

**AWPA**  
American Wire Producers Association

American Wire Producers Association

PO Box 151387

Alexandria, VA 22315

March 29, 2016

**GLOBAL STEEL INDUSTRY SITUATION  
DOCKET No. USTR-2016-0001**

**VIA ELECTRONIC SUBMISSION**

Mr. James Sanford  
Assistant U.S. Trade Representative  
for Small Business, Market Access  
and Industrial Competitiveness  
Office of the United States Trade Representative  
600 Seventeenth Street, NW  
Washington, DC 20508

Re: *Comments regarding the Global Steel Industry Situation  
and Its Impact on the U.S. Steel Industry and Market  
(Docket Number USTR-2016-0001)*

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Dear Mr. Sanford:

The American Wire Producers Association (“AWPA”) respectfully submits these comments regarding the situation of the global steel industry and recommendations for policies and actions to address issues such as overcapacity and unfair trade practices on the part of countries which trade with the United States.<sup>1</sup>

The AWPA is a trade association which represents a crucial but often overlooked segment of the U.S. steel industry—manufacturers of carbon, stainless, and other alloy steel wire and wire products. The 88 members of the AWPA produce more than 80 percent of the total U.S. output of these products. They employ more than 22,000 American workers in over 215 plants and facilities located in 35 states, and annual sales of these companies exceed \$11 billion.

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<sup>1</sup> *Request for Comments and Notice of Public Hearing Concerning Policy Recommendations on the Global Steel Industry Situation and Impact on U.S. Steel Industry and Market*, 81 Fed. Reg. 11,638 (March 4, 2016).

WIRE IS EVERYWHERE

office 703.299.4434 / email [info@awpa.org](mailto:info@awpa.org) / [www.awpa.org](http://www.awpa.org)

American manufacturers of steel wire and wire products are entrepreneurial and committed to maintaining their competitive market position despite heavy import pressure in their product sectors as well as in the downstream segments of U.S. manufacturing that purchase their products as inputs. The American wire industry is one of the most globally competitive segments of the U.S. steel industry, and AWPA members pride themselves on their high levels of productivity and constant reinvestment in the latest technology and equipment. AWPA members are equally proud of the tens of thousands of good-paying jobs that they provide to hard-working Americans in hundreds of communities throughout the United States.

AWPA members manufacture a nearly infinite variety of products which are used throughout the U.S. economy as finished products or intermediate inputs for further processing. These products include wire for residential and commercial construction applications; agricultural fencing; wire garment hangers for dry cleaners and uniform rental companies; innerspring units for beds and other furniture; threaded rod for commercial building construction; nails and staples; industrial fasteners for making everything from aircraft to automobiles to power tools; welding wire for gas and water transmission pipes; wire rope for elevators and cranes; prestressed wire strand and wire mesh for highway construction and other public works; wire for shelving and supermarket carts; bolts for securing light poles and signs; and stainless steel wire for springs, medical devices, and a variety of applications. The list goes on and on; there is virtually no aspect of everyday life that is not affected by steel wire and wire products made by AWPA members.

Although commentators and the press invariably focus on the impact of global trade issues on the basic steel sector,<sup>2</sup> overcapacity and subsidization of production and exports by foreign steel industries—particularly in China but also in other countries—have had disastrous consequences for downstream steel producers in the United States, including domestic wire and wire products manufacturers. Since 2001, imports of steel wire and wire products from China have surged as the result of China’s mercantilist policies, currency manipulation, subsidy programs, and unfair trade practices.<sup>3</sup> By 2015, drawn wire imports from China had increased by 368 percent; wire rope by 282 percent; wire strand by an astonishing 2,206 percent; wire springs by 253 percent; woven wire fabric by an incredible 5,091 percent; wire grill, netting and fencing by 74 percent; nails and staples by 149 percent; industrial fasteners by 186 percent; and chains and parts by 177 percent.

The following examples—from just a few segments of the American wire and wire products industry—highlight the pernicious impact of Chinese overcapacity, subsidization, and other unfair trade practices on our members’ product lines:

- (1) **GARMENT HANGERS.** This is a product for which there is almost no market in China. Nevertheless, with its vast production capacity and predatory pricing schemes, China targeted the U.S. market for steel wire hangers—the world’s largest by a substantial margin. In the span of just six years, imports of garment hangers from China went from zero to more than 2.5 billion in 2007, nearly destroying a once-vibrant and competitive American industry. A successful antidumping proceeding resulted in margins as high as 187.25 percent against unfairly-traded imports of Chinese hangers, but Chinese exporters undermined the effectiveness of that relief through pervasive transshipment of Chinese-made hangers through third countries, the falsification of commercial

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<sup>2</sup> See Exhibits 1 and 2.

<sup>3</sup> See Exhibit 3.

and customs documents, and other circumvention schemes and forms of duty evasion.<sup>4</sup>

- (2) **STEEL GRATING.** The imbalance between the magnitude of Chinese overcapacity and the size of the U.S. market is illustrated in dramatic fashion by a comparison of Chinese global exports of 4,797,998 metric tons of steel grating in 2014 and U.S. apparent consumption of steel grating of 170,993 metric tons during the same year.<sup>5</sup> Thus, Chinese exports of steel grating were 28 times greater than the entire U.S. market for this wire product and 29 times greater than U.S. production in 2014.<sup>6</sup>
- (3) **PRESTRESSED CONCRETE (PC) STEEL WIRE STRAND.** China has developed an enormous capacity to produce this product, and Chinese exports have flooded world markets and nearly overwhelmed the U.S. industry. According to the U.S. International Trade Commission (“ITC”), China’s exports of strand products ranged from 770,000 tons in 2010 to over 1,000,000 net tons in 2014.<sup>7</sup> The most recent data show U.S. production of PC strand in the range of 280,000 to 300,000 net tons and U.S. apparent consumption at less than 500,000 net tons.<sup>8</sup> Thus, Chinese exports alone are greater than the U.S. industry’s output and equivalent to the overall size of the U.S. market for this wire product.
- (4) **STEEL NAILS.** In 2014, China’s exports of nails amounted to 1.2 million short tons or more than eight times the output of the U.S. nail industry and almost twice the size of the entire U.S. market in that year.<sup>9</sup>

AWPA members in these and other sectors of the wire and wire products industry have taken action under the antidumping (“AD”) and countervailing duty (“CVD”) laws to try to respond to the surge of unfairly-priced and subsidized imports from China into the U.S. market.

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<sup>4</sup> See Exhibit 4 at 49–52; see also *id.* at 9–17, 31–33, and 53–54. See Exhibit 5.

<sup>5</sup> *Certain Steel Grating from China*, Inv. Nos. 701-TA-465 and 731-TA-1161 (Review), USITC Pub. 4578 (October 2015) at I-11 and I-14.

<sup>6</sup> *Id.* at I-8 and I-14.

<sup>7</sup> *Prestressed Concrete Steel Wire Strand from China*, Inv. Nos. 701-TA-464 and 731-TA-1160 (Review), USITC Pub. 4569 (September 2015) at I-18.

<sup>8</sup> *Id.* at I-11 and I-14.

<sup>9</sup> *Certain Steel Nails from Korea, Malaysia, Oman, Taiwan, and Vietnam*, Inv. Nos. 701-TA-521 and 731-TA-1252–1255 and 1257 (Final), USITC Pub. 4541 (July 2015) at III-3, IV-13, and VII-8.

Since 2007, AD and CVD orders have been issued on eight wire products, including the four highlighted above as well as uncovered innerspring units, threaded rod, wire shelving, and prestressed concrete rail tie wire.<sup>10</sup> Triple-digit dumping margins are not uncommon,<sup>11</sup> and the U.S. Department of Commerce (“Commerce”) has found that Chinese producers and exporters generally benefit from a wide range of subsidy programs, including subsidies that are conditioned on the exportation of products.<sup>12</sup> However, with literally hundreds and even thousands of different wire products subject to intense pressure from imports, the traditional AD and CVD remedies—while important—can provide only limited relief. Moreover, wire and wire products are incorporated into finished goods which, when imported, further diminish the market for our members’ products. For example, garden tools, fans, office equipment, gas grills, and picture frames are just a few consumer products which contain steel wire, and when these products are no longer made in the United States as the result of the same unfair trade practices that directly affect the wire inputs, American wire producers have lost another market segment.

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<sup>10</sup> See Exhibit 6.

<sup>11</sup> *Id.*

<sup>12</sup> *Certain Steel Grating from the People’s Republic of China: Final Affirmative Countervailing Duty Determination*, 75 Fed. Reg. 32,362 (June 8, 2010) at 32,365 (12 subsidy programs); *Pre-Stressed Concrete Steel Wire Strand from the People’s Republic of China: Final Affirmative Countervailing Duty Determination*, 75 Fed. Reg. 28,557 (May 21, 2010) and *Pre-Stressed Concrete Steel Wire Strand from the People’s Republic of China: Issues and Decision Memorandum for Final Determination* (May 14, 2010) at 18–42 (25 subsidy programs); *Certain Kitchen Shelving and Racks from the People’s Republic of China: Final Affirmative Countervailing Duty Determination*, 74 Fed. Reg. 37,012 (July 27, 2009) and *Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Certain Kitchen Appliance Shelving and Racks from the People’s Republic of China* (July 20, 2009) at 11–18 (6 subsidy programs).

Even if imported wire and wire products are subject to an AD or CVD order, the domestic industry may be denied effective relief as the result of widespread schemes by foreign suppliers and their U.S. importers to evade the applicable duties.<sup>13</sup> These schemes—all of which constitute customs fraud—include the following:

- (1) **TRANSSHIPMENT OF GOODS THROUGH THIRD COUNTRIES.** Chinese-origin goods subject to AD and/or CVD orders are shipped to a third country which is not subject to such orders. Sales and import documents are falsified to indicate that the third country is the source of the goods, and the goods subsequently enter the United States without the payment of applicable AD and/or CVD duties.
- (2) **FALSIFICATION OF THE COUNTRY OF ORIGIN WITHOUT TRANSSHIPMENT.** This brazen scheme is similar to transshipment except that the goods are shipped directly from China to the United States and never pass through any third country. Sales and import documents falsely indicate origination in a third country in order to avoid the assessment of applicable AD and/or CVD duties.
- (3) **MISCLASSIFICATION OF GOODS.** The tariff codes and/or descriptions of the goods are falsified to indicate merchandise which is not subject to AD or CVD orders. Again, the goods enter the United States without the payment of applicable AD and/or CVD duties.
- (4) **UNDERVALUATION OF GOODS.** This scheme unlawfully reduces an importer's liability because AD and CVD duties are generally calculated on an *ad valorem* (percentage) basis.
- (5) **ATTRIBUTION OF GOODS TO COMPANIES WITH A LOW OR NO AD/CVD RATE.** This scheme involves either shipping goods through a company with an AD/CVD rate which is lower than the producer's rate or simply falsifying the documents to reflect the name of such company. In either case, the United States is defrauded of the applicable duties.

U.S. wire and wire products manufacturers have submitted information about such evasion schemes to U.S. Customs and Border Protection ("CBP") through the e-Allegation

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<sup>13</sup> See Exhibit 7.

program, in meetings with officials at CBP Headquarters in Washington, and in visits with CBP inspectors at the ports. For example, the domestic industry which manufactures steel wire garment hangers has submitted 30 e-Allegations to CBP with documentary support, showing transshipment of hangers from China via third countries and misclassification of Chinese hangers as nonsubject merchandise in order to evade the assessment of applicable AD duties.<sup>14</sup> In another case, the largest American producer of uncovered innerspring units used in the manufacture of mattresses filed and won an AD case against China but was deprived of effective relief when imports of Chinese-origin innerspring units were transshipped through Hong Kong to the United States. A report prepared by a private investigator confirmed that there was no evidence of any production of these units in Hong Kong. In addition, during the course of annual administrative reviews of AD and CVD orders on products from China, Commerce often finds evidence of apparent violations of the trade laws, and it routinely furnishes this information to CBP “for further investigation and enforcement action.”<sup>15</sup>

The pervasiveness of duty evasion schemes was illustrated by a report prepared in late 2010 by the staff of Senator Ron Wyden, who was at that time Chairman of the Trade

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<sup>14</sup> In a 2013 report to Congress, CBP noted that “[p]ort operations targeting wire hangers from China led to the discovery of misclassifications and transshipments of this merchandise at several ports of entry, and a loss of revenue of more than \$2 million.” U.S. Customs and Border Protection, *Fiscal Year 2013 Report to Congress, Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2012* (July 19, 2013) at 5.

<sup>15</sup> *Certain Steel Threaded Rod From the People's Republic of China: Preliminary Results of the First Administrative Review and Preliminary Rescission, in Part*, 76 Fed. Reg. 26,696 (May 9, 2011) at 26,697. See also *Steel Wire Garment Hangers From the People's Republic of China: Preliminary Results and Preliminary Rescission, in Part, of the Second Antidumping Duty Administrative Review*, 76 Fed. Reg. 66,903 (October 28, 2011) at 66,905 (“[W]e intend to refer this matter to CBP to investigate whether this entry was entered properly.”); *Certain Steel Threaded Rod From the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review; 2011-2212*, 78 Fed. Reg. 21,101 (April 9, 2013) at 21,102 (“[W]e intend to refer this matter to CBP to investigate whether Jiaying Xinyue’s entries were entered improperly.”)

Subcommittee of the Senate Finance Committee. The Senator's staff created a fictitious company and set up a company profile on a Chinese business-to-business website "in order to find companies willing to cheat and evade AD/CVD orders."<sup>16</sup> The results were shocking. In less than two weeks, staff obtained written confirmation from ten Chinese companies that they were willing to engage in illegal evasion schemes in order to avoid the payment of applicable AD and/or CVD duties.<sup>17</sup> These Chinese companies offered to transship subject merchandise through third countries and falsify the country of origin, undervalue the merchandise to reduce the amount of AD or CVD duties, arrange for minor assembly operations in a third country, and ship subject merchandise under the name of a Chinese company which had a lower AD or CVD rate. Many of these Chinese offers involved shipments of steel wire and wire products.

Other countries seem to be following the Chinese export model or, in some cases, may be pressured by Chinese shipments into their markets to target the United States with their wire and wire products. In addition, these third countries have access to low-cost Chinese wire rod—which is subject to high dumping and countervailing duties in the United States—and enjoy a distinct competitive advantage in producing wire and wire products that they then ship to the U.S. market. Most of these countries are located in Asia, and they have exported increasing volumes of wire and wire products to the United States during the past several years.<sup>18</sup> For example, after the AD order on Chinese garment hangers went into effect at the end of 2008,

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<sup>16</sup> Staff Report Prepared for Senator Ron Wyden, *Duty Evasion: Harming U.S. Industry and American Workers* (November 8, 2010) at 5. The report is attached as Exhibit 4.

<sup>17</sup> *Id.*

<sup>18</sup> *See* Exhibit 8.

annual imports of hangers from the rest of Asia reached over a billion units.<sup>19</sup> Part of this increase was the result of startup hanger industries in countries like Vietnam, but the initial surge of imports was also fueled by transshipped and misclassified hangers from China. Imports of wire from the rest of Asia doubled from 2009 to 2015, and imports of wire strand tripled.<sup>20</sup> Imports of nails and staples from the rest of Asia grew by 86 percent during the same period, and these countries exported almost 700,000 net tons of industrial fasteners to the United States in 2015—an increase of 245,000 net tons over the 2009 figure.<sup>21</sup> The members of the AWWPA have responded to this influx of imports with petitions for relief under the trade laws, resulting in AD and CVD orders on garment hangers from Vietnam and Taiwan, uncovered innerspring units from Vietnam, and nails from six Asian countries.<sup>22</sup> The same challenges that confront American manufacturers of wire and wire products with respect to dumped and subsidized imports from China are present here as well—an almost infinite number of different wire products and the shifting of import sourcing from one country to another.

Given the prevalence of unfairly-traded wire and wire products from China and other countries and given the nature of the wire and wire products industry, the AWWPA submits that one of the few comprehensive means of dealing with the problem is to address structural imbalances and distortions with our trading partners and ensure that our trading partners take prompt and effective action to eliminate these imbalances and correct these distortions.

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<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> *See* Exhibit 6. There are also preexisting AD orders on PC strand from India, Korea, and Thailand.

Accordingly, the AWWA respectfully recommends the United States Government take the following actions:

- (1) Negotiate meaningful and enforceable reductions of excess capacity in the steel industries of China and other countries, including the segments of those industries that produce wire and wire products.
- (2) Negotiate—and if necessary, self-initiate CVD investigations—to eliminate the pervasive subsidy programs in China and other steel-exporting countries.
- (3) Take remedial action to ensure that China and other trading partners cease to manipulate their currencies in order to achieve a competitive price advantage for their exports in global markets.
- (4) Insist on the elimination of Chinese border tax schemes that promote exports of finished downstream products while discouraging exports of raw materials and other inputs. These schemes also encourage the build-up of excess capacity in the downstream wire and wire products industry in China.
- (5) Ensure that the United States, and in particular CBP, has the resources and the tools to investigate and take enforcement action against imports which evade lawful AD and CVD duties. The Trade Facilitation and Trade Enforcement Act of 2015 should improve CBP's ability to enforce existing and future AD and CVD orders.

The AWWA appreciates this opportunity to share the views and concerns of its member companies, and we look forward to continuing to work with the USTR and other agencies of the United States Government to eliminate overcapacity, subsidization, unfair trading practices, and other distortions in the global steel industry.

Sincerely,



Milton M. Magnus, III  
AWPA President  
President, M&B Metal Products Co., Inc.

Attachments

## **EXHIBIT LIST**

- EXHIBIT 1      *Hellenic Shipping News Worldwide* e-Article, “Hatch: Chinese Steel Overproduction Will Continue” (March 22, 2016)
- EXHIBIT 2      *The Economist* (Shanghai Edition) e-Article, “Industry in China: The March of the Zombies” (February 27, 2016)
- EXHIBIT 3      U.S. Imports of Steel Wire and Wire Products from China (Calendar Years 2001—2015)
- EXHIBIT 4      Staff Report Prepared for Senator Ron Wyden, “Duty Evasion: Harming U.S. Industry and American Workers” (November 8, 2010)
- EXHIBIT 5      Indictment: *United States of America v. Arturo Huizar-Velazquez, et al.*, U.S. District Court, Southern District of California (January 2010 Grand Jury)
- EXHIBIT 6      Antidumping (“AD”) and Countervailing Duty (“CVD”) Orders on Wire and Wire Products
- EXHIBIT 7      U.S. Customs and Border Protection (“CBP”) Reports and Update on Enforcement Actions regarding AD/CVD Duty Evasion
- EXHIBIT 8      U.S. Imports of Steel Wire and Wire Products from Asia Other Than China (Calendar Years 2009—2015)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

# EXHIBIT 1

*HELLENIC SHIPPING NEWS WORLDWIDE* E-ARTICLE

“HATCH: CHINESE STEEL OVERPRODUCTION  
WILL CONTINUE”

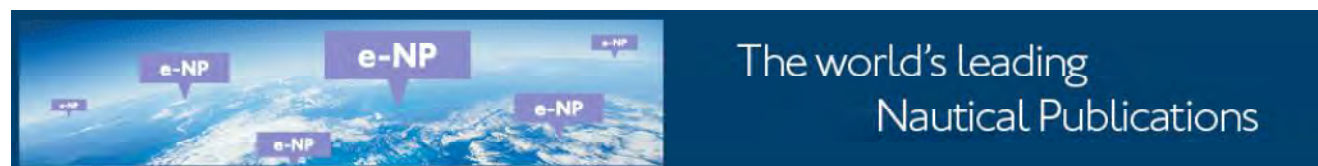
(MARCH 22, 2016)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
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MARCH 29, 2016



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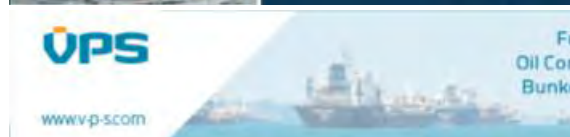
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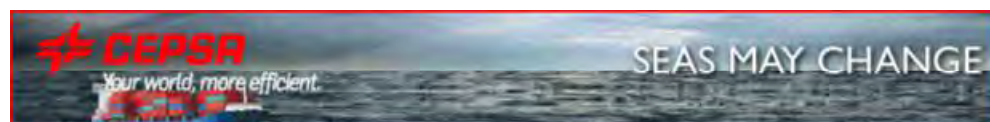
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Gold	Apr 16	1,251.60	1,260.80	1,242.90	+7.40	+0.59%
Copper	May 16	2.288	2.294	2.272	-0.004	-0.20%
US Coffee C	May 16	133.90	134.55	131.77	+2.55	+1.94%
Silver	May 16	15.835	16.020	15.785	-0.012	-0.08%
Crude Oil	May 16	41.47	41.85	40.78	-0.05	-0.12%
US Sugar #11	May 16	16.48	16.52	16.18	+0.18	+1.10%
US Wheat	May 16	466.12	470.62	465.62	-0.88	-0.19%

# Hatch: Chinese Steel Overproduction Will Continue

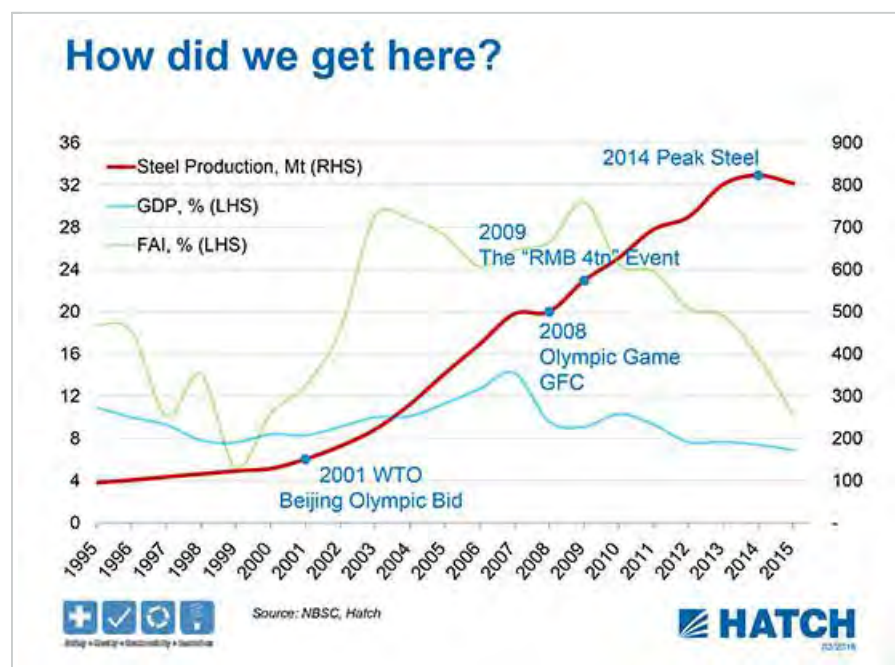
in Commodity News 22/03/2016



Chinese steel mills are operating at less than 70% capacity but are still churning out 820 million metric tons of steel annually.

China's apparent steel consumption, however, will fall toward the 500 mmt per year range by 2020, according to Terance Ko, Hong Kong-based Director of Consulting for Hatch Associates at the Platts Steel

Markets North America conference last week in Chicago.



Ko gave a lengthy talk describing market conditions in China and what role the central government there played in creating the overcapacity problem, which is lingering after an aggressive stimulus plan was created in response to the 2008-2009 global financial crisis.

## The Origin of Chinese Steel Overproduction

His explanation of how overproduction started said it began with the 2008 Olympic bid. Ever since the bid was announced, and then won, Chinese steel production has increased about 15% every year. No other nation could have produced that much steel and Ko said that much, honestly, was needed for the rapid industrialization necessary to prepare for the Olympics.

Around quarter three of 2006, the Chinese Government finally figured out that things were growing too quickly. There was a deliberate decision to slow down the steel industry. If the global financial crisis hadn't happened, peak steel in China would have happened around 2009. Instead, in 2009 Beijing pushed 4 trillion RMB into the market and steel production continued.

From there, the subsidies continued. In the first 3 quarters of 2015, 34 listed companies received subsidies from the government, totaling more than 2.6 billion RMB

Some steelmakers turned losses to gains because of these subsidies.

## WEEKLY DRY TIME CHARTER ESTIMATES

	6 MOS				1 Y
	ATL	FAIC	ATL	FAIC	
HANDY (10,000 dwt)	\$4,500	\$5,750	\$5,250	\$5,250	\$4,500
SUPRA (10,000 dwt)	\$5,400	\$5,150	\$5,550	\$5,550	\$5,400
ULTRA (10,000 dwt)	\$5,850	\$5,600	\$5,900	\$5,900	\$5,850
PANA/PMAX (10,000 dwt)	\$5,800	\$5,550	\$5,850	\$5,850	\$5,800
CAPE (10,000 dwt)	\$4,750	\$4,750	\$5,500	\$5,500	\$4,750

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## WEEKLY TANKER TIME CHARTER ESTIMATES

	1 YR		2 YR	
	1 YR	2 YR	1 YR	2 YR
HANDY	\$16,000	\$15,250	\$16,000	\$15,250
MR IMOS	\$17,500	\$17,000	\$17,500	\$17,000
LR1	\$20,500	\$20,000	\$20,500	\$20,000
LR2 (10,000 dwt)	\$25,000	\$24,000	\$25,000	\$24,000
AFRA (10,000 dwt)	\$24,500	\$23,250	\$24,500	\$23,250
SIJFZ	\$31,000	\$29,750	\$31,000	\$29,750
VLCC	\$45,000	\$42,500	\$45,000	\$42,500

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## WEEKLY CONTAINER IN

### New ConTex - all rates in

date	New ConTex			
	12 months		24 mo	
	Type 1100	Type 1700	Type 2500	Type 2700
22.03.2016	7.017	7.376	7.603	7.755
17.03.2016	7.032	7.384	7.588	7.747
15.03.2016	7.064	7.402	7.617	7.775

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### Where Do We Go From Here?

Now, up to 150 mmt of steelmaking capacity is planned to be eliminated in the next five years, with financial support from Beijing of \$15.4 billion (100 billion RMB).

Even that might not be enough to curtail overproduction, Ko warned. By 2020, China will have approximately 400 mt of excess rolling capacity. Mainly long products and other construction-related products will be produced from this capacity.

China is now committing to let private companies fail, mostly those with capacity of less than 2 or 3 mmt. Steel exports might go down by a million tons or so, but nothing that will move markets in a big way, Ko said.

There was some positive news about China's steel industry, though. Cleaner technology is being embraced by both steelmakers and the government. Ko said forecasts are showing China's percentage of electric arc furnace (EAF) market share is rising from its current low adoption rate of 7% to as high as 30% by 2030. Ko said the shutting down of smaller operators and green mandates will help push the shift.

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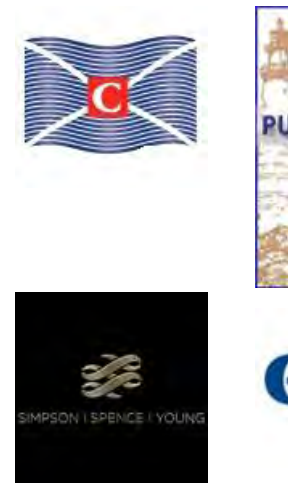
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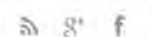
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## EXHIBIT 2

*THE ECONOMIST* (SHANGHAI EDITION) E-ARTICLE

“INDUSTRY IN CHINA:  
THE MARCH OF THE ZOMBIES”

(FEBRUARY 27, 2016)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

The Economist

## Industry in China

# The march of the zombies

**China's excess industrial capacity harms its economy and riles its trading partners**

Feb 27th 2016 | SHANGHAI | From the print edition

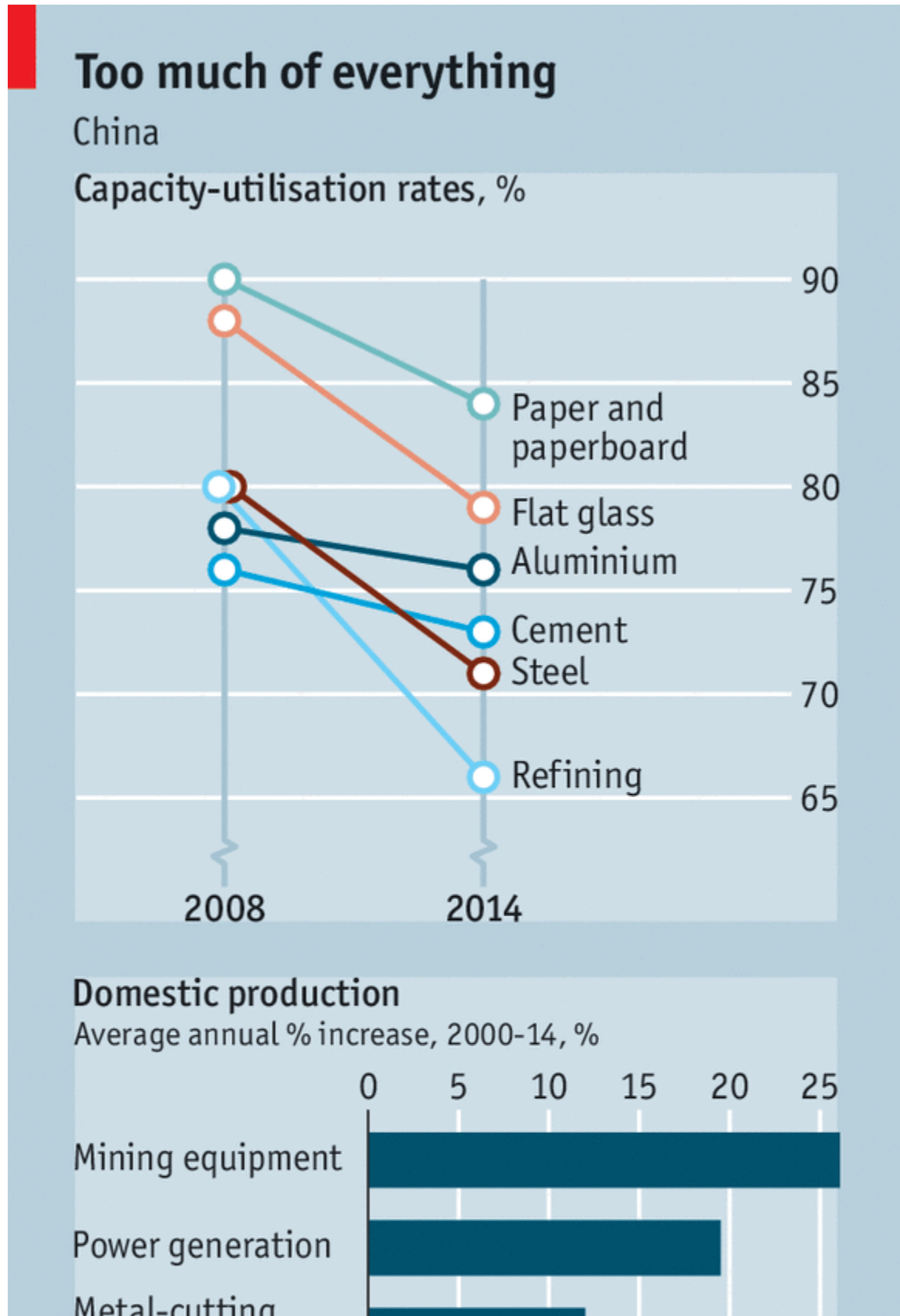
“OVERSUPPLY is a global problem and a global problem requires collaborative efforts by all countries.” Those defiant words were uttered by Gao Hucheng, China's minister of commerce, at a press conference held on February 23rd in Beijing. Mr Gao was responding to the worldwide backlash against the rising tide of Chinese industrial exports, by suggesting that everyone is to blame.



Oversupply is indeed a global problem, but not quite in the way Mr Gao implies. China's huge exports of industrial goods are flooding markets everywhere, contributing to deflationary pressures and threatening producers worldwide. If this oversupply were broadly the result of capacity gluts in many countries, then Mr Gao would be right that China should not be singled out. But this is not the case.

China's surplus capacity in steelmaking, for example, is bigger than the entire steel production of Japan, America and Germany combined. Rhodium Group, a consulting firm, calculates that global steel production rose by 57% in the decade to 2014, with Chinese mills making up 91% of this increase. In industry after industry, from paper to ships to glass, the picture is the same: China now has far too much supply in the face of shrinking internal demand. Yet still the expansion continues: China's aluminium-smelting capacity is set to rise by another tenth this year. According to Ying Wang of Fitch, a credit-rating agency, around

two billion tonnes of gross new capacity in coal mining will open in China in the next two years.



A



Economist.com

detailed report released this week by the European Union Chamber of Commerce in China reveals that industrial overcapacity has surged since 2008 (see charts). China's central bank recently surveyed 696 industrial firms in Jiangsu, a coastal province full of factories, and found that capacity utilisation had “decreased remarkably”. Louis Kuijs of Oxford Economics, a research outfit, calculates that the “output gap”—between production and capacity—for Chinese industry as a whole was zero in 2007; by 2015, it was 13.1% for industry overall, and much higher for heavy industry.

### Scarier than ghosts

Much has been made of China's property bubble in recent years, with shrill exposés of “ghost cities”. There has been excessive investment in property in places, but many of the supposedly empty cities do eventually fill up. China's grotesque overinvestment in industrial goods is a far bigger problem. Analysis by Janet Hao of the Conference Board, a research group, shows that investment growth in the manufacture of mining equipment and other industrial kit far outpaced that in property from 2000 to 2014. This binge has left many state-owned firms vulnerable to slowdown, turning them into profitless zombies.

Chinese industrial firms last year posted their first annual decline in aggregate profits since 2000. Deutsche Bank estimates that a third of the companies that are taking on more debt to cover existing loan repayments are in industries with overcapacity. Returns on assets of state firms, which dominate heavy industry, are a third those seen at private firms, and half those of foreign-owned firms in China.

The roots of this mess lie in China's response to the financial crisis in 2008. Officials shovelled money indiscriminately at state firms in infrastructure and heavy industry. The resulting overcapacity creates even bigger headaches for China than for the rest of the world. The overhang is helping to push producer prices remorselessly downward: January saw their

47th consecutive month of declines. Falling output prices add to the pressure on debt-laden state firms.

The good news is that the Chinese have publicly recognised there is a problem. The ruling State Council recently declared dealing with overcapacity to be a national priority. On February 25th the State-Owned Assets Supervision and Administration Commission, which oversees big firms owned by the central government, and several other official bodies said they would soon push ahead with various trial reforms of state enterprises. The bad news is that three of the tacks they are trying only make things worse.

One option is for China's zombies to export their overcapacity. But even if the Chinese keep their promises not to devalue the yuan further, the flood of cheap goods onto foreign markets has already exacerbated trade frictions. The American government has imposed countervailing duties and tariffs on a variety of Chinese imports. India is alarmed at its rising trade gap with China (see [article](http://www.economist.com/news/business/21693583-india-seeks-boost-its-manufacturing-industry-and-cut-trade-deficit-arrive-full-leave) (<http://www.economist.com/news/business/21693583-india-seeks-boost-its-manufacturing-industry-and-cut-trade-deficit-arrive-full-leave>)). Protesters against Chinese imports clogged the streets of Brussels in February. There is also pressure for the European Union to deny China the status of "market economy", which its government says it is entitled to after 15 years as a World Trade Organisation member, and which would make it harder to pursue claims of Chinese dumping.

Another approach is to keep stimulating domestic demand with credit. In January the government's broadest measure of credit grew at its fastest rate in nearly a year: Chinese banks extended \$385 billion of new loans, a record. But borrowing more as profits dive will only worsen the eventual reckoning for zombie firms.

A third policy is to encourage consolidation among state firms. Some mergers have happened—in areas such as shipping and rail equipment. But there is little evidence of capacity being taken out as a result. Chinese leaders are dancing around the obvious solutions—stopping the flow of cheap credit and subsidised water and energy to state firms; making them pay proper dividends rather than using any spare cash to expand further; and, above all, closing down unviable firms.

That outcome is opposed by provincial officials, who control most of the country's 150,000 or so publicly owned firms. Local governments are funded in part by company taxes, so party officials are reluctant to shut down local firms no matter how inefficient or unprofitable. They are also afraid of the risk of social unrest arising from mass sackings.

China's 33 province-level administrations are at least as fractious as the European Union's 28 member states, jokes Jörg Wuttke, head of the EU Chamber: "On this issue, increasingly

Beijing feels like it's Brussels." So Mr Gao's claim that the problem is not entirely his government's fault may be true in a sense. But in the 1990s China's leaders did manage bold state-enterprise reforms involving bankruptcies and capacity cuts, that overcame such vested interests. To meet today's concerns, the central government could provide more generous funding to local governments to offset the loss of tax revenues arising from bankruptcies, and also strengthen unemployment benefits for affected workers.

If China's current leaders have the courage to implement such policies, there may even be a silver lining. Stephen Shih of Bain, another consulting firm, argues that much quiet modernisation "has been masked in many industries by overcapacity". For example, little of the fertiliser industry's capacity used advanced technologies in 2011; most of the new capacity added since then has been the modern sort that is 40% cheaper to operate.

Baosteel Group, a giant state-owned firm, has been forced by Shanghai's local authorities to shut down dirty old mills in the gleaming city. So its bosses have built a gargantuan new complex in Guangdong province with nearly 9m tonnes of capacity. This highly efficient facility has cutting-edge green technologies that greatly reduce emissions of sulphur dioxide and nitrogen oxides, recycle waste gas from blast furnaces and reuse almost all wastewater. "When the older capacity in China is shut down, we'll have a much more modern industrial sector," Mr Shih says. "The question is, how long will this take?"

From the print edition: Business

# EXHIBIT 3

## U.S. IMPORTS OF STEEL WIRE AND WIRE PRODUCTS FROM CHINA (CALENDAR YEARS 2001–2015)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

# U.S. IMPORTS OF STEEL WIRE AND WIRE PRODUCTS FROM CHINA CALENDAR YEARS 2001–2015

QUANTITIES IN NET TONS FOR ALL PRODUCTS EXCEPT GARMENT HANGERS  
QUANTITIES OF GARMENT HANGERS IN UNITS

PRODUCT CATEGORIES										
YEAR	DRAWN WIRE	WIRE ROPE	WIRE STRAND*	WIRE SPRINGS	WOVEN WIRE FABRIC	WIRE GRILL, NETTING AND FENCING	NAILS AND STAPLES*	INDUSTRIAL FASTENERS	CHAINS AND PARTS	STEEL WIRE GARMENT HANGERS*
2001	37,218	10,482	2,169	11,716	4,517	47,601	123,645	174,180	37,062	0
2002	56,263	14,189	3,345	16,632	6,709	65,939	182,027	244,721	42,652	294,062,708
2003	61,233	19,124	22,642	18,039	8,010	70,191	265,603	259,976	47,940	487,748,019
2004	98,784	21,619	80,832	22,218	11,387	94,153	393,581	353,982	64,036	773,683,893
2005	129,238	26,472	105,763	36,338	6,504	59,214	558,387	443,882	73,959	1,044,700,856
2006	184,514	32,198	233,090	36,817	72,929	68,980	700,923	568,825	81,847	1,777,679,847
2007	157,760	34,717	229,442	32,073	81,421	68,750	636,882	542,377	89,421	2,697,369,183
2008	121,148	40,156	255,651	24,899	86,008	63,904	362,286	511,217	90,762	2,069,184,583
2009	79,287	30,580	69,303	10,733	56,709	47,866	212,630	298,025	66,413	733,870,626
2010	90,252	44,131	79,156	22,766	205,816	59,142	251,509	365,099	84,541	220,000,704
2011	80,047	43,957	86,578	21,704	218,462	61,705	247,811	398,184	99,569	588,917,073
2012	83,297	37,989	71,827	29,166	232,219	76,245	268,593	429,774	96,995	941,677,567
2013	98,315	34,661	51,312	30,164	239,784	66,211	244,435	418,470	86,808	1,119,899,939
2014	125,570	43,917	48,208	38,664	249,037	69,601	268,083	492,742	100,413	637,425,571
2015	174,136	40,068	50,019	41,374	234,475	82,853	307,670	498,470	102,713	91,882,778
CHANGE FROM 2001 TO 2015	368%	282%	2206%	253%	5091%	74%	149%	186%	177%	∞

\* *Antidumping (AD) and/or countervailing duty (CVD) orders against imports from China.*

Source: U.S. Department of Commerce and U.S. International Trade Commission, Trade DataWeb; AIS Import Report 3 (2001–2015).

## EXHIBIT 4

STAFF REPORT PREPARED  
FOR SENATOR RON WYDEN

“DUTY EVASION: HARMING U.S. INDUSTRY  
AND AMERICAN WORKERS”  
(NOVEMBER 8, 2010)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



**STAFF REPORT**

**DUTY EVASION:**

**HARMING U.S. INDUSTRY AND AMERICAN  
WORKERS**

Prepared for Senator Ron Wyden

November 8, 2010



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## Introduction

---

U.S. antidumping and countervailing duty (AD/CVD) laws form U.S. industry's protective backbone against injury from unfair trade. These laws provide American producers the ability to counter injurious unfair trade practices and ultimately allow for the imposition of additional duties on unfair imports.

Each year, U.S. companies collectively spend millions of dollars to initiate and litigate AD/CVD cases to keep illegally dumped or subsidized imports from entering the U.S. market and injuring them. Unfortunately, many U.S. producers believe that the evasion of America's unfair trade laws is increasingly pervasive. The circumvention of U.S. AD/CVD laws, either by foreign producers or importers, negatively affects industries throughout the United States, resulting in continued injury to U.S. industry, the loss of American jobs, and the loss of federal revenue.

Foreign suppliers subject to AD/CVD orders and their U.S. importers avoid paying AD/CV duties by a number of unscrupulous schemes, including illegal transshipment and falsified country of origin markings, undervalued invoices to pay less duty, and misclassification of goods. In sum, they cheat.

Staff set out to determine just how easy it is to find these trade cheats and determine the ease at which an importer could identify a foreign supplier willing to engage in circumvention schemes. In August 2010, staff created a fictitious company called AvisOne Traders, Inc. and set up a company profile on China's largest business-to-business e-commerce website, Alibaba.com, in order to find companies willing to cheat and evade AD/CVD orders. (AvisOne is an anagram for "evasion.")

The results are alarming and illustrative of how widespread the problem of duty evasion appears to be. In under two weeks and for as little as 30 minutes a day, one staff person, acting as a "purchasing manager" for AvisOne Traders, Inc., contacted roughly 120 companies through Alibaba.com and received 47 responses. Of these 47, this staff person received written confirmation from 10 Chinese companies that were willing to evade duties on five different products subject to U.S. AD/CVD orders. These products include uncovered innersprings units, lined paper school supplies, steel nails, natural bristle paint brushes, and light-walled rectangular pipe and tube. The AD/CVD orders on this merchandise, which represents just a small fraction of all AD/CVD orders currently in place, were put in place to protect over 120 businesses and 12,000 workers from unfairly traded imports.

This report is a compilation of information obtained by staff over a two-week period, and is organized into three parts. Part I presents e-mail correspondence between staff, acting under the auspices of AvisOne Traders, and Chinese producers. In a couple of additional examples, staff obtained from the counsel of U.S. industry non-solicited e-mails from Chinese producers offering to facilitate the evasion of AD/CVD orders. Part II presents a list of publically identified Chinese companies that advertise—in English—their ability to facilitate the evasion of AD/CVD laws. Part III includes snap shots of company websites that offer services designed to evade AD/CVD laws (in one instance, a website operated by the Chinese government itself and which advertises the services of a Chinese firm that facilitates evasion).

In the event that staff corresponded with a Chinese firm that is of interest to U.S. law enforcement, two versions of this report were prepared. A confidential version containing comprehensive information about the firms with which staff corresponded was provided to U.S. Customs and Border Patrol and Immigration and Customs Enforcement. This version, a public redacted version, was prepared in order to be shared with Members of Congress and their staff.



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**Part I:**  
**Email Correspondence Showcasing Companies’**  
**Willingness to Evade AD/CVD Orders**

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## Certain Steel Nails from China

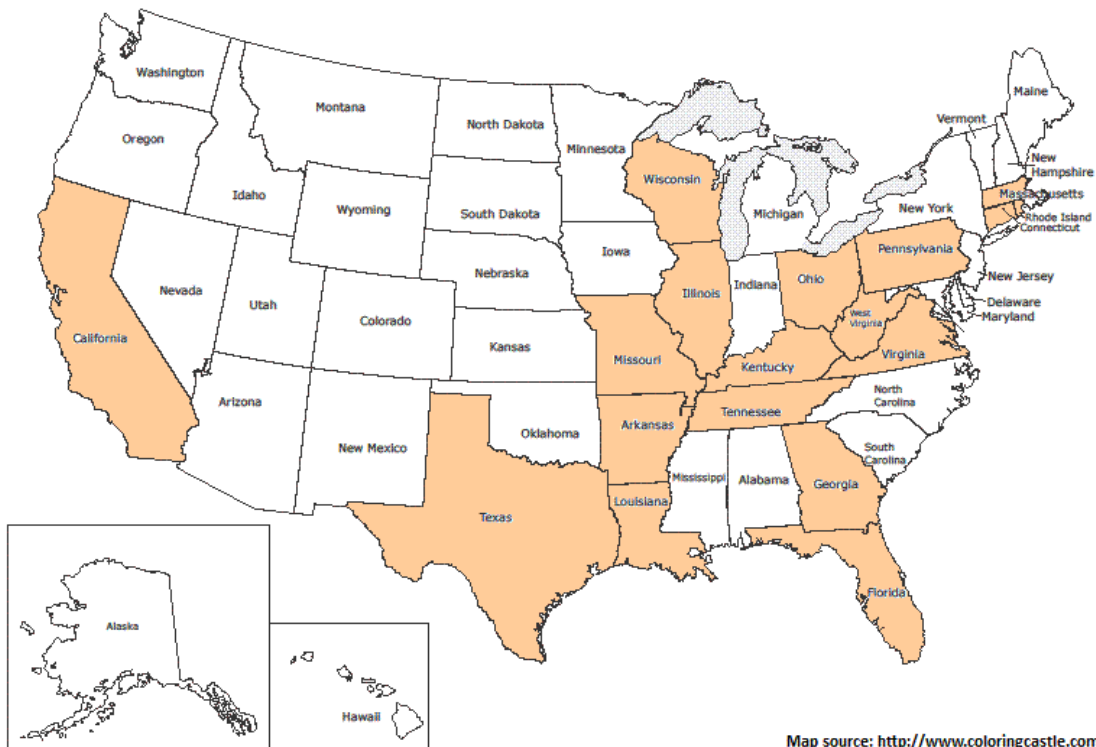
(DOC Case No. A-570-909)

Steel nails have a shaft length up to 12 inches, and include steel nails made of round wire and nails that are cut. They may be made of any type of steel, and have a variety of finishes. Nails are used in the construction of houses and used to make furniture and cabinets, among other applications.

### ***Industry at a Glance:***

- ⇒ Subject to AD order since August 1, 2008 (DOC)
- ⇒ Number of U.S. producers in 2007: 17
- ⇒ U.S. producers' U.S. shipments in 2007: \$220 million
- ⇒ U.S. employment of production and related workers in 2007: 791
- ⇒ U.S. production locations: Arkansas, California, Connecticut, Florida, Georgia, Illinois, Kentucky, Louisiana, Massachusetts, Missouri, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Virginia, Wisconsin, West Virginia
- ⇒ Leading sources of U.S. imports (by value) in 2007: China, Korea, United Arab Emirates (USITCa, USITCb)

### **U.S. Production Locations of Steel Nails**



## Companies Willing to Evade U.S. AD/CV Duties on Steel Nails

Staff, posing as a U.S. trading company, contacted these three Chinese steel nail producers/traders via Alibaba.com to inquire whether these companies could avoid paying duties on steel nails by illegal transshipment. In the first instance, Company A offered to transship when it was proposed by staff. In the second and third instances, Companies B and C directly proposed to illegally transship as a way to avoid paying duties. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### **Company A**

Product: Steel Nails

Country of origin: China

Means to evade duties: Illegal transshipment

**From: feedback@service.alibaba.com**

**To: \*\*\***

**Sent: Tues, August 31, 2010 5:12 AM**

**Subject: [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com**

Dear \*\*\*,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com.

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete steel nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

#### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company A via Alibaba.com, China's largest e-commerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices

## Company A (cont'd)

---

**From:** \*\*\*

Sent: Tues, August 31, 2010 10:57 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Concrete nail

---

Hi, dear sirs:

Thanks for your enquiry about nails

To take this opportunity, we are very glad to introduce our company to you. We are the professional manufacturer and exporter with high reputation in TianJin city China, handling of nail products etc. Pls let us know the concrete nails specification of you required, we will quote you our lowest price on based of that.

We are looking forward to your early reply.

Best regards.,

\*\*\*

**Explanation:**

Company A describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:36 AM

To: \*\*\*

Subject: Re: Concrete nail

---

Dear \*\*\*,

Thanks for your reply. Are you nails subject to any U.S. anti-dumping duties? If so, in your experience is there any way to avoid paying the duties?

Regards,

Paul

## Company A (cont'd)

---

**From:** \*\*\*

Sent: Sun, September 5, 2010 10:47 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Concrete nail

---

Hi, dear Paul:

Thanks for your email.

We have exported our products to U.S but the customer avoid the duties by themselves. So we do not know how can they avoid the duties. Sorry about that. But we can promise our products quality can meet your requirement.

Best regards.,

\*\*\*

**Explanation:**

When asked if there is a way to avoid paying duties, Company A initially says no. However, when illegal transshipment is proposed as a way to avoid paying duties, Company A agrees, demonstrating at the very least that it is aware of the method. In this instance, Company A offers to ship product through a third country.

**From:** <avisonetraders@gmail.com>

Sent: Wed, September 8, 2010 7:48 AM

To: \*\*\*

Subject: Re: Concrete nail

---

Dear \*\*\*,

Thanks for your reply. Would it be possible to transship the product through a third country and change the country of origin in order to avoid paying the duties?

Best regards,

Paul Union

**From:** \*\*\*

Sent: Wed, September 8, 2010 11:12 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Concrete nail

---

Dear Paul Union:

Thanks for your email.

As you said, we can arrange the container shipping from Xingang to Malaysia, Bangladesh or Singapore. And the shipping agent can help us to issue the original certification, it will increase the cost but I think it must be lower than duties.

Best regards.,

## **Company B**

Product: Steel Nails

Country of origin: China

Means to evade duties: Illegal transshipment

**From: feedback@service.alibaba.com**

To: \*\*\*

Sent: Tues, August 31, 2010

Subject: [avisonetraders@gmail.com] Inquiry about your product

---

### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company B via Alibaba.com, China's largest e-commerce platform.

Dear \*\*\*,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: Inquiry about your product

Dear sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

AvisOne Trades - Providing the Highest Quality Product at the Most Competitive Prices

## Company B (cont'd)

---

**From:** \*\*\*

Sent: Wed, September 1, 2010 3:02 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: [avisonetraders@gmail.com]inquiry about your product

---

Dear Mr Paul Union,

How are you?

Our factory have produce the steel nail for 46years.

If you need the quotation,pls inform me the exact information include the diameter of the wire nail,length of the nail,surface treatment and also the packing demand.

Sincerely thanks and best regards!~

Yours \*\*\*

**Explanation:**

In the first email, Company B describes its business and products. In the second email, staff asks if it is possible to avoid paying duties. Company B responds that it already engages in illegal transshipment.

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:33 AM

To: \*\*\*

Subject: [avisonetraders@gmail.com]inquiry about your product

---

Dear \*\*\*

Thanks for your response. Are your concrete nails subject to any U.S. anti-dumping duties? If so, in your experience is there any way to avoid paying the duties?

Regards,

Paul

**From:** \*\*\*

Sent: Sat, September 4, 2010 1:29 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: [avisonetraders@gmail.com]inquiry about your product

---

Dear Paul,

How are you?

Thank you for your e-mail. we have export the concrete nails to Canada then to U.S.or other country then to U.S. Our coil nail to U.S. do not need pay the duties.

If you have any other company in Canada or Singapore?

Maybe it is better way to avoid paying the duties.

Sincerely thanks and best regards!

Yours \*\*\*

## **Company C**

Product: Steel Nails

Country of origin: China

Means to evade duties: Illegal transshipment

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Tues, August 31, 2010 5:13 AM

**Subject:** [avisonetraders@gmail.com]Inquiry about your product

---

### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company C via Alibaba.com, China's largest e-commerce platform.

Dear \*\*\*,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: Inquiry about your product

Dear sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your concrete nails? Also, are your steel nails subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

AvisOne Trades - Providing the Highest Quality Product at the Most Competitive Prices

## Company C (cont'd)

---

**From:** \*\*\*

Sent: Tue, August 31, 2010 10:23 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: concrete steel nails

---

Dear sir ,

Good day ! I am \*\*\* ,from \*\*\* .  
I got your message on alibaba .  
so if you have any need ,please contact me .

Best regard .  
\*\*\*

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:37 AM

To: \*\*\*

Subject: Re: concrete steel nails

---

Thanks for your reply. I'm looking for concrete steel nails. Are these products subject to U.S. anti-dumping duties? [If so, is there any way to avoid paying the duties?](#)

Regards,  
Paul

**From:** \*\*\*

Sent: Tue, August 31, 2010 10:23 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: concrete steel nails

---

Dear sir ,

Yes . you want concrete steel nails?

[if you want to avoid paying the duties ,there is the way is send the goods to Malaysia and change a box ,then send to U.S](#)

so what do you think about it .

Best regard .

**Explanation:**

In this series of emails, staff ask Company C whether their nails are subject to U.S. antidumping duties and whether there is a way to avoid paying the duties. Company C proposes shipping product to Malaysia, changing containers, and then sending the new container with a different country of origin certificate to the United States.

## Company C (cont'd)

---

**From:** "Paul Union" <avisonetraders@gmail.com>

**Sent:** Wed, September 8, 2010 7:19 AM

**To:** \*\*\*

**Subject:** Re: concrete steel nails

---

Thank you for your reply. So you can transship through Malaysia and change the country of origin to avoid paying the anti-dumping duties? Can your company do that?

Regards,  
Paul

**From:** \*\*\*

**Sent:** Wed, September 8, 2010 8:43 PM

**To:** "Paul Union" <avisonetraders@gmail.com>

**Subject:** concrete steel nails

---

Dear sir ,

Thanks for your reply .

Yes .our company can do this .but in this way ,the cost will increase .

and just tell me your details product information .

Best regard .

**Explanation:**

Staff respond to Company C to confirm that it can transship product through Malaysia and change the country of origin of the product. Company C confirms its ability to illegally transship.



## Certain Lined Paper School Supplies from China

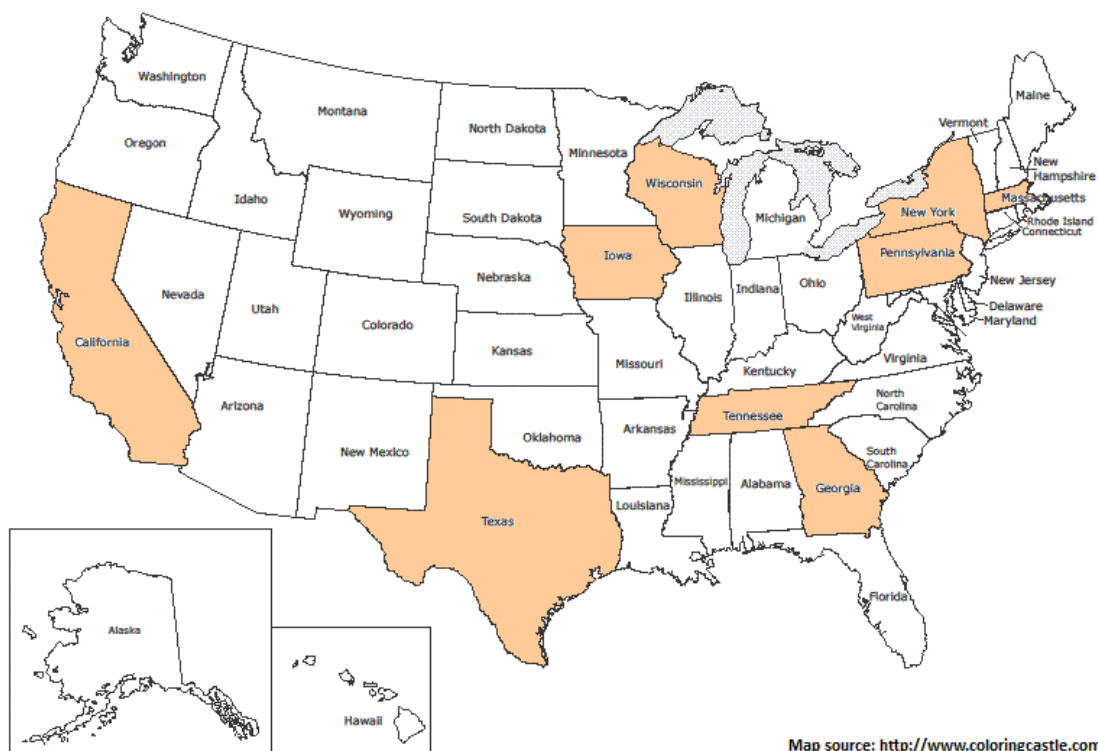
(DOC Case No. A-570-901)

Lined paper school supplies include spiral-bound and wireless notebooks, hole-punched filled paper, and composition books. The paper is typically white and wide-ruled or college-ruled.

### ***Industry at a Glance:***

- ⇒ Subject to AD order since September 28, 2006 (DOC)
- ⇒ Number of U.S. producers in 2005: 13
- ⇒ U.S. producers' U.S. shipments in 2005: \$260 million
- ⇒ U.S. employment of production and related workers in 2005: 942
- ⇒ U.S. production locations: California, Georgia, Iowa, Massachusetts, New York, Pennsylvania, Tennessee, Texas, Wisconsin (USITCc, USITCd)

### **U.S. Production Locations of Lined Paper School Supplies**



## Companies Willing to Evade U.S. AD/CV Duties on Paper Products

Staff, posing as a U.S. trading company, contacted Companies D and E via Alibaba.com to inquire whether they could avoid paying duties on paper school supplies. In the first instance, Company D proposes illegal transshipment through Malaysia to avoid paying duties. In the second instance, Company E professes that it does not know how to avoid paying antidumping duties. However, it states that it deliberately undervalues the value of its products, which is another form of duty evasion. Below are transcripts of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### Company D

Product: Paper school supplies

Country of origin: China

Means to evade duties: Illegal transshipment through Malaysia

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Wed, September 1, 2010

**Subject:** [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear \*\*\*,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: Inquiry about your product

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you,  
Paul Union, Purchasing Manager  
AvisOne Trading Company, Ltd.  
Tel: (503) 583-4237  
Email: AvisOneTraders@gmail.com

#### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company D via Alibaba.com, China's largest e-commerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices

## Company D (cont'd)

---

**From:** \*\*\*

Sent: Tue, August 31, 2010 10:04 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Inquiry about your product

---

Dear Paul,

It's please to get your enquiry from alibaba. Our factory \*\*\*, specializing in paper printing products, stationery notepad is our main product.

Herely I sending you our catalogue, pls check it, hop to meet your interesting. And customed item wel-come.

Actually, paper notebook is subjected to U.S. antidumping duties, because the our price is lower much than US market.

Looking forward to your soonly response.

Best regards,  
\*\*\*

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010

To: \*\*\*

Subject: Re: Inquiry about your product

---

Dear \*\*\*,

Thank you for your response. [Is there any way to avoid paying the anti-dumping duties in your experience?](#)

Regards,  
Paul

**Explanation:**

In the first email, Company D describes its business and products. In the second email, staff asks if it is possible to avoid paying duties.

## Company D (cont'd)

---

**From:** \*\*\*

Sent: Wed., September 8, 2010 5:44 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Inquiry about your product

---

Dear Paul,

Notebook of A4, A5, A6 size subjected to U.S. antidumping duties, other size no problem. [Solution is Shipping goods to Malaysia, transship to America to avoid paying the anti-dumping duties.](#)

How do you think about this solution?

Looking forward to hearing from you soon.

Thanks & Best regards,

\*\*\*

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Wed., September 8, 2010 7:20 AM

Subject: Re: Inquiry about your product

---

**Explanation:**

In the first email, Company D offers to illegally ship product through Malaysia to avoid paying duties. Company D confirms that it can change the country of origin when asked by staff.

Dear \*\*\*

Thank you for your reply. [Can your company transship through Malaysia and change the country of origin in order to evade the anti-dumping duties?](#)

Best regards,

Paul Union

**From:** \*\*\*

Sent: Wed., September 8, 2010 7:31 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Inquiry about your product

---

Dear Paul,

Thanks for your quick reply.

[yes, we can do that.](#) but first of all, you should tell me what kind of notebook are you seeking for your market, then I give you the CNF or CIF price, if price is suitable for your market, let's talk over further more.

Looking forward to your early reply with your inquiry.

Thanks & best regards,

\*\*\*

## **Company E**

Product: Paper school supplies

Country of origin: China

Means to evade duties: Undervaluation of invoice to pay less duty

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Wed, September 1, 2010

**Subject:** [avisonetraders@gmail.com]Inquiry about your product(AdminGenerate)

---

Dear \*\*\*,

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this send.

Mr. Paul Union is interested in your company.

Buyer's Message

Subject: Inquiry about your product

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your lined paper products? Also, are your lined paper products subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company E via Alibaba.com, China's largest e-commerce platform.

AvisOne Traders—Providing the Highest Quality Product at the Most Competitive Prices

## Company E (cont'd)

---

**From:** \*\*\*

Sent: Wed, September 1, 2010 1:39 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Our product

---

Dear paul,

Let me introduce my company to you ,my company—\*\*\* is specialized in the manufacturer of various color printed paper cards, paper handbags, packing boxes, gift boxes, labels, tags, brochures, posters, packing materials and other related products for 20 years.Providing 'Quality Products, Excellent Service, Competitive Prices and Prompt Delivery', pls kindly browse our website:\*\*\* for free!

we can not only design and produce unique and fashion style products but also can make products according to your requirements, and your design is welcome

Attachment is our catalogue about some paper bags and boxes ,pls check it !

If you have some new inquiry ,pls contact us for free !

Await for your prompt reply !

Best regard !

\*\*\*

**Explanation:**

In the first email, Company E describes its business and products. In the second email, staff asks if Company E's products are subject to antidumping duties and whether it is possible to avoid paying duties.

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:00 PM

To: \*\*\*

Subject: Re: Our product

---

Dear \*\*\*,

Thank you for your message. Are your paper notebooks subject to U.S. anti-dumping duties? In your experience, is there any way to avoid paying the anti-dumping duties?

Regards,

Paul

## Company E (cont'd)

---

**From:** \*\*\*

**Sent:** Wed, September 15, 2010 4:26 AM

**To:** "Paul Union" <avisonetraders@gmail.com>

**Subject:** Our product

---

Dear Paul,

Thank you for your reply !

I am sorry so late reply you ! we have no experience to avoid paying the anti-dumping duties ,besides we make the commerical invoice , we write that the value of products is less than the factual cost .

Await for your prompt reply !

Best regard !

\*\*\*

**Explanation:**

In this email, Company E states that it does not know how to avoid paying antidumping duties, but professes that it undervalues products on commercial invoices, which is a form of duty evasion.



# Light-Walled Rectangular Pipe and Tube from China

(DOC Case No. A-570-501)

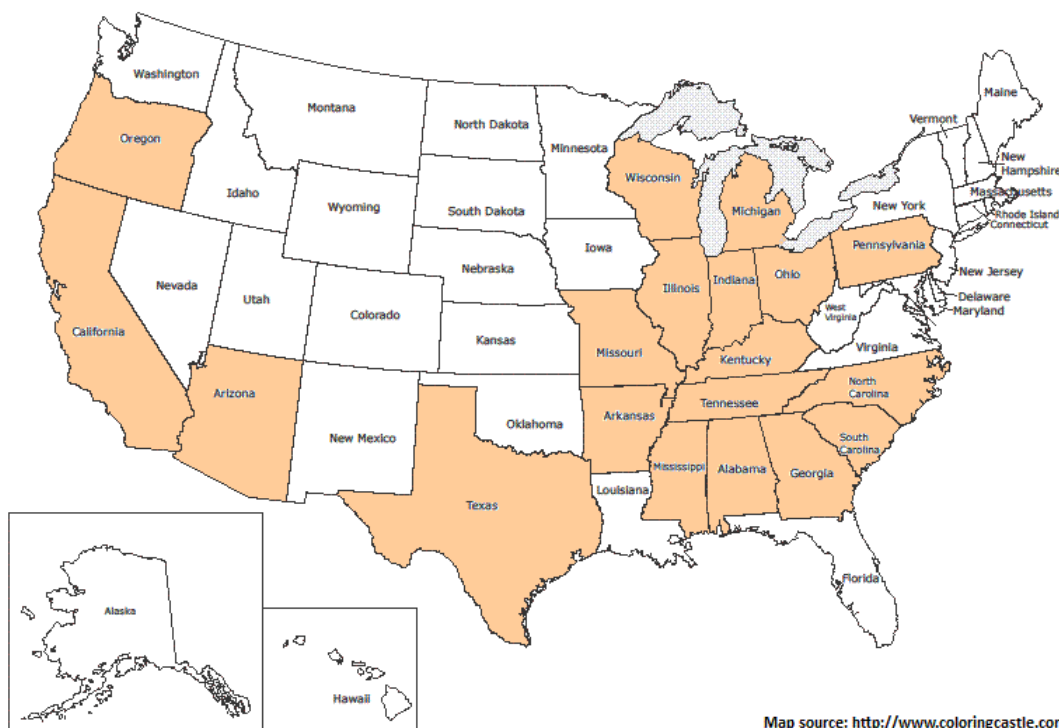
Carbon-quality welded light-walled rectangular pipe and tube is often referred to as ornamental or mechanical tubing. Principal uses include ornamental fencing, window guards and framing, and railings for construction and agricultural applications. It is also used in metal furniture, athletic equipment, and store display shelves.



## ***Industry at a Glance:***

- ⇒ Subject to AD/CVD orders since August 5, 2008 (DOC)
- ⇒ Number of U.S. producers in 2007: 28
- ⇒ U.S. producers' total shipments in 2007: \$513 million
- ⇒ U.S. employment of production and related workers in 2007: 973
- ⇒ U.S. production locations: Alabama, Arizona, Arkansas, California, Georgia, Illinois, Indiana, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Wisconsin (USITC, USITCf)

## **U.S. Production Locations of Light-Walled Rectangular Pipe and Tube**



## Companies Willing to Evade U.S. AD/CV Duties on Light-Walled Rectangular Pipe and Tube from China

---

Staff, posing as a U.S. trading company, contacted Company F via Alibaba.com to inquire whether its rectangular pipe and tube products are subject to U.S. antidumping duties and whether it could avoid paying such duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### Company F

Product: Pipe and tubular products

Country of origin: China

Means to evade duties: Illegal transshipment, also known as “entrepot” trade

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Tues, August 31, 2010 5:52 AM

**Subject:** [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

---

Dear \*\*\*:

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com.

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your rectangular tubular products? Also, are your light-walled rectangular tubular products subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

#### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company F via Alibaba.com, China's largest e-commerce platform.

## Company F (cont'd)

---

**From:** \*\*\*

**Sent:** Fri, September 3, 2010 4:42 AM

**To:** "Paul Union" <avisonetraders@gmail.com>

**Subject:** To Paul Union

---

Dear Paul Union

HAPPY WEEKEND. and hope you received my quotation of \*\*\* rectangular pipes .

About the antidumping duties .I check up alots of information on the net .I still can't sure if rectangular tubular products subject to any U.S. antidumping duties. Many informations said that On May 3rd, the InternationalTradeCommission voted for Chinese steel 99.14% at the tax anti-dumping tariffs on imports.Are you clear about this ??

Hope you can tell me more about .

Yours

\*\*\*

**Explanation:**

In the first email, Company F is not sure whether rectangular pipe and tube is subject to antidumping duties. In the second email, staff ask if it is possible to change the country of origin to avoid paying duties.

**From:** "Paul Union" <avisonetraders@gmail.com>

**Sent:** Fri, September 3, 2010 7:37 AM

**To:** \*\*\*

**Subject:** Re: To Paul Union

---

\*\*\*,

Thank you for your message. I am not sure if rectangular tubing is subject to U.S. anti-dumping duties. Is there any way to avoid paying the anti-dumping duties? Would it be possible to modify the country of origin certificate?

Regards,

Paul

## Company F (cont'd)

---

**From:** \*\*\*

Sent: Sat, September 4, 2010 6:38 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: To Paul Union

---

Dear Paul Union:

Thanks for your e-mail and have a good day .

I search a lot. Yes ,there has a way to avoid paying the antidumping duties .It's entrepot trade. Export documents issued by the third countries so that facilitate you in yours customs clearance, avoid "anti-dumping duties"customs clearance.

Can you accept the export file as payment terms, at the same time to third countries as its export documents, can reduce clearance documents tariffs?

And i've make certain about that rectangular tubular products subject to any U.S. antidumping duties.

Do you have any questions?

Yours Sincerely

\*\*\*

**Explanation:**

Company F offers proposes "entrepot trade" another name for illegal transshipment. Company F states that it will help find a logistics company that can illegally transship.

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Wed, September 8, 2010 7:45 AM

To: \*\*\*

Subject: Re: To Paul Union

---

Dear \*\*\*,

My apologies for my late reply. If I understand correctly, entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product? Can your company do this?

Best regards, Paul

**From:** \*\*\*

Sent: Thur, September 9, 2010 6:02 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: To Paul Union

---

Dear Paul Union:

How are you recently?

Yes you are right .entrepot trade would involve transshipping the rectangular tubular products to another country in order to change the country of origin to avoid paying the anti-dumping duties on Chinese product.I find a company can do this .But the products's price would be a little higher.

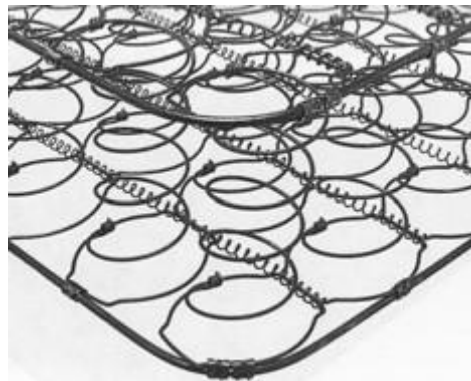
# Uncovered Innersprings Units from China

(DOC Case No. A-570-928)

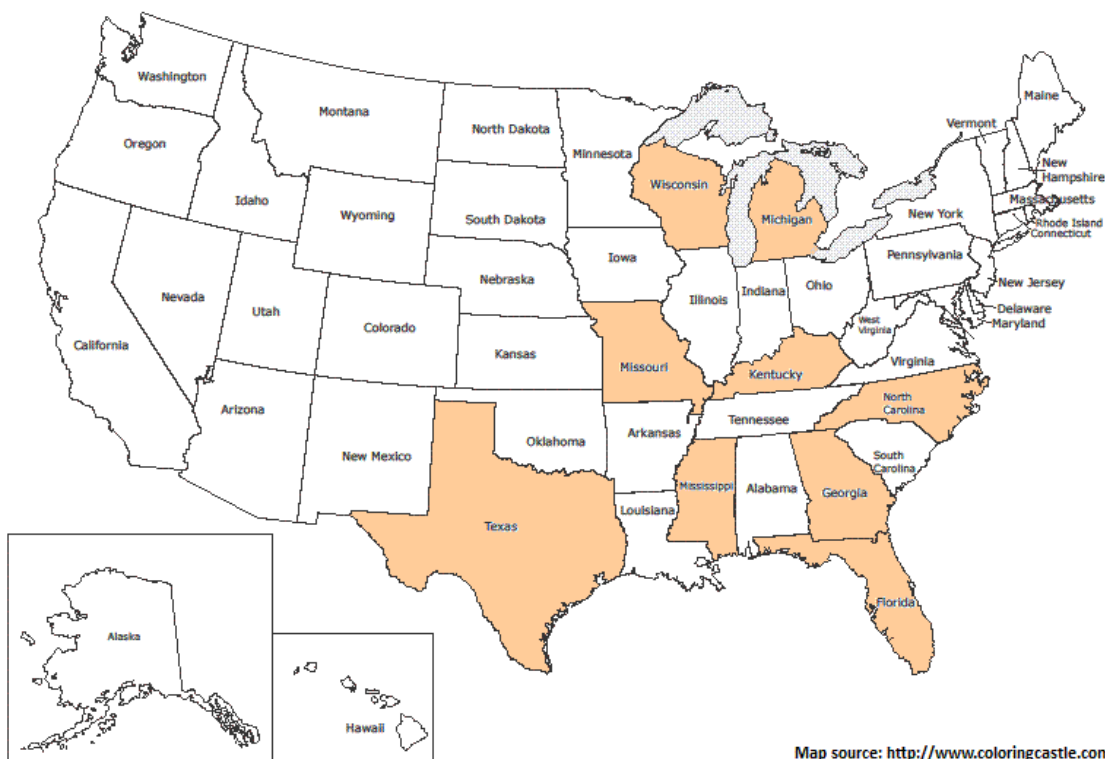
Uncovered innerspring units are composed of a series of individual metal springs joined together and used as the innerspring component in the manufacture of innerspring mattresses.

## ***Industry at a Glance:***

- ⇒ Subject to AD order since February 19, 2009 (DOC)
- ⇒ Number of U.S. producers in 2008: 8
- ⇒ U.S. producers' total shipments in 2007: \$539 million
- ⇒ U.S. employment of production and related workers in 2007: 2,970
- ⇒ U.S. production locations: Florida, Georgia, Kentucky, Michigan, Missouri, Mississippi, North Carolina, Texas, Wisconsin (USITCg, USITCh)



## **U.S. Production Locations of Uncovered Innerspring Units**



## Companies Willing to Evade U.S. AD/CV Duties on Uncovered Innersprings Units

Staff, posing as a U.S. trading company, contacted Company G via Alibaba.com to inquire whether it could avoid paying duties on uncovered innersprings units. Company G proposed illegally transshipping product through a third country, or undertaking minor assembly in the United States to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### Company G

Product: Uncovered innersprings units

Country of origin: China

Means to evade duties: Illegal transshipment or minor assembly in United States

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Tues, August 31, 2010

**Subject:** [avisonetraders@gmail.com] I want to buy the product you are selling on Alibaba.com

Dear \*\*\*

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com.

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customs in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your innersprings units? Also, are your innersprings units subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

#### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company G via Alibaba.com, China's largest e-commerce platform.

## Company G (cont'd)

**From:** \*\*\*

Sent: Wed, September 1, 2010 3:17 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: RE:FW [avisonetraders@gmail.com]I want to buy the product you are sel

Dear Paul

Thanks for your letter,and thanks for you are interested in our company.

We offer our price, as follows:

Wire :13g,(2.3mm). helical wire:17g (1.4mm) border 6g(4.88mm)

T type 36.5"\*73.5"\*6" 9\*24 10.7Kgs FOB Tianjin US\$11.07/pc

F type 51.5"\*73.5"\*6" 13\*24 14.9kgs FOB Tianjin US\$15.4/pc

Q type 58.5"\*78.5"\*6"15\*26 18.3kgs FOB Tianjin US\$18.92/pc

K type 74.5"\*78.5"\*6" 18\*26 22kgs FOB Tianjin US\$22.75/pc

Loading about 1250pcs in one 40' container. Gross weight 24Mt, Net weight :20Mt.

Yes ,our innerspring units is under U.S. antidumping duty, so we have two ways to export to your country: 1) Transit from the third part country, but would add about US\$3000/40'container fee for the third part country.

2) We could export the springs and the helical wire to your country, then you could make up them together by yourself.

What do you think, please let me know without any hesitation.

Thanks & Best Regards

\*\*\*

**Explanation:**

In response to staff's inquiry, Company G proposes illegally transshipping innersprings through a third market to avoid paying duties, or proposes that the U.S. importer undertake minor assembly of the product in the United States.



# Natural Bristle Paint Brushes from China

(DOC Case No. A-570-501)

Natural bristle paint brushes are made with natural (hog) bristle or other types of animal hair, and are used primarily to apply paint, stain, or varnish. Paint brushes come in several quality ranges and in a wide variety of widths and lengths.

## ***Industry at a Glance:***

- ⇒ Subject to AD order since February 14, 1986 (order terminated July 30, 2010 due to lack of interest) (DOC)
- ⇒ Number of U.S. producers in 2003: 12
- ⇒ U.S. producers' U.S. shipments in 2003: \$33 million
- ⇒ U.S. production locations: Florida, Illinois, Maryland, New Jersey, New York, Ohio, Oregon, Pennsylvania, Wisconsin (USITC)

## **U.S. Production Locations of Natural Bristle Paint Brushes**



## Companies Willing to Evade U.S. AD/CV Duties on Natural Bristle Paint Brushes from China

Staff, posing as a U.S. trading company, contacted Company H via Alibaba.com. Although the product is no longer subject to antidumping duties, Company H offered to ship product under a different company's name to avoid paying duties. The company stated that it could not directly change the country of origin, although it proposed illegally transshipping goods through Taiwan or Hong Kong as a way to avoid paying duties. Below is a transcript of email correspondence documenting a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### Company H

Product: Natural Bristle Paint Brushes

Country of origin: China

Means to evade duties: Exporting under a different company name (e.g., shipping agent)

**From:** feedback@service.alibaba.com

**To:** \*\*\*

**Sent:** Tues, August 31, 2010 5:34 AM

**Subject:** [avisonetraders@gmail.com]I want to buy the product you are selling on Alibaba.com

Dear \*\*\*:

You have received an inquiry from a free member on Alibaba.com. This is the first inquiry from this sender. Mr. Paul Union is interested in your company.

Buyer's Message

Subject: I want to buy the product you are selling on Alibaba.com.

Dear Sir:

We are a small trading company based in Oregon that supplies a diverse array of products to regional customers in the U.S. Pacific Northwest. We are seeking to diversify our supply chain in order to reduce costs. Can you provide a price list for your natural bristle paint brushes? Also, are your paint brushes subject to any U.S. antidumping duties?

Thank you,

Paul Union, Purchasing Manager

AvisOne Trading Company, Ltd.

Tel: (503) 583-4237

Email: AvisOneTraders@gmail.com

#### **Explanation:**

In this email, staff, acting as AvisOne Trading Co., initiates a product inquiry with Company H via Alibaba.com, China's largest e-commerce platform.

## Company H (cont'd)

---

**From:** \*\*\*

Sent: Tue, August 31, 2010 9:06 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear Mr Paul Union,

We are pleased to receive your following inquiry of natural bristle paint brush dated 31 August. Many thanks for it.

Yes, there has antidumping duties if we export to US market with natural bristle brush. Most of our US customers import paint roller and polyester brush from us. If you can use polyester brush instead of the bristle brush? Our polyester brush can hold much paints too as its split top end and the price is economic too.

Please let us know your comments about it and we will send you the details within one workday if we get your confirmation.

Best regards,  
\*\*\*

---

**From:** "Paul Union" <avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:27 AM

To: \*\*\*

Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear \*\*\*,

Thanks for your response. In your experience, is there any way to avoid paying the anti-dumping duties?

Regards,  
Paul

**Explanation:**

Company H acknowledges that its natural bristle paint brushes are subject to antidumping duties and asks if AvisOne is willing to purchase a different kind of paint brush. In the second email, staff ask Company H if it is possible to avoid paying duties.

## Company H (cont'd)

---

**From:** \*\*\*

Sent: Fri, September 3, 2010 9:27 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear Paul,

Thanks for your message, maybe we can export in the name of agent's company that can avoid paying the anti-dumping duties.

Best regards,

\*\*\*

**Explanation:**

Company H proposes exporting its products under a different name—in this case, the name of the shipping agent. Staff respond by asking if it possible also to change the country of origin certificate. Company H says that this is not possible, and proposes that AvisOne purchase brushes not subject to AD duties.

From: "Paul Union"

<avisonetraders@gmail.com>

Sent: Fri, September 3, 2010 8:27 AM

To: \*\*\*

Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear \*\*\*

My apologies for responding late to your email. As your describe it, your company can ship product under a different name (in this case, the shipping agent) in order to avoid paying the anti-dumping duties? Is it possible that your company can change the country of origin as well?

Looking forward to your thoughts on this. Best regards, Paul

**From:** \*\*\*

Sent: Wed, September 8, 2010 9:36 PM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear Paul Union,

Thanks for reply. I checked with the Exit Inscpetion and Quarantine, but the answer is "no" to change the origin country to other.

Now we don't have any better good thoughts about it, our most customers in America used the polyester material instead or just purchased the rollers. Can you use the polyester to instead the bristle?

Looking forward to your comments.

Best regards,

\*\*\*

## Company H (cont'd)

---

From: \*\*\*

Sent: Thur, September 9, 2010 2:00 AM

To: "Paul Union" <avisonetraders@gmail.com>

Subject: Re: Info of Natural bristle brush to Mr. Paul Union from China

---

Dear Paul Union,

Do you know any companies in Taiwan or HK who can help you to export the brushes to your company? We send the brushes to them and then they export to you with their name.

**Explanation:**

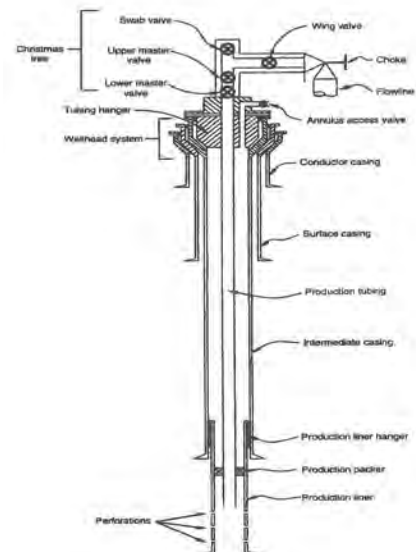
In this last email, Company H proposes exporting its brushes to companies in Taiwan or Hong Kong that can then re-export the brushes under those companies' names.



# Oil Country Tubular Goods (OCTG) from China

(DOC Case No. C-570-944)

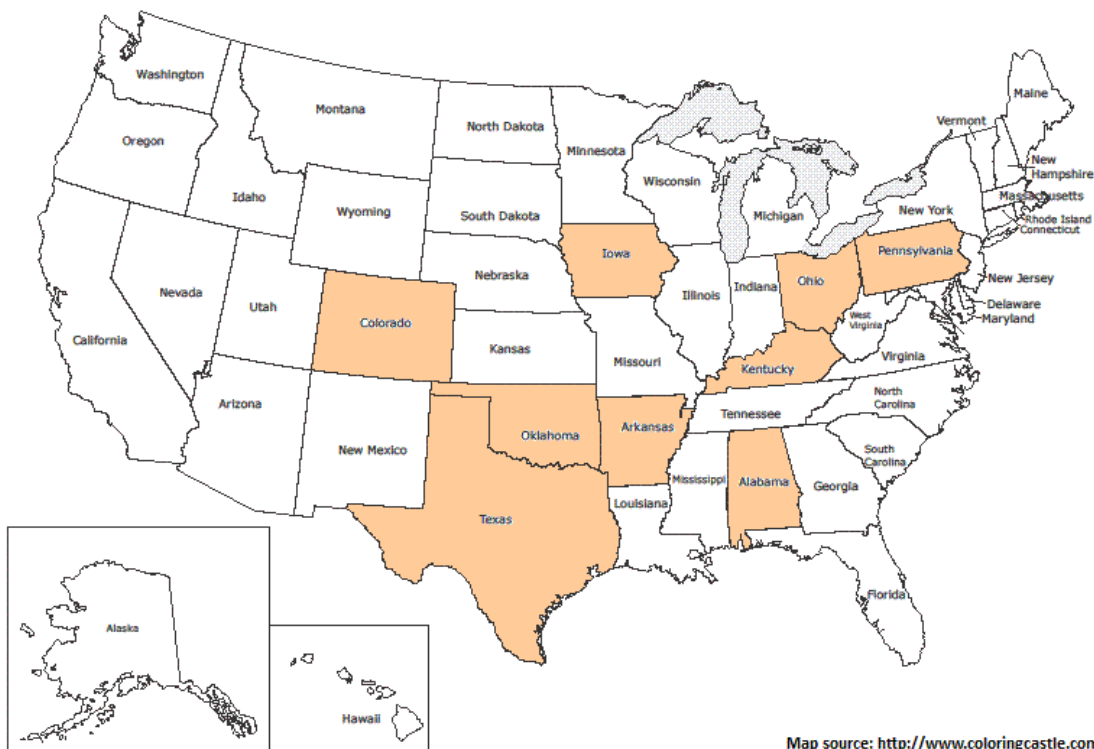
OCTG include carbon and alloy steel casing and tubing used in oil and gas wells. Casing is a circular pipe that serves as a structural retainer for the walls of the well. Tubing is installed inside the casing and is used to conduct the oil and gas to the surface.



## Industry at a Glance:

- ⇒ Subject to AD/CVD orders since May 21, 2010 (DOC)
- ⇒ Number of U.S. producers in 2009: 7
- ⇒ U.S. producers' U.S. shipments in 2008: \$6.2 billion
- ⇒ U.S. employment of production and related workers in 2008: 5,819
- ⇒ U.S. production locations: Alabama, Arkansas, Colorado, Iowa, Kentucky, Ohio, Oklahoma, Pennsylvania, Texas (USITCj, USITCK)

## U.S. Production Locations of OCTG



Map source: <http://www.coloringcastle.com>

## Companies Willing to Evade U.S. AD/CV Duties on OCTG from China

Company I is a trading company based in Turkey. It buys and sells Chinese-origin pipe products and changes the country of origin certificate to non-Chinese product. Below is a transcript of email correspondence provided to staff that document a willingness to evade AD/CVD orders on OCTG (highlighted in red). Textboxes provide an explanation of the correspondence.

### **Company I**

Product: Oil Country Tubular Goods

Country of origin: China

Means to evade duties: Changing country of origin certificate

**From: \*\*\***

Sent: Wed, August 11, 2010 3:45 AM

To: \*\*\*

Subject: DEAR \*\*\* PIPES FOR USA

DEAR \*\*\*

JUST MY BIG SPANISH PARTNER WHICH WE MADE WITH THEM OVER 10 MILLION USD PIPE ORDERS BEFORE SAID ,THEY CAN SHIP GOODS FROM VALENCIA SPAIN WITH EU ORIGIN CERTIFICATE .GOODS WILL BE PRODUCED IN CHINA& THEY WILL CHANGE ORIGIN IN SPAIN AND REEXPORT .THIS ONE OK? ALSO OUR SPAIN SELLER CAN OFFER UKRAIN OR EU ORIGIN .BUT SUGGEST ME TARGET PRICE . 4-YOUR MSN OR SKYPE ID ? MY SKYPE ID \*\*\* MY MSN \*\*\* MY MP \*\*\*

BEST REGARDS

\*\*\*

**From: \*\*\***

Sent: Wed, August 11, 2010 5:32 PM

To: \*\*\*

Subject: RE: DEAR \*\*\* PIPES FOR USA

\*\*\*,

#### **Explanation:**

In this example, Company I, working with its business partners, is offering a U.S. importer Chinese-origin pipe with a false country of origin certificate. The U.S importer recognizes that this is illegal, and ceases communication with Company I.

THIS IS ILLEGAL! It is called "circumvention" and is subject to firm prison time.

We will end all discussion at this stage.

## Company I (cont'd)

---

From: \*\*\*  
Sent: Wed, August 11, 2010 9:46 AM  
To: \*\*\*  
Subject: DEAR \*\*\* PIPES FOR USA

---

DEAR \*\*\*  
YOU ARE VEYR HARDWORKING PERSON.  
IT MEANS IF THEY CHANGE ORIGIN WITH COATING,PAINTING,BEVELLING ETC FORMALLY ,ACCORDING TO EU LAW ALSO NOT POSSIBBLE TO USE CHINESE RAW MATERIAL ? SO I IGNORE IT.  
2-ANY TARGET PRICE AS 0 ANTIDUMPING TAX ORIGINS ?

BEST REGARDS  
\*\*\*

**Explanation:**

Company I acknowledges that Chinese-origin pipe is subject to anti-dumping duties, but “ignores it.”



# Diamond Sawblades from China

(DOC Case No. 570-900)

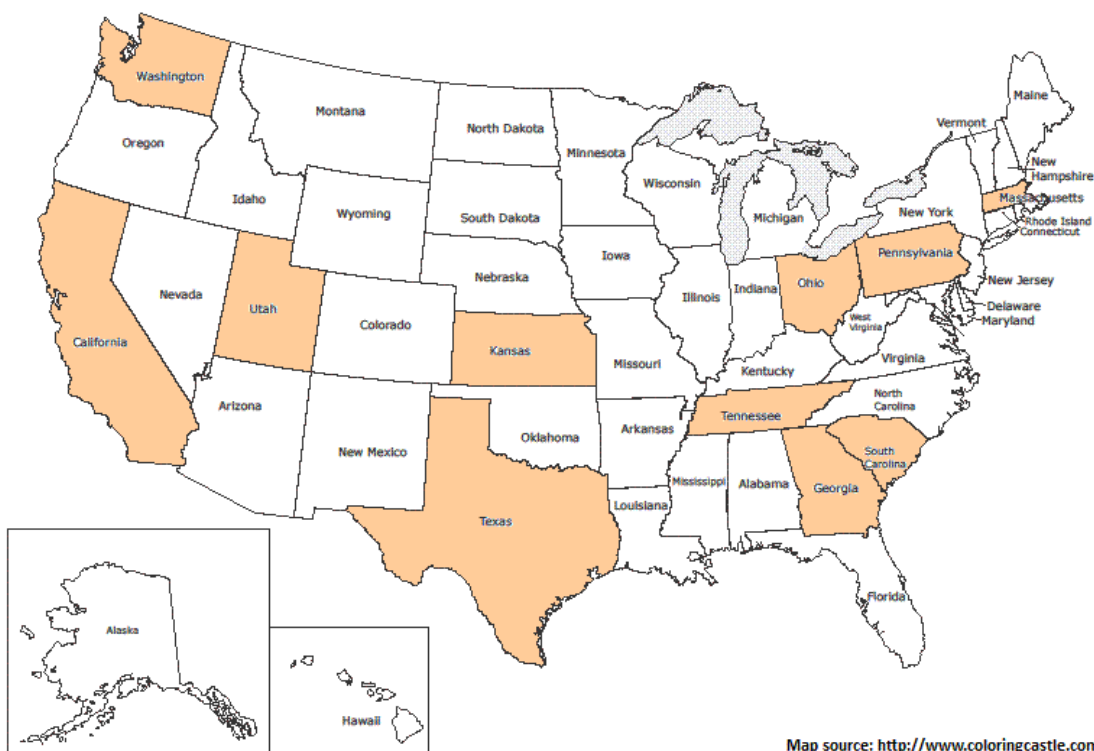
Diamond sawblades are circular cutting tools that have numerous functions and applications for cutting, ranging from cement, asphalt, marble, and tile, to masonry work such as brick and stone.

## *Industry at a Glance:*

- ⇒ Subject to AD/CVD orders since January 23, 2009 (DOC)
- ⇒ Number of U.S. producers in 2005: 22
- ⇒ U.S. producers' U.S. shipments in 2004: \$121 million
- ⇒ U.S. employment of production and related workers: 480 (finished diamond sawblades only)
- ⇒ U.S. production locations: California, Georgia, Kansas, Massachusetts, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Washington (USITCI, USITCm)



## U.S. Production Locations of Diamond Sawblades



## Companies Willing to Evade U.S. AD/CV Duties on Diamond Sawblades from China

Companies J and K are Chinese trading companies that import and export diamond sawblades. Company J characterizes antidumping duties as a “political game,” while Company K admits that it engages in illegal transshipment to avoid paying antidumping duties. Below are transcripts of email correspondence documenting a willing to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### **Company J**

Product: Diamond sawblades

Country of origin: China

Means to evade duties: Undervaluing invoices and misclassifying goods to avoid paying duties

**From:** \*\*\*

**Sent:** Thur, December 10, 2009 6:54 AM

**To:** Sales email account

**Subject:** Diamond tools and cutting machineries

#### **Explanation:**

In this email, Company J describes its business and products.

Dear Sir or Madam,

We are a Chinese company specialized in manufacturing various diamond tools which are widely used in Europe and USA.

Best ratio of quality to price could be achieved with the help of our diamond tools.

I'd like to offer you below tools for a reference in hope that we could be your competent and reliable partner in China.

Once got your requests, I'd like to send you our whole catalogue and pricelist.

Your prompt reply would be mostly appreciated.

Regards

\*\*\*

## Company J (cont'd)

---

**From:** \*\*\*

Sent: Thur, December 10, 2009 9:47 PM

To: \*\*\*

Subject: Re: Diamond tools and cutting machineries

---

Are your saw blades subject to antidumping duties?

**From:** \*\*\*

Sent: Thur, December 10, 2009

To: \*\*\*

Subject: Diamond tools and cutting machineries

---

Hi Sir,

Thanks for your prompt reply.

I don't think it's a big problem for us. We have 3 solutions to help you out of this high duty---it's just a political game: anti-dumping duty.

1. We can change the actual value of products in the Invoice a little bit.(as for small quantity such as trial order )
2. Our factory has responded to the lawsuit and will only be charged with 20% duty. When you order large quantity, it's no big deal.
3. We could ship the blades as the category of core.

Moreover, if you have any solutions, we would like to cooperate your actions from our side.

Regards

\*\*\*

### **Explanation:**

The U.S. importers asks if Company J's sawblades are subject to anti-dumping duties. Company J responds that antidumping is a "political game." Company J offers to undervalue the company invoice or misclassify the goods to avoid paying duties.

## **Company K**

Product: Diamond sawblades

Country of origin: China

Means to evade duties: Illegal transshipment

### **Explanation:**

Company K engages in illegal transshipment to avoid paying duties.

**From:** \*\*\*

Sent: Thur, August 5, 2010 9:28 PM

To: \*\*\*

Subject: Re: Diamond Blades

---

Hi \*\*\*,

Thanks for getting back to me.

No, we are not affected by the anti-dumping as we can do trans-shipment.

Regards,

\*\*\*

# Steel Wire Garment Hangers from China

(DOC Case No. A-570-918)

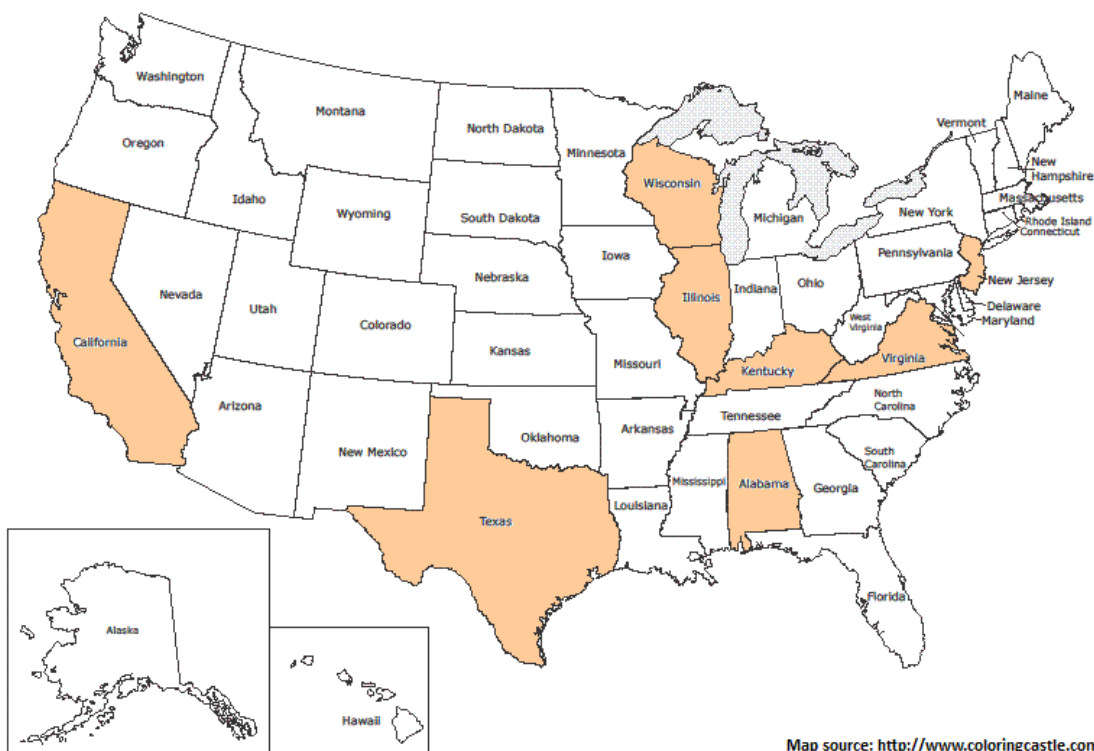
Steel wire garment hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries.

## ***Industry at a Glance:***

- ⇒ Subject to AD order since October 6, 2008 (DOC)
- ⇒ Number of U.S. producers in 2007: 7
- ⇒ U.S. producers' U.S. shipments in 2007: \$12 million
- ⇒ U.S. employment of production and related workers: 139
- ⇒ U.S. production locations: Alabama, California, Illinois, Kentucky, New Jersey, Texas, Virginia, Wisconsin (USITCn, USITCo)



## **U.S. Production Locations of Steel Wire Garment Hangers**



## Companies Willing to Evade U.S. AD/CV Duties on Steel Wire Garment Hangers from China

Companies L and M are Chinese metal hanger producers. In the first instance, Company L states that it can illegally transship through either Taiwan or Malaysia. In the second instance, Company M states that it can illegally transship via a third country for its “friends.” Below are transcripts of email correspondence provided to staff that document a willingness to evade AD/CVD orders (highlighted in red). Textboxes provide an explanation of the correspondence.

### **Company L**

Product: Steel wire garment hangers

Country of origin: China

Means to evade duties: Illegal transshipment

**From: \*\*\***

Sent: Thu, January 14, 2010 11:57:59 PM

To: \*\*\*

Subject: Re: \*\*\*

Attachment is our price list (FOB Shanghai), please find it. We have two ways to ship containers to US. One is from Taiwan, the transport charge is \$4200.00 per container. Another is from Malaysia, the transport charge is \$3200 per container, but the shipping date will be much longer than from Taiwan.

Please check the price, if it's ok, please let me know.

Best regards,

\*\*\*

#### **Explanation:**

Company L offers to ship containers to the United States via Taiwan or Malaysia. Although not explicitly stated in this email, the motive for shipping through a third country is to avoid paying duties.

## **Company M**

Product: Steel wire garment hangers  
Country of origin: China  
Means to evade duties: Illegal transshipment

**From: \*\*\***

Sent: Friday, April 09, 2010 9:27 PM

To: \*\*\*

Subject: Re: RE: RE: Re: Re: Hanger Business

---

Yes, the tariff rate is high. However, we are not extinct because of it.

We keep a solution for our friends. It is benefit for us and our client. Both have made profit from it.

We do not know how much profit you can make from working with wells. In China, yes, wells' tariff rate is the lowest in china.

It is about 16%. He is the only one company for the first rank. Our factory is of the second rank.

However, we still alive. "Fact speaks louder." Our clients also make profit working with us.

For this kind of client, we usually ship via another country, through which you only need to pay about 3.5% or lower rate. So for this, usually, CIF, DDU or DDP is suitable for you.

If you do not know it properly, we can do DDP for you. That is, door to door service. Its procedure is very easy for you, just like we send a package through courier. Through it, we will send the hangers directly to your warehouse. In a word, it will save you much energy, and most important, a lot of money.

A trial order may make you know much about us.

We look forward to your reply, and hope we can cooperate with each in the near future.

\*\*\*

### **Explanation:**

Company M offers to illegally ship product through a third country to avoid paying duties. As stated by Company M, this service is offered to "our friends" and that illegal transshipment "is a benefit for us and our client."



# Steel Grating from China

(DOC Case Nos. A-570-947 and C-570-948)

Steel grating (commonly referred to as bar grating), consists of two or more pieces of steel, including load-bearing pieces and cross pieces, joined by any assembly process, regardless of: (1) size or shape; (2) method of manufacture; (3) metallurgy (carbon, alloy, or stainless); (4) the profile of pieces; and (5) whether or not they are galvanized, painted, coated, clad or plated. Excluded from the scope are expanded metal grating, which is a single sheet or thin plate that has been slit and pulled; and safety plank grating, which is a single sheet or this plate that has been pierced or cold formed.

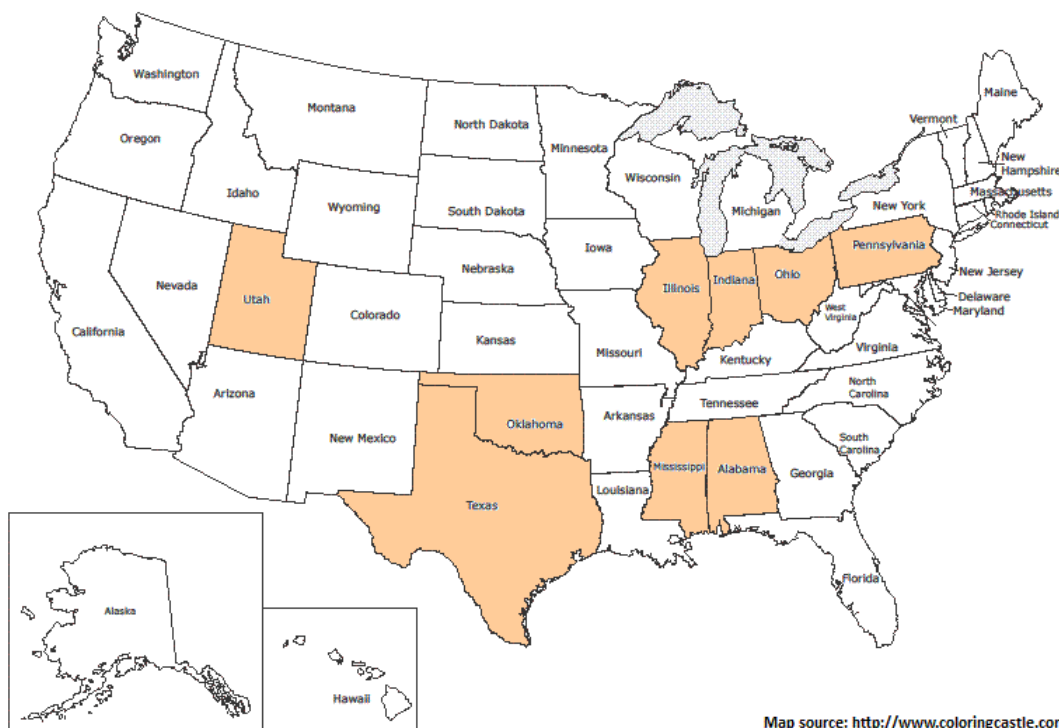
Steel grating is designed to support and distribute the weight of objects. Common end uses include walkways, mezzanines, catwalks, fire escapes, stairways, and flooring.



## Industry at a Glance:

- ⇒ Subject to AD/CVD orders since July 23, 2010 (DOC)
- ⇒ Number of U.S. producers in 2009: 7
- ⇒ U.S. producers' U.S. shipments in 2009: \$162 million
- ⇒ U.S. employment of production and related workers in 2009: 518
- ⇒ U.S. production locations: Alabama, Illinois, Indiana, Ohio, Oklahoma, Mississippi, Pennsylvania, Texas, Utah (USITCp, USITCq)

## U.S. Production Locations of Steel Grating



### Companies Willing to Evade U.S. AD/CV Duties on Steel Grating

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Company N is a Chinese steel grating producer. Below is an email provided to staff that documents the company's disregard for antidumping duty orders (highlighted in red).

#### **Company N**

Product: Steel grating

Country of origin: China

Means to evade duties: Illegal transshipment

**From: \*\*\***

Sent: Mon, August 30, 2010 1:01 AM

Subject: \*\*\*

---

Below is the result of your feedback form. It was submitted by () on Monday, August 30, 2010 at 01:01:13

Name: \*\*\*

Company: \*\*\*

Address: \*\*\*

City: Ningbo

State: Zhejiang

ZIP: 315195

Country: China

Phone: \*\*\*

Email: \*\*\*

Comments: Dear Sir,

If you need the best steel grating with low-cost, why not contact us directly here?

[FYI, Antidumping duty is no problem for us.](#)

Submit: Send!

---

**Part II:**  
**Foreign Logistics Companies Willing to Evade U.S.**  
**AD/CV Duties**

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## Foreign Companies Willing to Evade U.S. AD/CV Duties

The following foreign logistics companies publically advertise services to avoid paying AD/CV duties and other import restrictions like import quotas. These firms advertise their services in both English and Chinese on websites like alibaba.com, China's largest e-commerce website that links buyers and sellers. Most evasion schemes involve illegal transshipment through a third country and falsified country of origin certificates for Chinese-origin product destined to the United States and other export markets. Many firms work with factories located in third countries to obtain authentic country of origin certificates for Chinese-origin product.

### EverySky International Forwarding Agency

Address:	No. 455, Zhong Shan East Road, Ningbo, Zhejiang, China, 315400 Tel: +(86) 0574 2790 3558
Web:	<a href="http://www.everskyline.com/special1.php?id=6">http://www.everskyline.com/special1.php?id=6</a> <a href="http://www.alibaba.com/member/cn109650969.html">http://www.alibaba.com/member/cn109650969.html</a> <a href="http://www.made-in-china.com/showroom/infism/companyinfo/Eversky-International-Forwarding-Agency-Co-Ltd-.html">http://www.made-in-china.com/showroom/infism/companyinfo/Eversky-International-Forwarding-Agency-Co-Ltd-.html</a>
Company representative:	Mr. Zhao Hui Customer service representative: Mr. Cheng Tel: +(86) 0574 2787 9775 Email: jeffningbo@163.com
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Prepares false country of origin certificates for Indonesia and Malaysia. Principal transit ports are Singapore and Port Klang, Malaysia.

### H&T International Logistics Ningbo Ltd.

(subsidiary of Hualianton International Logistics Co., Ltd.)

Address:	Room 10-1, Yinyi Time Square, No. 8, Lengjing Street, Haishu District, Ningbo, China Tel: +(86) 574 8785 2330
Web:	<a href="http://www.hltNB.com">http://www.hltNB.com</a> <a href="http://blog.china.alibaba.com/blog/nb75520859/article/b0-i7726014.html">http://blog.china.alibaba.com/blog/nb75520859/article/b0-i7726014.html</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Prepares and provides false country of origin certificates and re-exports products through Port Klang, Malaysia. Company stipulates that domestic (Chinese) exporters must reach an understanding with the foreign importers regarding export documents (i.e. falsified country of origin certificates) and payment terms. Products illegally transshipped include fasteners, steel pipe, steel wire rope, steel wire hangers, aluminum products, clothing, shoes, candles, bearings, and citric acid.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### Ningbo Star International Freight Forwarding Co., Ltd

Address:	Also known as: Ningbo Richstar Freight Forwarding Agent Co., Ltd. High Storm International Freight Forwarding Co., Ltd. Win-Win International Freight Forwarding Co., Ltd.  Sharp Gate Street, Ningbo City, Zhejiang Province, No. 58, City Renhe Center, 16-1, China Tel: +(86) 0574 8768 6088
Web:	<a href="http://www.richstarfreight.com">http://www.richstarfreight.com</a> <a href="http://www.sweiphone.eb80.com">http://www.sweiphone.eb80.com</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Company uses different names when advertising transshipment services. Obtains authentic country of origin certificates from foreign factories despite product being of Chinese origin. Ships product from the Chinese ports of Dalian, Tianjin, Qingdao, Ningbo, Xiamen, and Shenzhen to Port Klang, Malaysia.
Illegal export procedures:	(1) Company's Malaysian branch acts as consignee in Malaysia. Removes first leg transportation manifest from China. (2) After cargo leaves China, customers provide copy of release of export documentation (e.g., first leg transportation, packing list, and invoice). (3) Malaysian branch in charge of procedures for changing containers and arranging booking for second leg transportation. (4) Before departure, Malaysia factories apply for certificates of origin for use for shipment of Chinese origin.

### Pulinktrans China, Ltd.

Address:	Room 206, Goldenland Building, No. 773 Siping Road, Shanghai, China, 200092 Tel: +(86) 21 6107 6102
Web:	<a href="http://pulinktranschina-3141826.en.gongchang.com/">http://pulinktranschina-3141826.en.gongchang.com/</a> <a href="http://www.hifob.com/redirect.php?tid=22211&amp;goto=lastpost">http://www.hifob.com/redirect.php?tid=22211&amp;goto=lastpost</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Provides authentic third-country country of origin certificates to clients, and can provide official authentication (by foreign country embassy) and notarized inspection report. Reportedly has cooperated closely with Ministries of Trade and Industry and Chambers of Commerce in Singapore, Malaysia, Indonesia, Thailand, Hong Kong, and the United Arab Emirates. Ports include Shanghai, Ningbo, Qingdao, Tianjin, Zhapu, Wenzhou, Shenzhen, and Hong Kong. Transshipment hubs include Malaysia and Thailand. Products illegally transshipped include fasteners, steel pipes, steel wire hangers, and clothing.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### Shenzen Sunpower Interntional Logistics, Ltd.

Address:	Room 2207, Gonglu Building, Block C, Yitai Centre, Dongmembei Road, Luohu District, Shenzhen, China, 518003 Tel: +(86) 0755 2519 1363 Email: sunpower@szsuperior.com
Web:	<a href="http://www.szsuperior.com/cn/home/index.asp">http://www.szsuperior.com/cn/home/index.asp</a> <a href="http://www.ilazhu.cn/search/sell-service-9.html">http://www.ilazhu.cn/search/sell-service-9.html</a>
Other info:	Company based in Shenzhen, China, but headquartered in Ipoh, Malaysia. Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Provides various country of origin certificates depending on degree of customs inspection, production subject to AD/CV duties, and country of destination. Third-country certificates of origin provided include Taiwan, Malaysia, Indonesia, Bangladesh, Thailand, Vietnam, and Sri Lanka. All certificates of origin are provided by in-country factories. Company provides all documentation, customs declarations, factory inspection, and other relevant procedures.

### Wintrans Logistics and Investment & Management Co., Ltd

Addresses:	Room 26A-D, Ocean Building, 268 Lujian Road, Xiamen, Fujian, China Tel: +(86) 592 806 5305 Email: info@wintrans.com.cn  <b>Shenzhen Wintrans Logistics Co., Ltd.</b> Luohu District, Shenzhen City, Pacific Business Building, B1402, Shenzhen, Guangdong, China  <b>Shanghai Wintrans Branch</b> Siping Road, 188 2108, Shanghai China
Web:	<a href="http://www.wintrans.com.cn/en/info/detail.asp?ID=5">http://www.wintrans.com.cn/en/info/detail.asp?ID=5</a> <a href="http://cn.made-in-china.com/showroom/wintransalice/companyinfo/%E5%8E%A6%E9%97%A8%E9%80%9A%E6%B4%B2%E7%89%A9%E6%B5%81%E6%8A%95%E8%B5%84%E7%AE%A1%E7%90%86%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8.html">http://cn.made-in-china.com/showroom/wintransalice/companyinfo/%E5%8E%A6%E9%97%A8%E9%80%9A%E6%B4%B2%E7%89%A9%E6%B5%81%E6%8A%95%E8%B5%84%E7%AE%A1%E7%90%86%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8.html</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Claims to work with business partners in Indonesia, Myanmar, and Malaysia that provide certificates of origin issued by factories located in those countries. Directs payment through Malaysia or Hong Kong. Products include steel pipes, apparel, shoes, ceramics, and furniture. Export markets include the United States, Canada, Mexico, Turkey, and Latin America.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### Gateway Container Line Co., Ltd.

Addresses:	<p><b>Gateway Container Line Co., Ltd. (Qingdao)</b> B-1022, Yu Yuan Mansion, No. 75 West Hong Kong Road, Qingdao, China, 266071 Tel: +(86) 532 8197 8801</p> <p><b>Gateway Container Line Co., Ltd. (Tianjin)</b> Room 2602, Twain building, Hangua Plaza, Dagunan Road, Hexi District, Tianjin, China, 300000</p> <p><b>Gateway Container Line Co., Ltd. (Shanghai)</b> Room 2201, No. 1, Alley 258, Dongbaoxing Road, Shanghai, China, 200080 Tel: +(86) 21 6356 0173</p> <p>Room 612, Hesun Building, No. 1600 Yan'an Road (W), Shanghai, China, 200052 Tel: +(86) 21 5258 5515</p> <p><b>Gateway Container Line Co., Ltd. (Ningbo)</b> 19 Floor, Unit B, Century Square, No. 118 Daliang Street, Ningbo, China, 315000 Tel: +(86) 574 8717 5858</p> <p><b>Gateway Container Line Co., Ltd. (Shenzhen)</b> Room 1705, Building A, Huaguoshan Building, South Garden Road, Shekou, Shenzhen, China, 518067 Tel: +(86) 755 2680 5586</p>
Web:	<a href="http://www.gateway-group.cn/en/index.htm">http://www.gateway-group.cn/en/index.htm</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Claims to provide services to both domestic (Chinese) exporters and foreign importers.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### Global Success International Transportation (Shenzhen) Ltd.

Address:	18F, Overseas Friendship Building, No. 12, Ying Chun Road, Luohu, Shenzhen, China, 510800 +(86) 755 8214 5368 Email: info@globalsourcing.com.cn
Web:	<a href="http://www.globesuccess.com.cn/en/index.asp">http://www.globesuccess.com.cn/en/index.asp</a> <a href="http://www.ecplaza.net/tradeleads/seller/5605380/transshipment_project.html">http://www.ecplaza.net/tradeleads/seller/5605380/transshipment_project.html</a>
Registration no:	Certified by China's Ministry of Commerce as a licensed non-vessel operating common carrier (NVOCC) (NVOCC#MOCNV 01254).
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Malaysia, Singapore, Indonesia, Bangladesh, the Philippines, and India. Third-country certificates of origin are issued for Chinese-origin product. Provides illegal transshipment services for the following products subject to U.S. AD/CVD orders: fasteners, threaded rod, steel hangers, locks, and wooden bedroom furniture. Also provides transshipment services for products subject to AD/CV duties in Europe, South America, and Turkey.

### Dyna International Shipping Ltd.

Address:	Room 01-02, 16/F, Ginza International Building, Shennan Road, Shenzhen, Guangdong, China Tel: +(86) 755 2151 7557 Email: Shenzhen@dynaprc.com  Other offices located in: Hong Kong, Guangzhou, Shanghai, Beihai, Huangpu, Nanhai, Foshan, Zhongshan, Wuhan, Kunming, Ningbo
Web:	<a href="http://www.dynaprc.com/english/index.asp">http://www.dynaprc.com/english/index.asp</a> <a href="http://www.hardware-wholesale.com/d-p115413722755560100-service-to-avoid-the-anti-dump-tax-import-from-china/">http://www.hardware-wholesale.com/d-p115413722755560100-service-to-avoid-the-anti-dump-tax-import-from-china/</a>
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Malaysia, Singapore, Thailand, and Indonesia with third-country certificates of origin. Advertises illegal transshipment services for Chinese products subject to AD/CV duties in the United States, Mexico, Colombia, Egypt, Turkey, and Europe.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### Hanhen Shipping (China) Co., Ltd.

Address:	A-1109, Jintian Building, Heping Road, Luohu, Shenzhen, China Tel: +(86) 0755 2556 5280
Web:	<a href="http://www.hanhen.com">http://www.hanhen.com</a> <a href="http://ca2.mofcom.gov.cn/aarticle/supplydemandofchina/supply/200905/20090506267440.html">http://ca2.mofcom.gov.cn/aarticle/supplydemandofchina/supply/200905/20090506267440.html</a>
Identification no:	China Tax ID: 440300769195249 United Nations Procurement Division Vendor ID: 09D00065 (Logistic Supplier)
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Transshipment hubs include Singapore and Dubai. Country of origin certificates from Malaysia, Vietnam, Indonesia, and Bangladesh are issued for Chinese-origin products subject to AD/CVD orders. Advertises illegal transshipment services on the website of the Embassy of China in Canada.

### Suzhou Yuncheng Ex/Im Co., Ltd.

Address:	No. 8-7 Shop, Shuixiang West Road, Meili Street, Songling Town, Wujiang, Jiangsu, China, 215200
Web:	<a href="http://yuncheng.en.alibaba.com/trustpass_profile.html">http://yuncheng.en.alibaba.com/trustpass_profile.html</a> <a href="http://www.alibaba.com/product-gs/269042075/Third_country_re_exports_seamless_steel.html">http://www.alibaba.com/product-gs/269042075/Third_country_re_exports_seamless_steel.html</a>
Company representative:	Mr. Yucheng Zhou
Business registration no.:	320584000113121
Issuing authority:	Suzhou City Wujiang Administration for Industry and Commerce
Issue date:	10/18/2007
Expiration date:	10/17/2017
Registered capital:	RMB 3,000,000
Other info:	Advertises illegal transshipment services to avoid paying AD/CV duties and other import restrictions. Advertises illegal transshipment services for seamless steel pipe and carbon steel fasteners, among other products.

## Foreign Companies Willing to Evade U.S. AD/CV Duties (cont'd)

### L'Assurex International Logistic Ltd.

Address:	Room 1207, Logistics Center, No. 1, Haitian Road, Huli, Xiamen, Fujian, China, 361000
Web:	<a href="http://www.lassurex.com">http://www.lassurex.com</a> <a href="http://www.alibaba.com/product-gs/282892965/sea_freight.html">http://www.alibaba.com/product-gs/282892965/sea_freight.html</a> <a href="http://lassurex.en.alibaba.com/product/283189523-209769395/shipping_agency_in_china.html?tracelog=cgsotherproduct1">http://lassurex.en.alibaba.com/product/283189523-209769395/shipping_agency_in_china.html?tracelog=cgsotherproduct1</a>
Company representative:	Mr. Liming Zheng
Registration no.:	350200200006505
Issuing authority:	Xiamen City Administration for Industry and Commerce
Issue date:	10/11/2007
Expiration date:	10/10/2027
Registered capital:	RMB 10,000,000
Other info:	Advertises illegal transshipment services on alibaba.com to avoid paying AD/CV duties and other import restrictions. Provides certificates of origin from Malaysia, Indonesia, and India for Chinese-origin product. Export markets include the United States, Venezuela, Brazil, Argentina, Europe, Jordan, Egypt.



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**Part III:**  
**Examples of Companies Advertising**  
**Illegal Transshipment Services on the Internet**

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The Economic and Commercial Counsellor's Office of the  
Embassy of the People's Republic of China in Canada  
中华人民共和国驻加拿大大使馆经济商务参赞处

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Current Location: Homepage > Supply & Demand > Cooperation > Text

### Hanhen Shipping Company search for cooperation

Thursday, May 21, 2009 Posted: 21:12 BJT(12 GMT)  
From: Hanhen Shipping Company Article type: Reproduced

Dear Sir/Madam,

I am writing to introduce you to Hanhen Shipping Company, which is based in Shenzhen on the east coast of China. We have taken the liberty of obtaining your details from the website and have made contact with a view to our respective organizations doing business together.

About Hanhen Shipping Company -- <http://www.hanhen.com/>  
Logistics Partner of United Nations ( VENDOR ID 09D00065)

My company has many years' experience in handling FCL/LCL/AIR/LAND/RAIL shipments. We provide a wide range of shipping services, including arranging local contact with the shipper(MAERSK, YANGMING, EVERGREEN, WANHAI, APL, COSCO and CSCL etc.), issuing of delivery documents, custom clearances etc. Especially we have a great advantage in rail transport from China to Russia/Middle Asia and large engineering machine transport. We operate according to international law and the laws of the Republic of China.

Key services  
We enjoy long-term relationships with all of the main shipping lines and airlines. As your shipping and trading agent we can offer:

Competitive freight rates and reliable service to and from most locations  
Rail transport from Tianjin/Shanghai/Lianyungang/Xiamen/Shenzhen to Russia/Middle Asia, etc.  
Industrial Projects Handling, Large Engineering Machine Transport (Such as crane, Heavy equipment etc.)  
Sea Export & Import Service (FCL/LCL/Consolidation)  
Air Freight Service  
Third Party Logistics  
Dangerous Cargo Handling  
Transshipment from China to Malaysia then to USA direct, to avoid quota and provide C/O of Malaysia.  
Handling of documents and cargos for FOB to CIF transactions, including switch MBL and HBL  
Assistance in application for Certificate of Origin, Form A, Legalisation of Docs, BV, SGS, as per instructions  
Diversion of Shipments  
Import to Shanghai/Ningbo/Shenzhen/Guangzhou  
Import from Hongkong to Mainland China under CEPA  
ATA/Personal Effects/Air Shipment  
Door to door delivery (Mainly USA, Canada, India, Europe)  
Warehouse consolidation services - 1. Receive cargo from more than one suppliers and loading container; and 2. Our warehouse can be used as your storage centre, you can put some cargo first, and sell them to your buyers in China  
We have several offices in the India and other different countries of Asia

If you need any further information, pls kindly feel free to contact us! And I'm sorry if any inconvenienced that caused by this e-mail.

Best Regards!  
kent chen

Hanhen Shipping (China) Co., Ltd  
1109 Jintian Building, Heping Road,  
Luohu, Shenzhen, China  
C: +86 0755 25565280  
Fax: +86 0755 25561580  
Cell: +86 13818671486  
Skype: kentchenxujun  
Man: kent@hanhen.com  
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【Big medium-sized small】 【Print】 【Transmit】

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International Distribution

Triangular Trade

Business Service

According to traders' demands in commercial interests and import tariff reduction, we provide BL switch for triangular trade, changing the CO, etc in order to protect the interests of traders and save tariff expenses.

1. Based on the principle of commercial confidentiality, we HANHEN work seriously as a intermediate part between processing manufacturers, traders and end-buyers and switch documents reasonably.

2. We use Singapore, Dubai to offer entrepot trade service and issue CO of Malaysia, Vietnam, Indonesia, Bangladesh in order to avoid tariff barriers.



Triangular Trade



Re-export Trade



Contact: [sales@hanhen.com](mailto:sales@hanhen.com) | Global Contact: [info@hanhen.com](mailto:info@hanhen.com)  
Tel: +86 755 25594780 Fax: +86 755 25561580/1680

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There are 909 transshipment from 115 suppliers on Alibaba.com
Related Searches: transshipment, Wholesale transshipment

See larger image: transshipment, the best way to avoid anti-dumping

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### transshipment, the best way to avoid anti-dumping

Other products by Shipment Type: FCL and LCL

FOB Price: US \$2,000 - 8,000 / Carton **Negotiable**

Port: china

Minimum Order Quantity: 1 Carton/Cartons

Supply Ability: 100 Carton/Cartons per Day

Payment Terms: L/C,D/A,D/P,Western Union,MoneyGram

Ms. Helen Lu

Contact Supplier

Send a Message to this Supplier

#### Supplier Details

**Asavvy Furniture Co., Ltd.**  
Jiangsu, China (Mainland)

Business Type:  
Manufacturer, Trading Company, Distributor/Wholesaler

Contact Details  
Gold Supplier (1<sup>st</sup> Year)  
A&V Checked

Online Showroom: 247 Products  
Other Similar Products from this Supplier  
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#### Quick Details

Place of Origin: Zhejiang China (Mainland)	Brand Name: everally	Model Number: transshipment
Departure: china	Destinations: all over the world	Route: EU
Carrier: Everysky international freight forward...	Departure Day: Monday	Transit Time (Days): 35
Shipment Type: FCL and LCL		

#### Specifications

Are you looking for a way to avoid antidumping?  
Transshipment may be the best way at present.

Nowadays, Transshipment is the best way to avoid anti-dumping duties. Now, we will tell you how it helps you to avoid anti-dumping and how it reduces your cost.

As we know, your country doesn't charge high tariffs for all the country but China. Now we can help you to provide the documents to your government certifying that the products are made of other low tariff countries instead of China.

How can we do it?

- 1st: We need to export those products (made in China) to other country (just as Malaysia). It is easy for us to do it and which just need cost your little money.
- 2nd: We will finish custom clearance for those cargos in Malaysia and then send it to our warehouse. Picking up those to re-load it to the new container (boording with Malaysia).
- 3rd: Finding a local factory to provide all the original documents to your country. And then export the products to your instruction Port.

After the operation of above, the original will be changed from China to Malaysia. You just need to pay the normal import duty.

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Ms. Helen Lu  
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Transshipment may be the best way at present.

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**shipping service in china**

FOB Price: [Get Latest Price](#)  
Payment Terms: T/T

[Ms. rainnie ling](#)

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**Supplier Details**

**L'assurex International Logistic Ltd.**  
(Fujian, China (Mainland))

Business Type:  
Trading Company, Agent

Contact Details  
[Contact Details](#)

[Gold Supplier \(1st Year\)](#)  
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Online Showroom: 39 Products  
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Product Details
Company Profile

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**Quick Details**

Place of Origin: Fujian China (Mainland)      Brand Name: L'Assurex      Model Number: Garment;Shoes;Small household ap...

Departure: China      Destination: Brazil

**Specifications**

shipping service in china: Avoid high duty & tax or Anti-dumping duty Service: Malaysia/ Indones Form A/ CO & India CO/ Bengal Fo

We have more than 4 years experience in this field, which mainly trade in consulting services in Certificate of Origin.

shipping service in china: Malaysia Form A/ CO & Indonesia Form B/ Form A & India Co/ Bengal Form A

to Europe (Turkey/ USA/ Venezuela/ Brazil/ Argentina/ Jordan/ Egypt etc...

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1. Service to avoid this anti-dump tax import shoes from China to Europe/Mexico/USA.
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3. Service to avoid this anti-dump tax import Door Locks from China to Egypt/South America.
4. Service to avoid this anti-dump tax import metal Silicon from China to Europe.
5. Service to avoid this anti-dump tax import metal valve from China to Mexico.
6. Service to avoid this anti-dump tax import ceramic tile&PVC from China to Turkey/Egypt.
7. Service to avoid this anti-dump tax import Bike fittings from China to Europe.
8. Service to avoid this anti-dump tax import Energy-saving lighting from China to Europe.

Pls do not hesitate to contact me if need this kind of service.

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Company Profile

**Contact us**

Entrepot Logistics Shanghai  
[China]

**Address:**  
road siping 356 Shanghai  
Shanghai China

**Phone:**  
86-21-55159001

**Contact name:**  
kirk

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## Entrepot Logistics Shanghai

### About Us

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We provide via 3rd country bonded area logistics with CO, FORM A to evade anti-dumping duties in your country. MSN entrepot-logistics (at) hotmail.com

Transshipment is the best way to evade anti-dumping.

Now, more and more countries are restricting or anti-dumping import Made in China products, espacially Turkey and Mexico are restricting the fabrics which made in china is the severest. The transshipment is the only way to avoid it.

We can help you to avoid anti-dumping if ...

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### Company Profile

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Company Name:	Entrepot Logistics Shanghai
Country/Territory:	China
Business Type:	Others
Registration Date:	2010/04/01 (Year/Month/Date)
Buyer / Seller in EC21:	Both
Keyword	fabrics, laminate floor, yarns, polyester

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## Transshipment, Help You Avoid Anti-Dumping Duties

Posted Wed, 08/11/2010 - 02:31 by infirm  
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Website: [Http://www.re-export.net](http://www.re-export.net)

### Description:

Are you looking for a way to avoid antidumping? Transshipment may be the best way at present.

Now we will show you how it helps you to avoid anti-dumping and how it reduces your cost.

As we know, your country doesn't charge high tariffs for all the country but China. Now we can help you to provide the documents to your government certifying that the products are made of other low tariff countries instead of China.

How can we do it?

1st: We need to export those products(made in China) to other country (just as Malaysia). It is easy for us to do it and which just need cost your little money.

2nd: We will finish custom clearance for those cargos in Malaysia and then send it to our warehouse. Picking up those to re-load it to the new container(booking with Malaysia).

3rd: Finding a local factory to provide all the original documents to your country. And then export the products to your instruction Post.

After the operation of above, the original will be changed from China to Malaysia. You just need to pay the normal import duty.

We are experienced in it for many years, and we are confident that we have the ability to help you to lower the import tariff. You are welcomed to contact us if you are fond of our service

Tags: transshipment, freight forwarder, sea freight, air freight, avoid anti-dumping

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Best tailor made sea, air, land and multimodal shipping solutions for clients, issue authorized all way Bill of Lading.

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Take the advantage of preferential contracts with HANJIN, CSCL and COSCO, we're able to provide requested cabinet space during peak seasons as well as long term stable price for Europe lines to ports Hamburg, Felixstowe, Rotterdam and Antwerp. For Mid-east Persian Gulf lines to ports Dubai, Abu Dhabi, B. Abbas, Bahrain, Dammam, Doha, Kuwait and Muscat. Simultaneously, we also offered competitive rates.

**Bulk Cargo Export Business:**

Being export large machinery and autos in the manner of bulk cargo for long time, we've built up close relations with bulk carrier companies and bulk cargo ports.

**Import Business:**

Depend on a professional team, we have been offering flawless import distribution services for years, customers world wide are new able to trace their cargos on ship via our website. Our client-oriented employees are available for any queries even during national holidays.

**Air Cargo Business:**

Our competitive rate and services is to Southeast Asia, Australia and Europe.

**Special Services: Third Country Transshipment**

The fact that import tax for same product varies in Customs of different countries makes reasonably avoid anti-dumping possible. Since we are founded, count on our reliable official intelligence and mature experience, we have been providing One-Stop Third Country Transshipment logistic service for domestic exporters and foreign importers, effectively helped our clients lower the cost, increase the profit and the competitiveness.

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**TRANSHIPMENT PROJECT TO AVOID ANTIDUMPING TAX**  
 Posting Date: Feb 20, 2009 GMT

Company: [Globe Success International Transportation \(Shenzhen\) LTD](#)  
 Membership: Free Member since Feb 20, 2009  
 Country/Region: China  
 Address: 18FL, Oversea Friendship Building, 12#, Yingchun Road, Luohu, shenzhen, Guangdong, China 510800  
 Contact: Ms. ANNA LEE  
 Phone: 86-755-8214-5702  
 Fax: 86-755-8230-7954  
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TRANSHIPMENT PROJECT TO AVOID ANTIDUMPING TAX

1) In order to save the antidumping tax when import the goods from China, here we would like to provide the service to China shippers and oversea consignees to arrange their goods via the third countries' port (this can be in Malaysia, Singapore, Indonesia, Bangladesh, Philippine, India, etc.) and issue the third country document to ship the goods to the final destination country.

A. antidumping goods export from China to USA:  
a. fastener, thread rod, steel hangers, locks, bed room wooden furniture, etc.

B. antidumping goods export from China to Europe:  
a. fastener, thread rod, leather shoes, bicycle and energy saving lamp, etc.

C. Antidumping goods export from China to South America:  
a. Hardware, garment, bicycle, tyre, etc.

D. antidumping goods export from China to Turkey:  
a. Ironing board, garment, shoes, tile, ceramic etc.

E. other antidumping goods, just keep us inquired

2) Any further inquiry, just let us know below information, then we will provide our best project for the routine way and advice for yr choosing.

A. goods name (if any H.S CODE, it is better)  
 B. quantity  
 C. destination  
 D. shpt ready date—if any  
 E. yr special requirement—if any (such as transiting country, document, time, etc.)

Appreciated for yr further contact.

Best regards!  
 Anna Lee  
 Globe Success International Transportation (Shenzhen) LTD  
 SHENZHEN OFFICE  
 TEL: 86-755-82145702  
 FAX: 86-755-82307954  
 MOBILE: 86-13714045400

18FL, Oversea Friendship Building, No.12 Ying Chun Rd, Shenzhen, China.

**Optional Information**  
 - HS Code : 7318 Screws, Bolts, Nuts, Coach Screws, Screw Hocks, Rivets, of Iron or Steel

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**Contact Information**

**Ms. ANNA LEE** [Contact Now](#)  
 ( transhipment dept. )

Company : [Globe Success International Transportation \(Shenzhen\) LTD](#)  
 Address : 18FL, Oversea Friendship Building, 12#, Yingchun Road, Luohu, shenzhen, Guangdong, China  
 Zip/Postal : 510800  
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 Number of Employees: 5 ~ 50  
 Business Scope: Service  
 Member Since: 2009  
 Last Sign In Date: 2010-09-29

## Product List

Product Name	Update Date
Export Via A-Third-Country Against The Anti-Dumping Policy	2010-07-05
Customs Clearance in Russia or Ukraine	2010-01-18

📁 Related Category: Service » Commercial Service

## Contact Details



Pulinktrans

Company Name: Pulinktrans China Ltd.  
 Company Address: Room 206, Goldenland Building, No. 773 Siping Rd, Shanghai, P. R. China  
 City/Town: Shanghai  
 Province/State: Shanghai  
 Country/Region: China  
 Zip/Postal Code: 200092  
 Phone Number:  
 Fax Number:  
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 Contact Person (Department): Mr. Zhang(Re-Export Department)


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#### Member Info

Business Type: Trade, Service  
Number of Employees: 5 ~ 50  
Business Scope: Transportation  
Member Since: 2010  
Last Sign In Date: 2010-04-21

#### Contact Details



Company Name: Shanghai Wintrans Branch  
Company Address: Siping Road 188 2108, Shanghai, China  
City/Town: Shanghai  
Province/State: Shanghai  
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# EXHIBIT 5

## INDICTMENT

*UNITED STATES OF AMERICA V. ARTURO HUIZAR-VELAZQUEZ, ET AL.*  
U.S. DISTRICT COURT, SOUTHERN DISTRICT OF CALIFORNIA  
(JANUARY 2010 GRAND JURY)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY

*yub*  
DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2010 Grand Jury

UNITED STATES OF AMERICA,

Case No.

**10CR3099**

**JAH**

Plaintiff,

I N D I C T M E N T

v.

ARTURO HUIZAR-VELAZQUEZ (1),  
JESUS DE LA TORRE-ESCOBAR (2),

Defendants.

Title 18, U.S.C., Sec. 371 -  
Conspiracy to Defraud the United  
States and Commit Offenses against  
the United States; Title 18,  
U.S.C., Sec. 542 - Entry of Goods  
by Means of False Statements;  
Title 18, U.S.C. 1001 - False or  
Fictitious Statements; Title 18  
U.S.C., Sec. 2 - Aiding and  
Abetting; Title 18, U.S.C.,  
Sec. 1343 - Wire Fraud; Title 18,  
U.S.C., Sec. 1956 - Laundering of  
Monetary Instruments; Title 18,  
U.S.C., Secs. 981(a)(1)(C),  
982(a)(1), and Title 28, U.S.C.,  
Sec. 2461 - Criminal Forfeiture

The grand jury charges:

Introductory Allegations

1. At all times material to this indictment, defendant ARTURO HUIZAR-VELAZQUEZ was a businessman who, among other things, controlled companies involved in the importation of steel wire garment hangers to the United States. Two of the companies defendant ARTURO HUIZAR-VELAZQUEZ controlled were Proveedoras de Limpiaduria de Tijuana and Huizar Cleaner de Mexico, both of which operated out of Tijuana, Baja California, Mexico.

TCP:nlv(4):San Diego  
8/4/10

1        2.     At all times material to this indictment, defendant JESUS  
2 DE LA TORRE-ESCOBAR was an employee of defendant ARTURO HUIZAR-  
3 VELAZQUEZ. Defendant ARTURO HUIZAR-VELAZQUEZ would direct defendant  
4 JESUS DE LA TORRE-ESCOBAR to perform tasks on behalf of Proveedoras  
5 de Limpiaduria de Tijuana and Huizar Cleaner de Mexico as well as  
6 other companies.

7        3.     Defendant ARTURO HUIZAR-VELAZQUEZ maintained at least two  
8 bank accounts in the United States, one with Wells Fargo Bank and the  
9 other with Bank of America. Defendant JESUS DE LA TORRE-ESCOBAR would  
10 travel from Mexico to the United States to make cash deposits into  
11 these bank accounts on behalf of defendant ARTURO HUIZAR-VELAZQUEZ.  
12 Defendant ARTURO HUIZAR-VELAZQUEZ would use these bank accounts to  
13 wire payments to Chinese companies that manufactured steel wire  
14 garment hangers.

15       4.     In return for the payments, the Chinese companies would ship  
16 steel wire garment hangers from the People's Republic of China to  
17 defendant ARTURO HUIZAR-VELAZQUEZ in Mexico. Defendants ARTURO  
18 HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR would then arrange for  
19 boxes of these Chinese wire garment hangers to be stamped "Made in  
20 Mexico." After stamping these boxes "Made in Mexico," defendant  
21 ARTURO HUIZAR-VELAZQUEZ would cause the Chinese steel wire garment  
22 hangers to be shipped from Mexico to the United States. Defendant  
23 JESUS DE LA TORRE-ESCOBAR would assist in shipping the Chinese steel  
24 wire garment hangers by, among other things, arranging for them to be  
25 loaded onto a container.

26 //

27 //

28 //

5. United States Customs and Border Protection is an agency within the United States Department of Homeland Security. It is the duty of Customs and Border Protection to assess import duties owed to the United States. It is also the duty of Customs and Border Protection to enforce "anti-dumping tariffs" or "anti-dumping duties" established by the United States on certain goods.

6. An "anti-dumping duty" or "anti-dumping tariff" is a tax that the United States imposes on foreign manufacturers that sell goods at unfair prices that harm competing manufacturers in the United States. The United States has imposed an anti-dumping duty on Chinese manufacturers of steel wire garment hangers.

Count '1

1. The Introductory Allegations are realleged as if fully set forth herein.

2. Beginning on a date unknown to the grand jury and continuing up to and including May 26, 2010, within the Southern District of California and elsewhere, defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR did knowingly and intentionally conspire with each other and with other persons known and unknown to the grand jury, to defraud the United States and to commit offenses against the United States, to wit: Entry of Goods by Means of False Statements, in violation of Title 18, United States Code, Section 542; False or Fictitious Statements, in violation of Title 18, United States Code, Section 1001; and Aiding and Abetting in violation of Title 18, United States Code, Section 2.

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1        3. It was part of the conspiracy that defendants ARTURO HUIZAR-  
2 VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR would defraud the United  
3 States by interfering with and obstructing the lawful governmental  
4 functions of the United States Customs and Border Protection to  
5 collect duties at international borders and enforce trade regulations,  
6 including anti-dumping regulations, all by deceit, craft and trickery  
7 and by means that are dishonest.

8        4. It was also part of the conspiracy that defendants ARTURO  
9 HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR would cause to be  
10 entered and introduced into the commerce of the United States, Chinese  
11 manufactured steel wire garment hangers by means of causing the boxes  
12 containing them to be falsely stamped "Made in Mexico."

13        5. It was also part of the conspiracy that defendants ARTURO  
14 HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR would knowingly and  
15 willfully make false, fraudulent, and fictitious material statements  
16 to Customs and Border Protection officers, in a matter within the  
17 jurisdiction of the United States Department of Homeland Security, by  
18 furnishing Chinese manufactured steel wire garment hangers in boxes  
19 falsely stamped "Made in Mexico."

20                    MANNER AND MEANS OF CONSPIRACY

21        6. In furtherance of this conspiracy and to effect the objects  
22 thereof, defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-  
23 ESCOBAR, and other co-conspirators known and unknown to the Grand Jury  
24 utilized the following manner and means among others:

- 25            a. Defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA  
26                TORRE-ESCOBAR would transport cash from Mexico into  
27                the United States.

28        //

- 1           b. Defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA  
2           TORRE-ESCOBAR would deposit the cash in two bank  
3           accounts located in the United States.
- 4           c. Defendant ARTURO HUIZAR-VELAZQUEZ would then cause  
5           money to be wired from these accounts to an overseas  
6           account controlled by companies located in the  
7           People's Republic of China.
- 8           d. Defendant ARTURO HUIZAR-VELAZQUEZ would email F.H. and  
9           others to order Chinese manufactured steel wire  
10          garment hangers from a company in the People's  
11          Republic China, causing said hangers to be shipped via  
12          ocean container from the People's Republic of China,  
13          through the United States, to a warehouse in Tijuana,  
14          Baja California, Mexico.
- 15          e. Defendant JESUS DE LA TORRE-ESCOBAR would pick up day  
16          laborers and transport them to the warehouse in  
17          Tijuana where the ocean container containing the steel  
18          wire garment hangers was kept.
- 19          f. Defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA  
20          TORRE-ESCOBAR would instruct day laborers to unload  
21          the boxes of hangers from the ocean container.
- 22          g. Defendant ARTURO HUIZAR-VELAZQUEZ would then instruct  
23          day laborers to stamp the boxes "Made in Mexico" to  
24          create the false impression that the hangers were  
25          manufactured in Mexico.
- 26          h. Defendant JESUS DE LA TORRE-ESCOBAR would assist in  
27          re-loading the boxes onto the ocean container, knowing  
28          that they had been falsely labeled "Made in Mexico."

- i. Defendant ARTURO HUIZAR-VELAZQUEZ would falsely assert to a representative of Ferrer Brokers, Inc. that the container contained a cargo of steel wire garment hangers made in Mexico.
- j. Defendant ARTURO HUIZAR-VELAZQUEZ would cause Ferrer Brokers, Inc., to assert falsely to officials of United States Customs and Border Protection that said steel wire garment hangers were manufactured in Mexico and thus not subject to any import duty.
- k. Defendant ARTURO HUIZAR-VELAZQUEZ would cause the entry of the hangers from Mexico into the United States without paying a special anti-dumping duty on the hangers, thus depriving the United States of tax revenue owed to it.
- l. Defendant ARTURO HUIZAR-VELAZQUEZ would then obtain profits from this venture and pay defendant JESUS DE LA TORRE-ESCOBAR for his services.

OVERT ACTS

7. In furtherance of this conspiracy and to effect the objects thereof the following overt acts, among others, were committed within the Southern District of California, and elsewhere:

- a. On or about July 31, 2009, defendant ARTURO HUIZAR-VELAZQUEZ caused \$24,000 to be wired from a bank account in the United States to a bank account controlled by a wire hanger export company located in the People's Republic of China.

//

//

- 1           b.    On or about February 25, 2010, defendant JESUS DE LA  
2           TORRE-ESCOBAR entered the United States from Mexico  
3           with \$9,545 cash in his pockets.
- 4           c.    On or about February 26, 2010, defendant JESUS DE LA  
5           TORRE-ESCOBAR caused \$9,500 to be deposited in a Wells  
6           Fargo bank account.
- 7           d.    On or about March 9-17, 2010, defendant ARTURO HUIZAR-  
8           VELAZQUEZ caused to be shipped from the People's  
9           Republic of China to Mexico an ocean container  
10          containing approximately 18,900 kilograms of steel  
11          wire garment hangers manufactured in the People's  
12          Republic of China.
- 13          e.    On or about March 17-19, 2010, defendant ARTURO  
14          HUIZAR-VELAZQUEZ caused boxes of said steel wire  
15          garment hangers to be labeled "Made in Mexico."
- 16          f.    On or about March 17-19, 2010, defendant JESUS DE LA  
17          TORRE-ESCOBAR caused to be loaded boxes of steel wire  
18          garment hangers onto a container knowing them to have  
19          been falsely labeled "Made in Mexico."
- 20          g.    On or about March 19, 2010, defendant ARTURO HUIZAR-  
21          VELAZQUEZ caused a portion of these steel wire garment  
22          hangers to enter the United States from Mexico through  
23          the Otay Mesa Cargo Facility.
- 24          h.    On or about March 19, 2010, defendant ARTURO HUIZAR-  
25          VELAZQUEZ caused it to be falsely asserted to  
26          officials of United States Customs and Border  
27          Protection that said wire hangers were manufactured in  
28          Mexico.

1 i. On or about March 19, 2010, defendant ARTURO HUIZAR-  
2 VELAZQUEZ caused it to be asserted falsely to  
3 officials of United States Customs and Border  
4 Protection that no import duties were owed on said  
5 wire hangers.

6 All in violation of Title 18, United States Code, Section 371.

7 Count 2

8 1. The Introductory Allegations and the allegations in Count 1  
9 are realleged as if set forth herein.

10 2. On or about March 19, 2010, within the Southern District of  
11 California and elsewhere, defendants ARTURO HUIZAR-VELAZQUEZ and JESUS  
12 DE LA TORRE-ESCOBAR, did knowingly cause to be entered and introduced  
13 into the commerce of the United States, Chinese manufactured steel  
14 wire garment hangers by means of falsely stamping boxes containing  
15 said hangers "Made in Mexico"; in violation of Title 18, United States  
16 Code, Section 542, and Title 18, United States Code, Section 2.

17 Count 3

18 1. The Introductory Allegations and the allegations in Count 1  
19 are realleged as if set forth herein.

20 2. On or about March 19, 2010, within the Southern District of  
21 California and elsewhere, defendants ARTURO HUIZAR-VELAZQUEZ and JESUS  
22 DE LA TORRE-ESCOBAR, did knowingly and willfully make false,  
23 fraudulent, and fictitious material statements to Customs and Border  
24 Protection officers, in a matter within the jurisdiction of the United  
25 States Department of Homeland Security, in that they furnished Chinese  
26 manufactured steel wire garment hangers in boxes falsely stamped "Made  
27 in Mexico"; in violation of Title 18, United States Code,  
28 Section 1001(a)(3), and Title 18, United States Code, Section 2.

Counts 4-29

1. The Introductory Allegations and the allegations in Count 1 are realleged as if set forth herein.

2. On or about a date unknown to the grand jury and continuing up until May 26, 2010, within the Southern District of California and elsewhere, defendant ARTURO HUIZAR-VELAZQUEZ, devised a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent representations as set forth in the Introductory Allegations and Count 1.

3. Defendant ARTURO HUIZAR-VELAZQUEZ caused to be transmitted by means of wire communication in foreign commerce signals for the purpose of executing such scheme and artifice as set forth below:

Count	Date	Communication
4	12/22/08	\$15,668.80 wire transfer sent from Bank of America to a company in the People's Republic of China
5	12/22/08	\$15,848.40 wire transfer sent from Bank of America to a company in the People's Republic of China
6	2/2/09	\$16,308.20 wire transfer from Bank of America to a company in the People's Republic of China
7	4/13/09	\$11,690.70 wire transfer sent from Bank of America to a company in the People's Republic of China
8	5/26/09	\$22,559.09 wire transfer sent from Bank of America to a company in the People's Republic of China
9	6/25/09	\$14,497.35 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
10	7/2/09	\$17,293.40 wire transfer sent from Bank of America to a company in the People's Republic of China

Count	Date	Communication
11	7/23/09	\$10,483.00 wire transfer sent from Bank of America to a company in the People's Republic of China
12	7/31/09	\$24,000.00 wire transfer sent from Bank of America to a company in the People's Republic of China
13	9/11/09	\$11,245.00 wire transfer sent from Bank of America to a company in the People's Republic of China
14	9/16	\$12,829.00 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
15	9/23/09	\$14,973.60 wire transfer sent from Bank of America to a company in the People's Republic of China
16	9/24/09	\$14,870.00 wire transfer sent from Bank of America to a company in the People's Republic of China
17	9/30/09	\$14,078.80 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
18	10/27/09	\$12,662.72 wire transfer sent from Bank of America to a company in the People's Republic of China
19	11/18/09	\$13,258.60 wire transfer sent from Bank of America to a company in the People's Republic of China
20	11/23/09	\$14,964.40 wire transfer sent from Bank of America to a company in the People's Republic of China
21	12/17/09	\$13,324.50 wire transfer sent from Bank of America to a company in the People's Republic of China
22	1/4/10	\$13,594.38 wire transfer sent from Bank of America to a company in the People's Republic of China
23	1/6/10	\$13,717.00 wire transfer sent from Bank of America to a company in the People's Republic of China
24	2/8/10	\$15,612.90 wire transfer sent from Bank of America to a company in the People's Republic of China

Count	Date	Communication
25	3/1/10	\$14,000.00 wire transfer sent from Bank of America to a company in the People's Republic of China
26	3/1/10	\$10,000 wire transfer sent from Bank of America to a company in the People's Republic of China
27	4/5/10	\$19,150.50 wire transfer sent from Bank of America to a company in the People's Republic of China
28	4/5/10	\$10,000 wire transfer sent from Bank of America to a company in the People's Republic of China
29	5/7/10	\$13,102.20 wire transfer sent from Bank of America to a company in the People's Republic of China

All in violation of Title 18, United States Code, Section 1343.

Counts 30-55

1. Within the Southern District of California and elsewhere, defendant ARTURO HUIZAR-VELAZQUEZ did transmit and transfer, monetary instruments to a place outside the United States from within the United States with the intent to promote a specified unlawful activity, to wit, wire fraud, Title 18, United States Code, Section 1343, as set forth below:

Count	Date	Communication
30	12/22/08	\$15,668.80 wire transfer sent from Bank of America to a company in the People's Republic of China
31	12/22/08	\$15,848.40 wire transfer sent from Bank of America to a company in the People's Republic of China
32	2/2/09	\$16,308.20 wire transfer sent from Bank of America to a company in the People's Republic of China
33	4/13/09	\$11,690.70 wire transfer sent from Bank of America to a company in the People's Republic of China

Count	Date	Communication
34	5/26/09	\$22,559.09 wire transfer sent from Bank of America to a company in the People's Republic of China
35	6/25/09	\$14,497.35 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
36	7/2/09	\$17,293.40 wire transfer sent from Bank of America to a company in the People's Republic of China
37	7/23/09	\$10,483.00 wire transfer sent from Bank of America to a company in the People's Republic of China
38	7/31/09	\$24,000.00 wire transfer sent from Bank of America to a company in the People's Republic of China
39	9/11/09	\$11,245.00 wire transfer sent from Bank of America to a company in the People's Republic of China
40	9/16/09	\$12,829.00 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
41	9/23/09	\$14,973.60 wire transfer sent from Bank of America to a company in the People's Republic of China
42	9/24/09	\$14,870.00 wire transfer sent from Bank of America to a company in the People's Republic of China
43	9/30/09	\$14,078.80 wire transfer sent from Wells Fargo Bank to a company in the People's Republic of China
44	10/27/09	\$12,662.72 wire transfer sent from Bank of America to a company in the People's Republic of China
45	11/18/09	\$13,258.60 wire transfer sent from Bank of America to a company in the People's Republic of China
46	11/23/09	\$14,964.40 wire transfer sent from Bank of America to a company in the People's Republic of China
47	12/17/09	\$13,324.50 wire transfer sent from Bank of America to a company in the People's Republic of China

Count	Date	Communication
48	1/4/10	\$13,594.38 wire transfer sent from Bank of America to a company in the People's Republic of China
49	1/6/10	\$13,717.00 wire transfer sent from Bank of America to a company in the People's Republic of China
50	2/8/10	\$15,612.90 wire transfer sent from Bank of America to a company in the People's Republic of China
51	3/1/10	\$14,000.00 wire transfer sent from Bank of America to a company in the People's Republic of China
52	3/1/10	\$10,000 wire transfer sent from Bank of America to a company in the People's Republic of China
53	4/5/10	\$19,150.50 wire transfer sent from Bank of America to a company in the People's Republic of China
54	4/5/10	\$10,000 wire transfer sent from Bank of America to a company in the People's Republic of China
55	5/7/10	\$13,102.20 wire transfer sent from Bank of America to a company in the People's Republic of China

All in violation of Title 18, United States Code, Section 1956(a)(2)(A).

#### CRIMINAL FORFEITURE

As a result of the commission of the felony offenses alleged in Counts 1, 2 and Counts 4 through 29, said violations being punishable by imprisonment for more than one year, and pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), defendants ARTURO HUIZAR-VELAZQUEZ and JESUS DE LA TORRE-ESCOBAR shall, upon conviction, forfeit to the United States all rights, title and interest in any and all property constituting, or derived from proceeds, the defendants obtained

//

1 directly or indirectly, as a result of such violations, including, but  
2 not limited to:

3 1. A monetary judgment equaling the sum of not less than  
4 \$5,000,000.00 based on the gross proceeds realized from the  
5 aforementioned offenses by the conspirators; and,

6 2. Cash or other funds deposited in bank accounts or located  
7 elsewhere in the United States, including but not limited to Bank of  
8 America Account # xxxxxx-x0200 and Wells Fargo Bank Account  
9 # xxxxxx6105;

10 All in violation of Title 18, United States Code, Section 981(a)(1)(C)  
11 and Title 28, United States Code, Section 2461(c).

12 As a result of the commission of the felony offense alleged in  
13 Counts 30 through 55, said violations being punishable by imprisonment  
14 for more than one year, and pursuant to Title 18, United States Code,  
15 Section 982(a)(1), defendant ARTURO HUIZAR-VELAZQUEZ shall, upon  
16 conviction, forfeit to the United States all rights, title and  
17 interest in any and all property involved in such offense, and any  
18 property traceable to such property, including but not limited to:

19 1. Cash or other funds deposited in bank accounts or located  
20 elsewhere in the United States, including but not limited to Bank  
21 of America Account # xxxxxx-x0200 and Wells Fargo Bank Account  
22 # xxxxxx6105;

23 2. Any interest in Proveedoras de Limpiaduria de Tijuana and  
24 Huizar Cleaner de Mexico; and,

25 All in violation of Title 18, United States Code, Section 982(a)(1).

26 //

27 //

28 //

1 If any of the above-described forfeitable property, as a result  
2 of any act or omission of the defendant -

- 3 (1) cannot be located upon the exercise of due diligence;  
4 (2) has been transferred or sold to, or deposited with, a  
5 third person;  
6 (3) has been placed beyond the jurisdiction of the Court;  
7 (4) has been substantially diminished in value; or  
8 (5) has been commingled with other property which cannot  
9 be subdivided without difficulty;

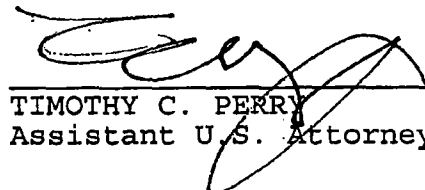
10 it is the intent of the United States, pursuant to Title 21, United  
11 States Code, Section 853(p) and Title 18, United States Code,  
12 Section 982(b), to seek forfeiture of any other property of the  
13 defendants up to the value of the said property listed above as being  
14 subject to forfeiture.

15 DATED: August 4, 2010.

16 A TRUE BILL:

17   
18 \_\_\_\_\_  
19 Foreperson

20 LAURA E. DUFFY  
21 United States Attorney

22 By:   
23 TIMOTHY C. PERRY  
24 Assistant U.S. Attorney  
25  
26  
27  
28

# EXHIBIT 6

## AD AND CVD ORDERS ON WIRE AND WIRE PRODUCTS

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

# AMERICAN WIRE PRODUCERS ASSOCIATION

## STATUS OF U.S. ANTIDUMPING (AD) AND COUNTERVAILING DUTY (CVD) ORDERS ON STEEL WIRE AND WIRE PRODUCTS

### BY COUNTRY

MARCH 2016

COUNTRY	PRODUCT	TYPE OF ORDER	DATE OF ORDER	DEPOSIT RATES
CHINA	STEEL NAILS	AD	August 1, 2008	0.00%—118.04%
	STEEL WIRE GARMENT HANGERS	AD	October 6, 2008	33.24%—187.25%
	UNCOVERED INNERSPRING UNITS	AD	February 19, 2009	164.75%—234.51%
	STEEL THREADED ROD	AD	April 14, 2009	39.42%—206.00%
	WIRE SHELVING	AD	September 14, 2009	0.00%—95.99%
	WIRE SHELVING	CVD	September 14, 2009	7.85%—264.09%
	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	June 29, 2010	42.42%—193.55%
	PRESTRESSED CONCRETE STEEL WIRE STRAND	CVD	July 7, 2010	9.42%—45.85%
	STEEL GRATING	AD	July 23, 2010	137.76%—145.18%
	STEEL GRATING	CVD	July 23, 2010	62.46%
	PRESTRESSED CONCRETE RAIL TIE WIRE	AD	June 24, 2014	31.40%—35.31%
VIETNAM	UNCOVERED INNERSPRING UNITS	AD	December 11, 2008	116.31%
	STEEL WIRE GARMENT HANGERS	AD	February 5, 2013	157.00%—220.68%
	STEEL WIRE GARMENT HANGERS	CVD	February 5, 2013	31.58%—90.42%
	STEEL NAILS	AD	July 13, 2015	323.99%
	STEEL NAILS	CVD	July 14, 2015	288.56%—313.97%
INDIA	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	January 28, 2004	83.65%—102.07%
	PRESTRESSED CONCRETE STEEL WIRE STRAND	CVD	February 4, 2004	62.92%
KOREA	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	January 28, 2004	35.64%—54.19%
	STEEL NAILS	AD	July 13, 2015	0.00%—11.80%
MEXICO	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	January 28, 2004	62.78%—77.20%
	PRESTRESSED CONCRETE RAIL TIE WIRE	AD	June 24, 2014	9.99%
TAIWAN	STEEL WIRE GARMENT HANGERS	AD	December 10, 2012	69.98%—125.43%
	STEEL NAILS	AD	July 13, 2015	0.00%—2.24%

**STATUS OF U.S. ANTIDUMPING (“AD”) AND COUNTERVAILING DUTY (CVD) ORDERS  
ON STEEL WIRE AND WIRE PRODUCTS**

**By Country**

MARCH 2016

PAGE 2

COUNTRY	PRODUCT	TYPE OF ORDER	DATE OF ORDER	DEPOSIT RATES
BRAZIL	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	January 28, 2004	118.75%
JAPAN	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	December 8, 1978	0.00%—15.80%
MALAYSIA	STEEL NAILS	AD	July 13, 2015	2.66%—39.35%
OMAN	STEEL NAILS	AD	July 13, 2015	9.10%
SOUTH AFRICA	UNCOVERED INNERSPRING UNITS	AD	December 11, 2008	121.39%
THAILAND	PRESTRESSED CONCRETE STEEL WIRE STRAND	AD	January 28, 2004	12.91%
U.A.E.	STEEL NAILS	AD	May 10, 2011	18.13%—184.41%

# AMERICAN WIRE PRODUCERS ASSOCIATION

## STATUS OF U.S. ANTIDUMPING (AD) AND COUNTERVAILING DUTY (CVD) ORDERS ON STEEL WIRE AND WIRE PRODUCTS

### BY PRODUCT

MARCH 2016

PRODUCT	COUNTRY	TYPE OF ORDER	DATE OF ORDER	DEPOSIT RATES
STEEL NAILS	CHINA	AD	August 1, 2008	0.00%—118.04%
	UNITED ARAB EMIRATES	AD	May 10, 2011	18.13%—184.41%
	KOREA	AD	July 13, 2015	0.00%—11.80%
	MALAYSIA	AD	July 13, 2015	2.66%—39.35%
	OMAN	AD	July 13, 2015	9.10%
	TAIWAN	AD	July 13, 2015	0.00%—2.24%
	VIETNAM	AD	July 13, 2015	323.99%
	VIETNAM	CVD	July 14, 2015	288.56%—313.97%
STEEL WIRE GARMENT HANGERS	CHINA	AD	October 6, 2008	33.24%—187.25%
	TAIWAN	AD	December 10, 2012	69.98%—125.43%
	VIETNAM	AD	February 5, 2013	157.00%—220.68%
	VIETNAM	CVD	February 5, 2013	31.58%—90.42%
UNCOVERED INNERSPRING UNITS	CHINA	AD	February 19, 2009	164.75%—234.51%
	SOUTH AFRICA	AD	December 11, 2008	121.39%
	VIETNAM	AD	December 11, 2008	116.31%
STEEL THREADED ROD	CHINA	AD	April 14, 2009	39.42%—206.00%
WIRE SHELVING	CHINA	AD	September 14, 2009	0.00%—95.99%
	CHINA	CVD	September 14, 2009	7.85%—264.09%
PRESTRESSED CONCRETE STEEL WIRE STRAND	CHINA	AD	June 29, 2010	42.42%—193.55%
	CHINA	CVD	July 7, 2010	9.42%—45.85%
	BRAZIL	AD	January 28, 2004	118.75%
	INDIA	AD	January 28, 2004	83.65%—102.07%
	INDIA	CVD	February 4, 2004	62.92%
	JAPAN	AD	December 8, 1978	0.00%—15.80%
	KOREA	AD	January 28, 2004	35.64%—54.19%
	MEXICO	AD	January 28, 2004	62.78%—77.20%
	THAILAND	AD	January 28, 2004	12.91%

**STATUS OF U.S. ANTIDUMPING (“AD”) AND COUNTERVAILING DUTY (CVD) ORDERS  
ON STEEL WIRE AND WIRE PRODUCTS**

**BY PRODUCT**

MARCH 2016

PAGE 2

STEEL GRATING	CHINA	AD	July 23, 2010	137.76%—145.18%
	CHINA	CVD	July 23, 2010	62.46%
PRESTRESSED CONCRETE RAIL TIE WIRE	CHINA	AD	June 24, 2014	31.40%—35.31%
	MEXICO	AD	June 24, 2014	9.99%

# EXHIBIT 7

## CBP REPORTS AND UPDATE ON ENFORCEMENT ACTIONS REGARDING AD/CVD DUTY EVASION

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

# **DECEMBER 2015 AD/CVD UPDATE**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



## Percentage of AD/CVD Entry Summaries filed in ACS vs ACE by Fiscal Year

Fiscal Year	Percent in ACE	Percent in ACS
2010	0.11	99.89
2011	0.17	99.83
2012	0.47	99.53
2013	11.59	88.41
2014	26.03	73.97
2015	57.34	42.66
2016	72.59	27.41

## Fiscal Year 2015 19 U.S.C. §1592 Penalties for AD/CVD Violations.

During FY 2015, U.S. Customs and Border Protection, CBP, assessed penalties under 19 U.S.C. §1592 for fraud, gross negligence, and negligence for AD/CVD violations for more than \$51 million. The penalties covered imports of commodities such as: aluminum extrusions, bedroom furniture, carbon and alloy steel, citric acid and sodium citrate, laminated woven sack, large diameter line pipe, pencils, petroleum candles, polyethylene bags, and tires.

## CBP Penalizes Two Wire Hanger Importers

In other penalty actions, CBP imposed \$420,478 in civil penalties on two importers from China for evading the antidumping duty order on wire hangers. CBP found that both importers failed to properly report the imports as subject to antidumping duties and failed to pay the antidumping duties. This resulted in a potential loss of revenue of \$1.4 million in antidumping duties. CBP found the importers negligent because of false statements and false invoicing. CBP is continuing its enforcement of the antidumping duty orders on wire hangers from China, Vietnam and Taiwan.

## Texas-Based Importers Agree to Pay \$15 Million to Settle False Claims Act Suit for Alleged Evasion of Customs Duties

The Department of Justice, DoJ, stated that University Furnishings LP and its general partner, Freedom Furniture Group Inc. (collectively known as University Furnishings) agreed to pay \$15 million to resolve a lawsuit brought under the False Claims Act. It was alleged that the companies made or conspired with others to make false statements regarding the tariff classification in order to avoid paying duties on wooden bedroom furniture imported from the People's Republic of China.

## 2016 Customs Steel Seminars

CBP's steel industry partners will be presenting five seminars in 2016. The partners are:

- American Iron and Steel Institute
- Committee on Pipe and Tube Imports
- Specialty Steel Industry of North America
- Wire Rod Producers' Coalition
- Pre-Stressed Concrete Railroad Tire Wire Coalition
- Steel Grating Coalition
- Long Product Producers' Coalition

The schedule for the steel seminars is:

Laredo, TX	February 23-25
New Orleans, LA	April 12-14
Philadelphia, PA	May 17-19
Los Angeles / Long Beach CA	July 19-21
Detroit, MI	August 23-25

# **JUNE 2015 AD/CVD UPDATE**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



### **AD/CVD Enforcement: 19 U.S.C. § 1592 Penalties**

In Fiscal Year 2015, CBP issued 11 penalties under 19 USC 1592 for Antidumping and Countervailing Duty (AD/CVD) violations for \$3,221,913. The following commodities were affected: Bedroom furniture; electro hydraulic units; citric acid and sodium citrate (2 cases); seamless carbon and alloy Steel; mattress spring coils; aluminum profiles; tires (2 cases), and, carbon corrosion resistant steel.

### **ACE Reports**

Effective May 11, 2015, all existing AD/CVD reports in the Automated Commercial Environment (ACE) secure data portal will be replaced with new reports designed to enhance AD/CVD oversight and provide data for both ACE and ACS entries. Personally customized AD/CVD reports currently saved in ACE users' "My Favorites" folder will no longer work.

The following two new reports will replace the existing AD/CVD reports for all trade users:

- ES-105 ADCVD Active Case List:
  - This report provides high-level information for active AD/CVD cases. It is meant to serve as a replacement for the Active Antidumping Cases and Active Countervailing Cases data files posted to CBP.gov.
- ES-109 ADCVD Entry Summary Liquidation:
  - This report provides information on unliquidated AD/CVD entry summaries and/or AD/CVD entry summaries liquidated over a particular time period. It is meant to serve as a replacement for the previous ESM-8027 report in ACE.

### **Prepare Now for November Transition to ACE for Entry/Entry Summary Filing**

On November 1, 2015, ACE will become CBP's official system of record for all electronically transmitted entry and corresponding summary data. Filers who are not prepared to file entries/entry summaries in ACE on November 1 could face delays in cargo processing, impacting release of entry goods at the border, since entries/entry summaries not filed in ACE will be filed as paper transactions.

### **Recent Accomplishments: 1<sup>st</sup> and 2<sup>nd</sup> Quarter FY2015**

Automotive and Aerospace (A&A) Center for Excellence and AD/CVD Alert issued a revenue alert on March 10, 2015 in response to this discovery. The revenue alert highlighted a \$50,459 recovery in the Port of Memphis based on the review of off-the-road tires for which AD/CVD deposits had not been paid.

On March 18, 2015, the completion of several entry summary reviews of Chinese off-the-road tires resulted in the collection of \$133,262 in unpaid AD/CVD deposits at the Port of Newark.

The top commodities involving AD/CVD violations include:

- Magnesite carbon brick
- New pneumatic off-the-road tires
- Seamless line & pressure pipe from Germany
- Steel wire hangers
- Non-oriented electrical steel from Sweden
- Passenger tires
- Refined brown aluminum oxide
- Monosodium glutamate
- Solar cells from Taiwan

# **JANUARY 2015 AD/CVD UPDATE**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



## AD/CVD Enforcement Updates

### CBP Makes Distributions under Continued Dumping and Subsidy Offset Act of 2000 (CDSOA)

U.S. Customs and Border Protection distributed \$70.1 million in antidumping and countervailing duties to eligible domestic producers in the affected industries in the FY 2014 distribution pursuant to CDSOA. AD/CVD collected on liquidated entries made prior to October 1, 2007 are eligible under CDSOA for distribution.

The distributions covered 270 AD/CVD Orders and include the following amounts to corresponding U.S. producers:

Corrosion-Resistant Carbon	
Steel Flat Products.....	\$28.1 million
Crawfish.....	\$19.8 million
Honey.....	\$7.3 million
Stainless Steel Plate in Coils .....	\$4.3 million
Hot Rolled Steel.....	\$1.5 million

The full list of CDSOA distributions for FY 2014 can be found at: [FY 2014 Annual Report](#)

### Selected FY 2014 Enforcement Highlights

- Import specialists at one port determined antidumping duties owed on shipments of activated carbon from China, and collected \$400,000.
- Import specialists determined that AD/CVD duties were due on six entries of tetrafluoroethane from China from two importers and approximately \$310,000 of AD/CVD duties were identified, and \$200,000 recovered.
- An entry summary-based operation collecting unpaid AD/CVD on Chinese carbon steel butt-weld fitting resulted in collection of \$2.3 million in AD/CVD.
- A review of sampled entry summary lines led to the collection of over \$210,000 on imports of helical spring lock washers from China and Taiwan.

- Import specialists reviewed over 100 steel entries from 8 importers, and found 9 shipments subject to antidumping order on non-oriented electrical steel. Four importers tendered over 2 million dollars for AD deposits, with an additional \$800,000 to be collected.
- One port evaluated entries of diamond saw blades, and collected \$251,626 in antidumping duties on 70 entries, with an additional \$400,000 to be collected.
- Targeting of shipments of xanthan gum from China led to over \$650,000 in antidumping deposits collected.

### AD/CVD Scam Alert

CBP issued a Scam Alert on CBP.gov about Chinese companies offering by email to transship goods subject to AD/CVD duties, as follows:

*"We have been exporting for many years from China, especially USA and Canada. If you need this product, please tell me, so I can quote you. Please do not worry about the dumping duties. This order will be operated through the intermediary trade. We will send the goods to a third country; the forwarder will repack our goods for export with other company title from that third country. It is a legit business."*

This is a violation of U.S. law. Knowingly engaging in activities designed to evade the payment of antidumping or countervailing duties is a federal crime. Violations involving duty evasion may result in civil and criminal penalties.

Report AD/CVD scams to CBP at: [CBP e-Allegations](#)

### CBP Labs and AD/CVD Enforcement

CBP Laboratories and Scientific Services played a key supporting role in CBP's anti-evasion efforts. In FY 2014, this division handled 1,746 samples relating to 529 cases of importations of suspect AD/CVD violations. The commodities analyzed included over 32 different products subject to AD/CVD orders.

# **DECEMBER 2014 AD/CVD UPDATE**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

**AD/CVD UPDATE****AD/CVD Enforcement Updates****Selected Fiscal Year 2014 Highlights**

- CBP collected \$508.5 million in AD/CVD cash deposits, a 12 percent increase from FY 2013.
- CBP conducted 78 audits of importers of AD/CVD commodities with AD/CVD discrepancies of \$24.6 million. CBP collected \$8.5 million. Commodities involved in the audits include aluminum extrusions, bearings, candles, nails, lock washers, pencils, plastic bags, ribbons, shrimp, solar cells, steel pipe, tires, tissue paper, wooden bedroom furniture, and wood flooring.
- CBP's AD/CVD targeting efforts led by the AD/CVD National Targeting and Analysis Group (NTAG) in Miami, Florida are achieving impressive results. AD/CVD NTAG targeting of imports of stainless steel sinks from China led to \$3.5 million in evaded AD and CVD identified in CBP entry summary reviews.

**Industry highlights**

- Frozen shrimp price increases: Certain types of frozen shrimp from several countries are subject to antidumping duties. According to the Southern Shrimp Alliance, since 2009 frozen shrimp import values have steadily increased, while domestic and import wholesale prices are trending upward.

**Department of Justice (DOJ) Files Four Cases with the Court of International Trade (CIT) Targeting Antidumping Duty Evasion**

The DOJ, on behalf of U.S. Customs and Border Protection (CBP), is seeking to recover antidumping duties and penalties levied by CBP in four cases involving imports of steel butt-weld pipe fittings, wire hangers, and polyethylene retail carrier bags from China. A combined total of about \$3.5 million of penalties and duties is being sought for collection.

*United States v. 3A Industrial Supply, LLC* (Oct. 5, 2014)

*United States v. AMW Trading, Inc.* (Oct. 8, 2014)

*United States v. Six Star Wholesale Inc.* (Oct. 8, 2014)

*United States v. CoStar, Inc.* (Nov. 4, 2014)

**Three Importers Contest CBP's Requests for Single Transaction Bonds as Additional Security for AD/CVD Concerns in the CIT**

CBP requests single transaction bonds as additional security to protect the revenue when it has reasonable suspicions that imports may be subject to additional AD/CVD duties. In three CIT cases filed in September and November 2014 involving imports of garlic from China and magnesia carbon brick allegedly from Vietnam, importers are beginning to challenge CBP's requests for single transaction bonds for AD/CVD concerns. The three cases are:

*Kwo Lee, Inc. v. United States*

*International Fresh Trade Corp. v. United States*

*FedMet Resources Corporation v. United States*

**CBP AD/CVD Entry Processing in FY 2014**

- CBP processed 279,890 new AD/CVD imports.
- CBP administered 1,532 AD/CVD instruction messages sent from the U.S. Department of Commerce, including 922 liquidation instructions to assess final AD/CVD duties.
- CBP assessed final duties on 142,481 AD/CVD entries.

**Industry Outreach**

- The annual CBP and Steel Industry Partnership meeting was held on October 21, 2014. CBP and the Steel Industry reaffirmed their partnership and will continue the steel seminar programs at the ports of entry. The U.S. steel industry works in partnership with CBP to enforce U.S. trade laws by providing trade intelligence and training to CBP personnel at various ports annually. Steel products constitute the largest group of AD and CVD orders, over 42 percent of all orders.
- CBP has an e-Allegations system to report trade violations at <https://apps.cbp.gov/callegations/>

# **CBP REPORT TO CONGRESS FOR 2014**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



# Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2014

*August 5, 2015*

Fiscal Year 2015 Report to Congress



Homeland  
Security

*U.S. Customs and Border Protection*

# Message from the Deputy Commissioner of CBP

August 5, 2015

I am pleased to present the following report, “Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2014,” prepared by U.S. Customs and Border Protection (CBP).

The report has been compiled pursuant to the language set forth in Senate Report 113-198 accompanying the *Fiscal Year (FY) 2015 Department of Homeland Security Appropriations Act* (P.L. 114-4) and Section 691(a) of the *North American Free Trade Agreement Implementation Act* (P.L. 103-182). The report provides an annual update regarding the collection of duties imposed under the Antidumping and Countervailing Duty laws during FY 2014. Additionally, the report summarizes CBP’s efforts to collect past due amounts and increase current collections.



Pursuant to Congressional requirements, this report is being provided to the following Members of Congress:

The Honorable John R. Carter  
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard  
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable John Hoeven  
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jeanne Shaheen  
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

The Honorable Orrin Hatch  
Chairman, Senate Committee on Finance

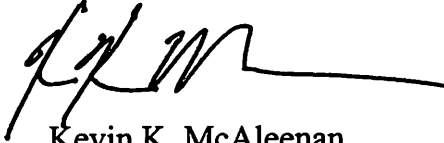
The Honorable Ron Wyden  
Ranking Member, Senate Committee on Finance

The Honorable Paul Ryan  
Chairman, House Committee on Ways and Means

The Honorable Sander M. Levin  
Ranking Member, House Committee on Ways and Means

I would be pleased to respond to any questions you may have. Please do not hesitate to contact my office at (202) 344-2001 or the Department's Deputy Under Secretary for Management and Chief Financial Officer, Chip Fulghum, at (202) 447-5751.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. McAleenan', with a long horizontal line extending to the right.

Kevin K. McAleenan  
Deputy Commissioner  
U.S. Customs and Border Protection

# Executive Summary

U.S. Customs and Border Protection (CBP) is committed to ensuring that Antidumping and Countervailing Duty (AD/CVD) laws are vigorously enforced. To this end, CBP has established key partnerships with U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), U.S. Department of Commerce (Commerce), U.S. Department of the Treasury, Office of the U.S. Trade Representative, and other partner agencies to provide comprehensive enforcement. With these effective collaborations in place, CBP has had success in identifying, penalizing, and disrupting efforts to evade the payment of AD/CVD. In FY 2014, CBP levied 29 monetary penalties totaling over \$61 million on importers for fraud, gross negligence, and negligence for AD/CVD violations under 19 USC § 1592. CBP also conducted 78 audits of importers that identified \$24.6 million in AD/CVD discrepancies with \$8.5 million collected to date.

The collection of outstanding AD/CVD duties and enforcement actions relating to AD/CVD matters remains a complex enforcement challenge. CBP and partner agencies are working closely together to address collection and related bonding issues. Consistent with legal requirements, in FY 2014, CBP continued to require additional security in the form of a Single Transaction Bond to protect the revenue when CBP had reasonable evidence of a risk of revenue loss. These measures have been very effective in protecting the revenue and facilitating compliance with AD/CVD. CBP also pursues administrative and/or judicial processes to maximize the collection of AD/CVD.

The future of AD/CVD enforcement will continue to rely on key partnerships, specifically with ICE HSI and Commerce, to identify patterns of noncompliance and to collaborate on enforcement cases. Partnerships with the trade community are also critical to identify unfair trading practices. The trade community provides market intelligence and commodity expertise to identify unfair trading practices or illegal trading activity. CBP is also implementing trade transformation initiatives to integrate and harmonize trade practices with CBP's processes, to better facilitate trade.

CBP's 10 Centers of Excellence and Expertise (CEE) are redefining how CBP understands trade risks on goods. By focusing on industry-specific issues, CBP is able to provide tailored support to unique trading environments. For CBP's AD/CVD enforcement, the CEEs are centralizing AD/CVD functions for the industries and importers covered by the respective CEE. The CEEs are helping to increase uniformity and expertise across CBP for administration of AD/CVD entries and AD/CVD enforcement. As described in this report, these initiatives underpin CBP's commitment to target the evasion of AD/CVD, protect the revenue of the U.S. Government, and ensure a level playing field for U.S. industry.



# Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2014

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# I. Legislative Language

This report has been compiled pursuant to the language set forth in Senate Report 113-198 accompanying the *Fiscal Year (FY) 2015 Department of Homeland Security Appropriations Act* (P.L. 114-4) and Section 691(a) of the *North American Free Trade Agreement Implementation Act* (P.L. 103-182).

Senate Report 113-198 states:

The Committee directs CBP to continue to work with the Departments of Justice and the Treasury (and all other relevant agencies) to increase collections, and provide a public report on an annual basis within 30 days of each year's distributions under the law. The report should summarize CBP's efforts to collect past due amounts and increase current collections, particularly with respect to cases involving unfairly traded United States imports from China. The report shall provide the same level of detail as required under this section in Senate Report 112-169.

The Committee further directs the Secretary and the Commissioner to work with the Secretary of Commerce to identify opportunities for the Department of Commerce to improve the timeliness, accuracy, and clarity of liquidation instructions sent to CBP. Increased attention and interagency coordination in these areas could help ensure that steps in the collection of duties are completed in a more expeditious manner. The Commissioner is directed to report within 180 days after the date of enactment of this act on the steps that have been taken in conjunction with the Department of Commerce to address these issues. Consistent with section 691a of Public Law 103-182, the North American Free Trade Agreement Implementation Act of 1993, the Committee directs the Commissioner to submit to Congress before the 60th day of each fiscal year a report regarding the collection of duties imposed under the AD/CVD laws during the preceding fiscal year.

Section 691(a) of P.L. 103-182 states:

(a) **ANTIDUMPING AND COUNTERVAILING DUTY COLLECTIONS.**—The Commissioner of Customs shall before the 60th day of each fiscal year after fiscal year 1994 submit to Congress a report regarding the collection during the preceding fiscal year of duties imposed under the antidumping and countervailing duty laws.

## II. Background on CBP's AD/CVD Enforcement

U.S. Customs and Border Protection (CBP) has a statutory responsibility to collect all revenue due to the U.S. Government, including Antidumping and Countervailing Duties (AD/CVD), resulting from the importation of goods into the United States. CBP has specifically designated AD/CVD enforcement as a Priority Trade Issue (PTI). PTIs are high-risk areas that can cause significant revenue loss, hurt the U.S. economy, or threaten the health and safety of the American people. The AD/CVD trade program was elevated to PTI status within CBP in FY 2003 to ensure that a concerted, systematic approach was implemented to facilitate legitimate trade, detect and deter evasion of the AD/CVD laws, and liquidate transactions in a timely and accurate manner.

CBP is committed to ensuring that AD/CVD laws are vigorously enforced, and takes an agencywide approach to AD/CVD enforcement. CBP collaborates with U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) to substantiate and act upon allegations of duty evasion and to support enforcement actions. CBP also partners with U.S. Department of Commerce (Commerce) on a wide range of AD/CVD issues related to enforcement responsibilities. CBP's agencywide coordination and partnerships with other government agencies are essential to its enforcement of AD/CVD laws.

### A. Enforcing AD/CVD Laws to Address Evasion

CBP is constantly developing new approaches to AD/CVD enforcement to meet the challenges posed by complex AD/CVD evasion schemes. CBP takes all indications or allegations of evasion very seriously and employs all available methods in accordance with law to address these matters. The increasing complexity of the strategies employed by parties attempting to evade AD/CVD laws is a constant challenge. CBP identifies potential evasion by working with U.S. industry, ICE HSI, Commerce, other U.S. Government agencies, and our international partners to develop new sources of information to identify AD/CVD evasion. CBP also takes a comprehensive and integrated view of security and trade enforcement and pursues all available avenues to identify and penalize efforts to evade AD/CVD. CBP is continually exploring options that will provide additional information and new and innovative tools to protect U.S. revenue and identify those who try to evade payment of AD/CVD.

CBP and ICE HSI have had success in identifying, penalizing, and disrupting efforts to evade the payment of AD/CVD. In FY 2014, CBP levied 29 monetary penalties totaling over \$61 million on importers for fraud, gross negligence, and negligence related to AD/CVD violations under 19 USC § 1592. These penalties covered importers of AD/CVD commodities such as artist canvas, aluminum extrusions, carbon steel,

chlorinated isocyanates, pasta, polyethylene retail carrier bags, saccharin, solar cells, stainless steel sinks, tapered roller bearings, and wire hangers for AD/CVD evasion, misclassification, and failing to properly file AD/CVD entries. CBP and ICE HSI seized shipments of AD/CVD commodities with a domestic value of over \$210,000 for violations of AD/CVD and related laws.

To target AD/CVD evasion, CBP utilizes significant national assets from across the agency to enforce AD/CVD laws. CBP employs many tools including import trade trend and valuation analysis, the use of targeted reviews and audits to address high-risk cases, lab testing, and special operations. In FY 2014, CBP carried out 35,148 reviews of potential AD/CVD evasion, which were recorded in CBP's Validation Activity system. CBP also conducted AD/CVD audit surveys to cover multiple importers of individual AD/CVD commodities. These AD/CVD audit surveys measure the risk of a sector of AD/CVD imports, determine the suitability of full audits, and provide informed compliance for future imports. In all, CBP completed 78 audits of importers of AD/CVD commodities, including aluminum extrusions, petroleum wax candles, steel nails, off-the-road tires, pencils, polyethylene retail carrier bags, ribbons, shrimp, solar cells, steel pipe, tapered roller bearings, tissue paper, wooden bedroom furniture, and wood flooring. Through these audits, CBP identified AD/CVD discrepancies with a value of approximately \$24.6 million and has collected approximately \$8.5 million to date. CBP is continuing to pursue collections of all unpaid duties.

CBP Laboratories and Scientific Services Division plays a key supporting role in CBP's anti-AD/CVD evasion efforts. CBP employs lab testing in multiple ways to enforce AD/CVD orders, including determining whether imports fall under the scope of AD/CVD Orders, and the country of origin of imports (as long as a laboratory test is available to do so). In FY 2014, this division handled 1,746 samples relating to 529 cases of importations of suspect AD/CVD violations. The commodities analyzed included aluminum extrusions, aluminum oxide, aluminum tubing, artist canvas, coated paper, bearings, diamond sawblades, garlic, hand trucks, hardwood and decorative plywood, honey, magnesia carbon bricks, mushrooms, pasta, petroleum wax candles, polyethylene retail carrier bags, polyethylene terephthalate film, solar cells, stainless steel sinks, stainless steel wire rod, steel hangers, steel nails, steel pipe, steel threaded rod, stilbenic optical brightening agents, wood flooring, thermal paper, tissue paper, and xanthan gum.

## **1. Enforcement Partnerships**

CBP's most valuable partner in AD/CVD enforcement is U.S. industry. U.S. industry, trade associations, and importers provide critical insight to CBP on enforcement issues related to developments in AD/CVD and other trade-sensitive imports, and advise CBP staff on the latest industrywide changes for such commodities. They also provide CBP with information on specific companies and imports, as well as technical commodity information. CBP has effective working relationships with many U.S. industries and

meets regularly with U.S. industry representatives to discuss AD/CVD evasion schemes, and U.S. industry representatives share valuable market and product information with CBP. By working with the trade community, CBP deepens its understanding of the way business and industry operates in the ever-changing global marketplace and leverages that information for risk analysis and targeting.

Meetings with industry representatives strengthen CBP's collection of AD/CVD on various types of merchandise. CBP works with U.S. industry to help prepare CBP to enforce AD/CVD on new products. During the preliminary phases of Commerce's AD/CVD investigations, CBP meets with industry representatives to obtain market information and commodity expertise, and CBP provides technical advice to make the measures more enforceable. During FY 2014, CBP held in-depth discussions with industry representatives to prepare to enforce AD/CVD on commodities such as grain-oriented electrical steel, monosodium glutamate, nonoriented electrical steel, passenger vehicle and light truck tires, solar products, and tetrafluoroethane.

After AD/CVD orders are issued, CBP meets with U.S. industry to discuss trends and indications of AD/CVD evasion. CBP works with industry representatives and Commerce to provide national webinars to educate CBP field staff on commodities subject to AD/CVD. In FY 2014, CBP conducted webinars with U.S. industry representatives regarding aluminum extrusions, citric acid, diffusion annealed nickel-plated flat-rolled steel, pre-stressed concrete steel rail tie wire, raw flexible magnets, solar cells, tissue and crepe paper, and wood flooring. Through these webinars, U.S. industry representatives were able to educate and inform CBP personnel about the AD/CVD commodities and potential enforcement concerns.

In FY 2014, CBP Headquarters received 89 allegations of AD/CVD evasion and noncompliance. These allegations were primarily provided to CBP through CBP's e-Allegations online trade violations reporting system available at <https://apps.cbp.gov/eallegations>. CBP reviews and researches every allegation submitted through e-Allegations to determine the validity of the trade law violations being alleged. Some are reviewed and resolved internally within CBP, and some are referred to ICE HSI for further investigation.

CBP is also collaborating with trade partners to develop and implement trade transformation initiatives to integrate and harmonize trade practices with CBP's processes in order to better facilitate trade. CBP continues to meet regularly with the Commercial Operations Advisory Committee (COAC) to solicit advice and develop new initiatives with regard to CBP's enforcement and collections of AD/CVD.

CBP works closely with ICE HSI to identify and investigate evasion of AD/CVD laws. CBP personnel refer many cases of AD/CVD evasion to ICE HSI for criminal investigation and, after building the cases until they are ready for investigation, work

closely with ICE HSI to establish the evidence of criminal violations. CBP and ICE HSI are opening joint Trade Enforcement Centers across the United States to increase enforcement of AD/CVD and other trade issues.

Another valuable partner in AD/CVD enforcement is Commerce, which is responsible for administering the AD/CVD laws and establishing the duty amounts CBP collects from importers. CBP and Commerce share extensive information on AD/CVD. On a continuing basis, Commerce refers to CBP the allegations of fraud or evasion it receives from the public in addition to evidence it uncovers during the conduct of its own AD/CVD proceedings. Commerce also provides CBP with potential audit candidates on the basis of information received in the context of its AD/CVD proceedings. Commerce further supports CBP's efforts at countering evasion by reviewing, upon request, information obtained during CBP audits and identifying discrepancies or claims that contradict information on Commerce's record of the underlying proceeding.

## **2. Enforcement Results**

CBP's AD/CVD targeting efforts, led by the AD/CVD National Targeting and Analysis Group (NTAG) in Miami, Florida, achieved notable results in FY 2014. For example, NTAG targeting of imports of stainless steel sinks from China led to \$3.68 million in evaded AD/CVD identified in CBP entry summary reviews. Targeting efforts by the NTAG, in conjunction with various ports, also led to over \$300,000 in AD/CVD collection with regard to mushrooms from China, as well as HSI referrals for several commodities.

In FY 2014, other examples of CBP's successes from targeting in AD/CVD enforcement by the NTAG, ports of entry, and Centers of Excellence and Expertise (CEE) include:

- An audit of an importer of various commodities subject to AD/CVD orders, including aluminum extrusions, wooden bedroom furniture, and tissue paper, resulted in the collection of nearly \$6.4 million.
- Import Specialists at two ports identified misclassified entries of petroleum wax candles from China and collected over \$1 million.
- Audits of 11 importers of polyethylene retail carrier bags, as well as the review of suspected misclassified and undervalued entries at various ports, resulted in the collection of \$695,612 in AD/CVD duties.
- Import Specialists at one port identified AD duties owed on shipments of activated carbon from China, and collected \$400,000.
- Import specialists determined that AD/CVD were due from two importers on six entries of tetrafluoroethane from China. Approximately \$310,000 of AD/CVD duties were identified, and \$200,000 was recovered.
- An entry summary-based operation collecting unpaid AD/CVD on Chinese carbon steel butt-weld fittings resulted in the collection of \$2.3 million in AD/CVD duties.

- A review of sampled entry summary lines led to the collection of over \$210,000 on imports of helical spring lock washers from China and Taiwan.
- Import specialists reviewed steel entries from 8 importers, and found 9 shipments subject to AD duties on nonoriented electrical steel. Four importers tendered over \$2 million for AD deposits, with an additional \$800,000 to be collected.
- One port evaluated entries of diamond sawblades, and collected \$251,626 in AD duties on 70 entries, with an additional \$400,000 still due.
- Targeting of shipments of xanthan gum from China led to over \$650,000 in AD deposits collected.

In FY 2014, ICE HSI criminal investigations, with CBP support, successfully disrupted distribution networks of numerous types of imported Chinese goods evading AD/CVD. These efforts include:

- An ICE HSI investigation of a honey broker as part of Operation Honeygate that led to a 3-year jail sentence and fines of \$2.86 million. The importer was facilitating illegal honey imports by falsely declaring that the honey originated in countries other than China to avoid payment of AD duties.
- An ICE HSI investigation that led to the indictment of four individuals and one corporation involved in the transshipment of Chinese-origin aluminum extrusions through Malaysia in order to evade AD/CVD on imports from China. The individuals and corporation pleaded guilty to the charges against them.
- An ICE HSI investigation that led to the indictment of an importer of wooden bedroom furniture from China that was filing false customs documents in order to pay a lower AD rate. The importer pleaded guilty in federal court and will carry out a maximum penalty of 2 years in prison and a fine of \$250,000 or twice the gain or loss caused by the offense.

In FY 2014, in the U.S. Court of International Trade (CIT), the U.S. Department of Justice (Justice Department), on behalf of CBP, sought to recover AD/CVD and penalties levied by CBP in four cases involving imports of steel butt-weld pipe fittings, wire hangers, and polyethylene retail carrier bags from China. A combined total of about \$3.5 million of penalties and duties is being sought for collection.

The examples listed in this section highlight just a few of the operations that are routinely conducted by CBP personnel. These efforts reflect the continued dedication of CBP to target the evasion of AD/CVD laws, protect the revenue of the U.S. Government, and ensure a level playing field for U.S. industry.

## B. Legal Enforcement

CBP's Office of Chief Counsel (OCC), through the Associate Chief Counsel for Trade and Finance, the Associate Chief Counsel for Enforcement, and field offices, continues

its vigorous engagement in both administrative and judicial actions related to the collection of outstanding AD/CVD and enforcement actions for customs law violations relating to AD/CVD matters.

In FY 2014, collection and litigation efforts by the Associate Chief Counsel for Trade and Finance resulted in the actual receipt of more than \$38.1 million in AD/CVD. Trade and Finance attorneys carry out OCC's strategic approach to AD/CVD collections litigation, which involves trying lead cases that will control outcomes in numerous other matters and pursuing interest in excess of bond amounts to deter future nonpayment by sureties. At the close of FY 2014, Trade and Finance attorneys were involved in ongoing litigation in over 30 offensive cases, over 300 defensive cases, bankruptcies, and state receivership and liquidation proceedings, together totaling more than \$316 million in AD/CVD at stake. During FY 2014, the U.S. Court of Appeals for the Federal Circuit (CAFC) affirmed an award of more than \$6 million to CBP in a lead case on a common surety defense to liability for AD/CVD.<sup>1</sup> Also during FY 2014, CBP prevailed in the CIT in a test of CBP's statutory authority to require an importer to provide Single Transaction Bonds (STB) before importation of entries likely subject to a substantially higher AD/CVD rate.<sup>2</sup>

Additionally, in FY 2014, Trade and Finance attorneys continued working with other CBP offices to develop an improved AD/CVD collections process, and also continued offering wide-ranging legal support to the *Continued Dumping and Subsidy Offset Act* (CDSOA) program within CBP's Office of Administration. In part, this required the provision of extensive litigation support to the Justice Department to defend CBP, as eligibility for CDSOA distributions had generated over 50 lawsuits, with more than a dozen still pending before the CIT or the CAFC.

The Associate Chief Counsel for Enforcement and OCC field office attorneys further carry out OCC's strategic approach to AD/CVD enforcement by using various available legal authorities, including 19 U.S.C. § 1592 and the False Claims Act (31 U.S.C. §§ 3729 – 3733), to assist CBP in assessing and collecting administrative penalties for violations involving AD/CVD. CBP attorneys work jointly with the Justice Department and ICE in both criminal and civil litigation involving AD/CVD to imprison criminal offenders, impose millions of dollars in AD/CVD penalties, and to collect substantial AD/CVD from importers and sureties.

## C. AD/CVD Entry Administration

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<sup>1</sup> See *United States v. Great American Ins. Co. of NY*, 738 F.3d 1320 (Fed. Cir. 2013).

<sup>2</sup> See *Yin Xin Int'l Trading Co., Ltd. v. United States Bureau of Customs and Border Prot.*, Court No. 13-00392 (dismissed Dec. 27, 2013).

CBP continues to pursue modernization efforts to process AD/CVD entries and facilitate legitimate trade. The administration of AD/CVD entries is a paper-based, labor-intensive, and time-consuming process involving multiple steps over a period of several years for each entry. When importers file AD/CVD entries upon import of merchandise into the United States, CBP's tasks include:

- searching and reviewing AD/CVD messages from Commerce;
- ensuring proper collection of the required cash deposit;
- reviewing entries for proper suspension codes and holding codes; and
- filing the entries for several years until Commerce issues liquidation instructions related to the entries, pursuant to the statutory timelines governing Commerce's AD/CVD proceedings and judicial review of those proceedings.

Once Commerce issues liquidation instructions, CBP's tasks include:

- reviewing these complex instructions and determining which entries from previous years are subject to these instructions;
- manually applying the final duty rates and calculating the amount of final duties due;
- entering the proper codes to electronically liquidate each entry;
- implementing separate court-ordered injunctions to stop liquidations; and
- processing protests involving liquidation instructions and deemed liquidations.

Some of these steps are repeated multiple times for individual entries involving more than one AD/CVD case.

All AD/CVD case management information, Commerce message processing, and CBP field inquiries are now processed, managed, and stored in the Automated Commercial Environment (ACE) to give national visibility of the data to the CBP user, as well as Commerce and the trade community. CBP has a collaborative partnership with Commerce in which Commerce creates the AD/CVD case in ACE and updates the case information throughout the lifetime of the case.

Commerce creates and uploads into ACE all the messages with instructions to CBP. The AD/CVD case information interacts with CBP's Automated Commercial System (ACS) and ACE entry processing systems, allowing importers and customs brokers to file AD/CVD entry information and CBP to liquidate the entries in ACS (the liquidation capability will remain in ACS until a liquidation module is developed in ACE).

In FY 2014, CBP processed 1,393 AD/CVD instruction messages issued by Commerce. CBP staff at ports of entry used the ACE AD/CVD inquiry module to submit 500 inquiries on AD/CVD issues to CBP Headquarters and Commerce. In addition, in FY 2014, CBP liquidated more than 142,481 AD/CVD entries in ACS. CBP and Commerce

continue to work together to identify enhancements to ACE that will further facilitate AD/CVD administration and enforcement.

CBP is initiating techniques to centrally manage and oversee the liquidation of AD/CVD entries on a national basis. These efforts are continuing in FY 2015.

## D. Trade Transformation

CBP is undergoing a rigorous transformation of how the agency processes trade. The result is the formation of CBP's 10 CEEs. The CEEs are integrating and harmonizing trade practices with the goal of increasing uniformity of commodity-specific processing procedures across ports of entry, facilitating timely resolution of trade compliance issues nationwide, and further strengthening crucial agency knowledge about key industry practices. CBP's CEEs are leveraging "trade intelligence" from industry to enhance CBP's ability to stay one step ahead of industry trends, as well as to capture specific allegations of trade fraud. The CEEs are enhancing CBP trade personnel's ability to specialize in commodities (including those subject to AD/CVD), building advanced knowledge in their respective industry, and increasing CBP's understanding of trade risks.

By focusing on industry-specific issues, the CEEs are able to provide tailored support to unique trading environments. For CBP's AD/CVD enforcement, the CEEs also will centralize AD/CVD functions for the industries and importers covered by the respective CEE. The CEEs will help increase uniformity and expertise across CBP for administration of AD/CVD entries and AD/CVD enforcement.

The 10 CEEs were all operational during FY 2014, and are continuing to expand their operational capabilities. Several CEEs have already participated in operations to identify evasion of AD/CVD in specific commodity sectors. CBP's 10 CEEs are as follows:

- Agriculture and Prepared Products (Miami);
- Automotive and Aerospace (Detroit);
- Apparel, Footwear, and Textiles (San Francisco);
- Base Metals (Chicago);
- Consumer Products and Mass Merchandising (Atlanta);
- Electronics (Los Angeles);
- Industrial and Manufacturing Materials (Buffalo);
- Machinery (Laredo);
- Petroleum, Natural Gas, and Minerals (Houston); and
- Pharmaceuticals, Health, and Chemicals (New York).

The Electronics, Pharmaceuticals, and Petroleum CEEs are expected to be fully operational by the end of FY 2015.

### III. AD/CVD Collections

#### A. Uncollected AD/CVD Duties

Pursuant to U.S. law, the AD/CVD regime operates on a retrospective basis. CBP collects estimated AD/CVD at the time of entry, but the actual AD/CVD that an importer should pay is not known until Commerce issues appropriate liquidation instructions. Commerce will conduct reviews only when a request is made. If no review is requested, Commerce will issue automatic instructions requesting CBP to liquidate at the amount of the cash deposit or bonding rate. If a review is conducted, Commerce will issue liquidation instructions following the completion of the review. Commerce reviews are usually completed within 1 to 2 years after entry has occurred. However, Commerce's findings also are subject to judicial review by the CIT, the CAFC, and possibly the U.S. Supreme Court; therefore, the final determination of the amount of AD/CVD due may not be known for several years. If the actual AD/CVD rate established by Commerce is greater than the estimated AD/CVD paid at entry, CBP is required to issue a bill to the importer to collect the additional duties. In many cases, and especially for AD/CVD orders covering imports from China, there is a substantial difference between the estimated and final AD/CVD duty rates.

Pursuant to law and regulation, the importer of record, which could be a foreign-based company, is liable for the additional duties in addition to the surety listed on the associated bond. Some importers are unwilling or unable to pay the actual duties, and some are no longer in business when CBP issues a bill, leading to uncollected AD/CVD. Undercapitalized importers with few assets, if still in business by the time bills for final AD/CVD are issued, often have difficulties in paying these bills. Other importers, often in the form of shell companies and foreign nonresident importers, have no intention of paying any final duties, and disappear as soon as there is any indication that final duties may increase. This is especially true for AD/CVD orders covering imports from China, and Chinese agriculture/aquaculture imports in particular. In addition, some importers participate in schemes to intentionally evade AD/CVD laws by filing incorrect entries, leading to additional uncollected AD/CVD.

CBP faces significant challenges in collecting unpaid duties from importers who have no assets in the United States. In addition, CBP faces significant challenges in collecting debts from importers located in other countries. Because the United States does not have reciprocal revenue agreements with foreign countries, it is difficult for CBP to collect from foreign-based entities. When CBP cannot collect from the importer, the amount of the bond is often insufficient to cover the duties owed.

In general, it is challenging for CBP to set prospective bonding levels for AD/CVD imports when the final duty liability and payment risk are unknown at the time of importation. Because the bond amount (set at entry) cannot be raised to reflect the unknown final assessments, the amount of the bond is often insufficient to cover the differences between the cash deposit and the assessment rate. The problems surrounding insufficient bonding amounts persist and are exacerbated by CBP's reliance on bond coverage in the case of undercapitalized importers, and by the lengthy delay that often occurs between importation and the final resolution of all applicable legal challenges. CIT and World Trade Organization rulings limit CBP's ability to increase the bonding amounts in most instances commensurate with the risk of a broad category of AD/CVD imports (such as a single commodity). The ability to impose bonding requirements that are more commensurate with the risk assessed would assist CBP to address this bonding and collection challenge on AD/CVD imports.

In FY 2014, uncollected AD/CVD on imports from China continued to make up a significant portion of the uncollected duties. In total, imports from China account for 93 percent of the uncollected AD/CVD. The top five cases for uncollected AD/CVD, comprising \$1.7 billion (or approximately 85 percent) of the \$2.0 billion in unpaid duties, all involve imports from China. Four of the top five cases for uncollected AD/CVD cases involve imports of Chinese agriculture/aquaculture products (*see* Section V of this report for more detailed information on uncollected AD/CVD). In addition, imports from Chinese new shippers, which often surge after receiving low duty rates through new shipper reviews, constitute at least 40 percent of uncollected duties, according to past U.S. Government Accountability Office studies.<sup>3</sup>

CBP continues to explore alternatives that will help to alleviate these challenges. CBP's analysis of uncollected duties is increasing CBP's understanding of trade risks related to AD/CVD collection and is helping to focus the risk analysis and targeting of the problem areas to make the measures more enforceable. Understanding the source of the uncollected duties is helping CBP to focus its efforts in those areas where greater risk exists. For example, CBP continues to try to address this problem by employing its legal authority to require additional security in the form of an STB on AD/CVD imports to protect the revenue when CBP has reasonable evidence that a risk of revenue loss exists. In cases of AD/CVD evasion and noncompliance (and other identified financial risks), these measures have been very effective in protecting the revenue and facilitating compliance with AD/CVD orders. Through these efforts and other bonding programs like E-bonding (*see* below), CBP is working diligently to proactively address the potential loss of AD/CVD. There was a decline (approximately 62 percent) in the uncollected AD/CVD amounts for FY 2014 open bills (those issued in FY 2014) from the uncollected amounts for FY 2013 open bills (those issued in FY 2013). With these

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<sup>3</sup> *See* United States Government Accountability Office, *Antidumping and Countervailing Duties, Congress and Agencies Should Take Additional Steps to Reduce Substantial Shortfalls in Duty Collection*, GAO-08-391 (March 2008).

ongoing efforts, CBP hopes to continue with this trend and discourage any further evasion of AD/CVD.

## B. Debt Collection Process

CBP is actively pursuing collection of uncollected AD/CVD against delinquent importers and sureties. An AD/CVD bill is created when an entry of imported merchandise, subject to CVD under 19 U.S.C. § 1671 or AD under 19 U.S.C. § 1673, liquidates with an increase in duties. AD/CVD bills are the direct result of a specific order from Commerce to liquidate the entry with additional AD/CVD due. CBP notifies the principal (importer) at the time of initial billing, and every 30 days after the due date, until the bill is paid or otherwise closed. Approximately 60 days after the initial bill date, CBP will report outstanding bills on a “Formal Demand on Surety for Payment of Delinquent Amounts Due” (informally known as the “612 report”), and every month thereafter until the bill is paid or otherwise closed. In accordance with 31 CFR § 901.2, CBP also provides an additional written demand informing the surety of the consequences of failing to cooperate with the agency to resolve the debt. CBP’s total process (importer demands and surety demands) for a given bill is 300 days, even before it is referred to CBP’s internal legal counsel. This period can be delayed if requested documents are not received.

Ultimately, if CBP is unable to collect the applicable duties from either the principal or surety via administrative collection processes and it is determined to be legally enforceable, the debt will be referred to CBP OCC for legal action if the principal amount is over \$1,500. OCC reviews each claim for legal sufficiency and makes demands on delinquent entities or refers matters to Justice Department for litigation, when appropriate (*see* the Legal Enforcement section of the report for more information). When available surety bond coverage fails to result in full payment of a claim, and the available evidence indicates that the importer may have gone out of business and left no assets that could satisfy a judgment, OCC refers the bills back to the Revenue Division for further investigation to determine the viability of the importer and/or to initiate termination of collection procedures.

The write-off period, or length of time it normally takes CBP to write off uncollected bills, varies by bill because of factors surrounding an importer, and the amount and nature of the debt. The time period also involves other factors such as protests, referral to CBP’s internal legal counsel, surety demands, and bankruptcy.

## C. Measures to Increase Collections

Consistent with legal requirements, CBP continued in FY 2014 to require additional security in the form of an STB to protect the revenue when CBP has reasonable evidence

of a risk of revenue loss. When utilized in cases of AD/CVD evasion and noncompliance (and other identified financial risks), these measures have been very effective in protecting the revenue and facilitating compliance with AD/CVD. CBP also pursues administrative and/or judicial processes to maximize the collection of AD/CVD through the court system.

In three CIT cases filed in FY 2014, importers of Chinese garlic contested CBP's STB requirements. In two of the three cases, *Yin Xin International Trading Co., Ltd and Jinxiang Hejia Co., Ltd. V. United States* and *International Fresh Trade Corp. v. United States*, the CIT denied the importers' requests for a temporary restraining order and preliminary injunction to stop CBP from requesting STBs.<sup>4</sup> In the third case, *Kwo Lee, Inc. v. United States*, the court granted the importer's request for a temporary restraining order and preliminary injunction, thereby preventing CBP from imposing the heightened bonding requirement on certain shipments.<sup>5</sup> CBP is continuing to target and review Chinese garlic shipments due to concerns about the appropriate payment of AD duties on subject imports.

In FY 2014, CBP proposed establishing a centralized office within the Office of Administration with the responsibility for developing and implementing STB policy, reporting on STB activities, and monitoring STB effectiveness. Upon implementation of the proposed new structure, all STBs will be filed at the Revenue Division in the Office of Administration and co-located with continuous bond processing. The proposed operating model would also require the development of a web-based bond application, known as E-bond, which serves as the platform through which sureties are to provide STBs. E-bond became effective in January 2015. E-bond will provide more transparency for all trade participants on the bonding process.

Further, a key component of the agency's strategy during FY 2014 to improve collections on AD/CVD debts involved the creation of a permanent team within CBP's Office of Administration dedicated solely to the collection of AD/CVD debts. In March 2014, the AD/CVD Collections Team consisting of four full-time members became operational. CBP personnel and their colleagues from other agencies also are working closely together to address collection issues in general. CBP plans to expand its dialogue with other agencies to jointly develop new ideas on bonding and other measures to increase AD/CVD collections.

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<sup>4</sup> See *Yin Xin International Trading Co., Ltd and Jinxiang Hejia Co., Ltd. v. United States*, Court No. 13-00392 (CIT 2013), and *International Fresh Trade Corp. v. United States*, Slip Op. 14-131 (CIT 2014).

<sup>5</sup> See *Kwo Lee, Inc. v. United States*, Slip Op. 14-121 (CIT 2014).

## IV. Agency Coordination

Senate Report 113-198 and P.L. 103-182 direct CBP to work with Commerce, U.S. Department of the Treasury (Treasury), and the Office of the U.S. Trade Representative, and all other relevant agencies to increase collections. In accordance with this requirement, CBP closely collaborates with ICE HSI to substantiate and act upon duty evasion allegations and to support enforcement actions. CBP works with ICE HSI at all levels to coordinate civil and criminal enforcement of the AD/CVD laws. Together, CBP and ICE HSI continued to work closely together on AD/CVD and other commercial fraud enforcement through the National Intellectual Property Rights Coordination Center, joint Trade Enforcement Coordination Center at the regional level, and expanding cooperation at the port and Special-Agent-in-Charge level. CBP and ICE HSI plan to continue to jointly train field staff from both agencies across the Nation on collaborating on AD/CVD commercial fraud enforcement.

CBP holds biweekly meetings at the working level and quarterly meetings at the executive level with Commerce to coordinate AD/CVD-related administration and enforcement activities. ICE HSI also began to participate in the joint working level meetings in FY 2014. This coordination helps to facilitate CBP's AD/CVD entry, liquidation, and collection processes on numerous case-specific issues throughout the year. CBP also meets, as needed, with Commerce, Treasury, and the Office of the U.S. Trade Representative as a group to confer on AD/CVD issues.

In general, CBP and Commerce interact at the working level on a daily basis on numerous technical issues. CBP and Commerce closely consult on the scope language of new AD/CVD petitions. Commerce regularly provides technical advice to CBP on the scope of existing AD/CVD orders, and the coverage of AD/CVD cash deposit and liquidation instructions. In FY 2014, Commerce staff also participated and provided extensive input in the COAC's AD/CVD working group.

CBP and Commerce continue to work jointly to improve the timeliness, accuracy, and clarity of liquidation instructions. CBP port personnel communicate daily with Commerce on AD/CVD matters and questions related to specific entries through the AD/CVD Portal within ACE. CBP reviews every AD/CVD instruction drafted by Commerce and advises Commerce about any concerns with the content of the message. Commerce continues to regularly review and edit its boilerplate AD/CVD instructions to enhance clarity, and collaborates with CBP on the language of fact-specific instructions, which deviate from the boilerplate.

Commerce, with CBP, also continued to research the status of liquidation instructions on unliquidated AD/CVD entries dating back to the 1970s that are still in CBP's databases

and files so that liquidation instructions could be issued where appropriate. Commerce helped to identify liquidation instructions for 868 unliquidated pre-1996 AD/CVD entries. CBP then worked to liquidate all of its pre-1996 AD/CVD entries in its databases.

In FY 2014, CBP identified a number of entries of Chinese garlic, crawfish tail meat, mushrooms, and honey from new shippers that entered between 1999 and 2006 that remained unliquidated. Commerce helped identify the liquidation instructions for these entries. With this information, CBP worked to liquidate and collect any cash deposits that were secured by STBs on these entries.

## V. Import and Collection Data

In FY 2014, companies imported approximately \$2.46 trillion in goods and deposited approximately \$43.3 billion in duties, taxes, and fees in the Treasury. Of the \$2.46 trillion in goods imported in FY 2014, approximately \$8.3 billion, or 0.3 percent, were subject to an AD/CVD order. Importers deposited approximately \$508.8 million in AD/CVD duties, which represents 1.2 percent of the \$43.3 billion in total duties, taxes, and fees.

There are approximately 40,000 unpaid AD/CVD bills from FY 2001 through FY 2014 totaling approximately \$2 billion, for which CBP is pursuing collection. Of this amount, \$145.5 million is under protest and \$101.2 million involves bankrupt debtors. Further amounts are owed by importers that have disappeared or dissolved without going through the bankruptcy process. Additionally, tens of millions of dollars are owed by sureties that are in rehabilitation or receivership.

A disproportionate share, indeed the major component, of all uncollected AD/CVD debt involves imports from China. As stated in Section III of this report, the top five AD/CVD cases for uncollected AD/CVDs all involve imports from China, and comprise more than \$1.7 billion (or approximately 85 percent) of the \$2.0 billion in unpaid duties, as follows:

• Fresh Garlic	(A-570-831)	\$506.6 million
• Wooden Bedroom Furniture	(A-570-890)	\$498.8 million
• Freshwater Crawfish Tail	(A-570-848)	\$330.8 million
• Preserved Mushrooms	(A-570-851)	\$201.8 million
• Honey	(A-570-863)	\$164.9 million

CBP is actively pursuing collection of the balance of the money against delinquent importers and sureties, and refers matters to the Justice Department for litigation, when appropriate (*see* the Legal Enforcement section of the report for more information).

### A. Import Value, Cash Deposit, and Liquidation Amount Information

P.L. 103-182 directed CBP to include, on both a fiscal year and an administrative review period basis, the value of imports and the cash deposits collected by case number, as well as the liquidation amounts by case number, including the computation of interest collected or refunded. The FY 2014 value of imports and cash deposits collected by case number is provided in Appendix A. The FY 2014 liquidation amount by case number, including the computation of interest collected or refunded, is provided in Appendix B.

## B. Information on Uncollected AD/CVD Amounts by Order and Fiscal Year

Senate Report 112-74 states that “the report shall provide the amount of uncollected duties for each AD/CVD order, and indicate the amount of open, unpaid bills for each such order.” The report for open AD/CVD bills by fiscal year is in Appendix C and is organized by the case number, fiscal year, bill amount,<sup>6</sup> and bill count. The open AD/CVD bills by fiscal year report tracks all bills that have not been paid beginning in FY 2001 through the end of FY 2014.

## C. FY 2014 CDSOA Clearing Account Balance and Disbursement Report

The FY 2014 Clearing Account Balances is attached as Appendix D. The amounts in the Clearing Account represent duties filed with CDSOA entries on a case-specific basis. The balances in Appendix D are as of October 1, 2014. These amounts represent AD/CVD duties filed with the entry before October 1, 2007, on CDSOA eligible cases. CBP does not collect or maintain Clearing Account data by Commerce period of review. These are preliminary numbers and may be refunded at liquidation to the importer of record on the basis of Commerce’s final determination on the case, which may not occur during a current year. Until liquidation is completed in ACS, funds do not transfer from the Clearing Account to the Special Account<sup>7</sup> for distribution under CDSOA. The Clearing Account does not include additional duty assessed at liquidation or reliquidation.

Liquidated duties collected and disbursed to domestic parties during FY 2014 are reported in the CDSOA Annual Disbursement Information (Appendix E). The CDSOA Annual Disbursement Report includes pre-liquidation interest collected.

CBP publishes a separate annual CDSOA report of all open bills for a specific fiscal year. This report includes only those AD/CVD entries subject to CDSOA liquidated in that fiscal year with open bills. For 2014, this report lists the amount of uncollected AD/CVD on each case as of September 30, 2014. All future collections on these bills that fall under CDSOA will be disbursed in the year in which they are received. This separate uncollected duties report is located on CBP’s public web site at:

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<sup>6</sup> The open AD/CVD bills report includes interest accrued as of the liquidation date. Interest continues to accrue until bills are paid in full.

<sup>7</sup> CDSOA has been repealed with respect to entries made on or after October 1, 2007. Only assessed AD/CVD collected on entries made before October 1, 2007, are transferred to the Special Account for distribution under the CDSOA. The *Claims Resolution Act of 2010* (P.L. 111-291) may also affect the amounts ultimately available for distribution.

<http://www.cbp.gov/trade/priority-issues/adcvd/continued-dumping-and-subsidy-offset-act-cdsoa-2000>

The FY 2014 amounts in the CDSOA uncollected duties report and the open AD/CVD bills by fiscal year report included in Appendix C may differ because the former report only relates to bills issued in FY 2014 for AD/CVD entries up to October 1, 2007, subject to CDSOA, while the latter report relates to bills issued in FY 2014 for all AD/CVD entries. Other differences may be due to the timing of data download.

## VI. Conclusion

CBP continues to ensure that, as an agency, it implements statutory and regulatory authorities and adheres to current CBP policy to maximize the collection of revenue. CBP will continue to prioritize enforcement actions and compliance initiatives in support of the U.S. AD/CVD laws. The cooperation between CBP, ICE HSI, and Commerce is strong, and together we will continue to pursue all available avenues to improve the level of duty collection, ensure importer compliance, and prevent loss of revenue.

CBP is committed to working with other government agencies to identify and resolve collection problems quickly, while ensuring that all relevant stakeholders understand these issues and are engaged in developing solutions to facilitate legitimate trade and protect the U.S. industry. CBP will continue to work closely with U.S. industry to obtain the key trade intelligence that is critical to enforcing AD/CVD laws.

## VII. Appendices

### Appendix A: Import Value and AD/CVD Deposit FY 2014

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
<b>Antidumping Duty Amounts</b>			
A122503	Iron Construction Castings/Canada	\$913,943	\$14,134.41
A122853	Citric Acid and Citrate Salts/Canada	\$64,161,707	\$696,192.51
A122988	Solar Panels/Canada	\$4,821	\$11,542.43
A201805	Circular Welded Steel Pipe/Mexico	\$338,384	\$110,406.62
A201830	Steel Wire Rod/Mexico	\$12,483,785	\$853,811.51
A201836	Light-Walled Rectangular Pipe and Tube/Mexico	\$73,939,915	\$910,385.05
A201838	Seamless Copper Pipe and Tube/Mexico	\$11,404,388	\$134,687.62
A201842	Large Residential Washers/Mexico	\$115,334,327	\$42,188,026.80
A201843	Pre-stressed Concrete Steel Rail Tie Wire/Mexico	\$5,508,289	\$876,716.72
A201844	Steel Concrete Reinforcing Bar/Mexico	\$287,669	\$123,298.74
A301602	Fresh Cut Flowers/Colombia	\$48	\$13.53
A351503	Iron Construction Castings/Brazil	\$1,449,378	\$122,617.35
A351825	Stainless Steel Bar/Brazil	\$9,282,934	\$9,251.23
A357991	Oil Country Tubular Goods/Argentina (China)	\$11,255	\$11,158.21
A401809	Non-Oriented Electrical Steel/Sweden	\$1,671,448	\$2,118,058.91
A405803	Purified Carboxymethylcellulose/Finland	\$60,306,850	\$3,629,137.89
A412201	Antifriction Ball Bearings/United Kingdom	\$6,295,076	\$614,859.39
A412988	Solar Panels/United Kingdom	\$330	\$790.09
A421811	Purified Carboxymethylcellulose/ Netherlands	\$1,227,710	\$28,757.01
A423808	Stainless Steel Plate in Coils/Belgium	\$16,063,118	\$107,815.67
A427818	Low Enriched Uranium/France	\$20	\$3.99
A428602	Brass Sheet and Strip/Germany	\$620,821	\$44,937.64
A428820	Seamless Line and Pressure Pipe/Germany	\$259,065	\$135,768.47
A428840	Lightweight Thermal Paper/Germany	\$17,505,962	\$611,634.83
A428841	Sodium Nitrate/Germany	\$8,099	\$12,214.91
A435803	Grain-Oriented Electrical Steel/Czech Republic	\$1,588,761	\$164,436.76
A441988	Solar Panels/Switzerland	\$106	\$253.79
A462101	Solid Urea/Russia	\$154,820,194	\$54,175.00
A462102	Uranium/Russia	\$1,326	\$0.00
A462326	Oil Country Tubular Goods/Ukraine	\$22,915,607	\$1,216,818.73
A470805	Stainless Steel Bar/Spain	\$113,023	\$19,382.84
A470814	Chlorinated Isocyanates/Spain	\$2,753,900	\$0.00

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
A475059	Pressure Sensitive Plastic Tape/Italy	\$2,223,225	\$31,284.51
A475201	Antifriction Ball Bearings/Italy	\$349	\$9.95
A475601	Brass Sheet and Strip/Italy	\$415,552	\$31,938.87
A475818	Pasta/Italy	\$57,973,562	\$2,422,966.35
A475820	Stainless Steel Wire Rod/Italy	\$202	\$22.73
A475828	Stainless Steel Butt-Weld Pipe Fittings/ Italy	\$5,024,632	\$135,664.33
A485805	Carbon and Alloy Seamless Standard, Line, and Pressure Pipe/Romania	\$39,723	\$5,558.22
A489501	Welded Carbon Steel Pipe and Tube/ Turkey	\$41,525,749	\$899,004.26
A489805	Pasta/Turkey	\$340,213	\$18,194.49
A489815	Light-Walled Rectangular Pipe and Tube/ Turkey	\$1,450,800	\$0.00
A489816	Oil Country Tubular Goods/Turkey	\$3,736,880	\$181,986.06
A489818	Steel Concrete Reinforcing Bar/Turkey	\$132,855,170	\$3,082,353.17
A517804	Oil Country Tubular Goods/Saudi Arabia	\$29,615,858	\$824,855.85
A520803	Polyethylene Terephthalate Film, Sheet, and Strip/UAE	\$8,509,053	\$618,447.63
A520804	Steel Nails/UAE	\$6,291,416	\$383,147.16
A533502	Polyethylene Terephthalate Film, Sheet, and Strip/UAE	\$769,558	\$54,484.69
A533810	Steel Nails/UAE	\$3,294,059	\$102,711.20
A533813	Preserved Mushrooms/India	\$15,624	\$0.00
A533817	Cut-To-Length Carbon Quality Steel Plate/India	\$25,135	\$7,467.61
A533820	Hot-Rolled Carbon Steel Flat Products/ India	\$4,664	\$1,113.30
A533823	Silicomanganese/India	\$270,251	\$41,402.45
A533824	Polyethylene Terephthalate Film/India	\$6,371,010	\$38,896.51
A533838	Caracole Violet Pigment 23/India	\$361,839	\$173,045.93
A533840	Frozen or Canned Warmwater Shrimp/India	\$1,175,036,328	\$33,248,656.42
A533843	Lined Paper Products/India	\$9,986,282	\$590,275.11
A533847	1-Hydroxyethylidene-1/India	\$455,625	\$14,124.45
A533855	Steel Threaded Rod/India	\$2,852,133	\$257,712.47
A533857	Oil Country Tubular Goods/India	\$16,056,417	\$2,174,920.96
A533894	Tissue Paper Products/India	\$1,760	\$1,982.46
A533988	Solar Panels/India	\$111	\$265.76
A549502	Circular Welded Pipe and Tube/Thailand	\$25,112,019	\$62.37
A549813	Canned Pineapple Fruit/Thailand	\$16,517	\$811.50
A549821	Polyethylene Retail Carrier Bags/ Thailand	\$40,674,573	\$485,541.92
A549822	Frozen or Canned Warmwater Shrimp/Thailand	\$514,781,780	\$715,030.08
A549831	Steel Threaded Rod/Thailand	\$201	\$134.08
A552801	Frozen Fish Fillets/Vietnam	\$291,711,985	\$3,796,626.37
A552802	Frozen or Canned Warmwater Shrimp/Vietnam	\$961,783,756	\$1,505,449.10

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
A552806	Polyethylene Retail Carrier Bags/Vietnam	\$116,983	\$62,741.91
A552807	Polyethylene Retail Carrier Bags/Vietnam	\$268	\$244.96
A552812	Steel Wire Garment Hangers/Vietnam	\$10	\$21.45
A552814	Wind Towers/Vietnam	\$877,668	\$452,350.09
A552816	Welded Stainless Pressure Pipe/Vietnam	\$8,022	\$1,709.82
A552817	Oil Country Tubular Goods/Vietnam	\$13,789,707	\$4,045,643.70
A557809	Stainless Steel Butt-Weld Pipe Fittings/ Malaysia	\$7,353,940	\$552,281.61
A557815	Welded Stainless Pressure Pipe/Malaysia	\$200,578	\$335,185.90
A557988	Solar Panels/Malaysia	\$569	\$1,362.30
A560802	Preserved Mushrooms/Indonesia	\$8,155,569	\$4,036.92
A560826	Monosodium Glutamate/Indonesia	\$170,955	\$9,731.41
A565801	Stainless Steel Butt-Weld Pipe Fittings/ Philippines	\$6,900,238	\$523,975.83
A565802	Oil Country Tubular Goods/Philippines	\$14,544,959	\$1,294,501.34
A570001	Potassium Permanganate/China	\$10,674	\$13,763.05
A570010	Solar Cells and Panels/China	\$110,495	\$20,593.38
A570201	Hand Tools/China (Hammers/Sledges)	\$185,679	\$84,335.40
A570202	Hand Tools/China (Bars/Wedges)	\$264,146	\$367,981.87
A570203	Hand Tools/China (Picks/Mattocks)	\$47	\$46.43
A570204	Hand Tools/China (Axes/Adzes)	\$66,914	\$126,715.07
A570502	Iron Construction Castings/China	\$12,078	\$11,201.13
A570504	Petroleum Wax Candles/China	\$1,508,769	\$1,633,299.87
A570506	Porcelain-On-Steel Cookware/China	\$1,256,459	\$135,808.05
A570601	Tapered Roller Bearings/China	\$128,436,794	\$3,896,958.04
A570806	Silicon Metal/China	\$4,974	\$6,938.23
A570814	Carbon Steel Butt-Weld Pipe Fittings/China	\$247,185	\$186,377.54
A570815	Sulfanilic Acid/China	\$1,100	\$937.20
A570822	Helical Spring Lock Washers/China	\$8,853,641	\$923,128.39
A570826	Paper Clips/China	\$23,948	\$29,540.12
A570827	Pencils/China	\$49,808,804	\$2,665,903.91
A570831	Fresh Garlic/China	\$122,168,350	\$3,841,749.39
A570832	Pure Magnesium/China	\$3,240	\$3,620.05
A570836	Glycine/China	\$33,254	\$150,903.33
A570848	Freshwater Crawfish Tail Meat/China	\$67,850,302	\$307,707.29
A570849	Cut-To-Length Carbon Steel Plate/China	\$10,260	\$13,193.35
A570851	Preserved Mushrooms/China	\$14,488,713	\$62,436.83
A570860	Steel Concrete Reinforcing Bar/China	\$1,132	\$1,500.24
A570863	Honey/China	\$40,523	\$29,653.25
A570865	Hot-Rolled Carbon Steel Flat Products/ China	\$50,769	\$34,641.91
A570866	Folding Gift Boxes/China	\$2,336,265	\$65,438.76

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
A570875	Nonmalleable Cast Iron Pipe Fittings/ China	\$15,273,715	\$2,113,279.44
A570878	Saccharin/China	\$7,830,458	\$66,677.57
A570879	Polyvinyl Alcohol/China	\$10,493,984	\$0.00
A570881	Malleable Pipe Fittings/China	\$69,542,794	\$7,195,521.51
A570882	Refined Brown Aluminum Oxide/China	\$125,762	\$170,005.08
A570886	Polyethylene Retail Carrier Bags/China	\$16,460,718	\$2,537,725.87
A570888	Ironing Tables/China	\$366	\$577.11
A570890	Wooden Bedroom Furniture/China	\$143,898,903	\$12,239,718.76
A570891	Hand Trucks/China	\$156,006	\$83,509.24
A570892	Caracole Violet Pigment 23/China	\$6,852	\$3,914.12
A570894	Tissue Paper Products/China	\$8,289,260	\$1,537,475.12
A570895	Crepe Paper Products/China	\$489	\$1,304.80
A570898	Chlorinated Isocyanates/China	\$20,338,304	\$2,102,282.97
A570899	Artist Canvas/China	\$8,364	\$14,257.35
A570900	Diamond Sawblades/China	\$29,598,773	\$508,037.60
A570901	Lined Paper School Supplies/China	\$601,623	\$1,548,411.88
A570904	Activated Carbon/China	\$18,968,128	\$1,656,610.28
A570905	Polyester Staple Fiber/China	\$8,545,307	\$379,848.49
A570908	Sodium Hexametaphosphate/China	\$30,956	\$28,260.52
A570909	Steel Nails/China	\$20,797,231	\$2,231,098.99
A570910	Welded Carbon Quality Steel/China	\$31,773	\$21,681.89
A570912	Off-The Road Tires/China	\$149,084,992	\$15,315,520.01
A570914	Pipe and Tube/China	\$22,802	\$58,161.04
A570916	Laminated Woven Sacks/China	\$7,202	\$5,385.70
A570918	Steel Wire Garment Hangers/China	\$29,273,026	\$477,654.65
A570919	Electrolytic Manganese Dioxide/China	\$1,200	\$1,799.04
A570920	Lightweight Thermal Paper/China	\$157,939	\$182,087.88
A570922	Raw Flexible Magnets/China	\$65,488	\$117,347.85
A570924	Polyethylene Terephthalate Film/China	\$4,985,289	\$139,667.98
A570928	Uncovered Innerspring Units/China	\$292	\$684.77
A570929	Small Diameter Graphite Electrodes/ China	\$10,498,835	\$79,125.57
A570930	Circular Welded Stainless Pipe/China	\$14,704	\$8,118.09
A570932	Steel Threaded Rod/China	\$2,725,099	\$1,612,434.95
A570933	Frontseating Service Valves/China	\$4,486,562	\$149,189.97
A570937	Citric Acid and Citrate Salts/China	\$11,416,239	\$244,318.34
A570939	Tow-Behind Lawn Groomers/China	\$98	\$378.55
A570941	Kitchen Shelving and Racks/China	\$2,173,728	\$238,132.17
A570943	Oil Country Tubular Goods/China	\$664,119	\$385,831.58
A570947	Steel Grating/China	\$173,472	\$232,103.62
A570951	Woven Electric Blankets/China	\$1,487	\$2,600.02

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
A570952	Narrow Woven Ribbons/China	\$293,078	\$653,561.05
A570954	Magnesia Carbon Brick/China	\$16,954	\$40,011.44
A570956	Seamless Pipe/China	\$196,248	\$190,630.84
A570962	Phosphate Salts/China	\$37,158	\$35,448.73
A570964	Seamless Copper Pipe and Tube/China	\$33,762,010	\$170,179.24
A570965	Drill Pipe/China	\$4,858	\$20,886.97
A570967	Aluminum Extrusions/China	\$10,276,014	\$3,284,027.09
A570970	Multilayered Wood Flooring/China	\$505,530,768	\$21,381,530.18
A570972	Stilbenic Optical Brightening Agents/China	\$2,312,376	\$2,455,049.59
A570977	Steel Cylinders/China	\$8,694,868	\$611,707.50
A570979	Solar Cells/China	\$292,114,325	\$34,538,708.61
A570983	Drawn Stainless Steel Sinks/China	\$43,266,008	\$13,948,660.77
A570985	Xanthan Gum/China	\$62,609,584	\$15,152,805.81
A570986	Hardwood Plywood/China	\$3,178,248	\$1,384,280.36
A570988	Silica Bricks and Shapes/China	\$128,260	\$116,921.82
A570992	Monosodium Glutamate/China	\$163,300	\$241,438.30
A570998	Tetrafluoroethane/China	\$17,500	\$41,532.75
A580809	Circular Welded Steel Pipe/Korea	\$36,399,828	\$981,729.31
A580810	Welded Stainless Steel Pipe/Korea	\$28,907,916	\$864,852.42
A580834	Steel Sheet and Strip in Coils/Korea	\$909,562	\$130,888.46
A580836	Cut-To-Length Carbon Quality Steel Plate/Korea	\$5,962,766	\$25,897.44
A580839	Polyester Staple Fiber/Korea	\$60,311,576	\$724,094.37
A580855	Diamond Sawblades/Korea	\$25,138,900	\$0.00
A580863	Laminated Woven Sacks/Korea	\$28	\$25.69
A580867	Large Power Transformers/Korea	\$125,079,512	\$27,119,617.97
A580868	Large Residential Washers/Korea	\$172,118,104	\$22,410,299.75
A580870	Oil Country Tubular Goods/Korea	\$203,322,886	\$25,063,335.76
A580871	Grain-Oriented Electrical Steel/Korea	\$869,281	\$46,419.61
A580988	Solar Panels/Korea	\$248	\$593.76
A582988	Oil Country Tubular Goods/Hong Kong (China)	\$7	\$16.76
A583008	Welded Carbon Steel Pipe and Tube/ Taiwan	\$21,454	\$2,081.12
A583605	Butt-Weld Pipe Fittings/Taiwan	\$2,322,230	\$101,713.68
A583814	Circular Welded Steel Pipe/Taiwan	\$4,500	\$1,060.20
A583815	Welded Stainless Steel Pipe/Taiwan	\$380,653	\$75,534.33
A583820	Helical Spring Lock Washers/Taiwan	\$2,611,584	\$833,820.32
A583831	Steel Sheet and Strip in Coils/Taiwan	\$72,345	\$9,109.75
A583833	Polyester Staple Fiber/Taiwan	\$7,781,582	\$0.00
A583835	Hot-Rolled Carbon Steel Flat Products/ Taiwan	\$35,083	\$7,114.83
A583837	Polyethylene Terephthalate Film/Taiwan	\$7,126,219	\$599,485.02

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
A583841	Polyvinyl Alcohol/Taiwan	\$14,081,732	\$2,493.85
A583842	Raw Flexible Magnets/Taiwan	\$624,269	\$202,090.02
A583843	Polyethylene Retail Carrier Bags/Taiwan	\$340,316	\$124,351.47
A583844	Narrow Woven Ribbons/Taiwan	\$12,832,633	\$560,918.02
A583846	Laminated Woven Sacks/Taiwan	\$27	\$24.77
A583848	Stilbenic Optical Brightening Agents/ Taiwan	\$21,762,980	\$1,347,128.59
A583849	Steel Wire Garment Hangers/Taiwan	\$33,580	\$23,499.28
A583850	Oil Country Tubular Goods/Taiwan	\$3,507,963	\$82,086.34
A583851	Nonoriented Electrical Steel/Taiwan	\$305,911	\$86,083.35
A583853	Solar Cells and Panels/Taiwan	\$39,536,511	\$10,100,341.46
A588068	Pre-stressed Concrete Steel Rail Tie Wire/ Japan	\$22,683	\$0.00
A588201	Antifriction Ball Bearings/Japan	\$115,235,895	\$8,794,767.72
A588602	Carbon Steel Butt-Weld Pipe Fittings/Japan	\$4,486	\$2,952.23
A588704	Brass Sheet and Strip/Japan	\$80,942	\$39,822.67
A588833	Stainless Steel Bar/Japan	\$312,121	\$191,860.75
A588845	Steel Sheet and Strip in Coils/Japan	\$5,331,875	\$2,138,840.98
A588850	Carbon and Alloy Pipe/Japan	\$40,393	\$36,387.82
A588851	Small Diameter Carbon and Alloy Pipe/Japan	\$274,971	\$197,033.10
A588857	Large Diameter Line Pipe/Japan	\$3,492,824	\$1,075,789.79
A588861	Polyvinyl Alcohol/Japan	\$180,343	\$249,640.31
A588869	Nickel-Plated Flat-Rolled Steel/Japan	\$11,099,548	\$5,101,898.94
A588870	Chlorinated Isocyanates/Japan	\$5,600	\$3,562.44
A588871	Grain-Oriented Electrical Steel/Japan	\$797,790	\$1,374,592.18
A588872	Non-Oriented Electrical Steel/Japan	\$1,859,364	\$3,067,074.74
A588991	Oil Country Tubular Goods/Japan (China)	\$496	\$491.73
<b>AD Duty Total</b>		<b>\$6,831,245,664</b>	<b>\$390,325,140.81</b>
<b>Countervailing Duty Amounts</b>			
C122989	Solar Cells/Canada	\$4,821	\$734.73
C201846	Sugar/Mexico	\$15,887,547	\$2,289,938.21
C331803	Frozen or Canned Warmwater Shrimp/Ecuador	\$20,332,542	\$2,331,536.79
C351504	Iron Construction Castings/Brazil	\$1,270,068	\$0.00
C427989	Solar Cells/France	\$9	\$1.37
C441989	Solar Cells/Switzerland	\$106	\$16.15
C475819	Pasta/Italy	\$114,029,341	\$1,604,559.31
C489502	Welded Carbon Steel Pipe and Tube/Turkey	\$41,525,983	\$6,903.30
C489806	Pasta/Turkey	\$340,213	\$27,185.08
C533818	Cut-To Length Carbon Quality Steel Plate/India	\$28,578	\$3,663.69
C533825	Polyethylene Terephthalate Film/India	\$6,411,662	\$455,058.60
C533839	Caracole Violet Pigment 23/India	\$354,264	\$72,801.24

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
C533844	Lined Paper Products/India	\$9,987,366	\$934,916.80
C533849	Commodity Matchbooks/India	\$427	\$42.19
C533854	Frozen or Canned Warmwater Shrimp/India	\$45,800,581	\$2,655,779.63
C533856	Steel Threaded Rod/India	\$2,379,306	\$78,635.68
C533858	Oil Country Tubular Goods/India	\$2,101,588	\$277,027.01
C552805	Polyethylene Retail Carrier Bags/Vietnam	\$116,983	\$6,176.70
C552808	Laminated Woven Sacks/Vietnam	\$250	\$567.13
C552815	Frozen or Canned Warmwater Shrimp/Vietnam	\$34,652,990	\$1,531,278.04
C557814	Frozen or Canned Warmwater Shrimp/Malaysia	\$167,395	\$18,078.66
C557989	Solar Cells/Malaysia	\$569	\$86.72
C565989	Solar Cells/Philippines	\$606	\$92.35
C570011	Carbon Quality Steel Pipe/China	\$123,831,412	\$26,954,807.75
C570013	Steel Wire Rod/China	\$4,442,687	\$457,596.78
C570015	53-Foot Domestic Dry Containers/China	\$1,280,136	\$133,902.16
C570911	Carbon Quality Steel Pipe/China	\$31,773	\$12,394.66
C570913	Off-the-Road Tires/China	\$147,918,458	\$6,926,831.71
C570915	Light-Walled Rectangular Pipe and Tube/China	\$22,802	\$3,484.16
C570917	Laminated Woven Sacks/China	\$256	\$718.47
C570921	Lightweight Thermal Paper/China	\$53,473	\$10,355.19
C570923	Raw Flexible Magnets/China	\$46,472	\$51,096.02
C570931	Stainless Steel Pressure Pipe/China	\$13,008	\$143.07
C570938	Citric Acid and Citrate Salts/China	\$11,412,867	\$2,829,965.88
C570942	Kitchen Shelving and Racks/China	\$2,173,082	\$225,652.39
C570944	Oil Country Tubular Goods/China	\$1,340,218	\$172,253.00
C570948	Steel Grating/China	\$173,372	\$99,794.22
C570953	Woven Ribbons/China	\$8,925,193	\$139,327.06
C570955	Magnesia Carbon Brick/China	\$17,899	\$4,338.72
C570957	Seamless Pipe/China	\$26,047	\$9,184.78
C570963	Potassium Phosphate Salts/China	\$37,150	\$40,534.36
C570966	Drill Pipe/China	\$19,835,367	\$2,017,355.22
C570968	Aluminum Extrusions/China	\$9,738,305	\$10,484,038.78
C570971	Multilayered Wood Flooring/China	\$486,615,135	\$6,939,851.55
C570978	Steel Cylinders/China	\$8,573,040	\$1,355,397.63
C570980	Solar Cells/China	\$278,297,046	\$43,192,375.72
C570984	Drawn Stainless Steel Sinks/China	\$40,709,505	\$3,287,027.99
C570987	Hardwood Plywood/China	\$1,071,001	\$242,367.52
C570989	Frozen or Canned Warmwater Shrimp/China	\$733,328	\$133,172.37
C570991	Chlorinated Isocyanates/China	\$3,362,743	\$385,343.58
C570993	Monosodium Glutamate/China	\$337,988	\$45,324.18
C570997	Non-Oriented Electrical Steel/China	\$5,577	\$7,017.54

<b>Table 1</b>			
<b>Import Value and AD/CVD Deposit FY 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Line Value</b>	<b>AD/CVD Duty</b>
C570999	Tetrafluoroethane/China	\$525,567	\$19,296.11
C580835	Steel Sheet and Strip in Coils/Korea	\$3,290,461	\$23,108.59
C580837	Cut-To Length Carbon Quality Steel Plate/Korea	\$878,441	\$0.00
C580864	Laminated Woven Sacks/Korea	\$28	\$63.52
C580869	Large Residential Washers/Korea	\$3,775	\$757.43
C583989	Solar Cells/Taiwan	\$31,951	\$4,869.33
<b>CVD Duty Total</b>		<b>\$1,451,148,758</b>	<b>\$118,504,826.82</b>

## Appendix B: Liquidations with Interest in FY 2014

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A100108	Corrosion-Resistant Carbon Steel/United States (Canada)	\$10,976.72
A122212	Dynamic Random Access Memory Semiconductors/Canada (Korea)	\$4.97
A122503	Iron Construction Castings/Canada	\$14,531.82
A122822	Corrosion-Resistant Carbon Steel/Canada	\$6,629.84
A122840	Steel Wire Rod/Canada	\$1,014,570.82
A122853	Citric Acid/Canada	\$929,127.90
A201805	Circular Welded Steel Pipe/Mexico	\$464.18
A201822	Steel Sheet and Strip in Coils/Mexico	\$26,149.95
A201827	Seamless Line Pipe/Mexico	\$9,468.73
A201830	Steel Wire Rod/Mexico	\$51,290.93
A201836	Light-Walled Rectangular Pipe and Tube/Mexico	\$1,960,610.88
A201838	Seamless Copper Pipe and Tube/Mexico	\$111,472.98
A201842	Large Residential Washers/Mexico	\$73,780.81
A331802	Frozen or Canned Warmwater Shrimp/Ecuador	\$4,852.64
A337806	Frozen Red Raspberries/Chile	\$2,858.00
A351503	Iron Construction Castings/Brazil	\$34,254.62
A351840	Orange Juice/Brazil	\$4,237,961.08
A351841	Polyethylene Terephthalate Film/Brazil	\$8,796.72
A357812	Polyethylene Terephthalate Film/Brazil	\$496.54
A405803	Purified Carboxymethylcellulose/Finland	\$60,138.21
A412201	Antifriction Ball Bearings/United Kingdom	\$3,123,302.35
A412203	Cylindrical Roller Bearings/United Kingdom	\$7,643.48
A412602	Forged Steel Crankshafts/United Kingdom	\$625.78
A421212	Dynamic Random Access Memory Semiconductors/Netherlands (Korea)	\$196.41
A421811	Purified Carboxymethylcellulose/Netherlands	\$15,996.09
A423108	Corrosion-Resistant Carbon Steel/Belgium	(\$209.50)
A423808	Stainless Steel Plate in Coils/Belgium	\$6,233,333.02
A427108	Corrosion-Resistant Carbon Steel Flat Products/France	\$942.62
A427201	Antifriction Ball Bearings/France	\$2,440,501.12
A427212	Dynamic Random Access Memory Semiconductors/France	\$214.57
A427818	Low Enriched Uranium/France	\$3.99
A427820	Stainless Steel Bar/France	\$643.65
A427827	Sodium Metal/France	\$115.95
A428201	Antifriction Ball Bearings/Germany	\$3,536,983.39

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A428203	Cylindrical Roller Bearings/Germany	\$526.15
A428212	Dynamic Random Access Memory Semiconductors/Germany (Korea)	\$961.33
A428602	Brass Sheet and Strip/Germany	\$53,706.95
A428820	Seamless Pipe/Germany	\$156,427.56
A428830	Stainless Steel Bar/Germany	\$516.66
A428840	Lightweight Thermal Paper/Germany	\$701,403.34
A428841	Sodium Nitrate/Germany	\$90,092.07
A433811	Xanthan Gum/Austria	(\$15,290.98)
A462101	Solid Urea/Russia	\$1,442,750.09
A462811	Ammonium Nitrate/Russia	\$248,203.81
A470805	Stainless Steel Bar/Spain	\$6,603.04
A470814	Chlorinated Isocyanates/Spain	(\$1,512.80)
A475059	Pressure Sensitive Plastic Tape/Italy	\$8,914.29
A475201	Antifriction Ball Bearings/Italy	\$7,252,811.24
A475601	Brass Sheet and Strip/Italy	\$13,647.10
A475818	Pasta/Italy	\$3,986,983.13
A475824	Stainless Steel Sheet and Strip in Coils/Italy	\$55.22
A475826	Cut-to-length Carbon Steel Plate/Italy	\$3,840.99
A475828	Stainless Steel Butt-weld Pipe Fittings/Italy	\$39,078.25
A475829	Stainless Steel Bar/Italy	\$0.00
A485805	Small-diameter Carbon Steel Seamless Pipe/Romania	\$42,889.05
A489501	Welded Carbon Steel Pipe and Tube/Turkey	\$2,018,315.89
A489805	Pasta/Turkey	\$396,355.33
A489807	Steel Concrete Reinforcing Bar/Turkey	(\$6,268.85)
A508604	Industrial Phosphoric Acid/Israel	\$19,585.83
A520803	Polyethylene Terephthalate Film, Sheet, and Strip/UAE	\$112,726.04
A520804	Steel Nails/UAE	(\$57.91)
A533502	Welded Carbon Steel Pipe and Tube/India	\$69,718.80
A533809	Forged Stainless Steel Flanges/India	\$1,535.46
A533810	Stainless Steel Bar/India	\$743,291.76
A533813	Preserved Mushrooms/India	\$3,513.68
A533817	Cut-To-Length Carbon Quality Steel Plate/India	\$5,063.18
A533820	Hot-Rolled Carbon Steel Flat Products/India	\$6,172,971.06
A533824	Polyethylene Terephthalate Film/India	\$188,217.57
A533838	Caracole Violet Pigment 23/India	\$357,323.28
A533840	Frozen or Canned Warmwater Shrimp/India	\$407,039.45
A533843	Lined Paper Products/India	\$157,993.89
A533847	1-Hydroxyethylidene-1/India	(\$1.94)

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A533855	Steel Threaded Rod/India	(\$30.21)
A549201	Antifriction Ball Bearings/Thailand	\$0.03
A549502	Circular Welded Pipe and Tube/Thailand	(\$32,029.04)
A549807	Carbon Steel Butt-weld Pipe Fittings/Thailand	\$46,799.87
A549813	Canned Pineapple/Thailand	\$28,899.14
A549817	Hot-Rolled Steel Products/Thailand	\$141,551.45
A549821	Polyethylene Retail Carrier Bags/Thailand	\$3,433,738.10
A549822	Frozen or Canned Warmwater Shrimp/Thailand	\$2,259,523.92
A549831	Steel Threaded Rod/Thailand	(\$89.96)
A552801	Frozen Fish Fillets/Vietnam	\$2,254,229.01
A552802	Frozen or Canned Warmwater Shrimp/Vietnam	\$18,787,888.03
A552806	Polyethylene Retail Carrier Bags/Vietnam	\$65,990.10
A552812	Steel Wire Garment Hangers/Vietnam	(\$67.70)
A557805	Extruded Rubber Thread/Malaysia	\$365,943.77
A557809	Stainless Steel Butt-weld Pipe Fittings/Malaysia	\$445,056.44
A557813	Polyethylene Retail Carrier Bags/Malaysia	\$233.59
A559201	Antifriction Ball Bearings/Singapore	\$10.08
A560802	Preserved Mushrooms/Indonesia	\$2,957.94
A560818	Line Paper Products/Indonesia	\$266.81
A565801	Stainless Steel Butt-Weld Pipe Fittings/the Philippines	\$576,651.59
A570001	Potassium Permanganate/China	\$9,784.25
A570002	Chloropicrin/China	\$153.12
A570201	Hand Tools/China (Hammers/Sledges)	\$308,064.09
A570202	Hand Tools/China (Bars/Wedges)	\$6,630,051.06
A570203	Hand Tools/China (Picks/Mattocks)	\$1,839.12
A570204	Hand Tools/China (Axes/Adzes)	\$2,644,523.02
A570501	Natural Bristle Paint Brushes/China	\$49.27
A570504	Petroleum Wax Candles/China	\$9,362,730.18
A570506	Porcelain-On-Steel Cookware/China	\$560,997.69
A570601	Tapered Roller Bearings/China	\$4,099,478.79
A570804	Sparklers/China	\$143,847.59
A570806	Silicon Metal/China	\$8.46
A570814	Carbon Steel Butt-weld Pipe Fittings/China	\$356,125.71
A570822	Helical Spring Lock Washers/China	\$435,242.20
A570826	Paper Clips/China	\$49,178.97
A570827	Cased Pencils/China	\$5,670,358.52
A570831	Fresh Garlic/China	\$60,915,495.04
A570832	Pure Magnesium/China	\$119,895,951.45
A570835	Furfural Alcohol/China	\$9,126.43

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A570836	Glycine/China	\$927,336.55
A570846	Brake Rotors/China	\$971,689.22
A570848	Freshwater Crawfish Tail Meat/China	\$291,619.18
A570849	Cut-To-Length Carbon Steel Plate/China	\$46,567.59
A570851	Preserved Mushrooms/China	\$157,674,054.85
A570855	Non-Frozen Apple Juice Concentrate/China	\$22,785.78
A570863	Honey/China	\$39,970,662.84
A570865	Hot Rolled Steel Products/China	\$16,094.28
A570866	Folding Gift Boxes/China	\$28,248.48
A570868	Folding Metal Tables and Chairs/China	\$154,744.64
A570873	Ferrovanadium/China	\$12,541.48
A570875	Non-malleable Cast Iron Pipe Fittings/China	\$3,557,035.41
A570878	Saccharin/China	\$40,658.51
A570879	Polyvinyl Alcohol/China	\$3,855.69
A570880	Barium Carbonate/China	\$1,269.91
A570881	Malleable Iron Pipe Fittings/China	\$7,634,243.04
A570882	Refined Brown Aluminum Oxide/China	\$312,378.95
A570886	Polyethylene Retail Carrier Bags/China	\$3,553,233.68
A570887	Tetrahydrofurfuryl Alcohol/China	\$741.78
A570888	Ironing Tables/China	\$310,847.52
A570890	Wooden Bedroom Furniture/China	\$45,270,152.31
A570891	Hand Trucks/China	\$399,087.34
A570892	Caracole Violet Pigment 23/China	\$2,681,566.15
A570893	Frozen or Canned Warmwater Shrimp/China	\$860,579.73
A570894	Tissue Paper Products/China	\$2,076,566.76
A570895	Crepe Paper Products/China	\$3,623.56
A570896	Alloy Magnesium/China	\$577.28
A570898	Chlorinated Isocyanates/China	\$1,720,033.22
A570899	Artist Canvas/China	\$350,630.29
A570900	Diamond Sawblades/China	\$753,940.58
A570901	Lined Paper School Supplies/China	\$1,661,839.94
A570904	Activated Carbon/China	\$3,539,357.97
A570905	Polyester Staple Fiber/China	\$473,394.83
A570909	Steel Nails/China	\$6,190,252.38
A570910	Welded Carbon Quality Steel/China	\$3,285,266.40
A570912	Off-The Road Tires/China	\$14,505,869.30
A570914	Pipe and Tube/China	\$14,880.79
A570916	Laminated Woven Sacks/China	\$1,660,212.34
A570918	Steel Wire Garment Hangers/China	\$18,482,624.29
A570919	Electrolytic Manganese Dioxide/China	\$2,852.98

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A570920	Lightweight Thermal Paper/China	\$24,863.62
A570922	Raw Flexible Magnets/China	\$254,023.68
A570924	Polyethylene Terephthalate Film/China	\$4,457,899.28
A570928	Uncovered Innerspring Units/China	\$6,271.34
A570929	Small Diameter Graphite Electrodes/China	\$1,133,021.92
A570930	Circular Welded Stainless Pipe/China	\$113,708.08
A570932	Steel Threaded Rod/China	\$1,719,905.74
A570933	Frontseating Service Valves/China	\$38,302.78
A570934	1-Hydroxyethylidene-1/China	\$5.79
A570937	Citric Acid/China	\$1,377,858.17
A570939	Tow-Behind Lawn Groomers/China	\$3,387.68
A570941	Kitchen Shelving and Racks/China	\$781,649.99
A570943	Oil Country Tubular Goods/China	\$4,621,839.46
A570947	Steel Grating/China	\$7,768.61
A570949	Wire Decking/China	\$100.10
A570951	Woven Electric Blankets/China	\$2,730.10
A570952	Narrow Woven Ribbons/China	\$2,124,856.74
A570954	Magnesia Carbon Brick/China	\$2,868,828.60
A570956	Seamless Pipe/China	\$419,670.90
A570962	Phosphate Salts/China	\$29,552.78
A570964	Seamless Copper Pipe and Tube/China	\$112,709.22
A570965	Drill Pipe/China	\$16,114.52
A570967	Aluminum Extrusions/China	\$7,899,167.89
A570970	Multilayered Wood Flooring/China	\$139,872.02
A570972	Stilbenic Optical Brightening Agents/China	\$9,024.45
A570973	Steel Wheels/China	(\$23.27)
A570977	Steel Cylinders/China	\$229,054.79
A570979	Solar Cells/China	\$11,130.37
A570981	Utility Scale Wind Towers/China	(\$431,918.05)
A570983	Drawn Stainless Steel Sinks/China	\$5,043,603.62
A570985	Xanthan Gum/China	\$365,453.26
A570986	Hardwood Plywood/China	\$327,706.15
A580008	Color Television Receivers/Korea	\$58,144.12
A580507	Malleable Cast Iron Pipe Fittings/Korea	\$20,743.01
A580605	Color Picture Tubes/Korea	\$3,736.35
A580806	Sweaters/Korea	\$4,276.49
A580809	Circular Welded Nonalloy Steel Pipe/Korea	\$3,613,478.26
A580810	Welded ASTM A-312 Stainless Steel Pipe/Korea	\$327,060.51
A580811	Carbon Steel Wire Rope/Korea	\$133.89

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A580812	Dynamic Random Access Memory Semiconductors/ Korea	\$78.79
A580813	Stainless Steel Butt-weld Pipe Fittings/Korea	\$36,013.90
A580816	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$33,600,939.55
A580834	Steel Sheet and Strip in Coils/Korea	\$83,009.82
A580836	Cut-To-Length Carbon Quality Steel Plate/Korea	(\$3,836.78)
A580839	Polyester Staple Fiber/Korea	\$592,170.51
A580850	Polyvinyl Alcohol/Korea	\$1,154.88
A580855	Diamond Sawblades/Korea	\$3,084,199.62
A580861	Circular Welded Steel Pipe/Korea	\$41,424.72
A580868	Large Residential Washers/Korea	\$15,979.27
A580988	Solar Panels/Korea	(\$1.01)
A582804	Laminated Woven Sacks/Hong Kong	\$12,255.24
A583008	Welded Carbon Steel Pipe and Tube/Taiwan	\$621,908.18
A583009	Color Television Receivers/Taiwan	\$564,647.34
A583508	Porcelain-On-Steel Cookware/Taiwan	\$23,807.87
A583605	Carbon Steel Butt-weld Pipe Fittings/Taiwan	\$100,436.67
A583814	Circular Welded Steel Pipe/Taiwan	\$8.72
A583815	Welded Stainless Steel Pipe/Taiwan	\$6,793.57
A583816	Stainless Steel Butt-weld Pipe Fittings/Taiwan	\$2,202.48
A583820	Helical spring lock washers/Taiwan	\$649,363.96
A583821	Forged Stainless Steel Flanges/Taiwan	\$3,001.92
A583831	Stainless Steel Sheet and Strip/Taiwan	\$23,334.18
A583833	Polyester Staple Fiber/Taiwan	(\$962.56)
A583835	Hot-Rolled Carbon Steel Flat Products/Taiwan	(\$26.83)
A583837	Polyethylene Terephthalate Film/Taiwan	\$51,141.45
A583841	Polyvinyl Alcohol/Taiwan	\$694,171.61
A583842	Raw Flexible Magnets/Taiwan	\$191,382.39
A583843	Polyethylene Retail Carrier Bags/Taiwan	\$177,795.13
A583844	Narrow Woven Ribbons/Taiwan	\$513,962.02
A583848	Stilbenic Optical Brightening Agents/Taiwan	\$2,168,556.99
A583849	Steel Wire Garment Hangers/Taiwan	\$74,103.92
A588015	Color Television Receivers/Japan	\$13,320.05
A588028	Roller Chain/Japan	\$383.19
A588054	Tapered Roller Bearings Under 4 Inches/Japan	\$1,261.72
A588201	Antifriction Ball Bearings/Japan	\$22,387,892.48
A588203	Cylindrical Roller Bearings/Japan	\$63,908.96
A588204	Antifriction Bearings (Needle)/Japan	(\$0.76)
A588205	Spherical Plain Bearings/Japan	\$2,105.19
A588210	Professional Electric Cutting Tools/Japan	\$703.32

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
A588405	Cellular Mobile Telephones/Japan	\$2,159.60
A588602	Carbon Steel Butt-weld Pipe Fittings/Japan	\$2,299.81
A588604	Tapered Roller Bearings Over 4 Inches/Japan	\$1,497.67
A588605	Malleable Cast Iron Pipe Fittings/Japan	\$8.48
A588704	Brass Sheet and Strip/Japan	\$119,473.97
A588802	3.5-Inch Microdisks/Japan	\$13,413.29
A588807	Industrial Belts/Japan	\$59.62
A588833	Stainless Steel Bar/Japan	\$249,082.61
A588845	Stainless Steel Sheet and Strip/Japan	\$1,507,817.56
A588850	Large-diameter Carbon Steel Seamless Pipe/Japan	\$247,960.82
A588851	Small-diameter Carbon Steel Seamless Pipe/Japan	\$26,757.43
A588854	Tin Mill Products/Japan	(\$259.53)
A588857	Welded Large Diameter Line Pipe/Japan	\$1,244,022.28
A588861	Polyvinyl Alcohol/Japan	\$476,809.65
A588867	Metal Calendar Slides/Japan	\$3.99
A791805	Stainless Steel Plate in Coils/South Africa	(\$1,724.28)
C100222	Dynamic Random Access Memory Semiconductors/United States (Korea)	\$135.97
C122222	Dynamic Random Access Memory Semiconductors/Canada (Korea)	\$7,013.37
C122841	Steel Wire Rod/Canada	\$923.23
C331803	Frozen or Canned Warmwater Shrimp/Ecuador	(\$29,298.61)
C357813	Honey/Argentina	\$7,900.48
C423809	Stainless Steel Plate in Coils/Belgium	(\$75,976.25)
C475815	Seamless Pipe/Italy	\$1,204.05
C475819	Pasta/Italy	\$1,658,161.94
C489502	Welded Carbon Steel Pipe and Tube/Turkey	(\$583.41)
C489806	Pasta/Turkey	\$85,189.48
C508222	Dynamic Random Access Memory Semiconductors/Israel (Korea)	\$96.74
C508605	Industrial Phosphoric Acid/Israel	\$59,310.76
C533063	Iron Metal Castings/India	\$1,538.59
C533818	Cut-To Length Carbon Quality Steel Plate/India	\$2,184.78
C533821	Hot-Rolled Steel Products/India	\$7,497,238.09
C533825	Polyethylene Terephthalate Film, Sheet and Strip/India	\$1,306,933.46
C533839	Caracole Violet Pigment 23/India	\$181,813.45
C533844	Lined Paper Products/India	\$749,034.33
C533854	Frozen or Canned Warmwater Shrimp/India	\$229,467.24
C533856	Steel Threaded Rod/India	(\$11.33)
C535001	Cotton Shop Towels/Pakistan	\$1,243.58

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
C549501	Circular Welded Steel Pipe/Thailand	\$20,006.70
C549818	Hot-rolled Steel Products/Thailand	\$87,277.84
C549828	Frozen or Canned Warmwater Shrimp/Thailand	\$13,002.07
C552805	Polyethylene Retail Carrier Bags/Vietnam	\$6,336.07
C552813	Steel Wire Garment Hangers/Vietnam	\$128,357.70
C552815	Frozen or Canned Warmwater Shrimp/Vietnam	\$20,489.18
C557806	Extruded Rubber Thread/Malaysia	(\$51,380.80)
C557814	Frozen or Canned Warmwater Shrimp/Malaysia	\$48,654.71
C559201	Antifriction Ball Bearings/Singapore	\$0.12
C560819	Lined Paper Products/Indonesia	\$61.50
C570911	Carbon Quality Steel Pipe/China	\$1,997,076.53
C570913	Off-The-Road Tires/China	\$4,530,109.25
C570917	Laminated Woven Sacks/China	\$164,574.77
C570921	Lightweight Thermal Paper/China	\$1,867.75
C570923	Raw Flexible Magnets/China	\$156,878.68
C570931	Stainless Steel Pressure Pipe/China	\$61,075.40
C570938	Citric Acid and Citrate Salts/China	\$793,993.72
C570940	Tow-Behind Lawn Groomers/China	\$178.62
C570942	Kitchen Shelving and Racks/China	\$1,140,224.74
C570944	Oil Country Tubular Goods/China	\$1,966,735.40
C570953	Woven Ribbons/China	\$106,431.97
C570955	Magnesia Carbon Brick/China	\$325,624.95
C570957	Seamless Pipe/China	\$179,600.84
C570961	Standard Steel Fasteners/China	\$1,765.99
C570963	Potassium Phosphate Salts/China	\$30,025.82
C570966	Drill Pipe/China	\$1,895,273.93
C570968	Aluminum Extrusions/China	\$46,451,598.70
C570971	Multilayered Wood Flooring/China	\$16,831.16
C570974	Steel Wheels/China	(\$24.69)
C570976	Galvanized Steel Wire/China	\$318.71
C570978	Steel Cylinders/China	\$141,930.19
C570980	Solar Cells/China	\$1,443,406.58
C570982	Utility Scale Wind Towers/China	(\$356,092.64)
C570984	Drawn Stainless Steel Sinks/China	\$1,002,816.10
C570987	Hardwood Plywood/China	(\$2,408.67)
C570989	Frozen or Canned Warmwater Shrimp/China	(\$11,394.25)
C570993	Monosodium Glutamate/China	(\$89.23)
C580208	Corrosion-Resistant Carbon Steel Flat Products/Korea	(\$317,704.37)
C580602	Top-Of-The-Stove Stainless Steel Cookware/Korea	\$177.14

<b>Table 2</b>		
<b>Liquidations with Interest FY 2014</b>		
<b>AD/CVD Case Number and Name</b>		<b>Liquidated Amount Plus Interest</b>
C580835	Steel Sheet and Strip in Coils/Korea	\$88,466.50
C580837	Cut-To Length Carbon Quality Steel Plate/Korea	\$616.20
C580851	Dynamic Random Access Memory Semiconductors and Modules/Korea	\$15,014.38
C580857	Coated Free Sheet Paper/Korea	\$3,107.95
C580869	Large Residential Washers/Korea	\$89.76
C583222	Dynamic Random Access Memory Semiconductors/Taiwan (Korea)	\$769.04
C791806	Stainless Steel Plate in Coils/South Africa	(\$180.33)
<b>Total Liquidations With Interest</b>		<b>\$788,741,805.23</b>

Amounts (in red) represent net amounts after the refund of interest.

## Appendix C: Open Bills for FY 2001 through FY 2014

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Corrosion-Resistant Carbon Steel/United States (Canada) (A100108)	2004	\$7,644.11	1
		<b>\$7,644.11</b>	
Cut-To Length Carbon Quality Steel Plate/United States (Canada) (A100109)	2004	\$161,762.38	28
		<b>\$161,762.38</b>	
Corrosion-Resistant Carbon Steel/Canada (A122822)	2004	\$19,924.35	96
	2006	\$1,515,145.35	444
	2007	\$1,888.81	1
	2010	\$3,162,824.97	2,165
		<b>\$4,699,783.48</b>	
Steel Wire Rod/Canada (A122840)	2005	\$2,190.63	1
	2013	\$0.97	1
		<b>\$2,191.60</b>	
Hard Red Spring Wheat/Canada (A122847)	2006	\$686.89	1
		<b>\$686.89</b>	
Dynamic Random Access Memory Semiconductors/Mexico (Korea) (A201212)	2001	\$250.56	1
		<b>\$250.56</b>	
Oil Country Tubular Goods/Mexico (A201215)	2006	\$98,081.60	2
		<b>\$98,081.60</b>	
Fresh Cut Flowers/Mexico (A201601)	2004	\$28,387.20	76
		<b>\$28,387.20</b>	
Steel Sheet and Strip in Coils/Mexico (A201822)	2011	\$250,182.46	51
	2013	\$58,452.11	6
		<b>\$308,634.57</b>	
Light-Walled Rectangular Pipe and Tube/Mexico (A201836)	2014	\$730.60	1
		<b>\$730.60</b>	
Silicon Metal/Brazil (A351806)	2006	\$109,913.91	13
		<b>\$109,913.91</b>	
Frozen or Canned Warmwater Shrimp/Brazil (A351838)	2008	\$99,599.43	4
		<b>\$99,599.43</b>	
Casing and Tubing/Argentina (A357215)	2004	\$10,961,926.08	36
		<b>\$10,961,926.08</b>	
Stainless Steel Plate/Sweden (A401040)	2006	\$800.07	1
		<b>\$800.07</b>	
Antifriction Ball Bearings/United Kingdom	2002	\$1,140.91	1

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
(A412201)	2010	\$5,281.21	9
	2011	\$19,381.27	21
		<b>\$25,803.39</b>	
Dynamic Random Access Memory Semiconductors/United Kingdom (Korea) (A412212)	2004	\$37.71	1
		<b>\$37.71</b>	
Stainless Steel Plate in Coils/Belgium (A423808)	2014	\$1,216,448.78	85
		<b>\$1,216,448.78</b>	
Antifriction Ball Bearings/France (A427201)	2006	\$64,134.53	11
	2008	\$46.32	1
		<b>\$64,180.85</b>	
Antifriction Ball Bearings/Germany (A428201)	2006	\$1,933.36	5
	2007	\$8,604.87	2
	2008	\$8,431.46	5
	2010	\$3,358,622.71	172
	2011	\$1,360,038.58	177
	2012	\$433.68	2
	2013	\$23.96	1
	2014	\$1,422.79	43
		<b>\$4,739,511.41</b>	
Cylindrical Roller Bearings/Germany (A428203)	2002	\$205.20	1
	2006	\$787.95	1
		<b>\$993.15</b>	
Pressure-Sensitive Plastic Tape/Italy (A475059)	2012	\$67,036.08	1
		<b>\$67,036.08</b>	
Antifriction Ball Bearings/Italy (A475201)	2006	\$7,373.40	8
	2008	\$19.54	1
	2010	\$6,147.73	5
	2011	\$548.94	3
	2012	\$7.19	1
	2013	\$22.16	1
	2014	\$49.81	2
		<b>\$14,168.77</b>	
Dynamic Random Access Memory Semiconductors/Italy (Korea) (A475212)	2001	\$4,669.70	3
		<b>\$4,669.70</b>	
Pasta/Italy (A475818)	2004	\$4,565.57	4
	2010	\$717,271.24	49
	2012	\$632,008.29	345

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
	2014	\$13,755.16	4
		<b>\$1,367,600.26</b>	
Stainless Steel Plate In Coils/Italy (A475822)	2013	\$6,247.55	1
		<b>\$6,247.55</b>	
Welded Carbon Steel Pipe and Tube/Turkey (A489501)	2014	\$90.27	1
		<b>\$90.27</b>	
Pasta/Turkey (A489805)	2011	\$20,432.76	1
	2014	\$106,671.05	12
		<b>\$127,103.81</b>	
Steel Concrete Reinforcing Bar/Turkey (A489807)	2010	\$317,519.76	1
	2011	\$286,554.73	1
		<b>\$604,074.49</b>	
Polyethylene Terephthalate Film, Sheet, and Strip/UAE (A533502)	2006	\$57,591.24	16
	2011	\$23,033.36	1
	2012	\$207,049.80	8
		<b>\$287,674.40</b>	
Steel Nails/UAE (A533810)	2013	\$380,189.76	27
	2014	\$63,183.36	7
		<b>\$443,373.12</b>	
Preserved Mushrooms/India (A533813)	2003	\$31,975.63	3
	2008	\$282,511.78	93
	2013	\$31,515,919.91	976
		<b>\$31,830,407.32</b>	
Hot-Rolled Carbon Steel Flat Products/ India (A533820)	2012	\$14,277.74	1
	2014	\$5,831,281.38	18
		<b>\$5,845,559.12</b>	
Polyethylene Terephthalate Film/India (A533824)	2013	\$17,698.01	6
		<b>\$17,698.01</b>	
Frozen Warmwater Shrimp/India (A533840)	2006	\$32,320.03	1
	2014	\$858.94	1
		<b>\$33,178.97</b>	
Lined Paper Products/India (A533843)	2010	\$42,937.82	3
		<b>\$42,937.82</b>	
Canned Pineapple Fruit/Thailand (A549813)	2003	\$227,763.97	30
		<b>\$227,763.97</b>	
Hot-Rolled Steel Products/Thailand (A549817)	2010	\$626,722.31	1
		<b>\$626,722.31</b>	
Polyethylene Retail Carrier Bags/ Thailand (A549821)	2007	\$523,737.31	12
	2008	\$7,945,668.10	143

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
	2009	\$10,148,792.40	205
	2010	\$1,805,734.73	41
	2012	\$932,322.89	78
	2014	\$1,518,035.26	14
		<b>\$22,874,290.69</b>	
Frozen Warmwater Shrimp/Thailand (A549822)	2010	\$264,562.78	45
	2011	\$5,596.08	1
	2012	\$987,238.57	259
		<b>\$1,257,397.43</b>	
Tissue Paper Products/Thailand (China) (A549826)	2010	\$136,705.13	1
		<b>\$136,705.13</b>	
Frozen Fish Fillets/Vietnam (A552801)	2005	\$694,790.28	24
	2006	\$1,370,725.80	29
	2007	\$14,266,463.86	76
	2008	\$1,763,895.53	43
	2009	\$3,186,538.44	84
	2010	\$849,300.20	14
	2011	\$1,113,440.92	32
	2012	\$1,808,488.54	53
	2013	\$492,447.21	23
	2014	\$18,442.03	1
		<b>\$25,564,532.81</b>	
Frozen Warmwater Shrimp/Vietnam (A552802)	2007	\$342,723.55	8
	2014	\$269,468.29	12
		<b>\$612,191.84</b>	
Tissue Paper Products/Vietnam (China) (A552804)	2010	\$2,988,489.36	22
	2012	\$22,143.52	1
		<b>\$3,010,632.88</b>	
Polyethylene Retail Carrier Bags/ Vietnam (A552806)	2011	\$1,385,261.77	18
		<b>\$1,385,261.77</b>	
Polyethylene Retail Carrier Bags/ Vietnam (A552807)	2012	\$26,063.39	1
		<b>\$26,063.39</b>	
Frozen Fish Fillets/Cambodia (A555801)	2008	\$628,187.35	13
		<b>\$628,187.35</b>	
Polyethylene Retail Carrier Bags/Malaysia (A557813)	2011	\$2,082,163.82	48
		<b>\$2,082,163.82</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Potassium Permanganate/China (A570001)	2004	\$622,867.89	13
		<b>\$622,867.89</b>	
Hand Tools/China (Hammers/Sledges) (A570201)	2006	\$43,157.90	12
	2007	\$6,920.16	1
	2008	\$39,294.59	49
	2012	\$212,705.58	7
		<b>\$302,078.23</b>	
Chloropicrin/China (A570202)	2006	\$18,878.94	4
	2007	\$962,034.71	44
	2008	\$6,091,674.25	121
	2011	\$8,471.19	2
	2012	\$123,375.77	5
	2013	\$95,611.28	13
	2014	\$82,186.55	4
		<b>\$7,382,232.69</b>	
Hand Tools/China (Picks/Mattocks) (A570203)	2006	\$1,033.44	1
	2008	\$92,662.00	41
	2013	\$79,070.94	28
		<b>\$172,766.38</b>	
Hand Tools/China (Axes/Adzes) (A570204)	2006	\$34,270.41	7
	2007	\$17,507.44	1
	2008	\$78,854.85	32
		<b>\$130,632.70</b>	
Natural Bristle Paint Brushes/China (A570501)	2002	\$158,876.47	1
		<b>\$158,876.47</b>	
Iron Construction Castings/China (A570502)	2003	\$183,286.48	23
		<b>\$183,286.48</b>	
Petroleum Wax Candles/China (A570504)	2002	\$27,542.30	5
	2004	\$587,853.45	20
	2005	\$67,981.92	2
	2006	\$45,802.74	1
	2007	\$163,114.72	7
	2008	\$6,943,159.64	152
	2010	\$133,939.42	5
	2011	\$151,509.01	2
	2014	\$252,529.65	17
		<b>\$8,373,432.85</b>	
Porcelain-On-Steel Cookware/China (A570506)	2010	\$573,452.72	27
	2011	\$35,297.24	4
		<b>\$608,749.96</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Tapered Roller Bearings/China (A570601)	2002	\$557,928.03	56
	2003	\$1,052,916.25	39
	2009	\$3,455,776.78	28
	2011	\$314,210.27	6
	2012	\$1,241,840.62	26
	2013	\$263,808.56	4
	2014	\$95,646.92	3
		<b>\$6,982,127.43</b>	
Silicon Metal/China (A570806)	2002	\$129,995.17	1
	2003	\$467,114.09	1
		<b>\$597,109.26</b>	
Refined Antimony Trioxide/China (A570813)	2009	\$7,989.82	1
		<b>\$7,989.82</b>	
Carbon Steel Butt-weld Pipe Fittings/China (A570814)	2009	\$225,507.19	3
	2010	\$112,099.56	1
		<b>\$337,606.75</b>	
Cased Pencils/China (A570827)	2002	\$8,182.38	2
	2003	\$37,750.65	4
	2005	\$4,576.03	3
	2008	\$29,533.42	3
	2009	\$36,165.73	2
	2010	\$19.13	1
	2011	\$1,019.84	1
	2012	\$68,998.44	18
	2013	\$1,299.20	2
	2014	\$145,905.28	8
		<b>\$333,450.10</b>	
Coumarin/China (A570830)	2003	\$187,727.37	2
		<b>\$187,727.37</b>	
Fresh Garlic/China (A570831)	2004	\$18,251,575.00	84
	2005	\$24,454.68	1
	2007	\$32,444,099.63	144
	2008	\$19,356,234.89	239
	2009	\$56,217,748.13	929
	2010	\$171,188,718.84	2,072
	2011	\$56,473,113.50	542
	2012	\$152,259,872.28	1,330
	2013	\$307,168.75	110
	2014	\$45,874.79	3
		<b>\$506,568,860.49</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Pure Magnesium/China (A570832)	2004	\$1,317,716.94	140
	2005	\$703,358.77	3
	2013	\$39,939,762.41	116
		<b>\$41,960,838.12</b>	
Glycine/China (A570836)	2008	\$724,706.68	31
	2009	\$620,029.80	13
	2010	\$751,738.13	3
		<b>\$2,096,474.61</b>	
Manganese Metal/China (A570840)	2001	\$19,652.94	1
		<b>\$19,652.94</b>	
Brake Rotors/China (A570846)	2001	\$731,328.34	18
	2002	\$326,187.24	9
	2003	\$174,615.03	6
	2007	\$2,480,721.05	259
	2008	\$1,295,030.45	325
	2009	\$1,268,614.83	204
	2010	\$693,003.98	241
	2012	\$2,527,986.46	132
		<b>\$9,497,487.38</b>	
Freshwater Crawfish Tail Meat/ China (A570848)	2002	\$18,176,111.17	56
	2003	\$45,178,469.73	112
	2004	\$91,325,399.27	97
	2005	\$15,887,687.83	80
	2006	\$50,354,508.50	153
	2007	\$61,403,349.89	120
	2008	\$10,044,042.73	69
	2009	\$25,368,245.84	102
	2010	\$5,426,738.26	23
	2012	\$5,523,510.83	14
	2013	\$2,156,303.79	13
		<b>\$330,844,367.84</b>	
Preserved Mushrooms/China (A570851)	2002	\$204,172.08	3
	2003	\$257,770.61	11
	2004	\$4,572,645.46	134
	2005	\$18,250,173.49	508
	2006	\$493,808.57	16
	2007	\$14,235,462.16	235
	2008	\$40,304,648.66	1,054
	2009	\$12,416,229.96	642
	2010	\$18,985,000.06	637

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
	2011	\$2,929,093.73	74
	2012	\$7,574,510.00	704
	2013	\$52,842,265.56	696
	2014	\$28,703,952.64	349
		<b>\$201,769,732.98</b>	
Non-Frozen Apple Juice Concentrate/China (A570855)	2004	\$357,621.61	7
		<b>\$357,621.61</b>	
Foundry Coke/China (A570862)	2004	\$1,365,873.71	2
		<b>\$1,365,873.71</b>	
	2003	\$1,740,456.86	6
	2005	\$9,519,834.83	80
	2006	\$2,007,776.42	33
	2007	\$23,152,373.17	458
	2008	\$1,923,630.72	59
	2009	\$35,173,898.24	495
	2010	\$34,423,651.64	301
	2011	\$18,873,751.56	131
	2012	\$4,822,389.83	138
	2013	\$17,814,654.98	102
	2014	\$15,459,307.26	235
Honey/China (A570863)		<b>\$164,911,725.51</b>	
Pure Magnesium/China (A570864)	2006	\$4,103,636.18	6
		<b>\$4,103,636.18</b>	
Hot Rolled Steel Products/China (A570865)	2010	\$79,720.71	1
		<b>\$79,720.71</b>	
Circular Welded Steel Pipe/China (A570870)	2012	\$43,767.56	1
		<b>\$43,767.56</b>	
Polyethylene Retail Carrier Bags/China (A570886)	2007	\$7,424.15	1
	2008	\$86,369.59	7
	2009	\$408,429.83	30
	2010	\$53,532.96	3
	2011	\$84,807.69	2
	2012	\$17,365.57	1
	2013	\$218,996.26	19
	2014	\$97,015.85	11
		<b>\$973,941.90</b>	
Ironing Tables/China (A570888)	2013	\$6,015,362.97	207
	2014	\$269,164.02	22
		<b>\$6,284,526.99</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Wooden Bedroom Furniture/China (A570890)	2007	\$105,862.25	84
	2008	\$712,945.42	32
	2009	\$84,952,940.13	2,846
	2010	\$48,366,987.85	2,591
	2011	\$156,047,939.48	3,299
	2012	\$77,237,032.60	2,562
	2013	\$104,099,323.85	3,192
	2014	\$27,323,690.03	684
		<b>\$498,846,721.61</b>	
Hand Trucks/China (A570891)	2007	\$3,530,179.09	22
	2008	\$4,719,963.52	78
	2009	\$391,847.31	6
	2011	\$999,208.12	27
	2012	\$260,857.08	13
	2013	\$1,058,798.09	65
		<b>\$10,960,853.21</b>	
Carbazole Violet Pigment 23/China (A570892)	2009	\$151,914.23	1
	2011	\$272,242.05	2
	2012	\$1,461,083.43	4
		<b>\$1,885,239.71</b>	
Frozen or Canned Warmwater Shrimp (A570893)	2008	\$4,308,782.38	40
	2010	\$2,906,673.64	29
	2011	\$891,674.68	3
		<b>\$8,107,130.70</b>	
Chlorinated Isocyanurates/China (A570898)	2011	\$3,437,519.71	9
	2013	\$989,828.26	8
	2014	\$21,297.83	1
		<b>\$4,448,645.80</b>	
Artist Canvas/China (A570899)	2010	\$62,485.73	24
	2014	\$243,091.98	1
		<b>\$305,577.71</b>	
Diamond Sawblades/China (A570900)	2013	\$1,274,061.89	47
	2014	\$30,208.76	4
		<b>\$1,304,270.65</b>	
Lined Paper School Supplies/China (A570901)	2009	\$44,254.61	2
	2011	\$336,766.82	2
		<b>\$381,021.43</b>	
Activated Carbon/China (A570904)	2011	\$172,424.22	3
	2012	\$128,004.97	2
	2013	\$435,859.55	10

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
		<b>\$736,288.74</b>	
Polyester Staple Fiber/China (A570905)	2010	\$254,948.11	251
	2011	\$52,720.94	96
	2012	\$302.31	1
		<b>\$307,971.36</b>	
Steel Nails/China (A570909)	2011	\$1,053,268.15	31
	2012	\$697,629.92	44
	2013	\$55,623.79	2
	2014	\$68,869.80	4
		<b>\$1,875,391.66</b>	
Welded Carbon Quality Steel/China (A570910)	2013	\$274,096.45	5
	2014	\$773,343.09	13
		<b>\$1,047,439.54</b>	
Off-The Road Tires/China (A570912)	2010	\$54,996.79	4
	2011	\$6,725,272.52	91
	2012	\$3,248,979.51	80
	2013	\$1,801,959.07	22
	2014	\$3,461,919.96	65
		<b>\$15,293,127.85</b>	
Pipe and Tube/China (A570914)	2011	\$67,313.83	1
		<b>\$67,313.83</b>	
Steel Wire Garment Hangers/China (A570918)	2010	\$244,476.77	4
	2011	\$6,110.67	1
	2012	\$2,330,313.32	50
	2013	\$6,569,987.88	164
	2014	\$2,498,457.38	78
		<b>\$11,649,346.02</b>	
Raw Flexible Magnets/China (A570922)	2012	\$30,232.28	2
	2013	\$48,377.44	1
		<b>\$78,609.72</b>	
Uncovered Innerspring Units/China (A570928)	2011	\$1,180,551.77	29
		<b>\$1,180,551.77</b>	
Steel Threaded Rod/China (A570932)	2012	\$273,410.29	1
		<b>\$273,410.29</b>	
Citric Acid and Certain Citrate Salts/China (A570937)	2012	\$125,870.84	1
	2013	\$991,459.68	15
		<b>\$1,117,330.52</b>	
Narrow Woven Ribbons/China (A570952)	2013	\$300,628.87	3
	2014	\$763,407.76	16
		<b>\$1,064,036.63</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Magnesia Carbon Brick/China (A570954)	2014	\$2,868,828.60	23
		<b>\$2,868,828.60</b>	
Aluminum Extrusions/China (A570967)	2014	\$391,382.26	14
		<b>\$391,382.26</b>	
Drawn Stainless Steel Sinks/China (A570983)	2013	\$3,402.51	1
		<b>\$3,402.51</b>	
Top-Of-The-Stove Stainless Steel Cookware/Korea (A580601)	2001	\$14,674.71	5
		<b>\$14,674.71</b>	
Polyethylene Terephthalate Film, Sheet and Strip/Korea (A580807)	2003	\$7,640.98	1
	2005	\$32,257.36	2
		<b>\$39,898.34</b>	
Corrosion-Resistant Carbon Steel Flat Products/Korea (A580816)	2009	\$3,490.00	3
	2010	\$21,192.01	2
	2013	\$3,561.11	1
		<b>\$28,243.12</b>	
Polyester Staple Fiber/Korea (A580839)	2005	\$71,251.12	13
		<b>\$71,251.12</b>	
Laminated Woven Sacks/Hong Kong (A582804)	2014	\$12,255.24	1
		<b>\$12,255.24</b>	
Welded Carbon Steel Pipe and Tube/Taiwan (A583008)	2003	\$370,702.91	15
	2012	\$1,051,206.48	101
		<b>\$1,421,909.39</b>	
Color Television Receivers/Taiwan (A583009)	2004	\$402.82	1
	2005	\$2,454,336.21	76
		<b>\$2,454,739.03</b>	
Small Business Telephone Systems/Taiwan (A583806)	2006	\$40,682.58	3
		<b>\$40,682.58</b>	
Steel Sheet and Strip in Coils/Taiwan (A583831)	2005	\$8,648.65	2
	2007	\$36,261.44	5
	2008	\$3,931.91	1
	2009	\$287,296.32	29
		<b>\$336,138.32</b>	
Polyethylene Retail Carrier Bags/Taiwan (A583843)	2014	\$21,332.44	5
		<b>\$21,332.44</b>	
Narrow Woven Ribbons/Taiwan (A583844)	2014	\$144,473.18	10
		<b>\$144,473.18</b>	
Bicycle Speedometers/Japan (A588038)	2001	\$30,763.05	9

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
		<b>\$30,763.05</b>	
Steel Wire Rope/Japan (A588045)	2011	\$51,979.52	42
	2012	\$351,834.75	36
		<b>\$403,814.27</b>	
Tapered Roller Bearings Under 4 Inches/Japan (A588054)	2003	\$39.11	2
	2005	\$54.49	1
		<b>\$93.60</b>	
Portable Electric Typewriters/Japan (A588087)	2004	\$3,889.17	1
		<b>\$3,889.17</b>	
Antifriction Ball Bearings/Japan (A588201)	2002	\$5,050.94	9
	2006	\$64,954.42	20
	2007	\$150,323.43	26
	2008	\$85,731.55	30
	2013	\$264.04	1
		<b>\$306,324.38</b>	
Casing and Tubing/Japan (A588215)	2006	\$136,521.64	1
		<b>\$136,521.64</b>	
Tapered Roller Bearings Over 4 Inches/Japan (A588604)	2003	\$253.34	2
		<b>\$253.34</b>	
Industrial Belts/Japan (A588807)	2002	\$18,911.05	8
		<b>\$18,911.05</b>	
Steel Sheet and Strip in Coils/Japan (A588845)	2013	\$30,992.73	1
		<b>\$30,992.73</b>	
Dynamic Random Access Memory Semiconductors/United Kingdom (Korea) (C412222)	2007	\$72,831.96	1
		<b>\$72,831.96</b>	
Pasta/Italy (C475819)	2006	\$16,990.56	38
	2010	\$854.16	48
	2014	\$3,132.26	5
		<b>\$20,976.98</b>	
Pasta/Turkey (C489806)	2011	\$1,861.14	1
		<b>\$1,861.14</b>	
Iron Metal Castings/India (C533063)	2001	\$11,765.00	5
	2002	\$3,116.39	6
	2003	\$2,952.66	4
		<b>\$17,834.05</b>	
Hot-Rolled Steel Products/India (C533821)	2012	\$54,923.31	1
	2014	\$4,661,116.46	18
		<b>\$4,716,039.77</b>	

<b>Table 3</b>			
<b>Open Bills by Case and Fiscal Year</b>			
<b>AD/CVD Case Name and Number</b>	<b>Fiscal Year</b>	<b>Bill Amount</b>	<b>Bill Count</b>
Polyethylene Terephthalate Film, Sheet and Strip/ India (C533825)	2013	\$13,421.00	6
		<b>\$13,421.00</b>	
Polyethylene Retail Carrier Bags/Vietnam (C552805)	2011	\$94,145.51	18
		<b>\$94,145.51</b>	
Steel Wire Garment Hangers/Vietnam (C552813)	2013	\$11,700.41	3
		<b>\$11,700.41</b>	
Carbon Quality Steel Pipe/China (C570911)	2013	\$119,092.65	5
	2014	\$988,180.80	13
		<b>\$1,107,273.45</b>	
Off-The-Road Tires/China (C570913)	2010	\$11,696.29	5
	2011	\$46,221.60	84
	2012	\$21,301.09	69
	2014	\$698.68	59
		<b>\$79,917.66</b>	
Raw Flexible Magnets/China (C570923)	2012	\$8,970.32	2
	2013	\$14,354.22	1
		<b>\$23,324.54</b>	
Citric Acid and Citrate Salts/China (C570938)	2013	\$50,917.01	15
		<b>\$50,917.01</b>	
Woven Ribbons/China (C570953)	2013	\$1,896.73	3
	2014	\$3,456.71	16
		<b>\$5,353.44</b>	
Magnesia Carbon Brick/China (C570955)	2014	\$325,624.95	23
		<b>\$325,624.95</b>	
Seamless Pipe/China (C570957)	2014	\$3,240.67	1
		<b>\$3,240.67</b>	
Aluminum Extrusions/China (C570968)	2013	\$136,379.76	2
	2014	\$3,974,423.37	14
		<b>\$4,110,803.13</b>	
Solar Cells/China (C570980)	2014	\$1,311.23	1
		<b>\$1,311.23</b>	
Drawn Stainless Steel Sinks/China (C570984)	2013	\$358.79	1
		<b>\$358.79</b>	
Corrosion-Resistant Carbon Steel Flat Products/Korea (C580208)	2009	\$60.37	3
		<b>\$60.37</b>	

Appendix D: CDSOA Clearing Account Balances as of October 1, 2014\*

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A301602	Fresh Cut Flowers/Colombia	\$100.00	\$0.00
A331802	Frozen or Canned Warmwater Shrimp/Ecuador	\$66,689.27	\$0.00
A337803	Fresh Atlantic Salmon/Chile	\$22,677.01	\$0.00
A337806	Frozen Red Raspberries/Chile	\$57,759.78	\$0.00
A351825	Stainless Steel Bar/Brazil	\$64,089.66	\$0.00
A351826	Seamless Pipe/Brazil	\$85,663.87	\$0.00
A351838	Frozen or Canned Warmwater Shrimp/Brazil	\$103,201.60	\$0.00
A357215	Casing and Tubing/Argentina	\$18,934.73	\$0.00
A357216	Drill Pipe/Argentina	\$2,266.04	\$0.00
A357802	Light-Walled Rectangular Tube/Argentina	\$4,356.56	\$0.00
A357812	Honey/Argentina	\$6,955.20	\$0.00
A401201	Antifriction Ball Bearings/Sweden	\$16,936.15	\$0.00
A401203	Cylindrical Roller Bearings/Sweden	\$8.08	\$0.00
A401601	Brass Sheet and Strip/Sweden	\$45.67	\$0.00
A401603	Stainless Steel Hollow Products/Sweden	\$144.47	\$0.00
A401805	Cut-To-Length Carbon Steel Plate/Sweden	\$64,095.86	\$0.00
A401806	Stainless Steel Wire Rod/Sweden	\$12,902.68	\$0.00
A403801	Fresh and Chilled Atlantic Salmon/Norway	\$39,388.69	\$0.00
A412201	Antifriction Ball Bearings/United Kingdom	\$1,119,142.66	\$0.00
A412203	Cylindrical Roller Bearings/United Kingdom	\$15,888.61	\$0.00
A412212	Dynamic Random Access Memory Semiconductors/United Kingdom (Korea)	\$85,265.25	\$0.00
A412803	Industrial Nitrocellulose/United Kingdom	\$137,323.56	\$0.00
A412822	Stainless Steel Bar/United Kingdom	\$11,930.36	\$0.00
A419212	Dynamic Random Access Memory Semiconductors/Ireland (Korea)	\$369.44	\$0.00
A421212	Dynamic Random Access Memory Semiconductors/Netherlands (Korea)	\$21,051.47	\$0.00
A421811	Purified Carboxymethylcellulose/Netherlands	\$53,157.63	\$0.00
A423077	Sugar/Belgium	\$1,997.17	\$0.00
A423602	Industrial Phosphoric Acid/Belgium	\$1,306.56	\$0.00
A423805	Cut-To-Length Carbon Steel Plate/Belgium	\$13,693.43	\$0.00
A423808	Stainless Steel Plate in Coils/Belgium	\$19,469.85	\$0.00
A427001	Sorbitol/France	\$25,423.78	\$0.00
A427009	Industrial Nitrocellulose/France	\$12,598.39	\$0.00
A427201	Antifriction Ball Bearings/France	\$360,431.62	\$0.00
A427203	Cylindrical Roller Bearings/France	\$18,387.05	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A427205	Spherical Plain Bearings/France	\$45,572.05	\$0.00
A427212	Dynamic Random Access Memory Semiconductors/France (Korea)	\$545.72	\$0.00
A427811	Stainless Steel Wire Rod/France	\$23,729.83	\$0.00
A427814	Stainless Steel Sheet and Strip/France	\$378,730.35	\$0.00
A427820	Stainless Steel Bar/France	\$29,684.96	\$0.00
A428082	Sugar/Germany	\$5,472.83	\$0.00
A428201	Antifriction Ball Bearings/Germany	\$1,004,762.33	\$0.00
A428203	Cylindrical Roller Bearings/Germany	\$145,302.73	\$0.00
A428205	Spherical Plain Bearings/Germany	\$45,334.80	\$0.00
A428212	Dynamic Random Access Memory Semiconductors/Germany (Korea)	\$10.28	\$0.00
A428602	Brass Sheet and Strip/Germany	\$6,897.18	\$0.00
A428802	Industrial Belts/Germany	\$12,677.60	\$0.00
A428803	Industrial Nitrocellulose/Germany	\$181,358.07	\$0.00
A428814	Cold-rolled Carbon Steel Flat Products/Germany	\$50,218.37	\$0.00
A428815	Corrosion-Resistant Carbon Steel Flat Products/Germany	\$1,971,828.14	\$0.00
A428816	Cut-To-Length Carbon Steel Plate/Germany	\$29,403.06	\$0.00
A428820	Seamless Pipe/Germany	\$8,869.10	\$0.00
A428821	Large Newspaper Printing Presses/Germany	\$22,232.10	\$0.00
A428825	Stainless Steel Sheet and Strip/Germany	\$159,973.94	\$0.00
A428830	Stainless Steel Bar/Germany	\$127,005.75	\$0.00
A449804	Steel Concrete Reinforcing Bar/Latvia	\$1,721.18	\$0.00
A470805	Stainless Steel Bar/Spain	\$31,231.77	\$0.00
A470807	Stainless Steel Wire Rod/Spain	\$49,082.84	\$0.00
A475059	Pressure-Sensitive Plastic Tape/Italy	\$9,966.78	\$0.00
A475201	Antifriction Ball Bearings/Italy	\$661,135.46	\$0.00
A475203	Cylindrical Roller Bearings/Italy	\$12,136.58	\$0.00
A475212	Dynamic Random Access Memory Semiconductors/Italy (Korea)	\$2,495.56	\$0.00
A475215	Casings and Tubing/Italy	\$45,670.16	\$0.00
A475601	Brass Sheet and Strip/Italy	\$5,893.44	\$0.00
A475703	Granular Polytetrafluoroethylene/Italy	\$1,106.97	\$0.00
A475802	Industrial Belts/Italy	\$4,216.14	\$0.00
A475811	Grain-Oriented Electrical Steel/Italy	\$391.49	\$0.00
A475814	Seamless Pipe/Italy	\$30.24	\$0.00
A475818	Pasta/Italy	\$210,098.66	\$0.00
A475820	Stainless Steel Wire Rod/Italy	\$10,474.97	\$0.00
A475822	Stainless Steel Plate In Coils/Italy	\$497.32	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A475824	Stainless Steel Sheet and Strip/Italy	\$2,185.14	\$0.00
A475826	Cut-To-Length Carbon Steel Plate/Italy	\$17,974.85	\$0.00
A475828	Stainless Steel Butt-weld Pipe Fittings/Italy	\$3.72	\$0.00
A475829	Stainless Steel Bar/Italy	\$8,270.35	\$0.00
A485109	Cut-To-Length Carbon Steel Plate/Romania	\$562.80	\$0.00
A485602	Tapered Roller Bearings/Romania	\$166.31	\$0.00
A485805	Small-Diameter Carbon Steel Seamless Pipe/Romania	\$2,618.91	\$0.00
A489501	Welded Carbon Steel Pipe and Tube/Turkey	\$4,535.85	\$0.00
A489602	Aspirin/Turkey	\$2,609.19	\$0.00
A489805	Pasta/Turkey	\$4,241.23	\$0.00
A489807	Steel Concrete Reinforcing Bar/Turkey	\$67,928.34	\$0.00
A507502	Raw In-Shell Pistachios/Iran	\$908.50	\$0.00
A533806	Sulfanilic Acid/India	\$753.56	\$0.00
A533808	Stainless Steel Wire Rod/India	\$25,024.65	\$0.00
A533809	Forged Stainless Steel Flanges/India	\$76,109.85	\$0.00
A533810	Stainless Steel Bar/India	\$26,847.55	\$0.00
A533813	Preserved Mushrooms/India	\$87,195.43	\$0.00
A533820	Hot-Rolled Steel Products/India	\$311,288.65	\$0.00
A533824	Polyethylene Terephthalate Film, Sheet and Strip/India	\$178,606.14	\$0.00
A533840	Frozen or Canned Warmwater Shrimp/India	\$273,417.60	\$0.00
A533843	Lined Paper School Supplies/India	\$50,041.51	\$0.00
A549502	Welded Carbon Steel Pipe and Tube/Thailand	\$39,473.23	\$0.00
A549601	Malleable Cast Iron Pipe Fittings/Thailand	\$755.89	\$0.00
A549807	Carbon Steel Butt-Weld Pipe Fittings/Thailand	\$68.92	\$0.00
A549813	Canned Pineapple/Thailand	\$472,871.07	\$0.00
A549821	Polyethylene Retail Carrier Bags/Thailand	\$118,886.86	\$0.00
A549822	Frozen or Canned Warmwater Shrimp/Thailand	\$473,903.97	\$0.00
A552801	Frozen Fish Fillets/Vietnam	\$1,203,111.38	\$0.00
A552802	Frozen or Canned Warmwater Shrimp/Vietnam	\$523,775.97	\$0.00
A557212	Dynamic Random Access Memory Semiconductors/Malaysia (Korea)	\$2,817.61	\$0.00
A557217	Static Random Access Semiconductors/Malaysia (Taiwan)	\$6,533.47	\$0.00
A557805	Extruded Rubber Thread/Malaysia	\$6,327.66	\$0.00
A557809	Stainless Steel Butt-weld Pipe Fittings/Malaysia	\$4,718.54	\$0.00
A559201	Antifriction Ball Bearings/Singapore	\$13,575.98	\$0.00
A559212	Dynamic Random Access Memory Semiconductors/Singapore (Korea)	\$11,802.68	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A559217	Static Random Access Semiconductors/Singapore (Taiwan)	\$33.40	\$0.00
A559801	Antifriction Ball Bearings/Singapore	\$455.95	\$0.00
A560802	Preserved Mushrooms/Indonesia	\$606,891.40	\$0.00
A565801	Stainless Steel Butt-weld Pipe Fittings/Philippines	\$49.70	\$0.00
A570001	Potassium Permanganate/China	\$37,442.79	\$0.00
A570003	Cotton Shop Towels/China	\$2,906.91	\$0.00
A570007	Barium Chloride/China	\$17,070.79	\$0.00
A570201	Hand Tools/China (Hammers/Sledges)	\$27,059.14	\$0.00
A570202	Hand Tools/China (Bars/Wedges)	\$99,501.72	\$0.00
A570203	Hand Tools/China (Picks/Mattocks)	\$24,868.46	\$0.00
A570204	Hand Tools/China (Axes/Adzes)	\$102,532.54	\$0.00
A570212	Dynamic Random Access Memory Semiconductors/China (Korea)	\$100.01	\$0.00
A570501	Natural Bristle Paint Brushes/China	\$16,272.78	\$0.00
A570502	Iron Construction Castings/China	\$101,950.21	\$0.00
A570504	Petroleum Wax Candles/China	\$1,551,509.17	\$0.00
A570506	Porcelain-On-Steel Cookware/China	\$47,261.35	\$0.00
A570601	Tapered Roller Bearings/China	\$334,616.57	\$0.00
A570804	Sparklers/China	\$28,449.24	\$0.00
A570805	Sodium Thiosulfate/China	\$45,597.61	\$0.00
A570806	Silicon Metal/China	\$165,061.31	\$0.00
A570808	Chrome-Plated Lug Nuts/China	\$28,239.04	\$0.00
A570814	Carbon Steel Butt-weld Pipe Fittings/China	\$5,633.34	\$0.00
A570822	Helical Spring Lock Washers/China	\$49,520.93	\$0.00
A570825	Sebacic Acid/China	\$115,352.13	\$0.00
A570826	Paper Clips/China	\$14,228.71	\$0.00
A570827	Pencils/China	\$911,640.35	\$0.00
A570831	Fresh Garlic/China	\$7,077,768.27	\$0.00
A570832	Pure Magnesium/China	\$58,941.07	\$0.00
A570836	Glycine/China	\$52,723.40	\$0.00
A570844	Melamine Institutional Dinnerware/China	\$2,235.41	\$0.00
A570846	Brake Rotors/China	\$1,230,140.39	\$0.00
A570848	Freshwater Crawfish Tail Meat/China	\$2,424,090.22	\$0.00
A570849	Cut-To-Length Carbon Steel Plate/China	\$13,958.44	\$0.00
A570851	Preserved Mushrooms/China	\$373,954.38	\$0.00
A570853	Aspirin/China	\$3,936.05	\$0.00
A570855	Nonfrozen Apple Juice Concentrate/China	\$7,508.19	\$0.00
A570860	Steel Concrete Reinforcing Bar/China	\$858.79	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A570863	Honey/China	\$7,164,849.72	\$0.00
A570865	Hot Rolled Steel Products/China	\$5,300.09	\$0.00
A570866	Folding Gift Boxes/China	\$34,767.60	\$0.00
A570867	Automotive Replacement Glass Windshields/China	\$83,169.45	\$0.00
A570868	Folding Metal Tables and Chairs/China	\$182,689.92	\$0.00
A570875	Nonmalleable Cast Iron Pipe Fittings/China	\$12,594.98	\$0.00
A570877	Lawn and Garden Steel Fence Posts/China	\$40,764.11	\$0.00
A570878	Saccharin/China	\$69,835.26	\$0.00
A570879	Polyvinyl Alcohol/China	\$2,114.11	\$0.00
A570881	Malleable Iron Pipe Fittings/China	\$57,345.74	\$0.00
A570884	Color Television Receivers/China	\$8,211.31	\$0.00
A570886	Polyethylene Retail Carrier Bags/China	\$307,739.37	\$0.00
A570888	Ironing Tables/China	\$3,607,619.31	\$0.00
A570890	Wooden Bedroom Furniture/China	\$3,186,558.42	\$0.00
A570891	Hand Trucks/China	\$332,182.38	\$0.00
A570892	Carbazole Violet Pigment 23/China	\$381.29	\$0.00
A570893	Frozen or Canned Warmwater Shrimp/China	\$402,790.34	\$0.00
A570894	Tissue Paper Products/China	\$796,282.46	\$0.00
A570895	Crepe Paper Products/China	\$11,161.50	\$0.00
A570896	Alloy Magnesium/China	\$15,188.95	\$0.00
A570899	Artist Canvas/China	\$795.36	\$0.00
A570901	Lined Paper School Supplies/China	\$3,366,045.50	\$0.00
A570904	Activated Carbon/China	\$86,194.96	\$0.00
A570905	Polyester Staple Fiber/China	\$5,466.80	\$0.00
A570908	Sodium Hexametaphosphate/China	\$24,494.48	\$0.00
A580008	Color Television Receivers/Korea	\$119.88	\$0.00
A580108	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$157.74	\$0.00
A580215	Casings and Tubing/Korea	\$246,708.93	\$0.00
A580601	Top-Of-The-Stove Stainless Steel Cookware/Korea	\$2,470.50	\$0.00
A580803	Small Business Telephone Systems/Korea	\$245,739.14	\$0.00
A580805	Industrial Nitrocellulose/Korea	\$16,186.48	\$0.00
A580807	Polyethylene Terephthalate Film, Sheet and Strip/Korea	\$27,002.86	\$0.00
A580809	Circular Welded Nonalloy Steel Pipe/Korea	\$218,246.19	\$0.00
A580810	Welded Stainless Steel Pipe/Korea	\$2,671.75	\$0.00
A580811	Carbon Steel Wire Rope/Korea	\$22,456.87	\$0.00
A580812	Dynamic Random Access Memory Semiconductors/Korea	\$22,046.86	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A580813	Stainless Steel Butt-weld Pipe Fittings/Korea	\$209,136.97	\$0.00
A580815	Cold-Rolled Carbon Steel Flat Products/Korea	\$4,712.27	\$0.00
A580816	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$663,555.74	\$0.00
A580829	Stainless Steel Wire Rod/Korea	\$3,134.51	\$0.00
A580831	Stainless Steel Plate in Coils/Korea	\$3,910.65	\$0.00
A580834	Stainless Steel Sheet and Strip/Korea	\$440,052.31	\$0.00
A580836	Cut-To-Length Carbon Steel Plate/Korea	\$20,891.23	\$0.00
A580839	Polyester Staple Fiber/Korea	\$46,877.77	\$0.00
A580841	Structural Steel Beams/Korea	\$3,667.46	\$0.00
A580847	Stainless Steel Bar/Korea	\$944.97	\$0.00
A580850	Polyvinyl Alcohol/Korea	\$26,798.54	\$0.00
A582212	Dynamic Random Access Memory Semiconductors/Hong Kong (Korea)	\$73.77	\$0.00
A583008	Small Diameter Carbon Steel Pipe and Tube/Taiwan	\$16,821.10	\$0.00
A583009	Color Television Receivers/Taiwan	\$11,205.60	\$0.00
A583212	Dynamic Random Access Memory Semiconductors/Taiwan (Korea)	\$607.37	\$0.00
A583508	Porcelain-On-Steel Cookware/Taiwan	\$16,149.31	\$0.00
A583605	Carbon Steel Butt-weld Pipe Fittings/Taiwan	\$2,308.85	\$0.00
A583803	Light-Walled Rectangular Tube/Taiwan	\$1,299.37	\$0.00
A583806	Small Business Telephone Systems/Taiwan	\$34,776.82	\$0.00
A583810	Chrome-Plated Lug Nuts/Taiwan	\$71,076.81	\$0.00
A583815	Welded Stainless Steel Pipe/Taiwan	\$9,377.60	\$0.00
A583816	Stainless Steel Butt-weld Pipe Fittings/Taiwan	\$20,283.10	\$0.00
A583820	Helical Spring Lock Washers/Taiwan	\$5,790.29	\$0.00
A583824	Polyvinyl Alcohol/Taiwan	\$15,315.02	\$0.00
A583826	Collated Roofing Nails/Taiwan	\$20,078.37	\$0.00
A583828	Stainless Steel Wire Rod/Taiwan	\$2,879.45	\$0.00
A583830	Stainless Steel Plate in Coils/Taiwan	\$4,400.97	\$0.00
A583831	Stainless Steel Sheet and Strip/Taiwan	\$97,719.10	\$0.00
A583833	Polyester Staple Fiber/Taiwan	\$30,407.84	\$0.00
A583837	Polyethylene Terephthalate Film, Sheet and Strip/Taiwan	\$146,689.35	\$0.00
A588028	Roller Chain/Japan	\$39,850.14	\$0.00
A588046	Polychloroprene Rubber/Japan	\$57,673.00	\$0.00
A588054	Tapered Roller Bearings Under 4 Inches/Japan	\$26,539.27	\$0.00
A588056	Melamine/Japan	\$141.84	\$0.00
A588201	Antifriction Ball Bearings/Japan	\$28,597,499.10	\$0.00
A588203	Cylindrical Roller Bearings/Japan	\$61,443.00	\$0.00

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
A588205	Spherical Plain Bearings/Japan	\$3,091.17	\$0.00
A588207	Electroluminescent Flat-Panel Displays/Japan	\$1,822.87	\$0.00
A588210	Professional Electric Cutting Tools/Japan	\$9,682.90	\$0.00
A588212	Dynamic Random Access Memory Semiconductors/Japan (Korea)	\$789.71	\$0.00
A588215	Casing and Tubing/Japan	\$698,584.09	\$0.00
A588217	Static Random Access Semiconductors/Japan (Taiwan)	\$420,538.61	\$0.00
A588405	Cellular Mobile Telephones/Japan	\$5,924.10	\$0.00
A588602	Carbon Steel Butt-weld Pipe Fittings/Japan	\$25,420.66	\$0.00
A588604	Tapered Roller Bearings Over 4 Inches/Japan	\$303,426.28	\$0.00
A588605	Malleable Cast Iron Pipe Fittings/Japan	\$296.71	\$0.00
A588609	Color Picture Tubes/Japan	\$703.86	\$0.00
A588702	Stainless Steel Butt-Weld Pipe Fittings/Japan	\$69,828.77	\$0.00
A588703	Internal Combustion Industrial Forklift Trucks/Japan	\$65,623.42	\$0.00
A588704	Brass Sheet and Strip/Japan	\$854.79	\$0.00
A588707	Granular Polytetrafluoroethylene/Japan	\$2,026.13	\$0.00
A588802	3.5-Inch Microdisks/Japan	\$74,794.54	\$0.00
A588807	Industrial Belts/Japan	\$63,811.82	\$0.00
A588810	Mechanical Transfer Presses/Japan	\$105,602.55	\$0.00
A588812	Industrial Nitrocellulose/Japan	\$18,863.46	\$0.00
A588826	Corrosion-Resistant Carbon Steel Flat Products/Japan	\$90,334.20	\$0.00
A588833	Stainless Steel Bar/Japan	\$16,030.75	\$0.00
A588837	Large Newspaper Printing Presses/Japan	\$45.78	\$0.00
A588843	Stainless Steel Wire Rod/Japan	\$40,559.93	\$0.00
A588845	Stainless Steel Sheet and Strip/Japan	\$151,962.11	\$0.00
A588846	Hot-Rolled Carbon Steel Flat Products/Japan	\$776,049.36	\$0.00
A588847	Cut-To-Length Carbon Steel Plate/Japan	\$5,903.67	\$0.00
A588850	Large-Diameter Carbon Steel Seamless Pipe/Japan	\$86,652.68	\$0.00
A588851	Small-Diameter Carbon Steel Seamless Pipe/Japan	\$39,087.84	\$0.00
A588852	Structural Steel Beams/Japan	\$236.71	\$0.00
A588857	Welded Large Diameter Line Pipe/Japan	\$155,681.07	\$0.00
A588861	Polyvinyl Alcohol/Japan	\$9,807.21	\$0.00
A602803	Corrosion-Resistant Carbon Steel Flat Products/Australia	\$5,177.45	\$0.00
C100222	Dynamic Random Access Memory Semiconductors/United States (Korea)	\$0.00	\$12,853.93

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
C351109	Cut-To-Length Carbon Steel Plate/Brazil	\$0.00	\$795.25
C357813	Honey/Argentina	\$0.00	\$35,798.39
C401209	Cut-To-Length Carbon Steel Plate/Sweden	\$0.00	\$11,295.47
C401401	Cold-Rolled Carbon Steel Flat Products/Sweden	\$0.00	\$9,849.70
C403802	Fresh and Chilled Atlantic Salmon/Norway	\$0.00	\$4,978.89
C412222	Dynamic Random Access Memory Semiconductors/United Kingdom (Korea)	\$0.00	\$9,285.46
C423209	Cut-To-Length Carbon Steel Plate/Belgium	\$0.00	\$11,815.12
C423809	Stainless Steel Plate in Coils/Belgium	\$0.00	\$3,949.26
C427109	Cut-To-Length Carbon Steel Plate/France	\$0.00	\$191.57
C427222	Dynamic Random Access Memory Semiconductors/France (Korea)	\$0.00	\$12,217.17
C427815	Stainless Steel Sheet and Strip/France	\$0.00	\$375,637.51
C428046	Sugar/Germany	\$0.00	\$32.25
C428207	Cold-Rolled Carbon Steel Products/Germany	\$0.00	\$1,682.73
C428208	Corrosion-Resistant Carbon Steel Flat Products/ Germany	\$0.00	\$112,729.45
C428209	Cut-To-Length Carbon Steel Plate/Germany	\$0.00	\$16,512.03
C428222	Dynamic Random Access Memory Semiconductors/Germany (Korea)	\$0.00	\$12,027.40
C435222	Dynamic Random Access Memory Semiconductors/Czech Republic (Korea)	\$0.00	\$1,869.48
C475109	Cut-To-Length Carbon Steel Plate/Italy	\$0.00	\$2,371.48
C475222	Dynamic Random Access Memory Semiconductors/Italy (Korea)	\$0.00	\$103,621.69
C475812	Grain-Oriented Electrical Steel/Italy	\$0.00	\$3,833.90
C475819	Pasta/Italy	\$0.00	\$138,838.26
C475821	Stainless Steel Wire Rod/Italy	\$0.00	\$2,128.09
C475830	Stainless Steel Bar/Italy	\$0.00	\$6,308.97
C489502	Welded Carbon Steel Pipe and Tube/Turkey	\$0.00	\$175,234.22
C489806	Pasta/Turkey	\$0.00	\$4,805.58
C507501	Raw In-shell Pistachios/Iran	\$0.00	\$490.63
C507601	Roasted In-shell Pistachios/Iran	\$0.00	\$6,081.24
C533063	Iron Metal Castings/India	\$0.00	\$8,528.36
C533821	Hot-Rolled Steel Products/India	\$0.00	\$538,772.82
C533825	Polyethylene Terephthalate Film, Sheet and Strip/India	\$0.00	\$825,139.14
C533844	Lined Paper School Supplies/India	\$0.00	\$104,601.54
C535001	Cotton Shop Towels/Pakistan	\$0.00	\$111,684.95
C549222	Dynamic Random Access Memory Semiconductors/Thailand (Korea)	\$0.00	\$295.86

<b>Table 4</b>			
<b>CDSOA Clearing Account Balances as of October 1, 2014</b>			
<b>AD/CVD Case Number and Name</b>		<b>Initial Assessed AD Duty (\$)</b>	<b>Initial Assessed CV Duty (\$)</b>
C549818	Hot-Rolled Steel Products/Thailand	\$0.00	\$331,972.46
C557222	Dynamic Random Access Memory Semiconductors/Malaysia (Korea)	\$0.00	\$4,803.03
C559222	Dynamic Random Access Memory Semiconductors/Singapore (Korea)	\$0.00	\$22,837.04
C560222	Dynamic Random Access Memory Semiconductors/Indonesia (Korea)	\$0.00	\$43.60
C570222	Dynamic Random Access Memory Semiconductors/China (Korea)	\$0.00	\$668.12
C580207	Cold-Rolled Carbon Steel Flat Products/Korea	\$0.00	\$1,280.79
C580208	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$0.00	\$223,522.28
C580602	Top-Of-The-Stove Stainless Steel Cookware/Korea	\$0.00	\$266.25
C580835	Stainless Steel Sheet and Strip/Korea	\$0.00	\$148,839.25
C580837	Cut-To-Length Carbon Steel Plate/Korea	\$0.00	\$139,749.78
C580842	Structural Steel Beams/Korea	\$0.00	\$92.61
C580851	Dynamic Random Access Memory Semiconductors and Modules/Korea	\$0.00	\$142,412.63
C583222	Dynamic Random Access Memory Semiconductors/Taiwan (Korea)	\$0.00	\$5,756.57
C588222	Dynamic Random Access Memory Semiconductors/Japan (Korea)	\$0.00	\$1,268.63
C903222	Dynamic Random Access Memory Semiconductors/Puerto Rico (Korea)	\$0.00	\$17,308.97
<b>Total</b>		<b>\$ 81,931,339.09</b>	<b>\$ 3,707,079.80</b>

\*These amounts represent antidumping and countervailing duties filed with the entry prior to 10/1/2007 on CDSOA eligible cases. These are preliminary numbers and may be refunded at liquidation to the importer of record based upon Commerce's final determination on the case, which may not occur during the current year. Funds do not transfer from the Clearing Account to the Special Account for CDSOA distribution until liquidation occurs. The Clearing Account does not include additional duty assessed at liquidation or reliquidation.

## Appendix E: FY 2014 CDSOA Disbursement Information

<b>Table 5</b>				
<b>FY 2014 CDSOA Disbursement Information</b>				
<b>AD/CVD Case Number and Name</b>		<b>2014 Available Amount</b>	<b>Adjustments*</b>	<b>2014 Amount Disbursed</b>
A331802	Frozen or Canned Warmwater Shrimp/Ecuador	\$818.63	(\$68.13)	\$750.50
A337806	Frozen Red Raspberries/Chile	\$2,858.00	(\$2,858.00)	\$0.00
A351838	Frozen or Canned Warmwater Shrimp/Brazil	\$168.69	(\$16.22)	\$152.47
A351840	Orange Juice/Brazil	(\$2,873,280.44)	\$2,873,280.44	\$0.00
A357812	Honey/Argentina	\$496.54	(\$35.76)	\$460.78
A412201	Antifriction Ball Bearings/United Kingdom	\$461,401.54	(\$461,401.54)	\$0.00
A412203	Cylindrical Roller Bearings/United Kingdom	\$7,621.37	(\$7,621.37)	\$0.00
A423808	Stainless Steel Plate in Coils/Belgium	\$4,648,501.09	(\$334,692.08)	\$4,313,809.01
A427201	Antifriction Ball Bearings/France	\$394,236.17	(\$394,236.17)	\$0.00
A427820	Stainless Steel Bar/France	\$476.07	(\$34.28)	\$441.79
A428201	Antifriction Ball Bearings/Germany	\$116,841.49	(\$116,841.49)	\$0.00
A428203	Cylindrical Roller Bearings/Germany	\$526.15	(\$526.15)	\$0.00
A428602	Brass Sheet and Strip/Germany	\$279.53	(\$20.13)	\$259.40
A428820	Seamless Pipe/Germany	\$18.28	(\$1.32)	\$16.96
A428825	Stainless Steel Sheet and Strip/Germany	\$9,387.41	(\$675.89)	\$8,711.52
A428830	Stainless Steel Bar/Germany	\$516.66	(\$37.20)	\$479.46
A475059	Pressure-Sensitive Plastic Tape/Italy	\$0.13	(\$0.13)	\$0.00
A475201	Antifriction Ball Bearings/Italy	\$669,659.63	(\$669,659.63)	\$0.00
A475601	Brass Sheet and Strip/Italy	\$0.47	(\$0.03)	\$0.44
A475818	Pasta/Italy	\$103,914.04	(\$7,481.81)	\$96,432.23
A475826	Cut-To-Length Carbon Steel Plate/Italy	\$3,840.99	(\$276.55)	\$3,564.44
A485805	Small-Diameter Carbon Steel Seamless Pipe/Romania	\$3,666.98	(\$264.02)	\$3,402.96
A489501	Welded Carbon Steel Pipe and Tube/Turkey	(\$2,478.09)	\$1,895.47	(\$582.62)
A489807	Steel Concrete Reinforcing Bar/Turkey	(\$83,994.50)	\$60,146.94	(\$23,847.56)
A508604	Industrial Phosphoric Acid/Israel	\$19,585.83	(\$1,410.18)	\$18,175.65
A533809	Forged Stainless Steel Flanges/India	\$1,240.37	(\$89.31)	\$1,151.06
A533813	Preserved Mushrooms/India	\$3,513.66	(\$2,145.27)	\$1,368.39

<b>Table 5</b>				
<b>FY 2014 CDSOA Disbursement Information</b>				
<b>AD/CVD Case Number and Name</b>		<b>2014 Available Amount</b>	<b>Adjustments*</b>	<b>2014 Amount Disbursed</b>
A533820	Hot-Rolled Steel Products/India	\$75,339.02	(\$5,424.39)	\$69,914.63
A533824	Polyethylene Terephthalate Film, Sheet and Strip/India	\$170,531.97	(\$12,278.30)	\$158,253.67
A533840	Frozen or Canned Warmwater Shrimp/India	\$22,656.15	(\$2,178.24)	\$20,477.91
A549807	Carbon Steel Butt-Weld Pipe Fittings/Thailand	\$442.37	(\$442.37)	\$0.00
A549813	Canned Pineapple/Thailand	\$31,292.22	(\$31,292.22)	\$0.00
A549817	Hot-Rolled Steel Products/Thailand	\$141,551.45	(\$10,191.71)	\$131,359.74
A549821	Polyethylene Retail Carrier Bags/Thailand	\$476,112.24	(\$34,280.09)	\$441,832.15
A549822	Frozen or Canned Warmwater Shrimp/Thailand	\$5,008.53	(\$484.13)	\$4,524.40
A552801	Frozen Fish Fillets/Vietnam	(\$3,898.86)	\$3,898.86	\$0.00
A552802	Frozen or Canned Warmwater Shrimp/Vietnam	\$1,946.32	(\$186.81)	\$1,759.51
A557805	Extruded Rubber Thread/Malaysia	\$365,944.27	(\$26,347.99)	\$339,596.28
A557809	Stainless Steel Butt-Weld Pipe Fittings/Malaysia	\$8.34	(\$0.61)	\$7.73
A559801	Antifriction Ball Bearings/Singapore	\$3.08	(\$3.08)	\$0.00
A565801	Stainless Steel Butt-Weld Pipe Fittings/Philippines	\$430.75	(\$31.01)	\$399.74
A570504	Petroleum Wax Candles/China	\$34,015.78	(\$2,449.15)	\$31,566.63
A570601	Tapered Roller Bearings/China	\$9,490.22	(\$683.30)	\$8,806.92
A570803	Hand Tools/China	\$615,737.04	(\$44,333.06)	\$571,403.98
A570822	Helical Spring Lock Washers/China	\$3,640.61	(\$262.12)	\$3,378.49
A570826	Paper Clips/China	\$2,408.80	(\$173.43)	\$2,235.37
A570827	Pencils/China	\$46,875.74	(\$3,375.07)	\$43,500.67
A570831	Fresh Garlic/China	\$3,652,281.73	(\$262,964.27)	\$3,389,317.46
A570832	Pure Magnesium/China	\$96,724.97	(\$6,964.20)	\$89,760.77
A570836	Glycine/China	\$165,292.52	(\$11,901.06)	\$153,391.46
A570846	Brake Rotors/China	\$85,464.13	(\$6,153.42)	\$79,310.71
A570848	Freshwater Crawfish Tail Meat/China	\$21,416,859.39	(\$1,542,013.86)	\$19,874,845.53
A570851	Preserved Mushrooms/China	\$80,556.11	(\$49,508.29)	\$31,047.82
A570863	Honey/China	\$7,900,434.52	(\$568,831.24)	\$7,331,603.28
A570866	Folding Gift Boxes/China	\$1,988.54	(\$1,988.54)	\$0.00
A570868	Folding Metal Tables and Chairs/China	\$10,942.85	(\$10,942.85)	\$0.00

<b>Table 5</b>				
<b>FY 2014 CDSOA Disbursement Information</b>				
<b>AD/CVD Case Number and Name</b>		<b>2014 Available Amount</b>	<b>Adjustments*</b>	<b>2014 Amount Disbursed</b>
A570875	Non-Malleable Cast Iron Pipe Fittings/China	\$461.30	(\$33.21)	\$428.09
A570881	Malleable Iron Pipe Fittings/China	\$204,732.02	(\$14,740.70)	\$189,991.32
A570886	Polyethylene Retail Carrier Bags/ China	\$68,022.43	(\$4,897.61)	\$63,124.82
A570890	Wooden Bedroom Furniture/China	\$6,124,726.25	(\$6,124,726.25)	\$0.00
A570891	Hand Trucks/China	\$701,009.66	(\$50,472.69)	\$650,536.97
A570893	Frozen or Canned Warmwater Shrimp/China	\$435,755.56	(\$41,704.18)	\$394,051.38
A570894	Tissue Paper Products/China	\$580,301.03	(\$41,781.67)	\$538,519.36
A570895	Crepe Paper Products/China	\$1,937.19	(\$139.48)	\$1,797.71
A570896	Alloy Magnesium/China	\$577.28	(\$41.56)	\$535.72
A570898	Chlorinated Isocyanurates/China	\$62,684.45	(\$4,513.28)	\$58,171.17
A570901	Lined Paper School Supplies/ China	\$39,396.89	(\$2,836.59)	\$36,560.30
A570904	Activated Carbon/China	\$87,942.37	(\$6,331.85)	\$81,610.52
A580008	Color Television Receivers/ Korea	\$58,144.12	(\$58,144.12)	\$0.00
A580507	Malleable Cast Iron Pipe Fittings/Korea	\$20,743.01	(\$1,493.50)	\$19,249.51
A580605	Color Picture Tubes/Korea	\$3,736.35	(\$3,736.35)	\$0.00
A580809	Circular Welded Non-Alloy Steel Pipe/Korea	\$1,113.88	(\$80.20)	\$1,033.68
A580810	Welded Stainless Steel Pipe/ Korea	\$5,889.66	(\$424.06)	\$5,465.60
A580812	Dynamic Random Access Memory Semiconductors/Korea	\$1,451.10	(\$104.48)	\$1,346.62
A580813	Stainless Steel Butt-Weld Pipe Fittings/Korea	\$36,013.90	(\$2,593.01)	\$33,420.89
A580816	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$30,386,159.27	(\$2,187,803.46)	\$28,198,355.81
A580839	Polyester Staple Fiber/Korea	\$29,803.10	(\$29,803.10)	\$0.00
A583009	Color Television Receivers/ Taiwan	\$564,647.34	(\$564,647.34)	\$0.00
A583508	Porcelain-On-Steel Cookware/ Taiwan	\$23,927.61	(\$1,722.79)	\$22,204.82
A583605	Carbon Steel Butt-Weld Pipe Fittings/Taiwan	\$92.00	(\$6.62)	\$85.38
A583815	Welded Stainless Steel Pipe/ Taiwan	\$101.44	(\$7.30)	\$94.14
A583816	Stainless Steel Butt-Weld Pipe Fittings/Taiwan	\$1,899.18	(\$136.74)	\$1,762.44

<b>Table 5</b>				
<b>FY 2014 CDSOA Disbursement Information</b>				
<b>AD/CVD Case Number and Name</b>		<b>2014 Available Amount</b>	<b>Adjustments*</b>	<b>2014 Amount Disbursed</b>
A583820	Helical Spring Lock Washers/ Taiwan	\$28.74	(\$2.07)	\$26.67
A583821	Forged Stainless Steel Flanges/ Taiwan	\$2,707.68	(\$194.95)	\$2,512.73
A583831	Stainless Steel Sheet and Strip/ Taiwan	\$15,482.31	(\$1,114.73)	\$14,367.58
A588015	Television Receivers/Japan	\$13,320.05	(\$13,320.05)	\$0.00
A588028	Roller Chain/Japan	\$383.19	(\$383.19)	\$0.00
A588054	Tapered Roller Bearings Under 4 Inches/Japan	\$1,216.00	(\$1,216.00)	\$0.00
A588201	Ball Bearings/Japan	\$5,688,087.41	(\$5,688,087.41)	\$0.00
A588203	Cylindrical Roller Bearings/ Japan	\$63,908.96	(\$63,908.96)	\$0.00
A588205	Spherical Plain Bearings/Japan	\$2,105.19	(\$2,105.19)	\$0.00
A588405	Cellular Mobile Telephones/ Japan	\$2,159.60	(\$2,159.60)	\$0.00
A588604	Tapered Roller Bearings Over 4 Inches/Japan	\$1,497.67	(\$1,497.67)	\$0.00
A588605	Malleable Cast Iron Pipe Fittings/ Japan	\$8.48	(\$0.61)	\$7.87
A588802	3.5-Inch Microdisks/Japan	\$13,413.29	(\$13,413.29)	\$0.00
A588807	Industrial Belts/Japan	\$59.62	(\$59.62)	\$0.00
A588823	Professional Electric Cutting Tools/Japan	\$703.32	(\$703.32)	\$0.00
A588833	Stainless Steel Bar/Japan	\$15,273.45	(\$1,099.69)	\$14,173.76
C357813	Honey/Argentina	\$7,900.48	(\$568.84)	\$7,331.64
C423809	Stainless Steel Plate in Coils/ Belgium	\$59,372.96	(\$4,274.85)	\$55,098.11
C475815	Seamless Pipe/Italy	\$1,204.05	(\$86.69)	\$1,117.36
C475819	Pasta/Italy	\$104,440.63	(\$7,519.73)	\$96,920.90
C489502	Welded Carbon Steel Pipe and Tube/Turkey	(\$1,220.55)	\$1,052.13	(\$168.42)
C508605	Industrial Phosphoric Acid/Israel	\$59,310.76	(\$4,270.37)	\$55,040.39
C533063	Iron Metal Castings/India	\$1,538.59	(\$110.78)	\$1,427.81
C533821	Hot-Rolled Steel Products/India	\$1,601,905.68	(\$115,337.22)	\$1,486,568.46
C533825	Polyethylene Terephthalate Film, Sheet and Strip/India	\$746,979.04	(\$53,782.49)	\$693,196.55
C535001	Cotton Shop Towels/Pakistan	\$1,243.58	(\$1,243.58)	\$0.00
C549818	Hot-Rolled Steel Products/ Thailand	\$87,277.84	(\$6,284.00)	\$80,993.84
C580208	Corrosion-Resistant Carbon Steel Flat Products/Korea	\$130,006.60	(\$9,360.47)	\$120,646.13

<b>Table 5</b>				
<b>FY 2014 CDSOA Disbursement Information</b>				
<b>AD/CVD Case Number and Name</b>		<b>2014 Available Amount</b>	<b>Adjustments*</b>	<b>2014 Amount Disbursed</b>
C580602	Top-Of-The-Stove Stainless Steel Cookware/Korea	\$177.14	(\$12.75)	\$164.39
C580851	Dynamic Random Access Memory Semiconductors and Modules/Korea	\$19,897.79	(\$1,432.64)	\$18,465.15
<b>GRAND TOTAL</b>		<b>\$86,981,555.43</b>	<b>(\$16,832,276.53)</b>	<b>\$70,149,278.90</b>
<b>LESS OFFSETS</b>				<b>\$0.00</b>
<b>TOTAL DISBURSED</b>				<b>\$70,149,278.90</b>

\*Adjustments may include sequestered amounts, reliquidations, administrative actions, or amounts held pending litigation.

## Appendix F: List of Acronyms

<b>Acronym</b>	<b>Definition</b>
ACE	Automated Commercial Environment
ACS	Automated Commercial System
AD/CVD	Antidumping/Countervailing Duty
CAFC	U.S. Court of Appeals for the Federal Circuit
CBP	U.S. Customs and Border Protection
CDSOA	Continued Dumping and Subsidy Offset Act
CEE	Center of Excellence and Expertise
CIT	U.S. Court of International Trade
COAC	Commercial Operations Advisory Committee
Commerce	U.S. Department of Commerce
E-bond	Electronic Bond
FY	Fiscal Year
HSI	Homeland Security Investigations (ICE)
ICE	U.S. Immigration and Customs Enforcement
NTAG	National Targeting and Analysis Group
OCC	Office of Chief Counsel (CBP)
PTI	Priority Trade Issue
STB	Single Transaction Bond
Justice Department	U.S. Department of Justice
Treasury	U.S. Department of the Treasury

# **CBP REPORT TO CONGRESS FOR 2012**

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016



# Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2012

Fiscal Year 2013 Report to Congress  
July 19, 2013



Homeland  
Security

*U.S. Customs and Border Protection*

# Message from the Acting Deputy Commissioner of CBP

July 19, 2013

I am pleased to present the following report, “Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2012,” prepared by U.S. Customs and Border Protection (CBP).

The report has been compiled pursuant to language set forth in Senate Report 112-169 accompanying the *Fiscal Year (FY) 2013 Department of Homeland Security (DHS) Appropriations Act* (P.L. 113-6) and Section 691(a) of the *North American Free Trade Agreement (NAFTA) Implementation Act* (P.L. 103-182). The report provides an annual update regarding the collection of duties imposed under the Antidumping and Countervailing Duty (AD/CVD) laws during FY 2012. Additionally, the report summarizes CBP’s efforts to collect past-due amounts and increase current collections.



Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable John R. Carter  
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable David E. Price  
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Mary L. Landrieu  
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Daniel Coats  
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

The Honorable Max Baucus  
Chairman, Senate Committee on Finance

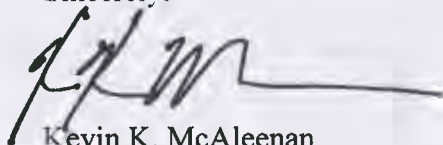
The Honorable Orrin G. Hatch  
Ranking Member, Senate Committee on Finance

The Honorable David Camp  
Chairman, House Committee on Ways and Means

The Honorable Sander M. Levin  
Ranking Member, House Committee on Ways and Means

I would be pleased to respond to any questions you may have. Please do not hesitate to contact my office at (202) 344-2001 or the Department's Chief Financial Officer, Peggy Sherry, at (202) 447-5751.

Sincerely,

A handwritten signature in dark ink, appearing to read 'K. McAleenan', with a long horizontal stroke extending to the right.

Kevin K. McAleenan  
Acting Deputy Commissioner  
U.S. Customs and Border Protection

# Executive Summary

CBP is committed to ensuring that AD/CVD laws are vigorously enforced. To this end, CBP has established key partnerships with the U.S. Department of Commerce (Commerce), U.S. Department of the Treasury (Treasury), Office of the U.S. Trade Representative, U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), and other partner agencies to provide comprehensive enforcement. With these effective collaborations in place, CBP was able to enhance agency-wide efforts in FY 2012 to enforce AD/CVD laws, which resulted in several high-value seizures. In FY 2012, CBP and HSI seized 57 shipments of AD/CVD commodities with a domestic value of \$13,681,270 for violations of AD/CVD and related laws. CBP also levied more than 50 monetary penalties for \$24,256,361 on importers for fraud, gross negligence, and negligence for AD/CVD violations under 19 U.S.C. § 1592. This report summarizes CBP's FY 2012 initiatives targeting the collection of duties imposed under AD/CVD laws.

The collection of outstanding AD/CVDs and enforcement actions relating to AD/CVD matters remains a complex enforcement challenge. CBP and partner agencies are working closely together to address collection and related bonding issues. As a result of CBP's multi-disciplinary Re-engineering Dumping (RED) Team initiative, CBP launched several new initiatives in FY 2012 to broaden the use of single transaction bonds to protect AD/CVD revenue. CBP also has been actively reaching out to the trade community to seek input on ways to improve the enforcement of the AD/CVD program and to develop enforcement targets. This proactive work with the trade community, upon the initiation of new AD/CVD orders, has resulted in more-effective enforcement of these orders at the border.

The future of AD/CVD enforcement will rely on key partnerships, specifically with HSI, to identify patterns of non-compliance, collaborate on enforcement cases, and establish joint AD/CVD fraud training. Partnerships with the trade community also represent the future of rooting out unfair trading practices. For example, CBP's trade intelligence initiative utilizes key industry contacts to identify unfair trading practices or illegal trading activity. CBP also is collaborating with trade partners to develop and implement trade transformation initiatives to integrate and harmonize trade practices with CBP's processes, to better facilitate trade.

CBP's Centers of Excellence and Expertise (CEEs) will redefine how CBP understands trade risks on goods. The CEEs will manage the importer as a distinct client with a corporate account for specific industries. This will further inform the supply chain unique to each importer, and will result in a nuanced understanding of trade practices and trade risks. For CBP's AD/CVD enforcement, the CEEs also will centralize AD/CVD functions for the industries and importers covered by the respective CEE. The CEEs will help increase uniformity and expertise across CBP for administration of AD/CVD entries and AD/CVD enforcement. As described in this report, these initiatives underpin CBP's commitment to pursuing collection of unpaid AD/CVD against delinquent importers and sureties.



# Antidumping and Countervailing Duty Enforcement Actions and Compliance Initiatives: FY 2012

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# I. Legislative Language

This report has been compiled pursuant to language set forth in Senate Report 112-169 accompanying the *FY 2013 DHS Appropriations Act* (P.L. 113-6) and Section 691(a) of the NAFTA Implementation Act (P.L. 103-182).

Senate Report 112-169 states:

The Committee directs CBP to continue to work with the Departments of Commerce and Treasury, and the Office of the United States Trade Representative (and all other relevant agencies) to increase collections, and to provide a public report on an annual basis, within 30 days of each year's distributions under the law. The report should summarize CBP's efforts to collect past due amounts and increase current collections, particularly with respect to cases involving unfairly traded U.S. imports from China. The report shall provide the amount of uncollected duties for each antidumping and countervailing duty order, and indicate the amount of open, unpaid bills for each such order. In that report, the Secretary, in consultation with other relevant agencies, including the Secretaries of Treasury and Commerce, should also advise as to whether CBP can adjust its bonding requirements to further protect revenue without violating U.S. law or international obligations, and without unreasonable costs upon importers.

The Committee further directs the Secretary to work with the Secretary of Commerce to identify opportunities for the Commerce Department to improve the timeliness, accuracy, and clarity of liquidation instructions sent to CBP. Increased attention and interagency coordination in these areas could help ensure that steps in the collection of duties are completed in a more expeditious manner.

Consistent with section 691a of Public Law 103-182, the North American Free Trade Agreement Implementing Act of 1993, the Committee directs the Commissioner of Customs to submit to Congress before the 60th day of each fiscal year a report regarding the collection of duties imposed under the antidumping and countervailing duty laws during the preceding fiscal year.

Section 691(a) of P.L. 103-182 states:

(a) ANTIDUMPING AND COUNTERVAILING DUTY COLLECTIONS.—The Commissioner of Customs shall before the 60th day of each fiscal year after fiscal year 1994 submit to Congress a report regarding the collection during the preceding fiscal year of duties imposed under the antidumping and countervailing duty laws.

## II. Background on CBP's AD/CVD Enforcement

CBP has a statutory responsibility to collect all revenue due the U.S. Government, including AD/CVD, resulting from the importation of goods into the United States. CBP has specifically designated AD/CVD enforcement as a Priority Trade Issue (PTI). PTIs are high-risk areas that can cause significant revenue loss, hurt the U.S. economy, or threaten the health and safety of the American people. The AD/CVD trade program was elevated to PTI status within CBP in FY 2003 to ensure that a concerted, systematic approach was implemented to facilitate legitimate trade, detect and deter circumvention of the AD/CVD laws, and liquidate transactions in a timely and accurate manner.

CBP is committed to ensuring that AD/CVD laws are vigorously enforced, and takes an agency-wide approach to AD/CVD enforcement. Numerous CBP offices play key roles in ensuring effective AD/CVD enforcement, including:

- the Office of Field Operations, including CBP Officers, Fines Penalty and Forfeiture Specialists, and Import and Entry Specialists;
- the Office of International Trade, including National Import Specialists, International Trade Specialists, Auditors, and Attorneys;
- the Office of Information Technology, including the Laboratories and Scientific Services;
- the Office of International Affairs, including Attachés; and
- the Office of Chief Counsel (OCC).

In addition, CBP collaborates with ICE HSI to substantiate and act upon duty evasion allegations and to support enforcement actions. CBP also partners with Commerce on a wide range of AD/CVD issues related to enforcement responsibilities.

### A. RED Team

In FY 2011, CBP created a multi-disciplinary RED Team to carry out a comprehensive review of the AD/CVD process and to develop solutions to enhance CBP's AD/CVD responsibilities. The RED Team continues to explore options to improve the three distinct areas of CBP's AD/CVD responsibilities: entry administration, collections, and deterrence of evasion. CBP's initiatives to strengthen these areas include:

- CBP is aligning efforts with HSI to expand the scope of the National Intellectual Property Rights Coordination Center to encompass AD/CVD and other commercial fraud enforcement as a critical responsibility affecting the protection of U.S. domestic industry. Among other things, CBP and HSI worked together to develop joint AD/CVD fraud training for CBP and HSI personnel. Two pilot classes were conducted in FY 2012 in New Orleans and Los Angeles with more than 50 CBP and HSI staff at each location, and additional classes are planned for FY 2013.

- CBP issued internal guidance to broaden the use of single transaction bonds when CBP reasonably believes that a risk of revenue loss exists for AD/CVD imports. This guidance includes specific scenarios where port directors may request single transaction bonds for imports subject or potentially subject to AD/CVD.
- In December 2012, CBP issued a 5-year AD/CVD strategy to guide CBP's AD/CVD enforcement program for FY 2013 through FY 2017. This strategy will be used as the guiding document to formulate CBP's AD/CVD policy and planning for that period. The strategy includes five overall objectives:
  - Detect and Deter Evasion;
  - Identify High-Risk Trade;
  - Protect Lawful Revenue;
  - Facilitate Legitimate Imports; and
  - Streamline the Administrative Process.
- CBP is in the process of reviewing CBP Form 5106 (Importer I.D. Input Record) for new importers and entities doing business with CBP. The goal of this review is to allow additional vetting of new importers by CBP; to provide additional data to determine risk; to link seemingly independent companies or parties together; and to otherwise reduce instances of unpaid duties (including AD/CVD) and abuse of trade and admissibility law (such as AD/CVD evasion) through shell companies or other related schemes. It is designed to identify problems before goods are imported into the United States.
- CBP, in coordination with Commerce and U.S. industry, is implementing a new approach to proactively prepare to enforce new AD/CVD measures before the measures go into effect, including outreach to domestic industry to obtain trade intelligence to enforce the measures.
- CBP and Commerce provided two joint Webinars on the aluminum extrusion AD/CVD cases to CBP field personnel and customs brokers to increase CBP enforcement and importer compliance with this important case. Other internal and external AD/CVD Webinars are in the planning process for FY 2013.

## B. Enforcing AD/CVD Laws

CBP is constantly developing new approaches of AD/CVD enforcement to meet the challenges posed by complex AD/CVD evasion schemes. CBP takes all indications or allegations of evasion very seriously and employs all available methods in accordance with law to address these matters. The increasing complexity of the strategies employed by parties attempting to evade AD/CVDs is a constant challenge. CBP identifies potential evasion by working with U.S. industry, HSI, and our international partners to develop new sources of information to identify AD/CVD circumvention. CBP also takes a comprehensive and integrated view of security and trade enforcement and is creatively using other civil authorities to impede AD/CVD evasion. CBP continually is exploring options that will provide additional information and new and innovative tools to protect U.S. revenue and identify those who try to use our retrospective system for illicit gains.

CBP stepped up its agency-wide efforts in FY 2012 to enforce AD/CVD laws in coordination with HSI. In FY 2012, CBP and HSI seized 57 shipments of AD/CVD commodities with a domestic value of \$13,681,270 for violations of AD/CVD and related laws. CBP also levied more than 50 monetary penalties for \$24,256,361 on importers for fraud, gross negligence, and negligence for AD/CVD violations under 19 U.S.C. § 1592.

CBP employed multiple methods at the port and national level to target AD/CVD evasion, including import trade trend and valuation analysis, the use of targeted reviews and audits to address high-risk cases, lab testing, and special operations. In FY 2012, CBP completed more than 50 audits of importers of AD/CVD commodities, including bearings, candles, carbazole violet pigment 23, hot-rolled carbon steel, nails, pencils, polyethylene terephthalate (PET) film, semiconductors, shrimp, steel pipe, tires, tissue paper, uncovered innerspring mattress units, and wooden bedroom furniture. Through these audits, CBP identified AD/CVD discrepancies totaling approximately \$41 million, and so far collected more than \$13 million. CBP is continuing to pursue collections on all money owed to the U.S. Government.

CBP's most valuable partner in AD/CVD enforcement is U.S. industry. CBP meets regularly with U.S. industry representatives to discuss AD/CVD circumvention schemes, and U.S. industry representatives share valuable private-sector intelligence with us. CBP, in close coordination with HSI, is increasing its efforts to reach out and work with U.S. industry to obtain more trade intelligence. CBP also is collaborating with trade partners to develop and implement trade transformation initiatives to integrate and harmonize trade practices with CBP's processes to better facilitate trade (these trade transformation initiatives are discussed in more detail in Section E). CBP continues to meet regularly with the Commercial Operations Advisory Committee's (COAC's) AD/CVD subcommittee to solicit advice and develop new initiatives with regard to CBP's enforcement and collections of AD/CVD (see Section D of this report for more information).

Another valuable partner in AD/CVD enforcement is Commerce, which is responsible for administering the AD/CVD laws and establishing the duty amounts CBP collects from importers. Commerce has a practice in place to refer to CBP any allegations of fraud or evasion it receives from the public in addition to evidence it uncovers during the conduct of its own AD/CVD proceedings. Commerce further supports CBP's efforts at countering evasion by reviewing, upon request, information obtained during CBP audits and identifying discrepancies or claims that contradict information on Commerce's record of the underlying proceeding.

As part of CBP's trade intelligence efforts, in FY 2012, CBP Headquarters received 149 allegations of AD/CVD evasion and noncompliance, including 91 from the trade community, 47 from the public, and 11 from another government agency. These allegations were provided to CBP primarily through CBP's e-Allegations online trade violations reporting system available at <https://apps.cbp.gov/eallegations/>. CBP reviews and researches every allegation submitted through e-Allegations to determine the validity of the trade law violations being alleged. Some are reviewed and resolved internally within CBP, and some are referred to HSI for further investigation.

In FY 2012, CBP's specific successes in AD/CVD enforcement include:

- Operation Piping Hot: In August 2012, CBP executed Operation Piping Hot, targeting illegal importations of steel pipe and tubing in an effort to protect U.S. industry from unfair foreign competition. During the operation, the South Florida National Targeting and Analysis Group, as well as the CBP Southwest Regional Science Center's mobile laboratory unit teamed up with officials at the Port of Laredo to target suspect shipments of steel pipe and tubing for examination, conduct field tests, and collect samples for further analysis. These imports were being sold at artificially low prices that continue to threaten the domestic industry's ability to sell domestically produced steel pipe and tubing at a competitive price. By leveraging CBP's diverse resources, CBP quickly and efficiently examined shipments, which facilitated the flow of legitimate goods through the Port of Laredo. Commerce provided valuable technical assistance to assist with this operation.
- An audit of an importer of steel-threaded rod from China identified imports with more than \$4 million in evaded AD/CVD, with collections so far of approximately \$1 million.
- CBP's pursuit of a trade allegation on evasion of the antidumping order on hand trucks from China resulted in the assessment and collection of more than \$1 million in penalties for an importer's failure to file antidumping entries on this merchandise.
- Port operations targeting wire hangers from China led to the discovery of misclassifications and transshipments of this merchandise at several ports of entry, and a loss of revenue of more than \$2 million (with at least \$1.2 million collected so far).
- Several ports discovered wind tower imports subject to AD/CVD and collected more than \$8 million in AD/CVD.
- Ports targeted solar cell and panel imports from China and, working with the CBP labs, identified several million dollars of imports subject to AD/CVD. One port alone has collected \$700,000 in revenue so far.
- An audit identified imports of PET film subject to more than \$5 million in antidumping duties.
- CBP collected more than \$280,000 of AD/CVD on imports of aluminum profiles evading the AD/CVD orders on aluminum extrusions from China.
- CBP conducted several targeted audits of importers to verify alleged transshipment of uncovered innerspring units from China.
- CBP targeted shipments of wooden bedroom furniture from Vietnam to determine whether these shipments were subject to antidumping duties, and obtained additional bonding on these entries while CBP verified where the shipments were produced.

The listed examples highlight just a few of the operations that are routinely conducted by CBP personnel. These efforts reflect the continued dedication of CBP to target the evasion of AD/CVD and protect the revenue of the U.S. Government and ensure a level playing field for U.S. industry.

CBP's Laboratories and Scientific Services played a key supporting role in these anti-evasion efforts. In FY 2012, this division handled 2,657 samples relating to 766 cases of importations of suspect AD/CVD violations. The commodities analyzed included honey, garlic, plastic carrier bags, PET film, steel, steel pipe, line pipe, steel nails, steel hangers, bearings, saccharin, wax candles, paper, pasta, diamond saw blades, aluminum extrusions, polyvinyl alcohol, steel bolts, steel rods, solar cells, and aluminum tubing.

## **1. FY 2012 Reports on CBP's AD/CVD Enforcement**

The U.S. Government Accountability Office (GAO) May 2012 report "Antidumping and Countervailing Duties Management Enhances Needed to Improve Efforts to Detect and Deter Duty Evasion" examined how CBP detects and deters AD/CVD evasion, and the factors that affect CBP's efforts. In its report, the GAO concluded:

CBP detects and deters evasion of AD/CVD through a three-part process that involves (1) identifying potential cases of evasion, (2) attempting to verify if evasion is occurring, and (3) taking enforcement action. To identify potential cases of evasion, CBP targets suspicious import activity, analyzes trends in import data, and follows up on allegations from external sources. If CBP identifies a potential case of evasion, it can use various techniques to attempt to verify whether evasion is occurring, such as asking importers for further information, auditing the records of importers suspected of evasion, and inspecting shipments arriving at ports of entry. If CBP is able to verify evasion, its options for taking enforcement action include (1) pursuing the collection of evaded duties, (2) imposing civil penalties, (3) conducting seizures, and (4) referring cases for criminal investigation. For example, between fiscal years 2007 to 2011, CBP assessed civil penalties totaling about \$208 million against importers evading AD/CV duties.

The GAO also noted that CBP faces several external challenges in attempting to gather conclusive evidence of evasion and take enforcement action against parties evading duties. According to the GAO, these challenges include: (1) the inherent difficulty of verifying evasion conducted through clandestine means; (2) limited access to evidence of evasion located in foreign countries; (3) the highly specific and sometimes complex nature of products subject to AD/CVDs; (4) the ease of becoming an importer of record, which evaders can exploit;<sup>1</sup> and (5) the limited circumstances under which CBP can seize goods evading AD/CVD.

In a separate July 2012 report to Congress, CBP specifically examined one of the issues raised by the GAO: options for verifying evasion in foreign countries. This report, titled

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<sup>1</sup> As noted, to address this issue, CBP is taking steps to revise the process for becoming an importer of record to reduce instances of unpaid duties and prevent AD/CVD evasion through the use of shell companies.

“Antidumping/Countervailing Duty Product Verification Teams,” was prepared by CBP in coordination with HSI, the Office of the U.S. Trade Representative, and the U.S. Department of State, in response to a request from Congress to review the possible uses of foreign production verification teams<sup>2</sup> to combat transshipment violations for products subject to AD/CVDs.

In this report to Congress, CBP concluded that regular use of production verification teams for AD/CVD would add an essential international component to CBP’s approach to AD/CVD enforcement. CBP noted the following in the report:

[A]t this time there is no international agreement specifically authorizing CBP (or ICE) to carry out production verification visits for merchandise subject to AD/CVD. Without this authority, CBP would need the permission of foreign governments on a case by case basis to conduct product verification visits. A great extent of the fraud involving illegal transshipment takes place outside the United States and involves manufacturers, exporters, and logistics companies, well before CBP receives any information about imports. Using production verification teams for AD/CVD enforcement in cooperating foreign countries would expand the border outward and could potentially directly confirm whether production actually took place in the claimed foreign location.

CBP is looking to identify opportunities to attempt use of production verification teams for AD/CVD enforcement in circumstances where it is possible to obtain permission from a foreign government to conduct such visits. The use of product verification teams would add an additional international component to CBP’s layered approach to AD/CVD enforcement; could confirm illegal transshipment of past imports; and provide valuable information to CBP and ICE/HSI in identifying future illegal transshipments of merchandise subject to AD/CVD and deter future violators.

CBP, in coordination with ICE/HSI, the Office of the U.S. Trade Representative, and the U.S. Department of State, will continue to explore bilateral and multilateral forums to facilitate the use of production verification teams for AD/CVD enforcement as well as partner with the industry and trade community to obtain trade intelligence on potential sources of illegal transshipment.

In FY 2012, on the basis of permission from the Government of India, CBP personnel visited India to obtain honey samples. These samples will assist CBP to scientifically distinguish honey that originated in India from honey that was illegally transshipped to avoid antidumping duties. CBP also worked closely with HSI attaché offices to coordinate HSI visits to purported production facilities in foreign countries to verify illegal AD/CVD transshipment. Broader use of verification visits overseas would be useful to enforcement of AD/CVD orders.

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<sup>2</sup> Production verification teams are teams of personnel that visit foreign manufacturers to verify trade compliance at the place of foreign production. CBP regularly uses production verification teams for textile enforcement, on the basis of authority in international agreements specifically for textiles with host countries.

## C. Legal Enforcement

CBP's OCC, through the Associate Chief Counsel for Trade & Finance, the Associate Chief Counsel for Enforcement, and field offices, continues its vigorous engagement in both administrative and legal actions related to the collection of outstanding AD/CVDs and enforcement actions relating to AD/CVD matters.

In FY 2012, collection and litigation efforts by the Associate Chief Counsel for Trade & Finance resulted in the actual receipt of more than \$21 million in AD/CVDs and a judgment for more than \$1.7 million in additional AD/CVDs. Trade & Finance attorneys carry out OCC's strategic approach to AD/CVD collections litigation, which involves advancing cases that will control outcomes in numerous other matters and pursuing interest in excess of bond amounts to deter future non-payment by sureties. At the close of FY 2012, Trade & Finance attorneys were involved in ongoing litigation in more than 27 collection cases initiated by CBP; more than 225 defensive cases, bankruptcies, and state receivership; and liquidation proceedings in which more than \$150 million in AD/CVD is at stake. In a lead case on appeal, CBP is defending a successful judgment for more than \$6 million in AD/CVD and is also seeking amendment of the judgment to include pre- and post-judgment interest on that amount, totaling more than \$5 million. Additionally, in FY 2012, Trade & Finance attorneys continued working with various CBP offices, for instance as part of the RED Team, to develop an improved AD/CVD collections process, and also continued offering wide-ranging legal support to the Continued Dumping and Subsidy Offset Act (CDSOA) program within CBP's Office of Administration. In part, this required the provision of extensive litigation support to the U.S. Department of Justice to defend CBP, as eligibility for CDSOA distributions has generated more than 50 lawsuits, approximately a dozen of which are still pending before the U.S. Court of International Trade (CIT) or the U.S. Court of Appeals for the Federal Circuit. The Associate Chief Counsel for Enforcement and field office attorneys also worked individually and jointly with the U.S. Department of Justice in AD/CVD criminal and civil cases to imprison criminal offenders, impose millions of dollars in AD/CVD penalties, and collect substantial AD/CVD from importers and sureties.

## D. AD/CVD Entry Administration

CBP continues to pursue modernization efforts to process AD/CVD entries and facilitate legitimate trade. The administration of AD/CVD entries is a paper-based, labor-intensive, and time-consuming process involving multiple steps over a period of several years for each entry. When importers file AD/CVD entries upon import of merchandise into the United States, CBP's tasks include searching and reviewing AD/CVD messages from Commerce, ensuring proper collection of the required cash deposit, reviewing entries for proper suspension codes and holding codes, and filing the entries for several years until Commerce issues liquidation instructions related to the entries, pursuant to the statutory timelines governing Commerce's AD/CVD proceedings. Once Commerce issues liquidation instructions, CBP's duties include reviewing these complex instructions and determining which entries from previous years are subject to these instructions, manually applying the final duty rates and calculating the amount of final duties due, inputting the proper codes to liquidate each entry electronically, implementing separate court-ordered injunctions to stop liquidations, and processing protests involving

liquidation instructions and deemed liquidations. Some of these steps are repeated multiple times for individual entries involving more than one AD/CVD case. This is complicated by companies that are out of business, have changed their name, or are otherwise outside of U.S. jurisdiction.

CBP's RED Team improved automated processes for liquidating AD/CVD entries in FY 2012 by introducing new automated processes with updated computer language to perform no change liquidations (liquidations with no change in final AD/CVD). This automated process, which previously involved a hybrid automated and manual entry-by-entry liquidation, will ultimately save the CBP field hundreds of personnel hours every year. To further assist CBP with its liquidation activities and pursuant to the May 2012 GAO Report "Antidumping and Countervailing Duties Management Enhances Needed to Improve Efforts to Detect and Deter Duty Evasion," quarterly Commerce provides CBP a "Six-Month Look-Ahead Report" identifying upcoming deadlines of the final results of AD/CVD reviews. The look-ahead report enables CBP to coordinate its resources to effectively appropriate liquidations during the upcoming 6-month period.

All AD/CVD case management information, Commerce message processing, and CBP field inquiries now are processed, managed, and stored in the Automated Commercial Environment (ACE) to give national visibility of the data to the CBP user, as well as Commerce and the trade community. These programming enhancements have improved the processing of AD/CVD entries and provide more-detailed information to ensure timely liquidation and assessment of appropriate AD/CVDs. This increased transparency also provides the trade community more tools to comply with AD/CVD import requirements. In FY 2012, CBP used ACE to process 1,219 Commerce AD/CVD instruction messages. CBP staff at ports of entry used the ACE AD/CVD inquiry module to submit 689 inquiries on AD/CVD issues to CBP Headquarters and Commerce. In addition, in FY 2012, CBP liquidated more than 142,726 AD/CVD entries in the Automated Commercial System (ACS) (liquidations will remain in ACS until a liquidation module is developed in ACE). CBP and Commerce continue to work together to identify enhancements to ACE that will further facilitate AD/CVD administration and enforcement.

In FY 2012, the COAC recommended that CBP, in conjunction with Commerce, research and co-create with input from the trade community a new AD/CVD reporting tool or database. The COAC believed there should be a better tool or database available to the trade community so importers and brokers can access the latest AD/CVD information, ensuring their entries are correctly filed. In response, CBP continued to update and make available on the CBP Web site ([www.cbp.gov](http://www.cbp.gov)) the latest AD/CVD case information downloaded from CBP databases to assist the trade community with its AD/CVD compliance and risk assessment.

## E. Trade Transformation

CBP is collaborating with trade partners in the development and implementation of trade transformation initiatives to integrate and harmonize trade practices with CBP's processes to better facilitate trade. Trade transformation initiatives include the CEEs and trade intelligence.

CBP is undergoing a rigorous transformation of how the agency processes trade. The result of this realignment, the new CEEs, will redefine how CBP understands trade risks on goods. This is because the CEEs adopt account-based principles that better define the risk posed within industry imports. Instead of dealing with each individual entry, the CEEs will deal with the importer as a distinct client with a corporate account for specific industries. This will further inform the supply chain that is unique to each importer, and will result in a nuanced understanding of trade practices and trade risks.

CBP's CEEs will leverage "trade intelligence" from industry to enhance CBP's ability to stay one step ahead of industry trends, as well as to capture specific allegations of trade fraud. The CEEs will increase uniformity of processing procedures across ports of entry, facilitate the timely resolution of trade compliance issues nationwide, and further strengthen critical agency knowledge on key industry practices. The CEEs will allow CBP trade personnel to specialize in commodities (including those subject to AD/CVD), building advanced knowledge in their respective industry, and increase CBP's understanding of trade risks.

CBP currently has four operating centers: the Information Technology & Consumer Electronics Center in Los Angeles; the Pharmaceuticals, Health, and Chemicals Center in New York; the Automotive and Aerospace Center in Detroit; and the Petroleum, Natural Gas, and Minerals Center in Houston. CBP expects to open 6 CEEs by the end of FY 2013, bringing the total to 10. They include:

1. Agriculture & Prepared Products (Miami);
2. Apparel, Footwear, & Textiles (San Francisco);
3. Base Metals (Chicago);
4. Consumer Products & Mass Merchandising (the big-box stores) (Atlanta);
5. Industrial & Manufacturing Materials (Buffalo); and
6. Machinery (Laredo).

The CEEs will transform the way CBP approaches trade operations and interacts with the international trade community. Through the CEEs, efforts are being expanded to increase uniformity of trade practices across all ports of entry, facilitate the timely resolution of trade compliance issues nationwide, and strengthen critical agency knowledge on key industry practices.

The centers will also serve as a ready source of clear and definitive information for our trade and other government partners on requirements and best practices. They will be a single point of processing for businesses enrolled in CBP's trusted shipper programs: the Customs-Trade Partnership Against Terrorism and Importer Self-Assessment. The CEEs represent CBP's expanded focus on trade in the 21st Century by transforming customs procedures to align with modern business practices. By focusing on industry-specific issues, CBP is able to provide tailored support to unique trading environments. For CBP's AD/CVD enforcement, the CEEs also will centralize AD/CVD functions for the industries and importers covered by the respective CEE. The CEEs will help increase uniformity and expertise across CBP for administration of AD/CVD entries and AD/CVD enforcement.

The CEEs also will leverage “trade intelligence” from trusted partners in the respective industries covered by the CEEs to further CBP’s ability to stay ahead of industry trends, as well as capture specific allegations of AD/CVD fraud. As mentioned previously, CBP, in close coordination with HSI, is increasing its efforts to reach out and work with U.S. industry to obtain more trade intelligence. The goal of trade intelligence efforts is to gain expertise from U.S. industry, trade associations, and importers and provide critical insight to CBP on enforcement issues related to developments in AD/CVD and other trade-sensitive imports, as well as advising CBP staff on the latest industry-wide changes for such commodities. Given the pace at which importers shift supply sources and production partners, this concept will be vital to maintaining an effective and forward-focused enforcement and facilitation posture for AD/CVD and other trade concerns.

### III. AD/CVD Collections

#### A. Uncollected AD/CVDs

Pursuant to U.S. law, the U.S. trade remedy regime operates retrospectively. CBP collects estimated AD/CVD at the time of entry, and the actual AD/CVD an importer should pay is not known until after Commerce reviews the AD/CVD order, if such a review is requested. Commerce reviews are usually completed within 1-to-2 years after entry has occurred, pursuant to U.S. statutory deadlines. Commerce's findings are subject to judicial review by the CIT, the Court of Appeals for the Federal Circuit, and possibly the U.S. Supreme Court; therefore, the final determination of the amount due may not be known for several years. If the actual AD/CVD rate established by Commerce is greater than the estimated AD/CVD paid at entry, CBP is required to issue a bill to the importer to collect the additional duties. Some importers are unwilling or unable to pay the actual duties, and some are no longer in business when CBP issues a bill, leading to uncollected AD/CVD. Some importers also participate in schemes to intentionally circumvent or evade paying duties, leading to additional uncollected AD/CVD.

Uncollected AD/CVD has significantly increased since 2001. Before 2001, the difference between deposit and assessment rates for non-market economy AD/CVD cases was not significant, and most importers paid any additional AD/CVD assessed at liquidation. Since 2001, there have been substantial differences between deposit and assessment rates for certain non-market economy AD/CVD cases, in particular, for cases on certain imports from China. Because the bond amount (set at entry) cannot be raised to reflect retrospective assessments, the amount of the bond is often insufficient to cover the differences between the cash deposit and the assessment rate. This problem is exacerbated by CBP's reliance on bond coverage in the case of undercapitalized importers, and by the lengthy delay that often occurs between importation and the final resolution of all applicable legal challenges.

Pursuant to law and regulation, the importer of record, which could be a foreign-based company, is liable for the additional duties in addition to the surety listed on the associated bond. CBP faces significant challenges in collecting unpaid duties from importers with no assets in the United States, including non-resident importers physically located in China and other countries. CBP has limited legal recourse in collecting debts from importers located in other countries. Reciprocal revenue agreements between the United States and foreign countries could enhance CBP's ability to collect from foreign-based entities. When CBP cannot collect from the importer, the amount of the bond is often insufficient to cover the additional duties.

In FY 2012, uncollected AD/CVD on imports from China continued to make up a significant portion of the uncollected duties. The top five cases for uncollected AD/CVD, comprising \$1.6 billion (or approximately 90 percent) of the \$1.79 billion in unpaid duties, all involve imports from China. Four of the top five cases for uncollected AD/CVD cases involve imports of Chinese agriculture/aquaculture products (see Section V of this report for more detailed information on uncollected AD/CVD).

Treasury's July 2007 report on Duty Collection Problems, FYs 2003–2006 specifically commented on the AD/CVD collection issues related to agriculture/aquaculture products:

There have been substantial differences in the collection rates for retrospectively assessed duties from case to case and product by product. Although a particular imported product may be associated with a high default rate (for example, crawfish imports), the most likely explanation for the varied default rates lies with the type of firms that are importing the product. If importers of a particular product are typically lightly capitalized firms or parties with minimal assets in the United States, one might expect a lower collection rate.

... CBP also determined that the principal entities responsible for uncollected duties were importers of agriculture/aquaculture merchandise subject to antidumping duties. Based on CBP's analysis, the collection problem with respect to this merchandise appeared to be attributable to the fact that importers of agriculture/aquaculture merchandise tended to be undercapitalized, and that by the time final liability was assessed (typically one or more years after the goods had entered), many of the companies were no longer in operation. Because the antidumping duties finally assessed often significantly exceeded both the cash deposit and the bond amount, CBP was left unable to collect the unsecured (retrospectively assessed) portion of the duties assessed.

In addition, this minimal capitalization allows undercapitalized companies easy entrance into the AD/CVD markets (no statutory qualifications or criteria must be satisfied to become an importer of record), and allows importers to quickly "disappear" if so inclined.

In 2004, CBP recognized the collection issues specific to AD/CVD agriculture and aquaculture imports and, therefore, applied to AD/CVD shrimp imports (including imports from China) a revised bond policy, which the United States believed appropriately increased the bond requirements commensurate to the risk of such imports. However, the enhanced bond policy was challenged at the CIT and at the World Trade Organization (WTO), where it was found inconsistent with U.S. WTO commitments and struck down by the CIT.

In April 2009, following the adoption of the WTO Appellate Body's report finding that the enhanced bonding requirement was WTO-inconsistent, CBP ended this program.

Because of the WTO and CIT rulings, CBP has been limited in its ability to apply enhanced bonding measures in the same manner to a broad category of AD/CVD imports (such as a single commodity). Together with colleagues at Commerce and Office of the U.S. Trade Representative, CBP will continue to explore alternatives consistent with WTO rules that may allow it to set bond amounts on the basis of risk, including an option to address the uncollected duties problems in those areas where there is evidence of greater risk.

In general, it is challenging for CBP to set prospective bonding levels for AD/CVD imports when the final duty liability and payment risk are unknown at the time of importation. The

ability to impose bonding requirements that are more commensurate with the risk assessed will go a long way toward addressing this challenge.

## **B. Measures to Increase Collections**

Ongoing efforts by the RED Team are specifically focusing on collections issues as a priority. On May 1, 2012, CBP issued guidance to CBP personnel on how to protect the revenue when the port has developed a reasonable belief that acceptance of a transaction secured by a continuous bond would place the revenue in jeopardy because of AD/CVD concerns. This additional protection can be done either through cash payment with live entry, or obtaining additional security in the form of a single transaction bond. These guidelines provide for the appropriate use of the port's existing authority pursuant to 19 CFR § 113.13(d) to require additional bonding in a uniform manner and case by case.

CBP and its colleagues from other agencies also are working closely together to address collection issues in general. In FY 2011, Commerce amended its regulations to require importers to deposit cash only during the provisional measures period in AD/CVD investigations, enabling CBP to collect estimated duties more efficiently and effectively at the time of entry. Before this regulatory change, importers had the option of posting a bond instead of cash during this period. This change will streamline the collection of AD/CVD cash deposits and security for final AD/CVD during the investigation period.

## IV. Agency Coordination

Senate Report 112-74 directs CBP to work with Commerce, Treasury, the Office of the U.S. Trade Representative, and all other relevant agencies to increase collections. In accordance with this requirement, CBP closely collaborates with HSI to substantiate and act upon duty evasion allegations and to support enforcement actions. CBP works with HSI at all levels to coordinate civil and criminal enforcement of the AD/CVD laws. As noted previously, CBP, in coordination with HSI, stepped up its agency-wide efforts in FY 2012 to enforce AD/CVD laws. CBP and HSI are jointly training field staff across the Nation on collaborating on AD/CVD commercial fraud enforcement. CBP, in close coordination with HSI, also is working jointly with U.S. industry to obtain more trade intelligence on AD/CVD evasion.

Daily, Commerce and CBP communicate on various AD/CVD-related issues, and hold at least biweekly meetings on the working level and at least quarterly meetings on the executive level to coordinate AD/CVD-related administration and enforcement activities. This coordination helps to facilitate CBP's AD/CVD entry, liquidation, and collection process on numerous case-specific issues throughout the year. CBP also meets, as needed, with Commerce, Treasury, and the Office of the U.S. Trade Representative as a group to confer on AD/CVD issues.

Among other things, CBP and Commerce jointly coordinated to resolve outstanding protests involving AD/CVD-related assessment issues raised by importers or sureties. In FY 2012, the number of outstanding AD/CVD-related protests was reduced from more than 50 protests in FY 2011 to 2 protests, allowing for collection action to proceed on the finalized protests. CBP also worked together with Commerce to identify products that may have been altered solely to fall outside the scope of AD/CVD orders. In FY 2012, CBP auditors and import specialists identified shipments of steel-threaded rods, plastic bags, and other commodities that may have been specifically engineered to fall outside the scope of AD/CVD orders. CBP provided this information for Commerce's consideration under Commerce's authority to make scope clarifications and circumvention determinations. As a result, Commerce is examining these issues under that authority.

Senate Report 112-74 also recommends that the Secretary of Homeland Security work with the Secretary of Commerce to identify opportunities for Commerce to improve the timeliness, accuracy, and clarity of liquidation instructions sent to CBP. Daily, CBP and Commerce work jointly to improve the timeliness, accuracy, and clarity of liquidation instructions. CBP reviews every AD/CVD instruction drafted by Commerce and advises Commerce about any concerns with the content of the message. Commerce continues to review and edit its boilerplate AD/CVD instructions regularly to enhance clarity, and CBP also regularly provides recommendations to Commerce for the same purpose. These issues frequently are discussed in the regular meetings between CBP and Commerce. Additionally, the two agencies regularly work together to determine methods to more effectively utilize the AD/CVD case management information in ACE and are currently preparing guidelines for both agencies in this regard.

During FY 2012, CBP and Commerce worked together to jointly develop an instruction checklist to be used as a guideline for both agencies on the accuracy and clarity of AD/CVD instructions.

This checklist highlighted the necessary data required for specific messages and provided instructions on what updates were required in the ACE AD/CVD module case reference file. This checklist was another effort to ensure that clear and concise AD/CVD instructions were issued, and that the ACE AD/CVD module was being updated regularly. The finalized checklist was deployed on October 1, 2012.

## V. AD/CVD Import and Collection Data

In FY 2012, companies imported approximately \$2.37 trillion in goods and deposited approximately \$30 billion in estimated duties, taxes, and fees in Treasury. Of the \$2.37 trillion in goods imported in FY 2012, approximately \$8.1 billion, or 0.3 percent, was subject to an AD/CVD order. This represents an increase of \$1.1 billion in AD/CVD imports from FY 2011. Importers deposited approximately \$440 million in AD/CVD, which represents 1.5 percent of the \$30 billion in estimated duties, taxes, and fees. AD/CVD deposits increased for both antidumping duty and CVD cases from FY 2011 by more than \$80 million.

There are approximately 35,000 unpaid AD/CVD bills from FY 2001 through FY 2012 totaling \$1.79 billion, for which CBP is pursuing collection.<sup>3</sup> Of this amount, \$152 million was under protest and \$71 million involves bankrupt debtors. Further amounts are owed by importers that have disappeared or dissolved without going through the bankruptcy process. Additionally, tens of millions of dollars are owed by sureties that are in rehabilitation or receivership.

Uncollected AD/CVD on imports from China comprise a disproportionate share of overall uncollected AD/CVD debt. The top five AD/CVD cases for uncollected AD/CVDs all involve imports from China, and comprise \$1.6 billion (or approximately 90 percent) of the \$1.79 billion in unpaid duties:

- Fresh garlic from China (A-570-831), \$541 million
- Crawfish from China (A-570-848), \$394 million
- Wooden bedroom furniture from China (A-570-890), \$369 million
- Honey from China (A-570-863), \$177 million
- Mushrooms from China (A-570-851), \$120 million

### A. Debt Collection Process

CBP is actively pursuing collection of the balance of the money against delinquent importers and sureties. An AD/CVD bill is created when an entry of imported merchandise, subject to countervailing duties under 19 U.S.C. § 1671 or antidumping duties under 19 U.S.C. § 1673, liquidates with an increase in duties. AD/CVD bills are the direct result of a specific order from Commerce to liquidate the entry with additional AD/CVD due. CBP notifies the principal (importer) at the time of initial billing, and every 30 days after the due date, until the bill is paid or otherwise closed. Approximately 60 days after the initial bill date, CBP will report outstanding bills on a Formal Demand on Surety for Payment of Delinquent Amounts Due (informally known as the “612 report”), and every month thereafter until the bill is paid or otherwise closed. In accordance with 31 CFR § 901.2, CBP also provides an additional written demand informing the surety of the consequences of failing to cooperate with the agency to

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<sup>3</sup> These figures are based on a new methodology to calculate uncollected AD/CVD from CBP’s databases. During FY 2012, the previous electronic queries used to calculate these data stopped working, and for part of FY 2012, CBP was unable to report these data. CBP believes the new methodology more accurately captures these data than previous methods.

resolve the debt. CBP's total due process (importer demands and surety demands) for a given bill is 300 days, even before it is referred to CBP's internal legal counsel. This period can be delayed if requested documents are not received.

Ultimately, if CBP is unable to collect the applicable duties from either the principal or surety via administrative collection processes and it is determined to be legally enforceable, the debt will be referred to CBP OCC for legal action if the principal amount is more than \$1,500 (even though the U.S. Department of Justice only will accept claims for legal action if the principal amount is more than \$2,500 (see 31 CFR § 904.4)). OCC reviews each claim for legal sufficiency and makes demands on delinquent entities or refers matters to the U.S. Department of Justice for litigation, when appropriate (see the Legal Enforcement section of the report for more information). When available surety bond coverage fails to result in full payment of a claim, and the available evidence indicates that the importer may have gone out of business and left no assets which could satisfy a judgment, OCC refers the bills back to the Revenue Division for further investigation to determine the viability of the importer and/or to initiate termination of collection procedures.

The write-off period, or length of time it normally takes CBP to write off uncollected bills, varies by bill because of factors surrounding an importer, and the amount and nature of the debt. The time period also involves other factors such as protests, referral to CBP's internal legal counsel, surety demands, and bankruptcy.

## **B. Import Value, Cash Deposit, and Liquidation Amount Information**

The NAFTA Implementation Act directed CBP to include, on both a fiscal year and an administrative review period basis, the value of imports and the cash deposits collected by case number, as well as the liquidation amounts by case number, including the computation of interest collected or refunded. The FY 2012 value of imports and cash deposits collected by case number is provided in Appendix A. The FY 2012 liquidation amount by case number, including the computation of interest collected or refunded, is provided in Appendix B.

## **C. Information on Non-Collected AD/CVD Amounts by Order and Fiscal Year**

Senate Report 112-74 states that "the report shall provide the amount of uncollected duties for each antidumping and countervailing duty order, and indicate the amount of open, unpaid bills for each such order." The report for open AD/CVD bills by fiscal year is in Appendix C and is organized by the case number, fiscal year, bill amount,<sup>4</sup> and bill count. The open AD/CVD bills by fiscal year report tracks all bills that have not been paid beginning in FY 2001 through the end of FY 2012.

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<sup>4</sup> The open AD/CVD bills report includes interest accrued as of the liquidation date. Interest continues to accrue until bills are paid in full.

## D. FY 2012 CDSOA Clearing Account Balance and Disbursement Report

The FY 2012 Clearing Account balance is attached as Appendix D. The amounts in the Clearing Account represent duties filed with CDSOA entries on a case-specific basis. CBP does not collect or maintain Clearing Account data by Commerce period of review. These are preliminary numbers and may be refunded at liquidation to the importer of record on the basis of Commerce's final determination on the case, which may not occur during the current year. Until liquidation is completed in ACS, funds do not transfer from the Clearing Account to the Special Account<sup>5</sup> for distribution under CDSOA. The Clearing Account does not include additional duty assessed at liquidation or reliquidation.

For entries subject to CDSOA, the amount of FY 2012 liquidated duties collected and disbursed to domestic parties are reported in the CDSOA Annual Disbursement Report (Appendix E). The CDSOA Annual Disbursement Report includes pre-liquidation interest collected.

CBP also publishes a separate annual CDSOA report of all open bills for a specific fiscal year. This report only includes those AD/CVD entries subject to CDSOA liquidated in that fiscal year with open bills. For 2012, this report lists the amount of uncollected AD/CVD on each case as of September 30, 2012. All future collections on these bills that fall under CDSOA will be disbursed in the year in which they are received. This separate uncollected duties report is located on CBP's public Web site at:

[http://www.cbp.gov/xp/cgov/trade/priority\\_trade/add\\_cvd/cont\\_dump/cdsoa\\_12/](http://www.cbp.gov/xp/cgov/trade/priority_trade/add_cvd/cont_dump/cdsoa_12/).

The FY 2012 amounts in the CDSOA uncollected duties report and the open AD/CVD bills by fiscal year report included in Appendix C may differ because the former report relates only to bills issued in FY 2012 for AD/CVD entries up to October 1, 2007, subject to CDSOA, and the latter report relates to bills issued in FY 2012 for AD/CVD entries from 2001 to 2012. Other differences may be due to the timing of data download.

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<sup>5</sup> CDSOA has been repealed with respect to entries made on or after October 1, 2007. Only assessed AD/CVD collected on entries made before October 1, 2007, are transferred to the Special Account for distribution under the CDSOA. The *Claims Resolution Act of 2010* (P.L. 111-291) also may affect the amounts ultimately available for distribution.

## VI. Conclusion

CBP continues to ensure that, as an agency, it implements statutory and regulatory authorities and adheres to current CBP policy to minimize loss of revenue. CBP will continue to prioritize enforcement actions and compliance initiatives in support of the U.S. AD/CVD laws. The cooperation between CBP, ICE, and Commerce is strong, and together we will continue to pursue all available avenues to improve the level of duty collection, ensure importer compliance, and prevent loss of revenue.

CBP is committed to working with other government agencies to identify and resolve collection problems quickly, while ensuring that all relevant stakeholders understand these issues and are engaged in developing solutions to facilitate legitimate trade and protect the U.S. industry.

## VII. Appendices

### Appendix A: Import Value and AD/CVD Deposit FY 2012

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
<b>Antidumping Duty Amounts</b>		
A122503	\$2,027,637.00	\$30,602.08
A122853	\$74,094,289.00	\$1,440,040.92
A122988	\$374.00	\$934.85
A201805	\$238,804.00	\$77,962.89
A201830	\$10,322,973.00	\$516,158.08
A201836	\$56,390,523.00	\$1,895,710.68
A201837	\$27,738.00	\$16,060.30
A201838	\$9,668,902.00	\$2,593,923.32
A201839	\$208,468,176.00	\$55,949,574.65
A201840	\$322,766.00	\$122,052.75
A201842	\$20,897,589.00	\$6,960,671.64
A201988	\$135.00	\$337.45
A351503	\$227,057.00	\$19,209.03
A351825	\$8,116,413.00	\$401,048.85
A351840	\$75,017,298.00	\$1,210,889.16
A351841	\$3,399.00	\$976.20
A357812	\$90,244,361.00	\$61,832.04
A403801	\$456,150.00	\$99,905.86
A405803	\$37,901,680.00	\$1,176,383.65
A412201	\$15,631,764.00	\$119.88
A412988	\$15,097.00	\$37,736.46
A421811	\$2,086,582.00	\$68,371.35
A423808	\$10,016,630.00	\$415,908.94
A427201	\$269.00	\$79.64
A427602	\$2,231.00	\$942.38
A427988	\$12,087.00	\$30,212.67
A428201	\$2,524.00	\$582.33
A428602	\$840,953.00	\$61,115.31
A428815	\$29,921,426.00	\$2,998,126.86
A428820	\$1,025,558.00	\$418,146.68
A428840	\$158,034,605.00	\$7,018,614.07
A428841	\$18,813.00	\$28,459.95
A428988	\$11,277.00	\$28,187.99
A462101	\$198,556,789.00	\$2,323,114.43

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
A462102	\$103,521,803.00	\$0.00
A462811	\$181,133.00	\$460,041.59
A462817	\$108,000.00	\$66,538.80
A470805	\$131,219.00	\$26,656.18
A470814	\$174,871.00	\$49,033.83
A475059	\$1,181,636.00	\$23,955.21
A475201	\$12,287.00	\$75.58
A475601	\$158,611.00	\$11,312.49
A475703	\$143,911.00	\$67,160.60
A475818	\$60,093,352.00	\$3,511,349.81
A475828	\$627,349.00	\$57,491.30
A485805	\$173,871.00	\$25,636.14
A489501	\$45,810,902.00	\$2,109,343.48
A489805	\$203,544.00	\$32,695.25
A489815	\$103,391.00	\$0.00
A520803	\$35,274,286.00	\$1,354,081.15
A520804	\$52,085,101.00	\$5,372,559.66
A520805	\$3,904,609.00	\$121,933.45
A523801	\$11,204,627.00	\$626,338.58
A533502	\$972,405.00	\$68,156.65
A533810	\$4,549,654.00	\$164,737.17
A533813	\$16,873,195.00	\$103,088.64
A533817	\$7,001.00	\$2,080.00
A533824	\$14,501,707.00	\$1,879.68
A533838	\$1,067,389.00	\$425,469.74
A533840	\$470,855,582.00	\$8,866,910.50
A533843	\$12,448,406.00	\$354,960.28
A533847	\$1,449,420.00	\$31,028.85
A533850	\$215.00	\$197.22
A549502	\$90,480,321.00	\$1,592,748.21
A549807	\$3,015.00	\$1,585.89
A549821	\$40,732,680.00	\$642,590.95
A549822	\$957,347,660.00	\$7,748,966.60
A552801	\$341,650,151.00	\$1,076,032.61
A552802	\$446,427,631.00	\$4,046,239.69
A552806	\$180,710.00	\$97,895.47
A552807	\$235.00	\$215.57
A552809	\$21,125.00	\$39,556.56
A552811	\$200,598.00	\$0.00
A557809	\$6,449,003.00	\$484,320.37

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
A557988	\$160.00	\$399.94
A560802	\$8,401,994.00	\$527.58
A560818	\$570.00	\$557.75
A565801	\$10,749,594.00	\$817,013.20
A570002	\$18,695.00	\$10,843.10
A570007	\$35,200.00	\$54,736.00
A570201	\$795,202.00	\$361,180.81
A570202	\$254,808.00	\$354,973.04
A570203	\$3,507.00	\$3,463.87
A570204	\$123,962.00	\$234,746.87
A570502	\$16,855.00	\$15,631.32
A570504	\$2,232,301.00	\$2,417,572.88
A570506	\$745,218.00	\$213,569.24
A570601	\$106,247,481.00	\$4,667,749.70
A570814	\$110,257.00	\$75,786.13
A570815	\$1,478.00	\$1,259.26
A570822	\$6,586,983.00	\$829,813.10
A570826	\$6,741.00	\$7,852.90
A570827	\$52,422,967.00	\$3,088,899.83
A570831	\$110,142,593.00	\$4,091,468.57
A570832	\$22,873.00	\$25,556.00
A570836	\$4,178,777.00	\$1,722,566.31
A570848	\$68,858,683.00	\$1,973,097.98
A570849	\$27,418.00	\$35,256.81
A570851	\$74,152,824.00	\$714,258.20
A570863	\$81,835.00	\$44,220.82
A570864	\$2,013.00	\$6,150.92
A570865	\$15,363.00	\$12,288.67
A570866	\$2,030,204.00	\$141,377.02
A570868	\$62,792,711.00	\$353,779.64
A570875	\$12,691,642.00	\$1,768,576.05
A570878	\$5,857,275.00	\$82,485.00
A570879	\$10,032,166.00	\$0.00
A570880	\$57,178.00	\$41,836.28
A570881	\$58,210,125.00	\$6,146,509.35
A570882	\$82,165.00	\$111,070.63
A570886	\$16,101,595.00	\$2,976,073.26
A570888	\$115,589.00	\$21,893.25
A570890	\$209,221,492.00	\$16,893,074.26
A570891	\$3,385,105.00	\$250,262.41

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
A570893	\$14,677,277.00	\$0.00
A570894	\$1,083,680.00	\$1,160,721.63
A570895	\$3,152.00	\$8,410.48
A570898	\$47,167,234.00	\$944,585.12
A570899	\$104,544.00	\$271,964.27
A570900	\$33,626,667.00	\$6,364,383.34
A570901	\$185,254.00	\$477,656.55
A570904	\$20,882,723.00	\$3,544,525.90
A570905	\$24,941,007.00	\$489,483.79
A570909	\$35,896,043.00	\$4,825,727.14
A570910	\$84,995.00	\$70,436.29
A570912	\$182,838,884.00	\$18,583,828.88
A570916	\$19,894.00	\$18,023.92
A570918	\$28,021,255.00	\$431,063.24
A570919	\$2,500.00	\$3,748.00
A570920	\$68,252.00	\$78,686.78
A570922	\$105,898.00	\$194,504.35
A570924	\$2,867,231.00	\$361,091.92
A570928	\$200.00	\$469.02
A570929	\$7,159,970.00	\$1,141,388.29
A570930	\$664,043.00	\$297,881.73
A570932	\$1,869,257.00	\$1,054,957.44
A570933	\$4,004,392.00	\$258,445.82
A570934	\$75.00	\$54.32
A570937	\$9,280,197.00	\$2,861,237.80
A570939	\$2,341.00	\$9,042.80
A570941	\$1,903,558.00	\$520,515.59
A570943	\$14,855,677.00	\$4,764,736.33
A570947	\$3,000.00	\$4,355.40
A570951	\$666.00	\$1,164.50
A570952	\$371,905.00	\$879,105.79
A570956	\$166,510.00	\$150,823.49
A570958	\$225.00	\$305.64
A570962	\$5,226.00	\$4,985.60
A570964	\$78,668,120.00	\$8,907,114.96
A570965	\$180,661.00	\$124,981.28
A570967	\$8,444,061.00	\$2,734,292.33
A570970	\$332,521,747.00	\$11,986,666.15
A570972	\$8,500.00	\$9,024.45
A570973	\$2,213,065.00	\$3,780,806.98

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
A570975	\$85,921.00	\$94,691.53
A570977	\$18,685,570.00	\$1,299,612.73
A570979	\$14,757,818.00	\$7,549,316.06
A570981	\$6,152,708.00	\$3,341,192.45
A570983	\$317.00	\$241.40
A580809	\$43,333,118.00	\$1,114,268.00
A580810	\$17,761,381.00	\$563,033.98
A580816	\$256,088,611.00	\$3,615,743.79
A580831	\$156,968.00	\$9,543.65
A580834	\$2,910,514.00	\$95,418.50
A580836	\$14,255,699.00	\$554,632.84
A580839	\$66,707,843.00	\$592,531.55
A580855	\$17,703,834.00	\$126,172.95
A580865	\$329,521,873.00	\$44,206,777.87
A580867	\$130,116,875.00	\$35,811,757.66
A580868	\$68,690,915.00	\$7,931,235.58
A580988	\$735.00	\$1,837.21
A583008	\$2,728,738.00	\$319,447.51
A583605	\$1,359,854.00	\$60,086.39
A583814	\$2,517.00	\$593.00
A583815	\$196,391.00	\$54,997.90
A583820	\$2,214,301.00	\$711,356.59
A583828	\$54,372.00	\$2,582.67
A583831	\$323,217.00	\$27,660.66
A583833	\$4,908,311.00	\$139,659.45
A583837	\$4,239,128.00	\$1,325,439.81
A583841	\$35,731,542.00	\$1,100,508.73
A583842	\$965,901.00	\$315,827.83
A583843	\$284,227.00	\$103,856.58
A583844	\$13,090,135.00	\$568,445.14
A583846	\$8,844.00	\$7,892.19
A583848	\$14,599,513.00	\$1,327,476.85
A583988	\$400.00	\$999.84
A588201	\$264,556,670.00	\$2,307.78
A588602	\$1,506.00	\$945.62
A588704	\$41,991.00	\$24,346.38
A588807	\$429,435.00	\$1,221.33
A588833	\$829,047.00	\$509,615.16
A588845	\$80,794,449.00	\$2,013,591.59
A588847	\$1,334.00	\$126.20

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
A588850	\$363,642.00	\$305,473.30
A588851	\$7,027.00	\$7,285.32
A588854	\$64,465.00	\$59,039.66
A588857	\$4,953,821.00	\$1,525,776.84
A588861	\$137,701.00	\$198,439.68
<b>ADD TOTAL</b>	<b>\$6,833,448,139.00</b>	<b>\$371,181,440.10</b>
<b>Countervailing Duty Amounts</b>		
C122989	\$374.00	\$151.08
C201989	\$135.00	\$4.87
C357813	\$110,904,312.00	\$0.00
C403802	\$276,510.00	\$2,597.79
C412989	\$22,874.00	\$825.75
C427989	\$13,387.00	\$483.27
C428989	\$11,118.00	\$401.36
C475819	\$116,633,512.00	\$1,832,869.81
C475827	\$1,514.00	\$37.09
C489502	\$45,810,902.00	\$9.61
C489806	\$149,043.00	\$10,591.75
C520806	\$1,563,792.00	\$0.00
C533818	\$1,158.00	\$148.46
C533825	\$14,747,123.00	\$914,792.57
C533839	\$1,067,389.00	\$185,941.76
C533844	\$12,025,437.00	\$1,109,855.49
C533851	\$215.00	\$487.73
C552805	\$180,683.00	\$9,558.96
C552808	\$35.00	\$79.40
C552813	\$2,344,346.00	\$327,231.04
C552989	\$245.00	\$8.84
C560819	\$570.00	\$231.14
C565989	\$151.00	\$5.45
C570911	\$77,134.00	\$28,983.11
C570913	\$183,461,874.00	\$8,888,912.13
C570917	\$7,335.00	\$16,639.46
C570921	\$51,537.00	\$7,024.49
C570923	\$136,888.00	\$150,508.41
C570931	\$664,043.00	\$66,022.27
C570938	\$13,865,064.00	\$1,252,777.60
C570940	\$2,283.00	\$303.64
C570942	\$1,845,081.00	\$525,404.50
C570944	\$10,779,701.00	\$1,450,583.51

<b>Appendix A</b>		
<b>Import Value and AD/CVD Deposit FY 2012</b>		
<b>AD/CVD Case Number</b>	<b>Line Value</b>	<b>AD/CVD Amount</b>
C570953	\$5,226,464.00	\$81,515.30
C570957	\$108,199.00	\$36,872.26
C570959	\$404,637.00	\$78,742.36
C570963	\$2,760.00	\$3,011.44
C570966	\$27,986,488.00	\$5,087,943.50
C570968	\$7,552,935.00	\$20,296,048.84
C570971	\$232,189,248.00	\$3,490,768.33
C570974	\$1,131,990.00	\$435,830.00
C570976	\$53,266.00	\$11,007.50
C570978	\$5,167,098.00	\$1,083,482.37
C570980	\$83,468,520.00	\$3,211,167.35
C570982	\$86,527,285.00	\$16,530,352.92
C570984	\$6,938,892.00	\$615,300.79
C580208	\$227,093,831.00	\$17,739.12
C580835	\$21,037,443.00	\$111,834.78
C580837	\$14,192,116.00	\$2,934.75
C580866	\$35,506,420.00	\$946,587.40
C580869	\$45,275,536.00	\$559,521.27
C583847	\$4,239.00	\$9,616.17
C583989	\$665,968.00	\$24,041.45
<b>CVD TOTAL</b>	<b>\$1,317,179,100.00</b>	<b>\$69,417,790.24</b>

## Appendix B: Liquidations with Interest in FY 2012

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A122503	\$44,175.87
A122601	\$1.86
A122822	\$91.70
A122840	\$28,138.66
A122853	\$1,483,868.28
A201215	\$113,096.04
A201601	\$34.94
A201802	\$10,044.00
A201805	\$292,409.68
A201822	\$119,666.71
A201827	\$345.85
A201830	\$294,489.30
A201834	\$36,668.99
A201836	\$2,544,037.46
A201837	\$295,780.76
A201838	\$265,513.16
A201839	(\$96,050.76)
A201840	(\$19.82)
A331602	\$4.95
A337803	\$2,485.85
A351503	\$25,973.05
A351817	\$90.47
A351825	\$50,286.06
A351826	\$337.34
A351828	\$7,230.27
A351840	\$45,925.56
A351841	\$505.47
A357215	\$388.05
A357812	\$59,097.24
A401040	\$27,125.19
A401201	\$2,488.43
A401203	\$1,912.09
A401806	\$5,448.25
A403801	\$69,862.83
A405803	\$96,921.91

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A412108	\$7.69
A412201	\$161,933.90
A412203	\$301.01
A412602	\$212.55
A412822	\$225.13
A421807	\$5,807,436.50
A421811	\$34,339.84
A423108	\$85.32
A423808	(\$11,982.76)
A427009	\$2,006.58
A427201	\$6,934,137.77
A427203	\$34.38
A427205	\$1,061.17
A427602	\$2,058.18
A427818	(\$43.80)
A427820	\$36,721.05
A428201	\$11,212,017.52
A428203	\$6,059.52
A428205	\$10.05
A428602	\$58,587.42
A428604	\$336.51
A428802	\$679.03
A428815	\$2,183,504.24
A428816	\$1,662.48
A428820	\$165,735.84
A428821	\$793.96
A428825	\$23,714.14
A428830	\$747.96
A428840	\$36,999.05
A428841	\$70,591.88
A462101	\$8,991.51
A462109	\$107.05
A462305	\$38,885.83
A462323	\$187.19
A462819	\$148,377.98
A470805	\$94,508.56
A475059	\$167,043.08

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A475201	\$4,664,499.67
A475212	\$53.90
A475215	\$1,446.11
A475603	\$21.69
A475703	\$337,202.34
A475802	\$2,659.70
A475814	\$2.67
A475818	\$7,430,107.99
A475820	\$14,823.63
A475822	\$854.92
A475824	\$11,736.49
A475826	(\$16.07)
A475828	\$9,814.89
A475829	(\$142.65)
A485602	\$0.61
A485803	\$696.37
A485805	\$87.01
A489805	\$7,726.83
A489807	\$118,757.18
A489812	\$35.72
A489815	(\$138.88)
A520803	\$5,645.55
A520804	\$7,851.74
A533207	\$114.14
A533502	\$463,708.26
A533806	\$1,812.79
A533808	\$160.55
A533809	\$7,370.03
A533810	\$208,265.29
A533813	\$77,744.48
A533817	\$13,388.82
A533820	\$244,555.54
A533824	\$26,038.90
A533838	\$173,270.14
A533840	\$646,541.93
A533843	\$634,386.56
A533847	\$39,502.87

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A533850	\$366.92
A538802	\$121.45
A549502	\$206,905.33
A549807	\$7,557.42
A549813	\$45,723.09
A549821	\$2,512,945.81
A549822	\$62,258,980.88
A552801	\$1,799,398.49
A552802	(\$692,914.08)
A552804	\$123,437.67
A552806	\$101,067.68
A552807	\$26,063.39
A557212	\$1,681.45
A557217	\$2,355.12
A557809	\$266,082.01
A557813	\$332.96
A559201	\$81.58
A559212	\$7,933.31
A560802	\$670,674.00
A560818	\$71.43
A565801	\$932,843.17
A570201	\$482,064.79
A570202	\$539,394.74
A570203	\$12,707.59
A570204	\$157,768.54
A570501	\$70.38
A570502	\$28,651.93
A570504	\$472,416.56
A570506	\$100,606.76
A570601	\$2,681,724.83
A570804	\$329.26
A570814	\$50,889.43
A570822	\$690,909.46
A570824	\$11,362.53
A570826	\$76,664.16
A570827	\$8,580,896.14
A570831	\$155,147,913.32

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A570832	\$25,101.22
A570844	\$4.59
A570846	\$2,667,609.80
A570847	\$38,207.36
A570848	\$9,347,674.17
A570849	\$1,296.51
A570851	\$7,986,119.50
A570855	\$118,461.02
A570856	\$12,911.40
A570863	\$13,997,317.11
A570864	\$56,232.21
A570865	\$16,227.58
A570866	\$134,433.94
A570867	\$580.44
A570868	\$515,176.72
A570870	\$43,767.56
A570874	\$71.16
A570875	\$1,257,120.91
A570877	\$320,298.94
A570878	\$60,642.82
A570880	\$14,188.18
A570881	\$5,620,224.76
A570882	\$132,281.73
A570886	\$3,713,626.38
A570888	\$6,993.70
A570890	\$113,279,138.15
A570891	\$3,012,454.68
A570892	\$1,590,908.92
A570893	\$245,395.80
A570894	\$2,967,212.44
A570896	(\$3,091.15)
A570898	\$126,886.06
A570899	\$66,704.33
A570900	\$426.11
A570901	\$326,512.24
A570904	\$7,071,950.22
A570905	\$449,743.12

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A570909	\$5,539,144.82
A570910	\$208,528.05
A570912	\$10,108,671.20
A570914	\$13,390.78
A570916	\$256,429.25
A570918	\$4,030,180.24
A570920	\$16,904.99
A570922	\$30,367.53
A570924	\$31,894.30
A570928	\$893.48
A570929	\$3,618,249.29
A570930	\$235,798.78
A570932	\$3,366,698.26
A570933	\$1,022,856.12
A570934	\$48,744.67
A570935	\$10,881.39
A570937	\$6,379,040.19
A570939	\$985.01
A570941	\$630,205.83
A570943	\$1,330,817.81
A570947	\$1,692,499.30
A570951	\$2,224,328.44
A570952	\$64,209.44
A570954	(\$802.01)
A570956	\$30,226.64
A570958	\$57,489.94
A570962	\$33,692.42
A570964	\$7,410.89
A570965	\$2,026,055.61
A570967	\$192,506.88
A570970	\$5,564.81
A570973	(\$739.23)
A570975	(\$357.91)
A580008	\$9,080.61
A580109	\$1,348.80
A580507	\$38.81
A580601	\$39.20

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A580605	\$304.89
A580803	(\$59.33)
A580807	\$231,771.82
A580809	\$866,139.72
A580810	\$1,665,907.45
A580811	\$400.05
A580815	\$15,037.13
A580816	\$86,048.13
A580829	\$340.93
A580831	\$58,461.40
A580834	\$344,384.99
A580836	\$107,825.34
A580839	\$449,390.85
A580855	(\$27.79)
A580861	\$0.00
A580865	(\$41.00)
A583008	\$5,117,042.79
A583009	\$36,538.20
A583507	\$584.16
A583605	\$66,109.02
A583803	\$247.47
A583806	\$103.43
A583814	\$16.49
A583815	\$114,830.84
A583816	\$17,984.13
A583820	\$693,554.08
A583826	\$16,678.08
A583831	\$3,328.29
A583833	\$10,556.61
A583837	\$2,118,217.45
A583842	\$197,658.82
A583843	\$58,310.92
A583844	\$499,988.06
A588028	\$12,718.32
A588045	\$3,752,909.73
A588054	\$12,582.33
A588108	\$4,895.66

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
A588201	\$1,324,169.97
A588203	\$9,037.34
A588205	\$2,553.89
A588405	\$157.36
A588602	\$3,979.69
A588604	\$30,594.01
A588704	\$55,302.93
A588706	\$114,149.88
A588707	\$1,677.50
A588807	\$16,427.91
A588833	\$452,590.71
A588845	\$958,216.80
A588846	(\$88,679.57)
A588847	(\$0.81)
A588850	\$91,253.88
A588851	\$45,444.10
A588854	\$53,906.95
A588857	\$15,197.64
A588861	\$412,547.05
A791819	\$3,307.12
C100222	(\$10,190.21)
C201017	\$3.38
C201222	\$2,227.45
C351209	\$93.91
C351829	(\$9,141.21)
C357803	\$951.19
C357813	\$8,779.71
C403802	\$32,874.43
C423809	(\$3,719.39)
C427109	\$997.31
C428206	\$447.17
C428208	\$73,351.01
C428209	\$6,186.53
C475215	\$10.58
C475819	\$2,306,178.88
C475827	(\$0.35)
C475830	\$123.93

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
C489502	\$32,886.61
C489806	\$1,407.60
C533063	\$80.64
C533807	\$1,114.60
C533818	\$5,777.33
C533821	\$1,075,838.95
C533825	\$261,199.43
C533839	\$66,238.78
C533844	\$1,234,635.55
C535001	\$187.90
C552805	\$50,252.64
C552813	(\$20.08)
C557222	\$8.28
C559222	\$44.29
C560819	\$27.57
C570911	\$164,302.91
C570913	\$3,844,640.31
C570915	\$773.17
C570917	\$71,999.28
C570921	\$1,680.80
C570923	\$9,038.49
C570931	\$18,510.57
C570936	\$3,839.16
C570938	\$356,439.04
C570942	\$779,077.09
C570944	\$2,324,499.50
C570948	\$438,101.67
C570953	\$23,207.23
C570955	(\$82.38)
C570957	\$9,883.91
C570959	\$32,118.10
C570963	\$38,534.38
C570966	\$2,493,271.12
C570968	\$2,856,114.73
C570971	\$1,610.28
C570974	\$6,882.48
C570976	(\$121.33)

<b>Appendix B</b>	
<b>Liquidations with Interest FY 2012</b>	
<b>Case Number</b>	<b>Liquidated Amount Plus Interest</b>
C570980	(\$20.14)
C580207	(\$1,938.34)
C580208	\$65,479.39
C580602	\$3.77
C580835	\$146,418.05
C580837	\$907.50
C580851	\$4,627.10
C580866	\$0.00

Negative amounts (in red) represent net amounts after the refund of interest.

## Appendix C: Open Bills for FY 2001 through FY 2012

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
A100109	2004	\$161,762.38	28
<b>A100109 Total</b>		<b>\$161,762.38</b>	<b>28</b>
A122822	2004	\$19,924.35	96
A122822	2006	\$1,602,096.87	464
A122822	2007	\$1,888.81	1
A122822	2010	\$3,162,850.64	2,165
<b>A122822 Total</b>		<b>\$4,786,760.67</b>	<b>2,726</b>
A122840	2005	\$2,190.63	1
A122840	2009	\$224,290.07	325
<b>A122840 Total</b>		<b>\$226,480.70</b>	<b>326</b>
A122847	2006	\$686.89	1
<b>A122847 Total</b>		<b>\$686.89</b>	<b>1</b>
A122853	2012	\$259,213.57	12
<b>A122853 Total</b>		<b>\$259,213.57</b>	<b>12</b>
A201212	2001	\$250.56	1
<b>A201212</b>		<b>\$250.56</b>	<b>1</b>
A201215	2006	\$98,081.60	2
<b>A201215 Total</b>		<b>\$98,081.60</b>	<b>2</b>
A201601	2004	\$28,387.20	76
<b>A201601 Total</b>		<b>\$28,387.20</b>	<b>76</b>
A201822	2011	\$251,852.85	52
<b>A201822 Total</b>		<b>\$251,852.85</b>	<b>52</b>
A201836	2011	\$2,164.01	11
<b>A201836 Total</b>		<b>\$2,164.01</b>	<b>11</b>
A351806	2006	\$109,913.91	13
<b>A351806 Total</b>		<b>\$109,913.91</b>	<b>13</b>
A351838	2006	\$63,175.27	3
A351838	2007	\$22,029.83	1
A351838	2008	\$99,599.43	4
<b>A351838 Total</b>		<b>\$184,804.53</b>	<b>8</b>
A357215	2004	\$10,961,926.08	36
<b>A357215 Total</b>		<b>\$10,961,926.08</b>	<b>36</b>
A401040	2006	\$911.68	1
<b>A401040 Total</b>		<b>\$911.68</b>	<b>1</b>
A412201	2002	\$1,140.91	1
A412201	2010	\$5,281.21	9
A412201	2011	\$19,381.27	21
<b>A412201 Total</b>		<b>\$25,803.39</b>	<b>31</b>

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
A412212	2004	\$37.71	1
<b>A412212 Total</b>		<b>\$37.71</b>	<b>1</b>
A427201	2006	\$64,134.53	11
A427201	2008	\$52.79	2
A427201	2011	\$3.97	2
A427201	2012	\$3,957.11	1
<b>A427201 Total</b>		<b>\$68,148.40</b>	<b>16</b>
A428201	2006	\$1,933.36	5
A428201	2007	\$8,604.87	2
A428201	2008	\$8,431.46	5
A428201	2010	\$3,385,608.99	173
A428201	2011	\$1,410,318.05	206
A428201	2012	\$27,182.02	25
<b>A428201 Total</b>		<b>\$4,842,078.75</b>	<b>416</b>
A428203	2002	\$205.20	1
A428203	2006	\$787.95	1
<b>A428203 Total</b>		<b>\$993.15</b>	<b>2</b>
A462101	2010	\$1,746,021.01	1
<b>A462101 Total</b>		<b>\$1,746,021.01</b>	<b>1</b>
A475059	2012	\$67,036.08	1
<b>A475059 Total</b>		<b>\$67,036.08</b>	<b>1</b>
A475201	2006	\$7,373.40	8
A475201	2008	\$19.54	1
A475201	2010	\$6,147.73	5
A475201	2011	\$1,689.14	4
A475201	2012	\$151.77	4
<b>A475201 Total</b>		<b>\$15,381.58</b>	<b>22</b>
A475212	2001	\$4,669.70	3
<b>A475212 Total</b>		<b>\$4,669.70</b>	<b>3</b>
A475818	2004	\$4,565.57	4
A475818	2009	\$8,072.76	3
A475818	2010	\$717,271.24	49
A475818	2012	\$1,046,667.91	646
<b>A475818 Total</b>		<b>\$1,776,577.48</b>	<b>702</b>
A475822	2007	\$9,743.03	1
<b>A475822 Total</b>		<b>\$9,743.03</b>	<b>1</b>
A489805	2011	\$20,432.76	1
<b>A489805 Total</b>		<b>\$20,432.76</b>	<b>1</b>
A489807	2010	\$317,519.76	1
A489807	2011	\$286,554.73	1

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
<b>A489807 Total</b>		<b>\$604,074.49</b>	<b>2</b>
A533502	2006	\$57,591.24	16
A533502	2011	\$23,033.36	1
A533502	2012	\$207,049.80	8
<b>A533502 Total</b>		<b>\$287,674.40</b>	<b>25</b>
A533810	2011	\$1.91	1
<b>A533810 Total</b>		<b>\$1.91</b>	<b>1</b>
A533813	2003	\$31,975.63	3
A533813	2008	\$296,327.28	95
<b>A533813 Total</b>		<b>\$328,302.91</b>	<b>98</b>
A533820	2012	\$205,401.63	3
<b>A533820 Total</b>		<b>\$205,401.63</b>	<b>3</b>
A533824	2007	\$17,936.88	4
A533824	2008	\$6,308.15	2
<b>A533824 Total</b>		<b>\$24,245.03</b>	<b>6</b>
A533840	2006	\$32,320.03	1
A533840	2008	\$20,722.20	1
<b>A533840 Total</b>		<b>\$53,042.23</b>	<b>2</b>
A533843	2010	\$42,937.82	3
<b>A533843 Total</b>		<b>\$42,937.82</b>	<b>3</b>
A549813	2003	\$227,763.97	30
A549813	2007	\$117,114.25	9
A549813	2008	\$5,632.31	1
<b>A549813 Total</b>		<b>\$350,510.53</b>	<b>40</b>
A549817	2010	\$626,722.31	1
<b>A549817 Total</b>		<b>\$626,722.31</b>	<b>1</b>
A549821	2007	\$523,737.31	12
A549821	2008	\$7,986,633.44	144
A549821	2009	\$10,701,157.55	234
A549821	2010	\$2,267,908.97	49
A549821	2012	\$1,025,769.00	85
<b>A549821 Total</b>		<b>\$22,505,206.27</b>	<b>524</b>
A549822	2010	\$264,562.78	45
A549822	2011	\$7,102.50	2
A549822	2012	\$976,478.02	258
<b>A549822 Total</b>		<b>\$1,248,143.30</b>	<b>305</b>
A549826	2010	\$136,705.13	1
<b>A549826 Total</b>		<b>\$136,705.13</b>	<b>1</b>
A552801	2005	\$694,790.28	24
A552801	2006	\$1,370,725.80	29

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
A552801	2007	\$14,398,293.95	90
A552801	2008	\$1,825,973.86	44
A552801	2009	\$3,186,538.44	84
A552801	2010	\$849,300.20	14
A552801	2011	\$1,113,440.92	32
A552801	2012	\$1,808,488.54	53
<b>A552801 Total</b>		<b>\$25,247,551.99</b>	<b>370</b>
A552802	2007	\$342,723.55	8
<b>A552802 Total</b>		<b>\$342,723.55</b>	<b>8</b>
A552804	2010	\$2,988,489.36	22
A552804	2012	\$22,143.52	1
<b>A552804 Total</b>		<b>\$3,010,632.88</b>	<b>23</b>
A552806	2011	\$1,418,473.29	20
<b>A552806 Total</b>		<b>\$1,418,473.29</b>	<b>20</b>
A552807	2012	\$26,063.39	1
<b>A552807 Total</b>		<b>\$26,063.39</b>	<b>1</b>
A555801	2008	\$678,189.48	14
<b>A555801 Total</b>		<b>\$678,189.48</b>	<b>14</b>
A557813	2011	\$2,085,375.88	49
<b>A557813 Total</b>		<b>\$2,085,375.88</b>	<b>49</b>
A570001	2003	\$63,060.09	2
A570001	2004	\$622,867.89	13
<b>A570001 Total</b>		<b>\$685,927.98</b>	<b>15</b>
A570201	2006	\$43,157.90	12
A570201	2007	\$6,920.16	1
A570201	2008	\$39,294.59	49
A570201	2012	\$227,092.43	9
<b>A570201 Total</b>		<b>\$316,465.08</b>	<b>71</b>
A570202	2006	\$18,878.94	4
A570202	2007	\$962,034.71	44
A570202	2008	\$6,128,278.52	122
A570202	2011	\$8,471.19	2
A570202	2012	\$388,306.99	13
<b>A570202 Total</b>		<b>\$7,505,970.35</b>	<b>185</b>
A570203	2006	\$1,033.44	1
A570203	2008	\$117,947.49	44
<b>A570203 Total</b>		<b>\$118,980.93</b>	<b>45</b>
A570204	2006	\$34,270.41	7
A570204	2007	\$17,507.44	1
A570204	2008	\$78,854.85	32

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
A570204	2012	\$1,245.36	1
<b>A570204 Total</b>		<b>\$131,878.06</b>	<b>41</b>
A570501	2002	\$158,876.47	1
<b>A570501 Total</b>		<b>\$158,876.47</b>	<b>1</b>
A570502	2003	\$183,286.48	23
<b>A570502 Total</b>		<b>\$183,286.48</b>	<b>23</b>
A570504	2002	\$27,542.30	5
A570504	2004	\$587,853.45	20
A570504	2005	\$4,575,303.87	91
A570504	2006	\$161,241.23	3
A570504	2007	\$163,114.72	7
A570504	2008	\$6,979,669.46	159
A570504	2010	\$133,939.42	5
A570504	2011	\$151,509.01	2
<b>A570504 Total</b>		<b>\$12,780,173.46</b>	<b>292</b>
A570506	2010	\$638,007.30	31
A570506	2011	\$35,297.24	4
<b>A570506 Total</b>		<b>\$673,304.54</b>	<b>35</b>
A570601	2002	\$557,928.03	56
A570601	2003	\$1,128,513.56	44
A570601	2009	\$3,455,776.78	28
A570601	2011	\$347,101.01	7
A570601	2012	\$1,241,840.62	26
<b>A570601 Total</b>		<b>\$6,731,160.00</b>	<b>161</b>
A570804	2007	\$643.02	2
<b>A570804 Total</b>		<b>\$643.02</b>	<b>2</b>
A570806	2002	\$129,995.17	1
A570806	2003	\$467,114.09	1
<b>A570806 Total</b>		<b>\$597,109.26</b>	<b>2</b>
A570813	2009	\$7,989.82	1
<b>A570813 Total</b>		<b>\$7,989.82</b>	<b>1</b>
A570814	2009	\$225,507.19	3
A570814	2010	\$112,099.56	1
<b>A570814 Total</b>		<b>\$337,606.75</b>	<b>4</b>
A570827	2001	\$29,883.88	1
A570827	2002	\$8,182.38	2
A570827	2003	\$37,750.65	4
A570827	2005	\$4,576.03	3
A570827	2008	\$60,371.35	7
A570827	2009	\$36,165.73	2

<b>Appendix C</b>			
<b>Open Bills By Case Number and Fiscal Year</b>			
<b>AD/CVD Case Number</b>	<b>Bill Fiscal Year</b>	<b>AD/CVD Bill Amount</b>	<b>Bill Count</b>
A570827	2010	\$19.13	1
A570827	2011	\$23,920.65	6
A570827	2012	\$220,698.17	45
<b>A570827 Total</b>		<b>\$421,567.97</b>	<b>71</b>
A570830	2003	\$187,727.37	2
<b>A570830 Total</b>		<b>\$187,727.37</b>	<b>2</b>
A570831	2004	\$18,251,575.00	84
A570831	2005	\$24,454.68	1
A570831	2007	\$36,794,540.59	166
A570831	2008	\$22,016,617.08	264
A570831	2009	\$60,702,805.24	1,177
A570831	2010	\$190,143,540.60	2,261
A570831	2011	\$61,047,303.57	602
A570831	2012	\$152,382,573.59	1,338
<b>A570831 Total</b>		<b>\$541,363,410.35</b>	<b>5,893</b>
A570832	2004	\$1,317,716.94	140
A570832	2005	\$715,862.80	4
<b>A570832 Total</b>		<b>\$2,033,579.74</b>	<b>144</b>
A570836	2008	\$724,706.68	31
A570836	2009	\$682,697.45	14
A570836	2010	\$818,945.72	5
<b>A570836 Total</b>		<b>\$2,226,349.85</b>	<b>50</b>
A570840	2001	\$19,652.94	1
<b>A570840 Total</b>		<b>\$19,652.94</b>	<b>1</b>
A570846	2001	\$731,328.34	18
A570846	2002	\$326,187.24	9
A570846	2003	\$174,615.03	6
A570846	2007	\$2,509,342.67	270
A570846	2008	\$1,343,353.54	337
A570846	2009	\$1,309,938.15	209
A570846	2010	\$736,232.42	252
A570846	2012	\$2,527,986.46	132
<b>A570846 Total</b>		<b>\$9,658,983.85</b>	<b>1,233</b>
A570848	2004	\$7,644.11	1
A570848	2002	\$18,370,578.67	57
A570848	2003	\$49,413,783.31	126
A570848	2004	\$92,069,174.64	101
A570848	2005	\$21,907,615.37	108
A570848	2006	\$59,850,162.28	173
A570848	2007	\$75,567,688.06	185

<b>Appendix C</b>			
<b>Open Bills By Case Number and Fiscal Year</b>			
<b>AD/CVD Case Number</b>	<b>Bill Fiscal Year</b>	<b>AD/CVD Bill Amount</b>	<b>Bill Count</b>
A570848	2008	\$11,623,436.10	73
A570848	2009	\$38,429,669.72	130
A570848	2010	\$5,426,738.26	23
A570848	2011	\$15,469,581.97	16
A570848	2012	\$5,523,510.83	14
<b>A570848 Total</b>		<b>\$393,659,583.32</b>	<b>1,007</b>
A570851	2002	\$204,172.08	3
A570851	2003	\$257,770.61	11
A570851	2004	\$4,572,645.46	134
A570851	2005	\$18,250,173.49	508
A570851	2006	\$493,808.57	16
A570851	2007	\$14,235,462.16	235
A570851	2008	\$40,335,716.00	1,055
A570851	2009	\$12,462,119.83	643
A570851	2010	\$18,985,000.06	637
A570851	2011	\$2,929,093.73	74
A570851	2012	\$7,760,607.11	714
<b>A570851 Total</b>		<b>\$120,486,569.10</b>	<b>4,030</b>
A570855	2004	\$357,621.61	7
<b>A570855 Total</b>		<b>\$357,621.61</b>	<b>7</b>
A570862	2004	\$1,365,873.71	2
<b>A570862 Total</b>		<b>\$1,365,873.71</b>	<b>2</b>
A570863	2003	\$1,740,456.86	6
A570863	2005	\$9,519,834.83	80
A570863	2006	\$2,007,776.42	33
A570863	2007	\$29,530,836.45	569
A570863	2008	\$1,923,630.72	59
A570863	2009	\$63,594,536.63	671
A570863	2010	\$38,566,204.96	331
A570863	2011	\$18,873,751.56	131
A570863	2012	\$12,132,007.38	283
<b>A570863 Total</b>		<b>\$177,889,035.81</b>	<b>2,163</b>
A570864	2006	\$4,103,636.18	6
A570864	2009	\$629,033.49	1
<b>A570864 Total</b>		<b>\$4,732,669.67</b>	<b>7</b>
A570865	2010	\$79,720.71	1
<b>A570865 Total</b>		<b>\$79,720.71</b>	<b>1</b>
A570868	2005	\$505,458.93	2
A570868	2007	\$254,697.78	1
A570868	2012	\$9.01	1

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
<b>A570868 Total</b>		<b>\$760,165.72</b>	<b>4</b>
A570870	2012	\$43,767.56	1
<b>A570870 Total</b>		<b>\$43,767.56</b>	<b>1</b>
A570886	2007	\$7,424.15	1
A570886	2008	\$86,369.59	7
A570886	2009	\$408,429.83	30
A570886	2010	\$53,532.96	3
A570886	2011	\$84,807.69	2
A570886	2012	\$165,943.06	3
<b>A570886 Total</b>		<b>\$806,507.28</b>	<b>46</b>
A570890	2007	\$105,862.25	84
A570890	2008	\$731,539.56	34
A570890	2009	\$85,183,826.33	2,907
A570890	2010	\$48,465,865.03	2,602
A570890	2011	\$156,327,199.66	3,331
A570890	2012	\$78,467,383.94	2,742
<b>A570890 Total</b>		<b>\$369,281,676.77</b>	<b>11,700</b>
A570891	2007	\$3,530,179.09	22
A570891	2008	\$4,719,963.52	78
A570891	2009	\$391,847.31	6
A570891	2010	\$361,470.47	13
A570891	2011	\$1,017,108.27	28
<b>A570891 Total</b>		<b>\$10,020,568.66</b>	<b>147</b>
A570892	2009	\$151,914.23	1
A570892	2011	\$272,242.05	2
A570892	2012	\$1,461,083.43	4
<b>A570892 Total</b>		<b>\$1,885,239.71</b>	<b>7</b>
A570893	2008	\$5,450,179.60	46
A570893	2010	\$3,421,928.65	31
A570893	2011	\$929,202.02	4
<b>A570893 Total</b>		<b>\$9,801,310.27</b>	<b>81</b>
A570898	2011	\$3,437,519.71	9
A570898	2012	\$177,642.07	1
<b>A570898 Total</b>		<b>\$3,615,161.78</b>	<b>10</b>
A570899	2010	\$62,485.73	24
<b>A570899 Total</b>		<b>\$62,485.73</b>	<b>24</b>
A570901	2009	\$44,254.61	2
A570901	2011	\$336,766.82	2
<b>A570901 Total</b>		<b>\$381,021.43</b>	<b>4</b>
A570904	2011	\$222,843.38	4

<b>Appendix C</b>			
<b>Open Bills By Case Number and Fiscal Year</b>			
<b>AD/CVD Case Number</b>	<b>Bill Fiscal Year</b>	<b>AD/CVD Bill Amount</b>	<b>Bill Count</b>
A570904	2012	\$220,203.64	16
<b>A570904 Total</b>		<b>\$443,047.02</b>	<b>20</b>
A570905	2010	\$254,948.11	251
A570905	2011	\$52,720.94	96
A570905	2012	\$30,104.97	8
<b>A570905 Total</b>		<b>\$337,774.02</b>	<b>355</b>
A570909	2011	\$1,112,003.97	34
A570909	2012	\$745,042.59	44
<b>A570909 Total</b>		<b>\$1,857,046.56</b>	<b>78</b>
A570910	2012	\$40,994.76	2
<b>A570910 Total</b>		<b>\$40,994.76</b>	<b>2</b>
A570912	2010	\$54,996.79	4
A570912	2011	\$7,112,295.11	119
A570912	2012	\$3,061,064.58	73
<b>A570912 Total</b>		<b>\$10,228,356.48</b>	<b>196</b>
A570914	2011	\$67,313.83	1
<b>A570914 Total</b>		<b>\$67,313.83</b>	<b>1</b>
A570916	2012	\$6,407.54	1
<b>A570916 Total</b>		<b>\$6,407.54</b>	<b>1</b>
A570918	2010	\$244,476.77	4
A570918	2011	\$6,110.67	1
A570918	2012	\$1,589,672.00	44
<b>A570918 Total</b>		<b>\$1,840,259.44</b>	<b>49</b>
A570922	2012	\$30,232.28	2
<b>A570922 Total</b>		<b>\$30,232.28</b>	<b>2</b>
A570928	2011	\$1,180,551.77	29
<b>A570928 Total</b>		<b>\$1,180,551.77</b>	<b>29</b>
A570932	2012	\$302,108.74	3
<b>A570932 Total</b>		<b>\$302,108.74</b>	<b>3</b>
A570937	2012	\$245,559.70	4
<b>A570937 Total</b>		<b>\$245,559.70</b>	<b>4</b>
A570941	2012	\$31,386.53	4
<b>A570941 Total</b>		<b>\$31,386.53</b>	<b>4</b>
A580601	2001	\$14,674.71	5
<b>A580601 Total</b>		<b>\$14,674.71</b>	<b>5</b>
A580807	2003	\$7,640.98	1
A580807	2005	\$32,257.36	2
<b>A580807 Total</b>		<b>\$39,898.34</b>	<b>3</b>
A580809	2004	\$78,453.98	6
A580809	2010	\$37,457.27	1

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
<b>A580809 Total</b>		<b>\$115,911.25</b>	<b>7</b>
A580810	2004	\$1,412.10	1
<b>A580810 Total</b>		<b>\$1,412.10</b>	<b>1</b>
A580816	2009	\$3,490.00	3
A580816	2010	\$22,980.35	3
A580816	2011	\$158,042.87	2
<b>A580816 Total</b>		<b>\$184,513.22</b>	<b>8</b>
A580839	2005	\$71,251.12	13
A580839	2011	\$21,481.78	1
<b>A580839 Total</b>		<b>\$92,732.90</b>	<b>14</b>
A583008	2003	\$370,702.91	15
A583008	2012	\$1,051,206.48	101
<b>A583008 Total</b>		<b>\$1,421,909.39</b>	<b>116</b>
A583009	2004	\$402.82	1
A583009	2005	\$2,454,336.21	76
<b>A583009 Total</b>		<b>\$2,454,739.03</b>	<b>77</b>
A583212	2004	\$10,852.83	1
<b>A583212 Total</b>		<b>\$10,852.83</b>	<b>1</b>
A583806	2006	\$40,682.58	3
<b>A583806 Total</b>		<b>\$40,682.58</b>	<b>3</b>
A583831	2005	\$8,648.65	2
A583831	2007	\$36,261.44	5
A583831	2008	\$3,931.91	1
A583831	2009	\$317,339.80	31
<b>A583831 Total</b>		<b>\$366,181.80</b>	<b>39</b>
A588045	2011	\$51,979.52	42
A588045	2012	\$504,353.62	59
<b>A588045 Total</b>		<b>\$556,333.14</b>	<b>101</b>
A588054	2003	\$39.11	2
A588054	2005	\$54.49	1
<b>A588054 Total</b>		<b>\$93.60</b>	<b>3</b>
A588087	2004	\$3,889.17	1
<b>A588087 Total</b>		<b>\$3,889.17</b>	<b>1</b>
A588201	2002	\$5,050.94	9
A588201	2006	\$64,954.42	20
A588201	2007	\$150,731.43	27
A588201	2008	\$86,495.24	33
A588201	2011	\$53,359.87	3
<b>A588201 Total</b>		<b>\$360,591.90</b>	<b>92</b>
A588215	2006	\$136,521.64	1

Appendix C			
Open Bills By Case Number and Fiscal Year			
AD/CVD Case Number	Bill Fiscal Year	AD/CVD Bill Amount	Bill Count
<b>A588215 Total</b>		<b>\$136,521.64</b>	<b>1</b>
A588604	2003	\$253.47	2
<b>A588604 Total</b>		<b>\$253.47</b>	<b>2</b>
A588807	2002	\$18,911.05	8
<b>A588807 Total</b>		<b>\$18,911.05</b>	<b>8</b>
A588833	2012	\$3,136.53	1
<b>A588833 Total</b>		<b>\$3,136.53</b>	<b>1</b>
A588845	2007	\$23,081.58	1
<b>A588845 Total</b>		<b>\$23,081.58</b>	<b>1</b>
C412222	2007	\$72,831.96	1
<b>C412222 Total</b>		<b>\$72,831.96</b>	<b>1</b>
C475819	2006	\$16,990.56	38
C475819	2010	\$854.83	48
<b>C475819 Total</b>		<b>\$17,845.39</b>	<b>86</b>
C489806	2011	\$1,861.14	1
<b>C489806 Total</b>		<b>\$1,861.14</b>	<b>1</b>
C533063	2001	\$27,859.95	8
C533063	2002	\$3,116.39	6
C533063	2003	\$2,952.66	4
<b>C533063 Total</b>		<b>\$33,929.00</b>	<b>18</b>
C533222	2008	\$6,694.47	1
<b>C533222 Total</b>		<b>\$6,694.47</b>	<b>1</b>
C533821	2012	\$719,157.17	3
<b>C533821 Total</b>		<b>\$719,157.17</b>	<b>3</b>
C533825	2007	\$38,540.25	4
C533825	2008	\$20,736.77	2
<b>C533825 Total</b>		<b>\$59,277.02</b>	<b>6</b>
C552805	2011	\$94,145.51	20
<b>C552805 Total</b>		<b>\$94,145.51</b>	<b>20</b>
C570911	2012	\$22,085.05	2
<b>C570911 Total</b>		<b>\$22,085.05</b>	<b>2</b>
C570913	2010	\$11,696.29	5
C570913	2011	\$69,768.12	105
C570913	2012	\$22,561.37	67
<b>C570913 Total</b>		<b>\$104,025.78</b>	<b>177</b>
C570923	2012	\$8,970.32	2
<b>C570923 Total</b>		<b>\$8,970.32</b>	<b>2</b>
C570942	2012	\$52,123.28	3
<b>C570942 Total</b>		<b>\$52,123.28</b>	<b>3</b>
C570968	2012	\$477,765.91	7

<b>Appendix C</b>			
<b>Open Bills By Case Number and Fiscal Year</b>			
<b>AD/CVD Case Number</b>	<b>Bill Fiscal Year</b>	<b>AD/CVD Bill Amount</b>	<b>Bill Count</b>
<b>C570968 Total</b>		<b>\$477,765.91</b>	<b>7</b>
C580207	2001	\$146.16	1
<b>C580027 Total</b>		<b>\$146.16</b>	<b>1</b>
C580208	2001	\$8,233.20	1
C580208	2009	\$60.37	3
C580208	2010	\$2,627.80	3
<b>C580208 Total</b>		<b>\$10,921.37</b>	<b>7</b>
<b>Grand Total</b>		<b>\$1,790,380,859.63</b>	<b>35,062</b>

## Appendix D: 2012 Clearing Account Balances

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A100108	Corrosion Resistant Carbon Steel Flat Products/United States	7,818.53	
A122006	Steel Jacks/Canada	400.53	
A122212	Korean DRAMs of 1 Meg+/Canada	94.42	
A122217	Taiwan SRAMs/Canada	443.80	
A122503	Iron Construction Castings/Canada	3,914.65	
A122605	Color Picture Tubes/Canada	1,641.23	
A122804	Steel Rails/Canada	873.94	
A122820	Hot-Rolled Carbon Steel Flat Products/Canada	296.14	
A122822	Corrosion-resistant Carbon Steel Flat Products/Canada	5,876.98	
A122840	Carbon and Certain Alloy Steel Wire Rod/Canada	9,128,559.73	
A201108	Corrosion-Resistant Carbon Steel Flat Products/Mexico	40.97	
A201212	Korean DRAMs of 1 Meg+/Mexico	33.48	
A201215	Casings and Tubing/Mexico	459,124.86	
A201216	Drill Pipe/Mexico	145,327.51	
A201601	Fresh Cut Flowers/Mexico	369.25	
A201805	Circular Welded Nonalloy Steel Pipe/Mexico	40,501.26	
A201817	Oil Country Tubular Goods/Mexico	160,127.77	
A201822	Stainless Steel Sheet and Strip/Mexico	23,614,148.51	
A201827	Large-diameter Carbon Steel Seamless Pipe/Mexico	3,089.44	
A201830	Carbon and Certain Alloy Steel Wire Rod/Mexico	795,327.19	
A201831	Prestressed Concrete Steel Wire Strand/Mexico	120.54	
A201836	Light-Walled Rectangular Pipe and Tube/Mexico	2,464.33	
A301602	Fresh Cut Flowers/Colombia	100.00	
A307701	Aluminum Rod/Venezuela	600.00	
A331802	Certain Frozen or Canned Warmwater Shrimp and Prawns/Ecuador	107,808.18	
A337602	Standard Carnations/Chile	152.41	
A337803	Fresh Atlantic Salmon/Chile	23,447.38	
A337806	Individually Quick Frozen Red Raspberries/Chile	70,289.96	
A351108	Corrosion-Resistant Carbon Steel Flat Products/Brazil	3,640.03	
A351109	Cut-to-Length Carbon Steel Plate/Brazil	2,277.18	
A351804	Industrial Nitrocellulose/Brazil	6,879.56	
A351824	Silicomanganese/Brazil	15,182.64	
A351825	Stainless Steel Bar/Brazil	64,089.66	
A351826	Seamless Pipe/Brazil	72,310.28	
A351838	Certain Frozen or Canned Warmwater Shrimp and Prawns/Brazil	103,201.60	
A351840	Certain Orange Juice/Brazil	19,206,355.43	
A357215	Casings and Tubing/Argentina	18,656.41	
A357216	Drill Pipe/Argentina	2,266.04	
A357802	Light Walled Rectangular Tube/Argentina	4,356.56	

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A357812	Honey/Argentina	6,955.20	
A401108	Corrosion-Resistant Carbon Steel Flat Products/Sweden	910.43	
A401109	Cut-to-length Carbon Steel Plate/Sweden	476.48	
A401201	Ball Bearings/Sweden	16,939.66	
A401203	Cylindrical Roller Bearings/Sweden	21.36	
A401601	Brass Sheet and Strip/Sweden	45.67	
A401603	Stainless Steel Hollow Products/Sweden	144.47	
A401805	Cut-to-length Carbon Steel Plate/Sweden	64,095.86	
A401806	Stainless Steel Wire Rod/Sweden	12,902.68	
A401808	Purified Carboxymethylcellulose/Sweden	13,694.54	
A403801	Fresh and Chilled Atlantic Salmon/Norway	39,388.69	
A405803	Purified Carboxymethylcellulose/Finland	3,804.60	
A412108	Corrosion-Resistant Carbon Steel Flat Products/United Kingdom	12,265.17	
A412201	Ball Bearings/United Kingdom	2,319,449.58	
A412203	Cylindrical Roller Bearings/United Kingdom	44,316.53	
A412212	Korean DRAMs of 1 Meg+/United Kingdom	85,265.25	
A412602	Certain Forged Steel Crankshafts/United Kingdom	13,334.67	
A412803	Industrial Nitrocellulose/United Kingdom	137,323.56	
A412806	Gene Amplification Thermal Cyclers and Subassemblies Thereof/United Kingdom	99.13	
A412822	Stainless Steel Bar/United Kingdom	11,930.36	
A419212	Korean DRAMs of 1 Meg+/Ireland	369.44	
A421108	Corrosion Resistant Carbon Steel Flat Products/Netherlands	995.93	
A421212	Korean DRAMs of 1 Meg+/Netherlands	21,247.88	
A421811	Purified Carboxymethylcellulose/Netherlands	53,157.63	
A423077	Sugar/Belgium	1,997.17	
A423108	Corrosion-Resistant Carbon Steel Flat Products/Belgium	4,148.97	
A423602	Industrial Phosphoric Acid/Belgium	1,306.56	
A423801	Coated Groundwood Paper/Belgium	20,774.58	
A423805	Cut-to-length Carbon Steel Plate/Belgium	13,693.43	
A423808	Stainless Steel Plate in Coils/Belgium	2,451,997.78	
A427001	Sorbitol/France	25,423.78	
A427009	Industrial Nitrocellulose/France	12,598.39	
A427108	Corrosion-Resistant Carbon Steel Flat Products/France	942.62	
A427201	Ball Bearings/France	1,476,211.36	
A427203	Cylindrical Roller Bearings/France	18,391.38	
A427205	Spherical Plain Bearings/France	48,066.47	
A427212	Korean DRAMs of 1 Meg+/France	826.14	
A427811	Stainless Steel Wire Rod/France	23,729.83	
A427814	Stainless Steel Sheet and Strip/France	378,844.53	
A427820	Stainless Steel Bar/France	64,417.79	
A428082	Sugar/Germany	5,472.83	

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A428108	Corrosion-Resistant Carbon Steel Flat Products/Germany	97,903.82	
A428109	Cut-to-Length Carbon Steel Plate/Germany	6,827.81	
A428201	Ball Bearings/Germany	1,205,780.33	
A428203	Cylindrical Roller Bearings/Germany	146,182.30	
A428205	Spherical Plain Bearings/Germany	45,335.72	
A428212	Korean DRAMs of 1 Meg+/Germany	971.61	
A428602	Brass Sheet and Strip/Germany	7,176.71	
A428802	Industrial Belts/Germany	12,677.60	
A428803	Industrial Nitrocellulose/Germany	181,358.07	
A428814	Cold-rolled Carbon Steel Flat Products/Germany	50,218.37	
A428815	Corrosion-resistant Carbon Steel Flat Products/Germany	1,984,320.47	
A428816	Cut-to-length Carbon Steel Plate/Germany	29,403.06	
A428820	Seamless Pipe/Germany	8,869.10	
A428821	Large Newspaper Printing Presses/Germany	22,232.10	
A428824	Stainless Steel Wire Rod/Germany	28,760.62	
A428825	Stainless Steel Sheet and Strip/Germany	160,688.11	
A428830	Stainless Steel Bar/Germany	128,395.46	
A428832	Carbon and Alloy Steel Wire Rod/Germany	1,991.23	
A428834	Cold Rolled Carbon Steel Flat Products/Germany	3,138.82	
A433108	Corrosion-Resistant Carbon Steel Flat Products/Austria	67,362.34	
A449804	Steel Concrete Reinforcing Bar/Latvia	1,721.18	
A462315	Cut-to-Length Carbon Steel Plate/Ukraine	457.25	
A462819	Magnesium Metal/Russia	6,448,346.96	
A470108	Corrosion-Resistant Carbon Steel Flat Products/Spain	1,911.60	
A470805	Stainless Steel Bar/Spain	31,231.77	
A470807	Stainless Steel Wire Rod/Spain	49,082.84	
A470814	Chlorinated Isocyanurates/Spain	44,258.23	
A475059	Pressure-sensitive Plastic Tape/Italy	9,966.91	
A475108	Corrosion-Resistant Carbon Steel Flat Products/Italy	2,776.18	
A475201	Ball Bearings/Italy	1,239,610.48	
A475203	Cylindrical Roller Bearings/Italy	12,136.58	
A475212	Korean DRAMs of 1 Meg+/Italy	2,495.56	
A475215	Casings and Tubings/Italy	45,670.16	
A475401	Brass Fire Protection Equipment/Italy	447.11	
A475601	Brass Sheet and Strip/Italy	5,893.91	
A475603	Tapered Roller Bearings/Italy	2,452.36	
A475703	Granular Polytetrafluoroethylene/Italy	1,106.97	
A475802	Industrial Belts/Italy	4,216.14	
A475811	Grain-oriented Silicon Electrical Steel/Italy	391.49	
A475814	Seamless Pipe/Italy	30.24	
A475818	Pasta/Italy	400,718.04	
A475820	Stainless Steel Wire Rod/Italy	10,474.97	
A475822	Stainless Steel Plate in Coils/Italy	497.32	

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A475824	Stainless Steel Sheet and Strip/Italy	2,185.14	
A475826	Cut-to-length Carbon Steel Plate/Italy	21,815.84	
A475828	Stainless Steel Butt-weld Pipe Fittings/Italy	3.72	
A475829	Stainless Steel Bar/Italy	31,996.46	
A485109	Cut-to-Length Carbon Steel Plate/Romania	562.80	
A485602	Tapered Roller Bearings/Romania	166.31	
A485803	Cut-to-length Carbon Steel Plate/Romania	835.95	
A485805	Small-diameter Carbon Steel Seamless Pipe/Romania	6,164.70	
A489501	Welded Carbon Steel Pipe and Tube/Turkey	4,669.41	
A489602	Aspirin/Turkey	2,609.19	
A489805	Pasta/Turkey	4,241.23	
A489807	Steel Concrete Reinforcing Bar/Turkey	69,358.48	
A507502	Raw In-shell Pistachios/Iran	908.50	
A533502	Welded Carbon Steel Pipe and Tube/India	2,318.65	
A533806	Sulfanilic Acid/India	753.56	
A533808	Stainless Steel Wire Rod/India	25,024.65	
A533809	Forged Stainless Steel Flanges/India	76,404.94	
A533810	Stainless Steel Bar/India	26,847.55	
A533813	Preserved Mushrooms/India	92,424.45	
A533820	Hot-rolled Steel Products/India	936,045.57	
A533824	PET Film, Sheet and Strip/India	352,792.87	
A533840	Certain Frozen or Canned Warmwater Shrimp and Prawns/India	325,217.01	
A533843	Certain Lined Paper School Supplies/India	50,041.51	
A549201	Ball Bearings/Thailand	0.03	
A549502	Welded Carbon Steel Pipe and Tube/Thailand	39,473.23	
A549601	Malleable Cast Iron Pipe Fittings/Thailand	755.89	
A549807	Carbon Steel Butt-weld Pipe Fittings/Thailand	859.05	
A549813	Canned Pineapple/Thailand	620,047.57	
A549817	Hot-rolled Steel Products/Thailand	141,551.45	
A549821	Polyethylene Retail Carrier Bags/Thailand	137,100.81	
A549822	Certain Frozen or Canned Warmwater Shrimp and Prawns/Thailand	593,877.21	
A552801	Certain Frozen Fish Fillets/Vietnam	1,207,010.24	
A552802	Certain Frozen or Canned Warmwater Shrimp and Prawns/Vietnam	2,818,655.13	
A555801	Certain Frozen Fish Fillets/Cambodia	38,615.46	
A557212	Korean DRAMs of 1 Meg+/Malaysia	2,937.46	
A557217	Taiwan SRAMs/Malaysia	6,533.47	
A557805	Extruded Rubber Thread/Malaysia	368,195.80	
A557809	Stainless Steel Butt-weld Pipe Fittings/Malaysia	4,718.54	
A559201	Ball Bearings/Singapore	14,499.68	
A559212	Korean DRAMs of 1 Meg+/Singapore	11,851.00	
A559217	Taiwan SRAMs/Singapore	33.40	

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<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A559801	Ball Bearings/Singapore	455.95	
A560802	Preserved Mushrooms/Indonesia	626,013.56	
A560820	Coated Free Sheet Paper/Indonesia	1,642.47	
A560834	Not Available	3,949.54	
A565801	Stainless Steel Butt-weld Pipe Fittings/Philippines	5,031.41	
A570001	Potassium Permanganate/China	37,442.79	
A570003	Cotton Shop Towels/China	2,906.91	
A570007	Barium Chloride/China	17,070.79	
A570201	Hammers and Sledges/China	112,024.85	
A570202	Bars and Wedges/China	146,419.27	
A570203	Picks and Mattocks/China	35,033.68	
A570204	Axes and Adzes/China	162,976.98	
A570212	Korean DRAMs of 1 Meg+/China	100.01	
A570213	Certain Compact Ductile Iron Waterworks Fittings and Glands/China	29,477.02	
A570501	Natural Bristle Paint Brushes/China	16,272.78	
A570502	Iron Construction Castings/China	105,818.40	
A570504	Petroleum Wax Candles/China	1,637,545.99	
A570506	Porcelain-on-steel Cooking Ware/China	59,040.29	
A570601	Tapered Roller Bearings/China	344,877.51	
A570804	Sparklers/China	28,449.24	
A570805	Sodium Thiosulfate/China	45,597.61	
A570806	Silicon Metal/China	165,061.31	
A570808	Chrome-plated Lug Nuts/China	28,239.04	
A570814	Carbon Steel Butt-weld Pipe Fittings/China	5,633.34	
A570822	Helical Spring Lock Washers/China	118,677.01	
A570825	Sebacic Acid/China	115,352.13	
A570826	Paper Clips/China	16,679.19	
A570827	Cased Pencils/China	1,032,363.95	
A570831	Fresh Garlic/China	10,186,137.59	
A570832	Pure Magnesium/China	58,941.07	
A570836	Glycine/China	52,723.40	
A570844	Melamine Institutional Dinnerware/China	2,235.41	
A570846	Brake Rotors/China	1,309,831.76	
A570848	Crawfish Tail Meat/China	2,424,090.22	
A570849	Cut-to-length Carbon Steel Plate/China	13,958.44	
A570851	Preserved Mushrooms/China	416,985.48	
A570853	Aspirin/China	3,936.05	
A570855	Non-frozen Apple Juice Concentrate/China	7,508.19	
A570860	Steel Concrete Reinforcing Bar/China	858.79	
A570863	Honey/China	10,127,651.79	
A570865	Hot Rolled Steel Products/China	5,300.09	
A570866	Folding Gift Boxes/China	36,756.14	

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<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A570867	Automotive Replacement Glass Windshields/China	84,457.51	
A570868	Folding Metal Tables and Chairs/China	218,511.75	
A570874	Ball Bearings/China	4,863.02	
A570875	Non-malleable Cast Iron Pipe Fittings/China	179,435.92	
A570877	Lawn & Garden Steel Fence Posts/China	40,764.11	
A570878	Saccharin/China	69,835.26	
A570879	Polyvinyl Alcohol/China	2,114.11	
A570881	Malleable Iron Pipe Fittings/China	55,461.56	
A570884	Certain Color Television Receivers/China	8,211.31	
A570886	Polyethylene Retail Carrier Bags/China	340,678.16	
A570888	Ironing Tables and Certain Parts Thereof/China	3,607,619.31	
A570890	Wooden Bedroom Furniture/China	8,914,909.03	
A570891	Hand Trucks and Certain Parts Thereof/China	689,467.77	
A570892	Carbazole Violet Pigment 23/China	381.29	
A570893	Certain Frozen or Canned Warmwater Shrimp and Prawns/China	8,394,305.40	
A570894	Certain Tissue Paper Products/China	1,754,914.26	
A570895	Certain Crepe Paper Products/China	16,065.84	
A570896	Alloy Magnesium/China	15,766.23	
A570898	Chlorinated Isocyanurates/China	11,778,747.97	
A570899	Artists' Canvas/China	795.36	
A570900	Diamond Sawblades and Parts Thereof/China	17.35	
A570901	Certain Lined Paper School Supplies/China	3,421,395.27	
A570904	Certain Activated Carbon/China	190,724.52	
A570905	Certain Polyester Staple Fiber/China	5,466.80	
A570908	Sodium Hexametaphosphate/China	24,494.48	
A570912	Off-the-road Tires/China	6,149.55	
A570916	Laminated Woven Sacks	25,926.05	
A580008	Color Television Receivers/Korea	119.88	
A580108	Corrosion-Resistant Carbon Steel Flat Products/Korea	157.74	
A580215	Casings and Tubing/Korea	246,708.93	
A580601	Top-of-the-stove Stainless Steel Cooking Ware/Korea	2,470.50	
A580605	Color Picture Tubes/Korea	2,276.91	
A580803	Small Business Telephone Systems/Korea	245,739.14	
A580805	Industrial Nitrocellulose/Korea	16,186.48	
A580807	PET Film, Sheet and Strip/Korea	27,002.86	
A580809	Circular Welded Nonalloy Steel Pipe/Korea	221,946.36	
A580810	Welded ASTM A-312 Stainless Steel Pipe/Korea	6,451.40	
A580811	Carbon Steel Wire Rope/Korea	22,738.65	
A580812	DRAMs of 1 Megabit and Above/Korea	22,757.65	
A580813	Stainless Steel Butt-weld Pipe Fittings/Korea	209,136.97	
A580815	Cold-rolled Carbon Steel Flat Products/Korea	4,712.27	
A580816	Corrosion-resistant Carbon Steel Flat Products/Korea	5,496,942.40	

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A580829	Stainless Steel Wire Rod/Korea	3,134.51	
A580831	Stainless Steel Plate in Coils/Korea	3,910.65	
A580834	Stainless Steel Sheet and Strip/Korea	444,457.84	
A580836	Cut-to-length Carbon Steel Plate/Korea	20,891.23	
A580839	Polyester Staple Fiber/Korea	69,476.87	
A580841	Structural Steel Beams/Korea	3,667.46	
A580847	Stainless Steel Bar/Korea	944.97	
A580850	Polyvinyl Alcohol/Korea	26,798.54	
A580855	Diamond Sawblades and Parts Thereof/Korea	456.87	
A582212	Korean DRAMs of 1 Meg+/Hong Kong	36,168.17	
A583008	Small Diameter Carbon Steel Pipe and Tube/Taiwan	16,821.10	
A583009	Color Television Receivers/Taiwan	11,205.60	
A583212	Korean DRAMs of 1 Meg+/Taiwan	607.37	
A583508	Porcelain-on-steel Cooking Ware/Taiwan	22,531.95	
A583605	Carbon Steel Butt-weld Pipe Fittings/Taiwan	2,352.78	
A583803	Light-walled Rectangular Tube/Taiwan	1,299.37	
A583806	Small Business Telephone Systems/Taiwan	34,776.82	
A583810	Chrome-plated Lug Nuts/Taiwan	71,076.81	
A583815	Welded ASTM A-312 Stainless Steel Pipe/Taiwan	9,479.04	
A583816	Stainless Steel Butt-weld Pipe Fittings/Taiwan	22,149.32	
A583820	Helical spring lock washers/Taiwan	4,702.12	
A583821	Forged Stainless Steel Flanges/Taiwan	2,707.68	
A583824	Polyvinyl Alcohol/Taiwan	15,315.02	
A583826	Collated Roofing Nails/Taiwan	20,078.37	
A583828	Stainless Steel Wire Rod/Taiwan	2,879.45	
A583830	Stainless Steel Plate in Coils/Taiwan	4,400.97	
A583831	Stainless Steel Sheet and Strip/Taiwan	97,719.10	
A583832	DRAMs of 1 Meg+/Taiwan	2,296.62	
A583833	Polyester Staple Fiber/Taiwan	30,407.84	
A583837	PET Film, Sheet and Strip/Taiwan	146,689.35	
A588014	Electronic Tuners/Japan	296.40	
A588028	Roller Chain/Japan	45,676.02	
A588046	Polychloroprene Rubber/Japan	57,673.00	
A588054	Tapered Roller Bearings 4 Inches and Under/Japan	27,559.96	
A588056	Melamine/Japan	141.84	
A588087	Portable Electric Typewriters/Japan	7,434.74	
A588108	Corrosion-Resistant Carbon Steel Flat Products/Japan	3,313.41	
A588201	Ball Bearings/Japan	39,275,008.34	
A588203	Cylindrical Roller Bearings/Japan	126,913.28	
A588205	Spherical Plain Bearings/Japan	4,970.40	
A588206	Active-Matrix LCD Flat Panel Displays/Japan	1,253.40	
A588207	Electroluminescent Flat-Panel Displays/Japan	1,822.87	
A588210	Professional Electric Cutting Tools/Japan	10,386.22	

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<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
A588212	Korean DRAMs of 1 Meg+/Japan	789.71	
A588215	Casings and Tubing/Japan	500,321.01	
A588217	Taiwan SRAMs/Japan	420,538.61	
A588404	Fabric Expanded Neoprene Laminate/Japan	119.18	
A588405	Cellular Mobile Telephones/Japan	8,083.70	
A588602	Carbon Steel Butt-weld Pipe Fittings/Japan	25,420.66	
A588604	Tapered Roller Bearings Over 4 Inches/Japan	304,930.81	
A588605	Malleable Cast Iron Pipe Fittings/Japan	296.71	
A588609	Color Picture Tubes/Japan	703.86	
A588702	Stainless Steel Butt-weld Pipe Fittings/Japan	69,828.77	
A588703	Internal Combustion Industrial Forklift Trucks/Japan	66,523.86	
A588704	Brass Sheet and Strip/Japan	854.79	
A588707	Granular Polytetrafluoroethylene/Japan	2,026.13	
A588802	3.5" Microdisks/Japan	88,207.83	
A588807	Industrial Belts/Japan	63,536.06	
A588810	Mechanical Transfer Presses/Japan	105,602.55	
A588812	Industrial Nitrocellulose/Japan	18,863.46	
A588814	PET Film Sheet and Strip/Japan	75.88	
A588820	New Minivans/Japan	14,122.49	
A588826	Corrosion-resistant Carbon Steel Flat Products/Japan	90,334.20	
A588833	Stainless Steel Bar/Japan	31,304.20	
A588837	Large Newspaper Printing Presses/Japan	45.78	
A588843	Stainless Steel Wire Rod/Japan	55,045.36	
A588845	Stainless Steel Sheet and Strip/Japan	151,962.11	
A588846	Hot-rolled Carbon Steel Flat Products/Japan	776,049.36	
A588847	Cut-to-length Carbon Steel Plate/Japan	5,903.67	
A588850	Large-diameter Carbon Steel Seamless Pipe/Japan	86,764.27	
A588851	Small-diameter Carbon Steel Seamless Pipe/Japan	39,087.84	
A588852	Structural Steel Beams/Japan	236.71	
A588854	Tin-mill Products/Japan	2,765.32	
A588857	Welded Large Diameter Line Pipe/Japan	155,681.07	
A588861	Polyvinyl Alcohol/Japan	9,807.21	
A588863	Wax and Wax/Resin Thermal Transfer Ribbon/Japan	5,041.11	
A588867	Metal Calendar Slides/Japan	3.99	
A602108	Corrosion-resistant Carbon Steel Flat Products/ Australia	177.75	
A602803	Corrosion-resistant Carbon Steel Flat Products/ Australia	5,177.45	
A791805	Stainless Steel Plate in Coils/South Africa	9,956.15	
A791811	Hot-rolled Carbon Steel Flat Products/South Africa	595.17	
A791819	Certain Aluminum Plate/South Africa	17,462.85	
C100222	DRAMs from Korea/United States		12,989.90
C122222	DRAMs from Korea/Canada		59,174.43
C122807	Fresh, Chilled and Frozen Pork/Canada		182.96
C122815	Pure and Alloy Magnesium/Canada		59,158.85

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
C122841	Carbon and Certain Alloy Steel Wire Rod/Canada		1,800.23
C201001	Leather Wearing Apparel/Mexico		111.36
C201003	Ceramic Tile/Mexico		18.81
C201017	Bricks/Mexico		487.01
C201222	DRAMs from Korea/Mexico		9,753.98
C274805	Carbon and Certain Alloy Steel Wire Rod/Trinidad & Tobago		98,389.67
C307702	Electrical Conductor Aluminum Redraw Rod/Venezuela		600.00
C331601	Fresh Cut Flowers/Ecuador		112.00
C337601	Standard Carnations/Chile		83.37
C351109	Cut-to-Length Carbon Steel Plate/Brazil		795.25
C357052	Non-Rubber Footwear/Argentina		169.77
C357803	Leather/Argentina		1,570.82
C357813	Honey/Argentina		43,698.87
C401209	Cut-to-Length Carbon Steel Plate/Sweden		11,295.47
C401401	Cold-rolled Carbon Steel Flat Products/Sweden		9,849.70
C403802	Fresh and Chilled Atlantic Salmon/Norway		4,978.89
C412046	European Union Sugar/United Kingdom		36.78
C412222	DRAMs from Korea/United Kingdom		9,285.46
C423209	Cut-to-Length Carbon Steel Plate/Belgium		11,815.12
C423809	Stainless Steel Plate in Coils/Belgium		772,132.51
C427046	European Union Sugar/France		41.47
C427109	Cut-to-Length Carbon Steel Plate/France		191.57
C427222	DRAMs from Korea/France		12,217.17
C427815	Stainless Steel Sheet and Strip/France		375,685.85
C427823	Cold-Rolled Carbon Steel Flat Products/France		162.39
C428046	European Union Sugar/Germany		32.25
C428207	Cold-Rolled Carbon Steel Products/Germany		1,682.73
C428208	Corrosion-Resistant Carbon Steel Flat Products/Germany		113,477.49
C428209	Cut-to-Length Carbon Steel Plate/Germany		16,512.03
C428222	DRAMs from Korea/Germany		12,027.40
C428829	Low Enriched Uranium/Germany		4.58
C435222	DRAMs from Korea/Czech Republic		1,869.48
C475109	Cut-to-Length Carbon Steel Plate/Italy		2,371.48
C475222	DRAMs from Korea/Italy		103,621.69
C475812	Grain-oriented Silicon Electrical Steel/Italy		3,833.90
C475815	Seamless Pipe/Italy		1,204.05
C475819	Pasta/Italy		335,500.98
C475821	Stainless Steel Wire Rod/Italy		2,128.09
C475830	Stainless Steel Bar/Italy		6,308.97
C489502	Welded Carbon Steel Pipe and Tube/Turkey		175,234.22
C489806	Pasta/Turkey		4,805.58
C507501	Raw In-shell Pistachios/Iran		490.63
C507601	Roasted In-shell Pistachios/Iran		6,081.24

<b>Appendix D</b>			
<b>Clearing Account Balances as of October 1, 2012*</b>			
<b>Case Number</b>	<b>Case Name</b>	<b>Initial Assessed Duty: Antidumping Duty (\$)</b>	<b>Initial Assessed Duty: Countervailing Duty (\$)</b>
C508222	DRAMs from Korea/Israel		124.90
C533063	Iron Metal Castings/India		8,528.36
C533821	Hot-rolled Steel Products/India		1,623,971.56
C533825	PET Film, Sheet and Strip/India		1,533,368.65
C533844	Certain Lined Paper School Supplies/India		104,601.54
C535001	Cotton Shop Towels/Pakistan		114,637.84
C542401	Certain Textile Mill Products and Apparel/Sri Lanka		100.00
C549222	DRAMs from Korea/Thailand		295.86
C549401	Certain Apparel/Thailand		3,798.84
C549701	Steel Wire Nails/Thailand		11,219.10
C549806	Steel Wire Rope/Thailand		1,634.56
C549818	Hot-rolled Steel Products/Thailand		419,250.30
C557222	DRAMs from Korea/Malaysia		4,803.03
C557806	Extruded Rubber Thread/Malaysia		34,895.70
C559201	Ball Bearings/Singapore		1,076.38
C559222	DRAMs from Korea/Singapore		22,837.04
C560222	DRAMs from Korea/Indonesia		43.60
C570222	DRAMs from Korea/China		668.12
C570907	Coated Free Sheet Paper/China		26,215.23
C570911	Circular Welded Carbon Quality Steel Pipe/China		151,106.92
C570913	Off-the-road Tires/China		2,708.10
C570917	Laminated Woven Sacks		91,495.41
C580207	Cold-Rolled Carbon Steel Flat Products/Korea		3,801.64
C580208	Corrosion-Resistant Carbon Steel Flat Products/Korea		1,461,513.03
C580602	Top-of-the-stove Stainless Steel Cooking Ware/Korea		266.25
C580835	Stainless Steel Sheet and Strip/Korea		150,118.80
C580837	Cut-to-length Carbon Steel Plate/Korea		139,749.78
C580842	Structural Steel Beams/Korea		92.61
C580851	DRAMS and DRAM Modules/Korea		154,496.94
C580857	Coated Free Sheet Paper/Korea		5,169.15
C583222	DRAMs from Korea/Taiwan		6,785.43
C588109	Cut-to-Length Carbon Steel Plate/Japan		587.66
C588222	DRAMs from Korea/Japan		1,268.63
C791806	Stainless Steel Plate in Coils/South Africa		1,040.90
C903222	DRAMs from Korea/Puerto Rico		17,308.97
<b>TOTAL</b>		<b>\$201,775,774.65</b>	<b>\$8,383,557.28</b>

\*These amounts represent duties filed with the entry. These are preliminary numbers and may be refunded at liquidation to the importer of record on the basis of Commerce's final determination on the case, which may not occur during the current year. Funds do not transfer from the Clearing Account to the Special Account for CDSOA distribution until liquidation occurs. The Clearing Account does not include additional duty assessed at liquidation or reliquidation.

## Appendix E: FY 2012 CDSOA Disbursement Information

<b>Appendix E</b>				
<b>FY 2012 CDSOA Disbursement Information</b>				
<b>Case Number</b>	<b>Case Name</b>	<b>2012 Available Amount</b>	<b>Adjustments*</b>	<b>2012 Amount Disbursed</b>
A331602	Fresh Cut Flowers/Ecuador	4.95	(4.95)	0.00
A337803	Fresh Atlantic Salmon/Chile	2,485.85	(2,485.85)	0.00
A351817	Cut-to-Length Carbon Steel Plate/Brazil	90.47	0.00	90.47
A351826	Seamless Pipe/Brazil	337.34	0.00	337.34
A351838	Certain Frozen Warmwater Shrimp and Prawns/Brazil	60,126.75	(31.21)	60,095.54
A357810	Oil Country Tubular Goods/Argentina	388.05	0.00	388.05
A357812	Honey/Argentina	8,562.80	0.02	8,562.82
A401040	Stainless Steel Plate/Sweden	27,125.19	0.00	27,125.19
A401203	Cylindrical Roller Bearings/Sweden (See A-401-801)	614.60	0.00	614.60
A401806	Stainless Steel Wire Rod/Sweden	5,448.25	0.00	5,448.25
A405803	Purified Carboxymethylcellulose/Finland	96,946.56	(96,946.56)	0.00
A412822	Stainless Steel Bar/United Kingdom	225.13	0.00	225.13
A421807	Hot-Rolled Steel Products/Netherlands	2,239,848.09	0.00	2,239,848.09
A423808	Stainless Steel Plate in Coils/Belgium	(8,527.59)	0.00	(8,527.59)
A427009	Industrial Nitrocellulose/France	2,006.58	(2,006.58)	0.00
A427201	Ball Bearings/France (See A-427-801)	(280,829.70)	170,129.61	(110,700.09)
A427820	Stainless Steel Bar/France	36,721.05	0.01	36,721.06
A428602	Brass Sheet and Strip/Germany	5,062.61	0.00	5,062.61
A428802	Industrial Belts/Germany	679.03	(679.03)	0.00
A428815	Corrosion-Resistant Carbon Steel Flat Products/Germany	5,910.00	0.00	5,910.00
A428816	Cut-to-Length Carbon Steel Plate/Germany	1,662.48	0.00	1,662.48
A428820	Seamless Pipe/Germany	365.87	0.00	365.87
A428821	Large Newspaper Printing Presses/Germany	793.96	(793.96)	0.00
A428825	Stainless Steel Sheet and Strip/Germany	91.08	0.01	91.09
A428830	Stainless Steel Bar/Germany	747.96	0.00	747.96
A469805	Stainless Steel Bar/Spain	1,189.31	0.01	1,189.32
A475059	Pressure-Sensitive Plastic Tape/Italy	10,821.01	0.00	10,821.01
A475703	Granular Polytetrafluoroethylene/Italy	337,202.34	0.00	337,202.34
A475802	Industrial Belts/Italy	2,659.70	(2,659.70)	0.00
A475814	Seamless Pipe/Italy	2.67	0.00	2.67
A475816	Oil Country Tubular Goods/Italy	1,446.11	0.00	1,446.11
A475818	Pasta/Italy	564,397.73	0.01	564,397.74
A475820	Stainless Steel Wire Rod/Italy	13,343.34	0.00	13,343.34
A475829	Stainless Steel Bar/Italy	(842.82)	0.01	(842.81)
A485803	Cut-to-Length Carbon Steel Plate/Romania	696.37	0.00	696.37
A489501	Welded Carbon Steel Pipe and Tube/Turkey	17.77	0.01	17.78

<b>Appendix E</b>				
<b>FY 2012 CDSOA Disbursement Information</b>				
<b>Case Number</b>	<b>Case Name</b>	<b>2012 Available Amount</b>	<b>Adjustments*</b>	<b>2012 Amount Disbursed</b>
A489807	Steel Concrete Reinforcing Bar/Turkey	52,810.41	0.00	52,810.41
A533808	Stainless Steel Wire Rod/India	23,872.26	0.00	23,872.26
A533809	Forged Stainless Steel Flanges/India	6,705.31	0.00	6,705.31
A533810	Stainless Steel Bar/India	97,986.03	(0.01)	97,986.02
A533813	Preserved Mushrooms/India	66,052.76	(38,267.56)	27,785.20
A533820	Hot-Rolled Steel Products/India	39,440.47	(0.01)	39,440.46
A533843	Certain Lined Paper School Supplies/India	111,683.80	0.00	111,683.80
A538802	Cotton Shop Towels/Bangladesh	121.45	(121.45)	0.00
A549502	Welded Carbon Steel Pipe and Tube/Thailand	1,462,034.17	(0.01)	1,462,034.16
A549807	Carbon Steel Butt-Weld Pipe Fittings/Thailand	91.89	(91.89)	0.00
A549813	Canned Pineapple/Thailand	43,825.03	(43,825.03)	0.00
A549821	Polyethylene Retail Carrier Bags/Thailand	347,573.71	0.01	347,573.72
A549822	Certain Frozen Warmwater Shrimp and Prawns/Thailand	41,319,490.77	(21,994.11)	41,297,496.66
A552801	Certain Frozen Fish Fillets/Vietnam	232,813.97	0.00	232,813.97
A552802	Certain Frozen Warmwater Shrimp and Prawns/Vietnam	326,309.39	(169.68)	326,139.71
A560802	Preserved Mushrooms/Indonesia	670,674.00	(387,457.82)	283,216.18
A560818	Certain Lined Paper School Supplies/Indonesia	4.89	0.00	4.89
A570501	Natural Bristle Paint Brushes/China	70.38	(70.38)	0.00
A570504	Petroleum Wax Candles/China	457,469.41	0.01	457,469.42
A570506	Porcelain-on-Steel Cooking Ware/China	26,481.39	0.00	26,481.39
A570601	Tapered Roller Bearings/China	311,749.69	0.00	311,749.69
A570803	Axes, Adzes, Bars, Hammers, Mattocks, Picks, Sledges and Wedges/China	1,311,006.77	0.00	1,311,006.77
A570822	Helical Spring Lock Washers/China	70,627.08	0.00	70,627.08
A570826	Paper Clips/China	35,996.10	(35,996.10)	0.00
A570827	Cased Pencils/China	5,250,556.53	0.00	5,250,556.53
A570831	Fresh Garlic/China	25,424,081.73	0.00	25,424,081.73
A570836	Glycine/China	144,539.48	0.00	144,539.48
A570844	Melamine Institutional Dinnerware/China	4.59	(4.59)	0.00
A570846	Brake Rotors/China	687,151.81	0.00	687,151.81
A570847	Persulfates/China	7,160.71	0.00	7,160.71
A570848	Crawfish Tail Meat/China	11,931,164.88	0.00	11,931,164.88
A570851	Preserved Mushrooms/China	3,047,291.42	(1,770,697.03)	1,276,594.39
A570855	Non-Frozen Apple Juice Concentrate/China	97,450.44	0.00	97,450.44
A570856	Synthetic Indigo/China	12,911.40	(12,911.40)	0.00
A570863	Honey/China	14,194,143.85	(0.01)	14,194,143.84
A570866	Folding Gift Boxes/China	837.68	(837.68)	0.00

<b>Appendix E</b>				
<b>FY 2012 CDSOA Disbursement Information</b>				
<b>Case Number</b>	<b>Case Name</b>	<b>2012 Available Amount</b>	<b>Adjustments*</b>	<b>2012 Amount Disbursed</b>
A570867	Automotive Replacement Glass Windshields/China	580.44	(580.44)	0.00
A570868	Folding Metal Tables and Chairs/China	321,740.32	(321,740.32)	0.00
A570875	Non-Malleable Cast Iron Pipe Fittings/China	2,478.92	0.00	2,478.92
A570877	Lawn and Garden Steel Fence Posts/China	309,149.51	(309,149.51)	0.00
A570881	Malleable Iron Pipe Fittings/China	131,693.52	0.00	131,693.52
A570886	Polyethylene Retail Carrier Bags/China	206,722.37	0.02	206,722.39
A570888	Ironing Tables and Certain Parts Thereof/China	5,929.36	0.00	5,929.36
A570891	Hand Trucks and Certain Parts Thereof/China	661,665.82	0.01	661,665.83
A570893	Certain Frozen Warmwater Shrimp and Prawns/China	343,487.93	(178.65)	343,309.28
A570894	Certain Tissue Paper Products/China	755,078.23	0.00	755,078.23
A570898	Chlorinated Isocyanurates/China	2,943,009.82	0.00	2,943,009.82
A570899	Artists' Canvas/China	65,811.71	0.00	65,811.71
A570901	Certain Lined Paper School Supplies/China	811,415.98	(0.01)	811,415.97
A570904	Certain Activated Carbon/China	3,051,763.98	0.00	3,051,763.98
A580008	Color Television Receivers/Korea	9,080.61	(9,080.61)	0.00
A580507	Malleable Cast Iron Pipe Fittings/Korea	38.81	0.00	38.81
A580605	Color Picture Tubes/Korea	304.89	(304.89)	0.00
A580807	PET Film/Korea	1,322.90	0.00	1,322.90
A580809	Circular Welded Nonalloy Steel Pipe/Korea	3,589.57	0.00	3,589.57
A580810	Welded ASTM A-312 Stainless Steel Pipe/Korea	1,175,239.43	0.00	1,175,239.43
A580811	Carbon Steel Wire Rope/Korea	400.05	(400.05)	0.00
A580812	DRAMs of 1 Megabit and Above/Korea	9,668.66	0.00	9,668.66
A580815	Cold-Rolled Carbon Steel Flat Products/Korea	15,037.13	0.00	15,037.13
A580816	Corrosion-Resistant Carbon Steel Flat Products/Korea	51,718.41	0.01	51,718.42
A580847	Stainless Steel Bar/Korea	454.52	0.00	454.52
A583009	Color Television Receivers/Taiwan	36,538.20	(36,538.20)	0.00
A583507	Malleable Cast Iron Pipe Fittings/Taiwan	584.16	0.00	584.16
A583605	Carbon Steel Butt-Weld Pipe Fittings/Taiwan	1,786.44	0.00	1,786.44
A583806	Small Business Telephone Systems/Taiwan	103.43	(103.43)	0.00
A583820	Helical Spring Lock Washers/Taiwan	3,419.57	0.00	3,419.57
A583826	Collated Roofing Nails/Taiwan	16,678.08	(16,678.08)	0.00
A583827	SRAMs/Taiwan	2,355.12	(2,355.12)	0.00
A583831	Stainless Steel Sheet and Strip/Taiwan	162,884.84	0.01	162,884.85
A588028	Roller Chain/Japan	12,527.22	(12,527.22)	0.00
A588045	Steel Wire Rope/Japan	3,149,954.84	(3,149,954.84)	0.00

<b>Appendix E</b>				
<b>FY 2012 CDSOA Disbursement Information</b>				
<b>Case Number</b>	<b>Case Name</b>	<b>2012 Available Amount</b>	<b>Adjustments*</b>	<b>2012 Amount Disbursed</b>
A588405	Cellular Mobile Telephones/Japan	157.36	(157.36)	0.00
A588602	Carbon Steel Butt-Weld Pipe Fittings/Japan	933.87	0.00	933.87
A588704	Brass Sheet and Strip/Japan	664.31	0.00	664.31
A588706	Nitrile Rubber/Japan	114,149.88	(114,149.88)	0.00
A588807	Industrial Belts/Japan	16,427.91	(16,427.91)	0.00
A588826	Corrosion-Resistant Carbon Steel Flat Products/Japan	4,895.66	0.00	4,895.66
A588833	Stainless Steel Bar/Japan	18,372.17	0.01	18,372.18
A588850	Large-Diameter Carbon Steel Seamless Pipe/Japan	2,740.07	0.00	2,740.07
A588851	Small-Diameter Carbon Steel Seamless Pipe/Japan	36.06	0.00	36.06
A588861	Polyvinyl Alcohol/Japan	40,725.20	(40,725.20)	0.00
C351818	Cut-to-Length Carbon Steel Plate/Brazil	93.91	0.00	93.91
C357813	Honey/Argentina	8,779.71	0.00	8,779.71
C423809	Stainless Steel Plate in Coils/Belgium	(9,937.47)	(0.01)	(9,937.48)
C427817	Cut-to-Length Carbon Steel Plate/France	997.31	(997.31)	0.00
C428208	Corrosion-Resistant Carbon Steel Flat Products/Germany (See C-428-817)	353.89	(0.01)	353.88
C428209	Cut-to-Length Carbon Steel Plate/Germany (See C-428-817)	7,915.95	0.00	7,915.95
C475817	Oil Country Tubular Goods/Italy	10.58	0.00	10.58
C475819	Pasta/Italy	157,205.05	0.01	157,205.06
C475830	Stainless Steel Bar/Italy	123.93	0.00	123.93
C489502	Welded Carbon Steel Pipe and Tube/Turkey	32,895.36	0.00	32,895.36
C533063	Iron Metal Castings/India	80.64	0.00	80.64
C533821	Hot-Rolled Steel Products/India	123,705.46	0.00	123,705.46
C535001	Cotton Shop Towels/Pakistan	187.90	(187.90)	0.00
C580207	Cold-Rolled Carbon Steel Flat Products/Korea (See C-580-818)	4,334.94	(0.01)	4,334.93
C580208	Corrosion-Resistant Carbon Steel Flat Products/Korea (See C-580-818)	23,572.41	0.00	23,572.41
C580835	Stainless Steel Sheet and Strip/Korea	234.15	0.00	234.15
C580837	Cut-to-Length Carbon Steel Plate/Korea	858.03	0.01	858.04
C580851	DRAMs and DRAM Modules/Korea	(83,545.99)	73,877.33	(9,668.66)
<b>GRAND TOTAL</b>		<b>\$125,681,189.58</b>	<b>(\$6,203,791.64)</b>	<b>\$119,474,907.14</b>
<b>LESS OFFSETS</b>				<b>(\$805,336.59)</b>
<b>TOTAL DISBURSED</b>				<b>\$118,669,570.55</b>

\*Adjustments may include reliquidations, administrative actions, or amounts held pending litigation.

## Appendix F: List of Acronyms

<b>Acronym</b>	<b>Definition</b>
ACE	Automated Commercial Environment
ACS	Automated Commercial System
AD/CVD	Antidumping/Countervailing Duty
CBP	U.S. Customs and Border Protection
CDSOA	Continued Dumping and Subsidy Offset Act
CEE	Center of Excellence and Expertise
CIT	U.S. Court of International Trade
COAC	Commercial Operations Advisory Committee
Commerce	U.S. Department of Commerce
DHS	Department of Homeland Security
FY	Fiscal Year
GAO	U.S. Government Accountability Office
HSI	Homeland Security Investigations (ICE)
ICE	U.S. Immigration and Customs Enforcement
NAFTA	North American Free Trade Agreement
OCC	Office of Chief Counsel (CBP)
PET	Polyethylene Terephthalate (film)
PTI	Priority Trade Issue
RED	Re-engineering Dumping (Team)
Treasury	U.S. Department of the Treasury
WTO	World Trade Organization

# EXHIBIT 8

## U.S. IMPORTS OF STEEL WIRE AND WIRE PRODUCTS FROM ASIA OTHER THAN CHINA

(CALENDAR YEARS 2009–2015)

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

**AMERICAN WIRE PRODUCERS ASSOCIATION**

**COMMENTS REGARDING THE GLOBAL STEEL INDUSTRY SITUATION  
AND ITS IMPACT ON THE U.S. STEEL INDUSTRY AND MARKET  
(DOCKET NUMBER USTR-2016-0001)**

MARCH 29, 2016

# U.S. IMPORTS OF STEEL WIRE AND WIRE PRODUCTS FROM ASIA OTHER THAN CHINA CALENDAR YEARS 2009–2015

QUANTITIES IN NET TONS FOR ALL PRODUCTS EXCEPT GARMENT HANGERS  
QUANTITIES OF GARMENT HANGERS IN UNITS

PRODUCT CATEGORIES										
YEAR	DRAWN WIRE	WIRE ROPE	WIRE STRAND*	WIRE SPRINGS	WOVEN WIRE FABRIC	WIRE GRILL, NETTING AND FENCING	NAILS AND STAPLES*	INDUSTRIAL FASTENERS	CHAINS AND PARTS	STEEL WIRE GARMENT HANGERS*
2009	50,174	48,556	51,735	15,990	13,416	8,660	171,303	439,980	15,079	838,585,293
2010	61,841	64,113	60,532	23,938	28,518	17,645	233,999	542,457	19,306	1,304,471,297
2011	52,504	65,034	71,474	23,495	33,729	17,657	252,364	545,342	24,303	1,059,677,477
2012	74,197	58,555	103,227	26,460	31,698	20,666	260,050	580,286	23,194	587,460,262
2013	69,053	55,297	142,623	20,947	27,207	16,542	294,434	638,279	20,845	269,924,476
2014	89,428	59,552	163,630	22,038	31,116	15,088	309,732	644,070	23,708	783,529,235
2015	104,592	47,669	153,731	21,545	29,173	13,546	318,992	684,563	24,246	1,124,522,710
CHANGE FROM 2009 TO 2015	108%	-2%	197%	35%	117%	56%	86%	56%	61%	34%

\* *Antidumping (AD) and/or countervailing duty (CVD) orders against imports from China.*

*Source: U.S. Department of Commerce and U.S. International Trade Commission, Trade DataWeb; AIS Import Report 3 (2009–2015).*