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PERIOD OF REVIEW: TO

PERIOD COVERED: 03/08/1994 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 ORDERS ON CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM VARIOUS COUNTRIES

MESSAGE NO: 4067111 DATE: 03 08 1994

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CASES: A - 602 - 803 A - 122 - 822

A - 588 - 826 - -

- - - -

PERIOD COVERED: 03 08 1994 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 ORDERS ON CERTAIN
CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS 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. THE DEPARTMENT ALSO AMENDED ITS FINAL DETERMINATION ON CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM JAPAN ON AUGUST 19, 1993. THESE INSTRUCTIONS CLARIFY THOSE PREVIOUSLY ISSUED. PARAGRAPHS 2-5 OF THESE INSTRUCTIONS ARE UNALTERED FROM THE PREVIOUS INSTRUCTIONS.

2. ONE OF THE FOUR CLASSES OR KINDS OF PRODUCTS COVERED BY THESE ORDERS IS CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS. THESE PRODUCTS INCLUDE FLAT-ROLLED CARBON STEEL PRODUCTS, OF RECTANGULAR SHAPE, EITHER CLAD, PLATED, OR COATED WITH CORROSION-RESISTANT METALS SUCH AS ZINC, ALUMINUM, OR ZINC-, ALUMINUM-, NICKEL- OR IRON-BASED ALLOYS, (WHETHER OR NOT CORRUGATED OR PAINTED, VARNISHED OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES IN ADDITION TO THE METALLIC COATING, IN COILS, (WHETHER OR NOT IN SUCCESSIVELY SUPERIMPOSED LAYERS) AND OF A WIDTH OF 0.5 INCH OR GREATER, OR IN STRAIGHT LENGTHS WHICH, IF OR A THICK LESS THAN 4.75 MILLIMETERS, ARE OF A WIDTH OF 0.5 INCH OR GREATER AND WHICH MEASURES AT LEAST 10 TIMES THE THICKNESS OR IF OF A THICKNESS OF 4.75 MILLIMETERS OR MORE ARE OF A WIDTH WHICH EXCEEDS 150 MILLIMETERS AND MEASURES AT LEAST TWICE THE THICKNESS, AS CURRENTLY CLASSIFIABLE IN THE HTS UNDER ITEM

NUMBERS 7210.31.0000, 7210.39.0000, 7210.41.0000, 7210.49.0030, 7210.49.0090, 7210.60.0000, 7210.70.6030, 7210.70.6060, 7210.70.6090, 7210.90.1000, 7210.90.6000, 7210-90.9000, 7212.21.0000, 7212.29.0000, 7212.30.1030, 7212.30.1090, 7212.30.3000, 7212.30.5000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7212.60.0000, 7215.90.1000, 7215.90.5000, 7217.12.1000, 7217.13.1000, 7217.19.1000, 7217.19.5000, 7217.22.5000, 7217.23.5000, 7217.29.1000, 7217.29.5000, 7217.32.5000, 7217.33.5000, 7217.39.1000, AND 7217.39.5000.

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 ARE

FLAT-ROLLED STEEL PRODUCTS EITHER PLATED OR COATED, WITH TIN, LEAD, CHROMIUM AND CHROMIUM OXIDES ("TERNE PLATE"), OR BOTH CHROMIUM AND CHROMIUM OXIDES ("TIN-FREE"), WHETHER OR NOT PAINTED, VARNISHED OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES IN ADDITION TO THE METALLIC COATING. ALSO EXCLUDED FROM THESE ORDERS ARE CERTAIN CLAD STAINLESS FLAT-ROLLED PRODUCTS, WHICH ARE THREE-LAYERED CORROSION-RESISTANT CARBON STEEL FLAT-ROLLED PRODUCTS LESS THAN 4.75 MILLIMETERS IN COMPOSITE THICKNESS THAT CONSIST OF A CARBON STEEL FLAT-ROLLED PRODUCT CLAD ON BOTH SIDES WITH STAINLESS STEEL IN A 20-60-20 PERCENT RATIO.

IN ITS FINAL DETERMINATION, THE INTERNATIONAL TRADE COMMISSION (ITC) DIVIDED THE ABOVE DESCRIPTION INTO CORROSION-RESISTANT CLAD PLATE AND CORROSION-RESISTANT (OTHER THAN CLAD PLATE). THE ITC DEFINED CORROSION-RESISTANT CLAD PLATE AS CLAD PRODUCTS IN STRAIGHT LENGTHS OF 0.1875 INCH OR MORE IN COMPOSITE THICKNESS AND OF A WIDTH WHICH EXCEEDS 150 MILLIMETERS AND MEASURES AT LEAST TWICE THE THICKNESS. THE ITC EXCLUDED CORROSION-RESISTANT CLAD PLATE FROM THESE ORDERS.

ALTHOUGH THE HTS SUBHEADINGS ARE PROVIDED FOR CONVENIENCE AND CUSTOMS (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:

AUSTRALIA	A-602-803	CANADA	A-122-822
BRAZIL	A-351-816	MEXICO	A-201-808
JAPAN	A-588-826		

4. ON AUGUST 9, 1993, THE ITC NOTIFIED THE DEPARTMENT THAT

IMPORTS OF CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM BRAZIL AND MEXICO NEITHER MATERIALLY INJURE NOR THREATEN TO INJURE THE U.S. INDUSTRY. THEREFORE, CUSTOMS SHALL TERMINATE THE SUSPENSION OF LIQUIDATION PREVIOUSLY ORDERED ON CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM BRAZIL AND MEXICO, AND RELEASE OR REFUND ANY CASH DEPOSIT OR BOND COLLECTED WITH RESPECT TO CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM BRAZIL AND MEXICO.

5. ON AUGUST 9, 1993, THE ITC NOTIFIED THE DEPARTMENT THAT IMPORTS OF CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM AUSTRALIA, CANADA, AND JAPAN 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, CUSTOMS SHALL CONTINUE TO SUSPEND LIQUIDATION OF ALL ENTRIES OF CORROSION-RESISTANT STEEL FLAT PRODUCTS FROM CANADA, AS WELL AS FROM AUSTRALIA AND JAPAN, AND SHALL REQUIRE A CASH DEPOSIT OR POSTING OF A BOND EQUAL TO THE WEIGHTED-AVERAGE MARGIN PERCENTAGES LISTED BELOW:

MANUFACTURER/PRODUCER EXPORTER	CUSTOMS ID NUMBER	MARGIN PERCENTAGE/
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AUSTRALIA

BHP	A-602-803-001	24.96
ALL OTHERS	A-602-803-000	24.96

CANADA

DOFASCO INC.	A-122-822-001	10.89
STELCO INC.	A-122-822-003	28.27
ALL OTHERS	A-122-822-000	22.29

JAPAN

KAWASAKISTEEL CORP.	A-588-826-004	36.41
NIPPONSTEEL CORP.	A-588-826-002	36.41
ALL OTHERS	A-588-826-000	36.41

6. FOR DEPARTMENT OF COMMERCE (DOC) 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 DOC 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 DOC ALWAYS CONSIDERS A SUBSTANTIAL TRANSFORMATION, IS NOT ALWAYS CONSIDERED A SUBSTANTIAL TRANSFORMATION BY CUSTOMS. THEREFORE, THE DOC AND CUSTOMS COULD HAVE TWO DIFFERENT COUNTRY OF ORIGIN DESIGNATIONS. (FOR EXAMPLE, IF A RESELLER PURCHASES A COIL OF HOT-ROLLED CARBON STEEL AND GALVANIZES IT, THE DOC WOULD CONSIDER THAT A SUBSTANTIAL TRANSFORMATION FOR ANTIDUMPING PURPOSES, BUT DEPENDING ON THE METALLURGICAL CHANGES THE GALVANIZING PRODUCED, CUSTOMS MIGHT 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 9 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 "THIRDCOUNTRY" 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.

7. THEREFORE, CUSTOMS SHALL CONTINUE TO SUSPEND LIQUIDATION OF ALL CARBON STEEL FLAT PRODUCTS THAT ARE GALVANIZED OR COATED WITH ANOTHER CORROSION-RESISTANT METAL OR ALLOY IN AUSTRALIA, CANADA, OR JAPAN, 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:

CUSTOMS COUNTRY OF ORIGIN

MANUFACTURER/PRODUCER EXPORTER	CUSTOMS ID NUMBER	MARGIN PERCENTAGE
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ARGENTINA

DOFASCO INC. (CANADA)	A-357-108-001	10.89
STELCO INC. (CANADA)	A-357-108-003	28.27
ALL OTHERS (CANADA)	A-357-108-020	22.29

AUSTRALIA

DOFASCO INC. (CANADA)	A-602-108-001	10.89
STELCO INC. (CANADA)	A-602-108-003	28.27
ALL OTHERS (CANADA)	A-602-108-020	22.29

AUSTRIA

DOFASCOINC. (CANADA)	A-433-108-001	10.89
STELCOINC. (CANADA)	A-433-108-003	28.27
ALLOTHERS (CANADA)	A-433-108-020	22.29

BELGIUM

DOFASCO INC. (CANADA)	A-423-108-001	10.89
STELCO INC. (CANADA)	A-423-108-003	28.27
ALL OTHERS (CANADA)	A-423-108-020	22.29

BRAZIL

DOFASCO INC. (CANADA)	A-351-108-001	10.89
STELCO INC. (CANADA)	A-351-108-003	28.27
ALL OTHERS (CANADA)	A-351-108-020	22.29

FINLAND

DOFASCOINC. (CANADA)	A-405-108-001	10.89
STELCOINC.(CANADA)	A-405-108-003	28.27
ALLOTHERS (CANADA)	A-405-108-020	22.29

FRANCE

DOFASCO INC. (CANADA)	A-427-108-001	10.89
STELCO INC. (CANADA)	A-427-108-003	28.27
ALL OTHERS (CANADA)	A-427-108-020	22.29

GERMANY

DOFASCO INC. (CANADA)	A-428-108-001	10.89
STELCO INC. (CANADA)	A-428-108-003	28.27
ALL OTHERS (CANADA)	A-428-108-020	22.29

ITALY

DOFASCO INC. (CANADA)	A-475-108-001	10.89
STELCO INC. (CANADA)	A-475-108-003	28.27
ALL OTHERS (CANADA)	A-475-108-020	22.29

JAPAN

DOFASCO INC. (CANADA)	A-588-108-001	10.89
STELCO INC. (CANADA)	A-588-108-003	28.27
ALL OTHERS (CANADA)	A-588-108-020	22.29

KOREA, REPUBLIC OF

DOFASCO INC. (CANADA)	A-580-108-001	10.89
STELCO INC. (CANADA)	A-580-108-003	28.27
ALL OTHERS (CANADA)	A-580-108-020	22.29

MEXICO

DOFASCO INC. (CANADA)	A-201-108-001	10.89
STELCO INC. (CANADA)	A-201-108-003	28.27

ALL OTHERS (CANADA)	A-201-108-020	22.29
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NETHERLANDS

DOFASCO INC.(CANADA)	A-421-108-001	10.89
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STELCO INC. (CANADA)	A-421-108-003	28.27
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ALL OTHERS (CANADA)	A-421-108-020	22.29
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NEW ZEALAND

DOFASCO INC.(CANADA)	A-614-108-001	10.89
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STELCO INC. (CANADA)	A-614-108-003	28.27
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ALL OTHERS (CANADA)	A-614-108-020	22.29
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POLAND

DOFASCO INC. (CANADA)	A-455-108-001	10.89
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STELCO INC. (CANADA)	A-455-108-003	28.27
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ALL OTHERS (CANADA)	A-455-108-020	22.29
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ROMANIA

DOFASCO INC. (CANADA)	A-485-108-001	10.89
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STELCO INC. (CANADA)	A-485-108-003	28.27
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ALL OTHERS (CANADA)	A-485-108-020	22.29
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SPAIN

DOFASCO INC. (CANADA)	A-470-108-001	10.89
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STELCO INC. (CANADA)	A-470-108-003	28.27
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ALL OTHERS (CANADA)	A-470-108-020	22.29
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SWEDEN

DOFASCO INC. (CANADA)	A-401-108-001	10.89
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STELCO INC. (CANADA)	A-401-108-003	28.27
ALL OTHERS (CANADA)	A-401-108-020	22.29

UNITED KINGDOM

DOFASCO INC. (CANADA)	A-412-108-001	10.89
STELCO INC. (CANADA)	A-412-108-003	28.27
ALL OTHERS (CANADA)	A-412-108-020	22.29

UNITED STATES

DOFASCO INC. (CANADA)	A-100-108-001	10.89
STELCO INC. (CANADA)	A-100-108-003	28.27
ALL OTHERS (CANADA)	A-100-108-020	22.29

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 COMMERCE AT (202) 482-3793.

8. 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.

9. IN THE EVEN TTHAT 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 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 COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- 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 CARBON STEEL AND GALVANIZES IT -- 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 COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- 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 AND GALVANIZES IT -- 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 COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- 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 AND GALVANIZES IT--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 COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- 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 AND GALVANIZES IT--NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

10. 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. THIS 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.

11. 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).

12. 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 COIL OF CORROSION-RESISTANT CARBON STEEL FROM THE U.S. AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- 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 AND GALVANIZES IT -- 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.

13. IN THE CASE OF CORROSION-RESISTANT SUBJECT MERCHANDISE FROM DNN, A CANADIAN GALVANIZER OF STEEL PRODUCTS WHICH IS RELATED TO DOFASCO, A DEPOSIT IS REQUIRED EQUAL TO DOFASCO'S ESTIMATED

MARGIN OF DUMPING, 10.89 PERCENT, ON THE FULL VALUE OF DNN MERCHANDISE.

14. IN THE CASE OF CORROSION-RESISTANT SUBJECT MERCHANDISE FROM SOREVCO, INC., A RELATED PARTY TO DOFASCO, A DEPOSIT IS REQUIRED EQUAL TO DOFASCO'S ESTIMATED MARGIN OF DUMPING, 10.89 PERCENT, ON THE FULL VALUE OF SOREVCO MERCHANDISE.

15. 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 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 COMMERCE AT (202) 482-3793.

16. 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