WITH METAL, WHETHER OR NOT PAINTED, VARNISHED, OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES, 4.75 MILLIMETERS OR MORE IN THICKNESS AND OF A WIDTH WHICH EXCEEDS 150MILLIMETERS AND MEASURES AT LEAST TWICE THE THICKNESS, AS CURRENTLY CLASSIFIABLE IN THE HTS UNDER

ITEM NUMBERS 7208.31.0000, 7208.32.0000, 7208.33.1000, 7208.33.5000, 7208.41.0000, 7208.42.0000, 7208.43.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.11.0000, 7211.12.0000, 7211.21.0000, 7211.22.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, AND 7212.50.0000. INCLUDED IN THESE ORDERS ARE FLAT-ROLLED PRODUCTS OF NONRECTANGULAR CROSS-SECTION

WHERE SUCH CROSS-SECTION IS ACHIEVED SUBSEQUENT TO THE ROLLING PROCESS (I.E., PRODUCTS WHICH HAVE BEEN "WORKED AFTER ROLLING") -- FOR EXAMPLE, PRODUCTS WHICH HAVE BEEN BEVELLED OR ROUNDED AT THE EDGES. EXCLUDED FROM THESE ORDERS IS GRADE X-70 PLATE.

ALTHOUGH THE HTS SUBHEADINGS ARE PROVIDED FOR CONVENIENCE AND CUSTOMS PURPOSES, OUR WRITTEN DESCRIPTION OF THE SCOPE OF THESE PROCEEDINGS IS DISPOSITIVE.

3. FOR FURTHER REPORTING PURPOSES, THESE CASES HAVE BEEN ASSIGNED THE FOLLOWING INVESTIGATION NUMBERS:

BRAZIL A-351-817

CANADA A-122-823

MEXICO A-201-809

4. ON AUGUST 9, 1993, THE ITC NOTIFIED THE DEPARTMENT THAT IMPORTS OF CUT-TO-LENGTH CARBON STEEL PLATE FROM BRAZIL, CANADA, AND MEXICO MATERIALLY INJURE THE U.S. INDUSTRY. SEVERAL PARTIES TO THE CANADA CASE HAVE ALLEGED THAT THE DEPARTMENT'S FINAL DETERMINATIONS CONTAINED MINISTERIAL ERRORS WHICH SHOULD BE CORRECTED. HOWEVER, ON JULY 9, 1993, THE DEPARTMENT RECEIVED A REQUEST FOR A BINATIONAL PANEL REVIEW OF ITS DETERMINATIONS. BECAUSE THIS CASE IS CURRENTLY IN LITIGATION, THE DEPARTMENT DOES NOT HAVE JURISDICTION TO CORRECT MINISTERIAL ERRORS AT THIS TIME. THEREFORE, THE U.S. CUSTOMS SERVICE (CUSTOMS) SHALL CONTINUE TO SUSPEND LIQUIDATION OF ALL CUT-TO-LENGTH CARBON STEEL PLATE FROM CANADA, AS WELL AS FROM BRAZIL AND MEXICO, THAT IS ENTERED, OR WITHDRAWN FROM WAREHOUSE, FOR CONSUMPTION, ON OR AFTER FEBRUARY 4, 1993, AND SHALL REQUIRE A CASH DEPOSIT EQUAL TO THE ESTIMATED FINAL MARGINS LISTED BELOW:

MANUFACTURER

PRODUCER/ EXPORTER	CUSTOMS ID NUMBER	MARGIN PERCENTAGE
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BRAZIL

COSIPA	A-351-817-001	109.00
USIMINAS	A-351-817-002	42.08
ALL OTHERS (BRAZIL)	A-351-817-000	75.54

CANADA

IPSCO	A-122-823-002	1.47
STELCO INC.	A-122-823-003	68.70
ALL OTHERS (CANADA)	A-122-823-000	61.95

MEXICO

AHMSA	A-201-809-003	49.25
ALL OTHERS (MEXICO)	A-201-809-000	49.25

5. FOR DEPARTMENT PURPOSES, THE COUNTRY OF ORIGIN OF MERCHANDISE SUBJECT TO THESE ORDERS MAY BE DIFFERENT FROM THE COUNTRY OF ORIGIN AS DETERMINED BY CUSTOMS UNDER THE FOLLOWING SCENARIO: STEEL IS MANUFACTURED IN ONE COUNTRY, AND THEN, IN ANOTHER COUNTRY, UNDERGOES FURTHER PROCESSING WHICH RESULTS IN A CHANGE

IN CLASS OR KIND. IN SUCH CASES, THE DEPARTMENT ALWAYS CONSIDERS THE STEEL TO BE SUBSTANTIALLY TRANSFORMED, AND THE COUNTRY OF ORIGIN FOR PURPOSES OF DETERMINING THE CORRECT ANTIDUMPING DUTY DEPOSIT RATE TO BE THE COUNTRY WHERE THE FURTHER PROCESSING TAKES

PLACE.

HOWEVER, SUCH FURTHER PROCESSING, WHICH THE DEPARTMENT ALWAYS CONSIDERS A SUBSTANTIAL TRANSFORMATION, IS NOT ALWAYS CONSIDERED A SUBSTANTIAL TRANSFORMATION BY CUSTOMS. THEREFORE, THE DEPARTMENT AND CUSTOMS COULD HAVE TWO DIFFERENT COUNTRY OF ORIGIN

DESIGNATIONS. (FOR EXAMPLE, IF A COIL OF STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE IS PRODUCED IN ONE COUNTRY, AND IS CUT TO LENGTH IN ANOTHER, THE DEPARTMENT WOULD CONSIDER THAT A SUBSTANTIAL TRANSFORMATION FOR ANTIDUMPING PURPOSES, BUT CUSTOMS

WOULD NOT.)

THE FOLLOWING IS THE FORMAT FOR CUSTOMS IDENTIFICATION NUMBERS FOR STEEL THAT ORIGINATES IN ONE COUNTRY (INCLUDING THE U.S.) AND

IS FURTHER PROCESSED IN ANOTHER COUNTRY SUCH THAT THE PRODUCT IS CHANGED TO ANOTHER CLASS OR KIND -- AND UNDERGOES A SUBSTANTIAL TRANSFORMATION FOR ANTIDUMPING PURPOSES BUT NOT FOR CUSTOMS PURPOSES -- BEFORE (RE)ENTERING THE U.S. (SEE PARAGRAPH 8 BELOW FOR FURTHER INSTRUCTIONS.):

A-XXX-YYY-ZZZ

A -- ANTIDUMPING

XXX -- THE COUNTRY OF ORIGIN, AS DETERMINED BY CUSTOMS.

YYY -- THE CODE OF THE PRODUCT AS IT ENTERS THE U.S., I.E., REFLECTING ANY FURTHER PROCESSING DONE. FOR THESE "THIRD-COUNTRY" PRODUCTS,

"107" WILL ALWAYS INDICATE COLD-ROLLED CARBON STEEL;

"108" WILL ALWAYS INDICATE CORROSION-RESISTANT CARBON STEEL; AND

"109" WILL ALWAYS INDICATE CUT-TO-LENGTH CARBON STEEL PLATE.

ZZZ -- THE UNIQUE COMPANY CODE WHICH CORRESPONDS TO THE COMPANY THAT SUBSTANTIALLY TRANSFORMED THAT PRODUCT.

6. CUSTOMS SHALL CONTINUE TO SUSPEND LIQUIDATION OF ALL CARBON STEELPLATE THAT IS CUT TO LENGTH IN BRAZIL, CANADA, AND MEXICO, REGARDLESS OF ITS CUSTOMS COUNTRY OF ORIGIN, THAT IS ENTERED, OR WITHDRAWN FORM WAREHOUSE, FOR CONSUMPTION, ON OR AFTER FEBRUARY

4, 1993, AND SHALL REQUIRE A CASH DEPOSIT EQUAL TO THE ESTIMATED FINAL MARGINS LISTED BELOW:

CARBON STEEL CUT-TO-LENGTH PLATE - ANTIDUMPING

CUSTOMS COUNTRY OF ORIGIN

MANUFACTURER/PRODUCER EXPORTER	CUSTOMS ID NUMBER	MARGIN PERCENTAGE
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ARGENTINA

IPSCO (CANADA)	A-357-109-002	1.47
STELCO INC. (CANADA)	A-357-109-003	68.70
ALL OTHERS (CANADA)	A-357-109-020	61.95
AHMSA (MEXICO)	A-357-109-021	49.25
ALL OTHERS (MEXICO)	A-357-109-040	49.25

AUSTRALIA

IPSCO (CANADA)	A-602-109-002	1.47
STELCO INC.(CANADA)	A-602-109-003	68.70
ALL OTHERS (CANADA)	A-602-109-020	61.95
AHMSA (MEXICO)	A-602-109-021	49.25
ALL OTHERS (MEXICO)	A-602-109-040	49.25

AUSTRIA

IPSCO (CANADA)	A-433-109-002	1.47
STELCO INC. (CANADA)	A-433-109-003	68.70
ALL OTHERS (CANADA)	A-433-109-020	61.95
AHMSA (MEXICO)	A-433-109-021	49.25
ALL OTHERS(MEXICO)	A-433-109-040	49.25

BELGIUM

IPSCO (CANADA)	A-423-109-002	1.47
STELCO INC. (CANADA)	A-423-109-003	68.70
ALL OTHERS (CANADA)	A-423-109-020	61.95
AHMSA (MEXICO)	A-423-109-021	49.25
ALL OTHERS (MEXICO)	A-423-109-040	49.25

BRAZIL

IPSCO (CANADA)	A-351-109-002	1.47
STELCO INC. (CANADA)	A-351-109-003	68.70
ALL OTHERS (CANADA)	A-351-109-020	61.95
AHMSA (MEXICO)	A-351-109-021	49.25
ALL OTHERS (MEXICO)	A-351-109-040	49.25

CANADA

AHMSA (MEXICO)	A-122-109-021	49.25
ALL OTHERS (MEXICO)	A-122-109-040	49.25

FINLAND

IPSCO (CANADA)	A-405-109-002	1.47
STELCO INC.(CANADA)	A-405-109-003	68.70
ALL OTHERS (CANADA)	A-405-109-020	61.95
AHMSA (MEXICO)	A-405-109-021	49.25
ALL OTHERS (MEXICO)	A-405-109-040	49.25

FRANCE

IPSCO (CANADA)	A-427-109-002	1.47
STELCO INC. (CANADA)	A-427-109-003	68.70
ALL OTHERS (CANADA)	A-427-109-020	61.95

AHMSA (MEXICO)	A-427-109-021	49.25
ALL OTHERS (MEXICO)	A-427-109-040	49.25

GERMANY

IPSCO (CANADA)	A-428-109-002	1.47
STELCO INC. (CANADA)	A-428-109-003	68.70
ALL OTHERS (CANADA)	A-428-109-020	61.95
AHMSA (MEXICO)	A-428-109-021	49.25
ALL OTHERS (MEXICO)	A-428-109-040	49.25

ITALY

IPSCO (CANADA)	A-475-109-002	1.47
STELCO INC.(CANADA)	A-475-109-003	68.70
ALL OTHERS (CANADA)	A-475-109-020	61.95
AHMSA (MEXICO)	A-475-109-021	49.25
ALL OTHERS (MEXICO)	A-475-109-040	49.25

JAPAN

IPSCO (CANADA)	A-588-109-002	1.47
STELCO INC.(CANADA)	A-588-109-003	68.70
ALL OTHERS (CANADA)	A-588-109-020	61.95
AHMSA (MEXICO)	A-588-109-021	49.25
ALL OTHERS (MEXICO)	A-588-109-040	49.25

KOREA, REPUBLIC OF

ISPCO (CANADA)	A-580-109-002	1.47
STELCO INC.(CANADA)	A-580-109-003	68.70
ALL OTHERS (CANADA)	A-580-109-020	61.95

AHMSA (MEXICO)	A-580-109-021	49.25
ALL OTHERS (MEXICO)	A-580-109-040	49.25

MEXICO

IPSCO (CANADA)	A-201-109-002	1.47
STELCO INC. (CANADA)	A-201-109-003	68.70
ALL OTHERS (CANADA)	A-201-109-020	61.95

NETHERLANDS

IPSCO (CANADA)	A-421-109-002	1.47
STELCO INC. (CANADA)	A-421-109-003	68.70
ALL OTHERS (CANADA)	A-421-109-020	61.95

AHMSA (MEXICO)	A-421-109-021	49.25
ALL OTHERS (MEXICO)	A-421-109-040	49.25

NEW ZEALAND

IPSCO (CANADA)	A-614-109-002	1.47
STELCO INC.(CANADA)	A-614-109-003	68.70
ALL OTHERS (CANADA)	A-614-109-020	61.95

AHMSA (MEXICO)	A-614-109-021	49.25
ALL OTHERS (MEXICO)	A-614-109-040	49.25

POLAND

IPSCO (CANADA)	A-455-109-002	1.47
STELCO INC.(CANADA)	A-455-109-003	68.70
ALL OTHERS (CANADA)	A-455-109-020	61.95

AHMSA (MEXICO)	A-455-109-021	49.25
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ALL OTHERS (MEXICO)	A-455-109-040	49.25
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ROMANIA

IPSCO (CANADA)	A-485-109-002	1.47
STELCO INC.(CANADA)	A-485-109-003	68.70
ALL OTHERS (CANADA)	A-485-109-020	61.95
AHMSA (MEXICO)	A-485-109-021	49.25
ALL OTHERS (MEXICO)	A-485-109-040	49.25

SPAIN

ISPCO (CANADA)	A-470-109-002	1.47
STELCO INC.(CANADA)	A-470-109-003	68.70
ALL OTHERS (CANADA)	A-470-109-020	61.95
AHMSA (MEXICO)	A-470-109-021	49.25
ALL OTHERS (MEXICO)	A-470-109-040	49.25

SWEDEN

ISPCO (CANADA)	A-401-109-002	1.47
STELCO INC.(CANADA)	A-401-109-003	68.70
ALL OTHERS (CANADA)	A-401-109-020	61.95
AHMSA (MEXICO)	A-401-109-021	49.25
ALL OTHERS (MEXICO)	A-401-109-040	49.25

UNITED KINGDOM

IPSCO (CANADA)	A-412-109-002	1.47
STELCO INC.(CANADA)	A-412-109-003	68.70
ALL OTHERS (CANADA)	A-412-109-020	61.95

AHMSA (MEXICO)	A-412-109-021	49.25
ALL OTHERS (MEXICO)	A-412-109-040	49.25

UNITED STATES

IPSCO (CANADA)	A-100-109-002	1.47
STELCO INC.(CANADA)	A-100-109-003	68.70
ALL OTHERS (CANADA)	A-100-109-020	61.95

AHMSA (MEXICO)	A-100-109-021	49.25
ALL OTHERS (MEXICO)	A-100-109-040	49.25

NOTE: THE PRECEDING LIST IS NOT EXHAUSTIVE. SHOULD A CUSTOMS OFFICER PROCESS AN ENTRY FOR A COMBINATION NOT LISTED ABOVE, OR IF THERE ANY OTHER QUESTIONS REGARDING THIS MATTER BY CUSTOMS OFFICERS, PLEASE CONTACT THE TRADE COMPLIANCE DIVISION, ANTIDUMPING/COUNTERVAILING DUTY BRANCH, VIA E-MAIL USING ATTRIBUTE "HQ OAB." OTHER INTERESTED PARTIES SHOULD CONTACT EDWARD YANG OR RICHARD WEIBLE, OFFICE OF AGREEMENTS COMPLIANCE, IMPORT ADMINISTRATION,INTERNATIONAL TRADE ADMINISTRATION, U.S. DEPARTMENT OF COMMERCEAT (202) 482-3793.

7. IN GENERAL, THE DEPOSIT RATE REQUIRED ON EACH ENTRY WILL BE THAT ASSIGNED TO THE MANUFACTURER OF THE FLAT-ROLLED STEEL PRODUCT. FOR AN ENTRY TO BE ACCEPTED, THE NAME OF THE MANUFACTURER MUST BE CLEARLY IDENTIFIED.

8. IN THE EVENT THAT THE EXPORTER IS NOT THE MANUFACTURER (E.G., THE EXPORTER IS A RESELLER, TRADING COMPANY, OR STEEL SERVICE CENTER), THESE INSTRUCTIONS SHOULD BE FOLLOWED:

A) IF THE EXPORTER AND THE MANUFACTURER ARE IN THE SAME COUNTRY, AND THAT COUNTRY IS SUBJECT TO THESE ORDERS, THE PROCEDURE SHOULD

BE AS FOLLOWS:

1) IF THE UNRELATED EXPORTER PERFORMS NO FURTHER PROCESSING

BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

2) IF THE THE UNRELATED EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOESNOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOTWIDE, ONE-INCH THICK PLATE AND SLITS IT INTO TWO, TWO-FOOT WIDE PLATES -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3) IF THE UNRELATED EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE, AND CUTS THE STEEL TO LENGTH -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

NOTE: IN THE EVENT THAT THE EXPORTER IS RELATED TO THE MANUFACTURER, THEN A DEPOSIT EQUAL TO THE RATE ASSIGNED TO THE MANUFACTURER WILL BE REQUIRED. THE CORRECT RATE WILL BE THAT FOR THE CLASS OR KIND TO WHICH THE PRODUCT BELONGS AT THE TIME THAT IT IS ENTERED, OR WITHDRAWN FROM WAREHOUSE, FOR CONSUMPTION. IF THE EXPORTER HAS FURTHER PROCESSED THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER, AND IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT, THE "ALL OTHERS" RATE WILL

APPLY.

B. IF THE EXPORTER IS IN ONE SUBJECT COUNTRY AND THE MANUFACTURER IS IN A DIFFERENT SUBJECT COUNTRY, THE PROCEDURE SHOULD BE AS FOLLOWS:

1) IF THE EXPORTER PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

2) IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE, ONE-INCH THICK PLATE AND SLITS IT INTO TWO, TWO-FOOT SIDE PLATES -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3) IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE, AND CUTS THE STEEL TO LENGTH -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

C) IF THE EXPORTER IS IN A COUNTRY SUBJECT TO THESE ORDERS, BUT THE MANUFACTURER IS NOT, THE PROCEDURE SHOULD BE AS FOLLOWS:

1) IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.), NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

2) IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.) -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE, ONE-INCH THICK PLATE AND SLITS IT INTO TWO, TWO-FOOT WIDE PLATES -- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

3) IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.) -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE, AND CUTS THE STEEL TO LENGTH -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

D) IF THE EXPORTER IS NOT IN A COUNTRY SUBJECT TO THESE ORDERS, BUT THE MANUFACTURER IS, THE PROCEDURE SHOULD BE AS FOLLOWS:

1) IF THE EXPORTER PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE

ASSIGNED SPECIFICALLY TO IT.

2)IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE, ONE-INCH THICK PLATE AND SLITS IT INTO TWO, TWO-FOOT WIDE PLATES -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3)IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE, AND CUTS THE STEEL TO LENGTH -- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

9. IF MERCHANDISE ENTERED UNDER 9802.00.60 (AMERICAN GOODS RETURNED), HAS BEEN TRANSFORMED INTO A CLASS OR KIND OF MERCHANDISE SUBJECT TO THESE ORDERS IN A COUNTRY SUBJECT TO THESE ORDERS, A DEPOSIT ON THE FULL VALUE OF THE PRODUCT WILL BE REQUIRED. THE DEPOSIT WILL BE EQUAL TO THE FOREIGN MANUFACTURER'S ASSIGNED RATE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

10. FOR THE PURPOSES OF ANTIDUMPING AND COUNTERVAILING DUTIES, GALVANIZING CONSTITUTES SUBSTANTIAL TRANSFORMATION (E.G., U.S. ORIGIN STEEL PLATE GALVANIZED IN ANOTHER COUNTRY IS SUBJECT TO THE AD VALOREM CASH DEPOSIT FOR CORROSION-RESISTANT STEEL FROM THE SUBJECT COUNTRY).

11. MERCHANDISE IS "TOLLED" WHEN THE ORIGINAL MANUFACTURER HAS THE MERCHANDISE FURTHER PROCESSED BY ANOTHER COMPANY WHILE RETAINING TITLE TO, OR OWNERSHIP OF, THE MERCHANDISE. U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS WILL BE TREATED IN THE FOLLOWING MANNER:

A) FOR U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS, BUT FOR WHICH THE TOLLING PROCESS DOES NOT TRANSFORM THE PRODUCT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT RECEIVED FROM THE U.S. MANUFACTURER -- E.G., IF A FOREIGN "TOLLER" IMPORTS A FOUR-FOOT WIDE, ONE-INCH THICK FROM THE U.S. AND SLITS THE PLATE INTO TWO, TWO-FOOT WIDE PLATES-- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

B) FOR U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS, AND FOR WHICH THE TOLLING PROCESS DOES TRANSFORM THE MERCHANDISE INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT RECEIVED FROM THE U.S. MANUFACTURER -- E.G., IF A FOREIGN "TOLLER" IMPORTS FROM THE U.S. A COIL OF HOT-ROLLED STEEL OF A THICKNESS OF 4.75 MILLIMETERS OR MORE, AND CUTS THE STEEL TO LENGTH --THE DEPOSIT REQUIRED WILL BE ON THE FULL VALUE OF THE NEW PRODUCT AND WILL BE EQUAL TO THAT OF THE "TOLLER" OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE "TOLLER" HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

12. IF THERE ARE ANY QUESTIONS REGARDING THIS MATTER BY CUSTOMS OFFICERS, PLEASE CONTACT VIA E-MAIL, THROUGH THE REGIONAL ANTIDUMPING/COUNTERVAILING DUTY COORDINATOR, THE TRADE COMPLIANCE DIVISION, ANTIDUMPING/COUNTERVAILING DUTY BRANCH SUING ATTRIBUTE "HQ OAB." OTHER INTERESTED PARTIES SHOULD CONTACT

EDWARD YANG OR RICHARD WEIBLE, OFFICE OF AGREEMENTS COMPLIANCE,
IMPORT ADMINISTRATION, INTERNATIONAL TRADE ADMINISTRATION,U.S.
DEPARTMENT OF COMMERCE AT (202) 482-3793.

13. THERE ARE NO RESTICTIONS ON THE RELEASE OF THIS INFORMATION.

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Company Details

*Party Indicator Value:

I = Importer, M = Manufacturer, E = Exporter, S = Sold To Party