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July 1, 2019

Secretary of Commerce
Attn: Enforcement and Compliance
Central Records Unit, Room 18022
U.S. Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

A-489-829
Pages: 162
§751(a) review, 3/7/17-6/30/18
Office VII
BPI redacted at pp. 1,4-14,18-22 &
Exhs. S1-2-S1-15, S1-18-S1-42
Public version

Re: *Steel Concrete Reinforcing Bar from Turkey*;
Kaptan response to §A-C SQR

Dear Mr. Secretary:

Respondent Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. (“Kaptan Demir”) and its affiliates, by their counsel, respond herewith to the §§A-B-C supplemental questionnaire in the referenced proceeding. This submission is made electronically. A public version will be submitted within one business day.

This submission contains proprietary information for which we request proprietary treatment pursuant to 19 CFR §351.304. We agree that all proprietary information may be released under administrative protective order. Where possible, we have provided ranged figures for proprietary figures. This request for proprietary treatment uses the following codes:

Code	19 CFR §351.105(c) –	Reason
1	(1)	Business or trade secret
2	(2)	Production cost and elements thereof
3	(3)	Distribution cost and elements thereof
4	(4)	Terms of sale
5	(5)	Prices of individual sales, likely sales, offers
6	(6)	Names of particular customers, distributors or suppliers
7	(7)	Margin on individual sale
8	(8)	CVD – amount of benefit applied for or received
9	(9)	Name of source of proprietary information
11	(11)	Any other specific business proprietary information the release of which would cause substantial harm to the competitive position of the submitter
13		The question contains BPI

International Trade Administration/E&C

July 1, 2019

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The material for which proprietary treatment is requested is as follows:

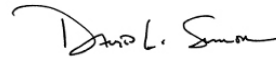
Page/Exh.	Reason	Code
1,4,5,7-14, 18,19,21,22		13
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All worksheets are BPI by reason of codes 1,2,3,4,6,11.

Respectfully submitted,



David L. Simon / Ayla Simon
 Counsel to Kaptan Group



**KAPTAN DEMİR ÇELİK
ENDÜSTRİSİ ve TİCARET A.Ş.**

COMPANY CERTIFICATION

I, Omer Engin Çebi, Export Operations Manager, currently employed by Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. and Kaptan Metal Dis Ticaret ve Nakliyat A.Ş. (collectively, "Kaptan"), certify that I prepared or otherwise supervised the preparation of the attached **response to section A,B,C supplemental questionnaire** due or filed on **July 1, 2019**, in the Antidumping Administrative Review of *Steel Concrete Reinforcing Bar from the Republic of Turkey* (A-489-829), for the period 3/7/17-6/30/18. I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that the public information and any business proprietary information of Kaptan and contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that I am filing a copy of this signed certification with this submission to the Department of Commerce.

Signed:


**KAPTAN DEMİR ÇELİK
ENDÜSTRİSİ ve TİCARET A.Ş.**

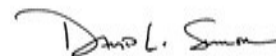
Date: July 1, 2019

KAPTAN DEMİR ÇELİK ENDÜSTRİSİ ve TİCARET A.Ş.

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CERTIFICATION OF COUNSEL

I, David L. Simon, with the Law Offices of David L. Simon, PLLC, counsel to Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. and its affiliates, certify that I have read the attached §A-C supplemental questionnaire response due or filed on July 1, 2019, in the administrative review of the antidumping order on rebar from Turkey, case No. A-489-829, for the period 3/7/17-6/30/18. In my capacity as counsel with respect to this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.



David L. Simon
July 1, 2019

CERTIFICATE OF SERVICE

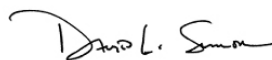
I, David L. Simon, certify that the attached submission was served by first-class mail, postage prepaid, on the following parties on July 1, 2019:

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(PUBLIC VERSION ONLY)



David L. Simon

BEFORE THE
UNITED STATES DEPARTMENT OF COMMERCE
ENFORCEMENT AND COMPLIANCE
Washington, DC, USA

Steel Concrete Reinforcing Bar from Turkey

A-489-829
Administrative Review:
3/7/2017-6/30/2018
E&C Office VII: AC

PUBLIC VERSION

**RESPONSE OF KAPTAN DEMİR ÇELİK ENDÜSTRİSİ VE TİCARET A.Ş.
AND ITS AFFILIATES TO SECTION A-C SUPPLEMENTAL
QUESTIONNAIRE**

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Date: July 1, 2019

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EXHIBIT LIST

Exhibit Name	Status
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Exhibit S1-2 Purchases and Sales from Affiliates	BPI
Exhibit S1-3 Distribution Flowchart (HM)	BPI
Exhibit S1-4 Distribution Flowchart (US)	BPI
Exhibit S1-5 Selling Functions Chart	BPI
Exhibit S1-6 Affiliated Party Financial Statements	BPI
Exhibit S1-7 Cebi Trans Documentation	BPI
Exhibit S1-8 Unaffiliated Freight Documentation	BPI
Exhibit S1-9 List of Freight Companies	BPI
Exhibit S1-10 Affiliated Party Freight Contract	BPI
Exhibit S1-11 Sample Invoices from Unaffiliated Freight Companies	BPI
Exhibit S1-12 Freight Arm's Length Chart	BPI
Exhibit S1-13 Freight Invoices for Missing DESTH	BPI
Exhibit S1-14 Revised Home Market Sales Listing (Actual Weight Basis)	BPI
Exhibit S1-15 Sample Freight Documentation for Tekirdag and Istanbul	BPI
Exhibit S1-16 Plant to Port Distance	Public
Exhibit S1-18 Freight Reconciliations	BPI
Exhibit S1-19 Revised Short Term TL Borrowing Rate	BPI
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Exhibit S1-42 Revised Alloy Cost Reallocation	BPI

This is the response of Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. (Kaptan) to the June 11, 2019, supplemental questionnaire of the Department of Commerce in the antidumping administrative review of steel concrete reinforcing bar (rebar) from Turkey, A-489-829, for the period March 7, 2017 through June 30, 2018.

Supplemental Questionnaire Sections A-C

Section A

1. Provide an updated organizational chart and narrative response regarding Kaptan's operating structure, consistently identifying the titles of the business units.

Kaptan provides an updated organizational chart in Exhibit S1-1.

- a. As requested in the initial questionnaire, provide narrative explanation of the functions each business unit performs.

Kaptan provides the requested narrative explanation of the functions each business unit performs in Exhibit S1-1.

- b. As requested in the initial questionnaire, identify the business units associated with the merchandise subject to this review.

As rebar is the primary product Kaptan manufactures, all business units are associated with the merchandise subject to review either related to sales/purchase/production or at an administrative level.

- c. Clarify the difference among []

These terms have been used interchangeably in the response.

- d. Identify and provide a narrative description of the functions performed by the "export department" and "production planning department" identified in

Kaptan's response to question 4(b) of the Section A questionnaire.

Production planning department is the same as production directorship. Export department is also explained under "Sales & Marketing Directorship" in Exhibit S1-1.

2. Kaptan's questionnaire response identified 11 affiliated entities involved in the production or sale of rebar. However, in response to questions 2(h) and (i), you stated, "not applicable."¹
 - a. Please explain the inconsistency between your responses and provide updated information on affiliated entities, if needed.

In response to question 2(d) in Section A, Kaptan provided brief descriptions of each group company that is involved in the production or sale of rebar.

Question 2(h) states (emphasis added):

Identify all suppliers, (sub)contractors, lenders, exporters, distributors, resellers, and other persons involved in the development, production, sale and/or distribution of the merchandise under review which Commerce may also consider affiliated with your company,...

Kaptan understood by Commerce's use of the word "also" that Commerce wanted Kaptan to identify any such affiliates that had not been previously identified in response to question 2. The word "also" means "in addition." ¹ Therefore, the question is asking about such affiliated companies "in addition to" those previously identified.

Since Kaptan had already listed all affiliated parties that have an involvement in the production and sale of rebar in response to question 2d, Kaptan accurately responded, "Not applicable. There are no such parties that the Department may consider affiliated with Kaptan," meaning that there were no such parties other than those previously identified.

In sum, all affiliated companies or individuals involved in development, production, sale and/or distribution of the merchandise under review have been identified in the responses preceding question 2.h.

- b. List the quantity and value of all business transactions between all affiliates

¹ <https://www.google.com/search?q=meaning+also&ie=utf-8&oe=utf-8>, accessed June 25, 2019.

identified in response to question 2(d) separated by transactions involving subject and non-subject merchandise.

Kaptan provides in Exhibit S1-2 revised listings which include all transactions (purchases and sales) between Kaptan and all the affiliated companies listed in question 2d.

3. Provide a flow chart to illustrate your method of distribution in the Turkish market.

Kaptan provides a flowchart in Exhibit S1-3 which illustrates Kaptan's method of distribution in the home market.

4. Explain the different channels used in the U.S. during the POR.

There is only one channel in the U.S. Please see Exhibit S1-4 which illustrates Kaptan's method of distribution in the U.S. market.

5. Provide a separate description and chart for each U.S. channel of distribution.

As noted above, there is only one channel in the U.S. Please see Exhibit S1-4 which illustrates Kaptan's method of distribution in the U.S. market.

In this channel, Kaptan ships directly to the customer's location by vessel.

As explained in Kaptan's Section A response, merchandise is sold on a CFR (Cost and Freight) basis. In most instances, Kaptan acted as the importer of record and therefore paid U.S. customs duties, AD/CVD duties, section 232 duties (if any) and U.S. brokerage. Kaptan is responsible for delivering the goods to the vessel and paying for the shipment. From that point, all activities thereafter, including unloading the cargo, are on the customer's account. The transportation to a U.S. port is arranged and paid for by Kaptan as a function of its sales transactions. Because most of Kaptan's sales to U.S. are on a free-out basis (i.e., customer is responsible for unloading at destination but seller is responsible for loading at port of exportation), Kaptan also arranges for all the loading and handling activities at the port of exportation. Also as part of the sales transaction, Kaptan is responsible to provide a mill test certificate to the customer, as proof that the merchandise is produced in conformity with ASTM standards. Kaptan usually also provides the customer a survey report from an independent inspection company. This report covers the quantity and quality of the merchandise shipped. Kaptan does not have any institutional presence in the U.S. or any other countries other

than Turkey. Therefore, all sales to the U.S. are made to unaffiliated customers on an export price basis. Merchandise sold to the U.S. is generally manufactured to order.

6. Fully describe all of the selling activities identified in Exhibit A-6. Provide consistent descriptions and titles of selling services provided for U.S. sales

Please see Exhibit S1-5 for a more detailed chart which describes the selling activities in A-6. The explanations provided replace the narrative response to question 3(c) in Kaptan's Section A response.

7. Specify which party pays the section 232 duties, report any such duties it pays in its U.S. sales database, and provide proof of payment.

Kaptan's latest entry in the POR for which Kaptan was the importer of record was on February 20, 2018, which was before the Section 232 duties were imposed. Hence, no 232 duties were paid for Kaptan's shipments that entered in this POR. In general terms, Kaptan pays the Section 232 duties when it is the importer of record.

8. Explain Kaptan's process for offering deferred payment terms. Include in this description the reason for providing [] for U.S. sales but [] for home market sales.

The difference in credit terms generally reflects a difference in the anticipated currency stability and credit risk as between the U.S. and home market. The dollar is generally stable over an extended period of time, while the Turkish lira is subject to a greater instability than the dollar.

9. Explain why your U.S. sales utilize contracts but your home market sales do not. Explain how, if at all, this divergence affects your date of sale records in your normal books and records and the date of sale reported to Commerce, which is "the earlier of date of shipment or date of invoice for both markets."

HM sales are generally in quantities of a few truckloads, and therefore each individual transaction is relatively small. The average quantity on each of the over-ten-thousand invoices in the HM sales database is about 90 Mtons. A truckload is generally 25 Mtons at most, since there are limits to the weight a truck may carry. The risk of loss on any given invoice is therefore relatively low, and so it is possible to proceed in a less detailed manner than for export sales. In fact, the common practice in the Turkish market is to structure sales exactly as Kaptan does it. If Kaptan were to require

substantially more structure in its individual sales, its customers would turn elsewhere rather than taking on an additional paperwork burden, while, for its part, Kaptan would have to hire substantially more staff to handle additional paperwork requirements. Finally, in the domestic market, Kaptan and its customers are operating within the same country and, hence, within the same legal system. Therefore, in the event of a substantial default, Kaptan is readily able to secure its rights. For these reasons, Kaptan maintains a lean sales structure in the domestic market.

For the U.S. market, each invoice covers, on average, nearly 2,000 Mtons of rebar. The risk of loss on an individual shipment is therefore much greater. Moreover, since Kaptan and its customer are in different jurisdictions, it is necessary to have a much more detailed understanding of each party's obligations and responsibilities. Furthermore, since payment is often by letter of credit, and is always through international banking channels, the parties to the sale must take into consideration the law concerning documentary transfers (letters of credit) and the laws concerning such other payment terms as cash against documents.

The difference in the sale methodology does not affect Kaptan's accounting recordations, since such recordations are made only on accounting events – here, issuance of an invoice. The entry into a sales agreement, in the case of U.S. sales, or the taking of an order in the case of HM sales, is not an accounting event and is not recorded in Kaptan's books of account. In fact, "date of sale" is an antidumping term only; it is not an accounting concept.

10. In Exhibit A-4, you identified [] as an affiliate involved in the manufacture and sale of subject merchandise. As requested in the initial questionnaire, please provide financial statements for [].

Please see **Exhibit S1-6 for the audited financial statement of [] for the year 2017.**

Section B

11. For each freight provider, explain how you calculated inland freight to the customer and provide sample documentation demonstrating and supporting your calculations.

Kaptan delivers rebar to its home market customers always on trucks. As noted in Kaptan's Section B response, Kaptan reports the inland freight for the delivery of the subject merchandise on a sales specific basis. Kaptan's sales team enters the unit freight rate in the sales system for each sale made on a delivered basis. The sales staff also checks the unit freights in the system against the actual freight invoice received. The amounts reported in field INLFTCH are based on the rates in the sales system.

As noted in Kaptan's Section B response, the deliveries are arranged and performed by both affiliated ([]) and unaffiliated parties

Sample documentation showing the sales and freight invoices as well as screen prints from the sales system showing the freight in the system are provided in Exhibit S1-7 for [] and Exhibit S1-8 for unaffiliated freight companies. Kaptan also demonstrates that [] freight rates are at arm's length in these exhibits. For the three destinations for which Kaptan provides samples (Altinsehir, Basaksehir, Silivri), [] charged the same freight rates as unaffiliated freight companies.

12. Identify all affiliated and unaffiliated parties that provided inland freight services during the POR and provide your freight contracts with each provider. Provide sample documentation of invoices for services performed by both affiliated and unaffiliated parties. Submit the financial statements of all affiliated freight providers.

A list of all freight providers in the POR is provided in Exhibit S1-9.

As noted above, the only affiliated freight provider is [], whose financial statements were provided in Exhibit A-10 in Kaptan's Section A response. Kaptan's freight contract with [] is provided in Exhibit S1-10. The unaffiliated freight providers are very small companies and Kaptan does not sign contracts with them. Sample invoices from unaffiliated freight providers are submitted in Exhibit S1-11. Kaptan includes a chart in this exhibit which ties the freight invoices to the home market sales listing.

13. Demonstrate that services provided by the affiliate were at arm's length prices.

Please see Exhibit S1-12. In Exhibit S1-7 and S1-8, Kaptan provides freight invoices for affiliated freight vendor [] and freight invoices for unaffiliated freight

providers. As summarized *Exhibit S1-12*, [] and unaffiliated freight providers charge the same freight rates for the same destination.

14. For the [] HM sales reporting inland freight costs, provide documentation showing that these sales were delivered, where they were delivered, the sale terms for each sale, the amount charged for the delivery, and the calculations you used to determine the amount reported in the HM sales database for inland freight.

Kaptan inadvertently did not report destination of the sales [] in the home market. These sales are on "delivered" terms and there are freight invoices for these sales. Kaptan accurately reported inland freight costs for these sales in the submitted home market sales data. Documentation such sales invoices, waybills and freight invoices is provided *Exhibit S1-13*. Kaptan also provides DESTH for these two transactions in the revised home market sales listing that is provided in *Exhibit S1-14*.

15. Provide a detailed description of your INLFTCH calculation for home market sales to []. Include supporting documentation.

The reported freight rates are accurate. As explained in the response to the question 11, Kaptan reported inland freight for home market sales on a sales specific basis. Kaptan provides sales invoices, waybills, and freight invoices for the lowest and highest INLFTCH rates for both [] sales in *Exhibit S1-15*. For the sale to [], the difference was due to the relative proximity of the delivery address to Kaptan's plant and shipment quantity. The delivery location for the freight invoice of [] was Misinli, almost next door to Kaptan's rolling mill, which is also in Misinli. The other transaction, for which [], was a location that is much further away from Kaptan's plant. Furthermore, in the latter instance, [], which increases the per unit freight cost.

For the sale to []L, it should be noted that Istanbul is a very large city with an area of 5,461 km² and the distance between two ends approaching 100 miles. Kaptan's Marmara Ereğlisi mill is located just west of Istanbul. As such, the distance from Kaptan's mill to locations in the western part of Istanbul (such as Silivri) is quite close while locations in easternmost parts of Istanbul are quite far and require use of highways, bridges, and tunnels with substantial tolls. In *Exhibit S1-15*, Kaptan provides two examples of sales for two sales shipped to different parts of Istanbul, i.e., Silivri and Maltepe to demonstrate the freight rate difference.

16. Explain why domestic freight costs for U.S. sales were [] than domestic freight costs for HM sales and provide supporting documentation.

In response to the question 2(b) in the Section A response, Kaptan explained that the Ereğli mill is located 7 Km from the Martaş port. Therefore, the distance from the plant to port for U.S. sales is much lower than the distance for most home market sales deliveries. For this reason, freight costs for U.S. sales are [] than domestic freight costs for HM sales. Please see Exhibit S1-16 for the map that shows the distance from the Ereğli plant to Martas Port.

17. For 2017 and 2018, reconcile the following values to Kaptan's financial statements:
- Total home market freight reported in the home market sales database ([] TL);

Please see Exhibit S1-18 Part 1.

Kaptan notes that this question provides an incorrect total freight figure of []. This is most likely based on the erroneous figure provided on Petitioners' comments dated February 27, 2019. It appears the Petitioners have multiplied the total INLFTCH figure by 2 in their comments. Petitioners also used NETQTYH in their calculation.

The correct total freight reported in Kaptan's home market sales listing for Kaptan Demir sales (excluding sales made by Kaptan Metal is [] This figure ties directly to GL account 760 04 0302 with a very minor reconciliation difference. Kaptan excludes the freight incurred in relation to [] as shown on the second page of Exhibit S1-18 Part 1.

- Total Turkish freight for U.S. sales reported in the U.S. sales database ([] TL);

Please see Exhibit S1-18 Part 2.

As noted in Kaptan's Section C response, for deliveries to port, Kaptan maintains a list of all shipments to port, which includes the name of trucks, dispatch numbers, customer names, vessel names, unit prices of inland freight to ports, and shipment quantities in kg. Kaptan utilized this list to report inland freight to port on a sales specific basis for each U.S. shipment (vessel name).

To reconcile to freight to port to Kaptan's trial balance, Kaptan obtained the subsidiary ledger of account 760 04 0202 in which inland freight to port expenses are recorded. Kaptan then manually identified the relevant lines associated with the U.S.

sales and referenced the vessel name by using a common key composed of freight vendor number, freight invoice date and transaction number. In the second tab of the reconciliation worksheets, Kaptan provides a monthly breakdown of the account 760 04 0202

Please note that this exhibit reconciles the total inland freight as per Exhibit C-7 which is [] The difference between this figure and the total DINLFTPU in the U.S. sales listing [] relates to excluded U.S. sales which entered outside the POR. Exhibit S1-18 is subtotaled by vessel name and separated as subject and not related to U.S. sales. In the second tab of the reconciliation worksheet, Kaptan provides a monthly breakdown of the account 760 04 0202 and shows the total amount in this account for the POR as []. This rolls up to line “E.2 Sales, Marketing and Distribution Expenses” in the financials total of which is [].

c. Total international freight ([] TL); and

Please see Exhibit S1-18 Part 3.

As with inland freight to port, Kaptan records ocean freight in a subsidiary ledger of the account 760 04 0202. In Exhibit S1-18 Part 3, Kaptan provides a subsidiary ledger of this account on which Kaptan has identified the lines corresponding to ocean freight charges for U.S. shipments. The shipment on vessel [] had [] tons of plain round bars. This is demonstrated on the last page of Exhibit S1-18 Part 3.

d. Total amounts reported for account number [] and [] for 2017 and 2018.

Please see Exhibit S1-18 Part 1, 2 and 3. These accounts are already covered in the reconciliations in prior steps

18. Calculate CREDITH using [] and removing []. Provide detailed description of the interest rate and credit calculations.

During the submission of Section B-D on January 29, 2019, Kaptan provided the Exhibit B-9 in both Excel and PDF formats. Kaptan reported the correct interest rate of []% in home market sales listing and also provided the correct exhibit in PDF format.

However, Kaptan inadvertently provided an excel file for Exhibit B-9 which was not updated. In Exhibit S1-19, Kaptan provides a revised and corrected exhibit (in both PDF and Excel) where zero-interest rate loans are removed. In addition, Kaptan updated CREDITH by using the following formula in the revised home market sales listing. In addition, INVCARH is also revised to use the updated interest rate.

(Gross Unit Price x (Date of the Receipt of Payment – Shipment date) x W.Avg. ST Borr. Rate)

365

19. Provide detailed description of the nature of each home market billing adjustment reported by Kaptan during the POR.

Kaptan added detailed description of the nature of each home market billing adjustment in an updated billing adjustment that is provided in Exhibit S1-20.

- a. For each billing adjustment type, provide supporting documentation, including but not limited to email communications and invoices.

In Exhibit S1-21 Kaptan provides four sample documents pertaining to adjustments booked in accounts 611, 600, 153 and 602, respectively.

- b. For [] pertaining to customer [] and invoices: [], provide all documentation and email correspondence related to the reported billing adjustments. Describe the nature and circumstances of each billing adjustment. Explain and demonstrate how these billing adjustments related to the sales you reported in the home market sales database.

Please see Exhibit S1-22. Kaptan reports a billing adjustment of [] TL for sales reported in [] for the customer []. This billing adjustment amount is the sum of four billing adjustment invoices which were already listed in Exhibit B-8 Billing Adjustment in Kaptan's Section B response (Jan. 29, 2019), which are identified by the same original invoice number 31702819. Kaptan shows these four adjustment invoices and ties the billing adjustment amount [] to the sales listing in Exhibit S1-23 and provides all available documentation referenced as Document No: 6569-6570-6571-41801891.

Kaptan also provides supporting invoices for the billing adjustments of the invoices [] in the Exhibit S1-24. Please see related billing adjustment invoices [] or []

J. In both of the billing adjustment invoices, the original sales invoice numbers are indicated.

20. Provide an explanation for your indirect selling expense calculations and provide supporting documentation, particularly in regard to the indirect selling expenses incurred by Kaptan Metal.

Kaptan Metal's indirect selling expenses are calculated by dividing the total general and administrative expenses (account 770) of Kaptan Metal for the POR by its total sales (accounts 600 + 601). This is appropriate because the G&A of a selling companies is considered to be ISE. Please see **Exhibit S1-25 for full GL detail for the POR for both numerator and the denominator.**

21. Report Kaptan Metal and Kaptan Demir's indirect selling expenses [].

Kaptan reports Kaptan Demir's indirect selling expenses in field INDIRSH and Kaptan Metal's indirect selling expenses in INDIRS1H (for only sales made through Kaptan Metal).

22. Explain why you are [] value for minimum yield strength in accordance with the values requested by Commerce. Do you have any records which would allow you to determine the grade for these sales? Provide revised sales information if necessary to accurately reflect the products sold in the home market.

In the initial submission, Kaptan did not report minimum yield strength for 689 home market sales since quality and grade information was not available for these sales in the system extracts that Kaptan worked with. Also, mill test certificates were not presented to the customers for these sales. Upon the Department's request, Kaptan was able to manually retrieve internal quality certificates for these sales and is now reporting all required product characteristics including minimum yield strength in the revised home market sales listing.

23. Explain the discrepancy between your narrative response to field MARTH and your reporting in the sales database for [] in field MARTH. Do you have any records which would allow you to determine the correct martensitic designation for these sales? Revise the sales database as necessary.

In the initial submission, Kaptan did not report minimum yield strength for 689 home market sales since quality and grade information was not available for these sales in the system extracts that Kaptan worked with. Also, mill test certificates were not presented to the customers for these sales. Upon the Department's request, Kaptan was able to manually retrieve internal quality certificates for these sales and now reporting all required product characteristics including MARTH in the revised home market sales listing.

24. For the [] it appears that some of the product was non-prime merchandise and the rest was "mixed and short-length" rebar. Please confirm. If not, add a field to designate the short-length rebar and explain the other product groups for which you [].

Kaptan confirms that sales for which MARTH and minimum yield strength could not be reported are non-standard merchandise and "mixed and short-length" rebar.

25. Submit complete sales and production documentation for the INVOICEH: [].

Kaptan provides sales and production documentation in Exhibit S1-26.

26. Report the payment term types as requested in Commerce's initial questionnaire with detailed descriptions of the designations. Provide supporting documentation where necessary.

As noted in Kaptan's Section B response, Kaptan reports the customer-specific average age of receivables in field PAYTERMH. Kaptan does not maintain any terms of payment in its sales system.

27. Provide information on the sales reported in Exhibit B-5, including terms of sale, circumstances of sale, and whether the customer knew they were purchasing [] rebar when the purchase was made. Provide sample sales invoices as well.

Please see Exhibit S1-27. Kaptan provides sales orders and invoices for three most commonly sold []. The [] is offered to the customers because no Turkish grade products are available at the time the customer placed the order. The offered []. There is a substantial overlap among the standards for rebar applicable in different countries, and if rebar produced to a foreign standard also satisfies the physical and

mechanical requirements of a domestic standard, then such rebar may be appropriate for sale to a customer requiring that domestic standard or its equivalent.

28. Explain the []. In addition, state in which currency unit you are valuing INVCARH and provide a sample calculation for INVCARH. Revise the sales database as necessary.

Kaptan inadvertently reported “n/a” for INVCARH in Exhibit B-1. The currency of the INVCARH is the same as the currency of the price which is indicated in field CURRH. A sample calculation of INVCARH for two sample sales in different currencies is provided below.

SEQ1H	SEQH	GRSUPRH	S.T. TL Borrowing Rate	Inventory Turnover (Days)	INVCARH
		a	b	c	d=a*b*c/365
6	10140	[]	[]%	[]	[]
497	44681	[]	[]%	[]	[]

29. Correct the discrepancy in [] field.

Kaptan corrects [] in the revised home market sales listing.

30. Provide a [] documenting your arm’s length calculation and results. This should include [].

Kaptan provides the requested arm’s length calculation and results in Exhibit S1-

28.

Section C

31. If possible, report the actual and theoretical weight in the home market and cost databases. Report all adjustments and cost information on a theoretical weight basis. Please explain any calculations, estimates, or assumptions used to derive the theoretical weight for the home market databases.

If unable to calculate the theoretical weight, please provide a detailed explanation, describing the limitations of Kaptan’s production and reporting in the home and non-U.S. export markets, as opposed to the production and reporting for U.S. sales.

As Kaptan has repeatedly explained,² for rebar other than that produced for the U.S. market and a few other markets in which sales are made on a theoretical weight basis, Kaptan has no record of the number of pieces produced in the plant or sold in the home (or third-country) market, so it does not have the capability to generate a database based on theoretical weight for either COP or HM sales. In the U.S. market, Kaptan was able to provide the theoretical weight because it actually makes a count of the number of pieces sold when producing for and shipping to the U.S. market. However, Kaptan does not count the number of pieces when producing for or selling to other markets, including the home market.

As soon as this supplemental questionnaire was issued, Kaptan inquired with the Department to seek guidance on how to proceed with respect to the request to provide the theoretical weight for home market sales and cost of production. When Kaptan was required to report information that the company does not maintain in the ordinary course of business, Kaptan developed a methodology that enables it to report the requested theoretical weights in a reasonable manner tied to raw data generated and maintained in the ordinary course of business.

As part of Kaptan's quality control procedures, samples are taken in the rolling mills in the production of every 25 tons (approximately 2-3 samples per hour). In these samples, Kaptan's production team records grade, size, actual weight and unit nominal (theoretical) weight. Sample sizes are on average 60-80 cm in length. This information is kept in a Microsoft® Access database. Kaptan has utilized the database of these samples for the period of review, from which an actual to theoretical ratio for each grade/size combination can be calculated. Kaptan presents the average actual to theoretical ratios in **Exhibit S1-29. These ratios are then multiplied by the actual weight on the same basis in both the home market sales and cost of production databases to report the theoretical weights. Revised home market and COP listings are provided in **Exhibit S1-30** and **Exhibit S1-31**,³ respectively. The expenses and adjustments are restated on a theoretical**

² See Kaptan June 12, 2019 letter, March 11, 2019 letter at 4; Kaptan March 26, 2019 letter at 1; Kaptan first letter of April 2, 2019 at 1-2; Kaptan second letter of April 2, 2019 at 1-2.

³ Kaptan has revised yield strength and martensitic information for certain home market sales as explained in response to question 22 and 23 above. Because the production quantity by grade and size is based on sales quantities, Kaptan also revises its COP Listings that were on an actual weight basis. In addition, since alloy cost reallocation (Exhibit D-17 in January 28 Section D response), this exhibit is also updated and a

weight basis by multiplying each per unit adjustment by the actual to theoretical weight ratio.

32. Provide a detailed description of the formula used to calculate theoretical weight for the U.S. sales. Explain each factor utilized in the formula (e.g., rebar diameter, density of steel, etc.). Provide sample calculations.

The theoretical weight of the subject merchandise sold to the U.S. is taken from the ASTM A 615 specifications. In Exhibit S1-32 Kaptan provides a sample calculation for the first five items of the invoice submitted in Exhibit A-7 and demonstrates how the theoretical weights on the commercial invoice tie to the ASTM A 615 specification. Kaptan has submitted the ASTM A615 specification in its Section A response at Exhibit A-14.

As for theoretical weight for HM sales and COP, please see Kaptan's response to question 30.

33. Provide the plant reports for all plants used to calculate the actual production quality weight for March 2017 and explain how the production quantity was calculated for your largest U.S. and home market CONNUM.

The requested plant reports for March 2017 are provided in In Exhibit S1-33. Kaptan shows how the production quantity was calculated for its highest-volume U.S. and home market CONNUM in Exhibit S1-34.

Sales Data:

First of all Kaptan extracts from its sales system all POR home market and export sales for rebar and non-subject product with following items: sales month, sales quarter, sales quantity, grade, and diameter. Kaptan categorizes its products as "subject" and "non-subject" in the sales data. Then, Kaptan assigns DIAMM (1, 2, 3, or 4) for each product listed in the data as instructed in the questionnaire. Since Kaptan is able to know the sales quarter, DIAMM, and subject/non-subject information, it assigns a "KEY" code for each for listed in the sales data.

Examples are given as follows:

revised version is provided in Exhibit S1-42

KEY

2017Q2_1_Rebar : Sales in 2017 second quarter, DIAMM=1, product=rebar

2017Q4_2_Round: Sales in 2017 last quarter, DIAMM=2, product=non-subject

2018Q2_3_Rebar: Sales in 2018 second quarter ,DIAMM=3, product=rebar

Production:

Kaptan obtains monthly production information from its Eregli and Corlu Rolling mills with regard to production quantity, production time, size, production month and product (subject or non-subject) information during the POR. Kaptan assigns quarters to each production month in the production data and categorizes each production diameter according to CONNUM specification of DIAMM as requested in the questionnaire. Then, the same “KEY” item is also listed in this production database to match with sales data prepared previously. Examples are given below:

KEY

2017Q2_1_Rebar : Sales in 2017 second quarter, DIAMM=1, product=rebar

2017Q4_2_Round: Sales in 2017 last quarter, DIAMM=2, product=non-subject

2018Q2_3_Rebar: Sales in 2018 second quarter ,DIAMM=3, product=rebar

Production Summary Table:

All information of KEY, production quantity (r,t), production time (n,p) are calculated from production data of rolling mills. In the same table, SALESQTY (Ref:S1) is directly obtained from “Sales Summary Extract,” which is the summary of the “Sales Data” by KEY category. Therefore, sales quantity information is now added in the production summary table for each KEY category.

Kaptan calculates columns PRODRATIO, C%, E% in the production summary table which will be linked to sales summary table afterwards. Please see the formula of each item noted in production summary table document.

PRODRATIO : Kaptan uses this ratio in sales database by each KEY to multiply the sales quantity with this and get a total production quantity for each item in sales data.

C%, E%: Kaptan divides its each rolling mill KEY factors by total production of both rolling mills to find the production share of rolling mill E (for Eregli) and C for Corlu in the production summary table. Then, these ratios are directly linked to sales summary table by each KEY item. As shown in the sales summary table, Kaptan uses E% and C% ratios to multiply by total production quantity calculated in sales summary table and get production quantity for each rolling mill in the sales data in each KEY item.

Total quantity of for each highest selling CONNUMs for home market and US market are shown in sales summary table under each table which ties to COP data.

Kaptan shows all formulae and reconciliations in **Exhibit S1-34.**

34. You reported a total production quantity of [] MT in your cost database. What is the corresponding theoretical weight of your rebar production during the POR.

The theoretical weight of the rebar production quantity in the POR is [] tons.

35. Provide a separate data field that accounts for Section 232 duties paid by Kaptan including amounts paid on its behalf.

As noted above in response to question 7, Kaptan's latest entry in the POR for which Kaptan was the importer of record was on February 20, 2018, which was before the Section 232 duties were imposed. Hence, no 232 duties were paid for Kaptan's shipments that entered in this POR. In general terms, Kaptan pays the Section 232 remedial duties when it is the importer of record.

In question 37 below, the Department asks Kaptan to report all sales with purchase order or invoice date within the POR. Even though it is the Department's consistent and longstanding practice in EP cases to calculate the dumping margin only

based on entries during the POR, Kaptan complies with this request and adds the shipment made on vessel [], which entered the U.S. in July 2018, after the POR. Kaptan was the importer of record for part of this shipment and paid the Section 232 duties. These duties are reported in field SEC232U.

36. With respect to the sales terms between Kaptan and two customers: []:

- a. Explain whether the sale terms changed between Kaptan and these customers during the POR. If so, provide a detailed explanation for those changes.

Kaptan negotiates with customers on a sale by sale basis. There are no general, declared, standard sales terms by customer or by market. While in general Kaptan's sales to the U.S. were on a CFR duty paid basis, in the period where there was uncertainty about Section 232 duties, Kaptan preferred not to make sales on a duty paid basis. There was no declared, published change in sales terms. During verbal negotiations with customers for this period, it was communicated to the customers that sales would be made on CFR basis.

- b. Provide supporting documentation for any changes made to sales terms, including, but not limited to, all sales term-related correspondence and emails between contracting parties.

As noted above, Kaptan negotiates with customers on a sale by sale basis. There are no general declared standard sales terms by customer or by market. While in general Kaptan's sales to the U.S. were on a CFR duty paid basis, in the period where there was uncertainty about Section 232 duties, Kaptan preferred not to make sales on a duty paid basis. There was no declared, published change in sales terms. During verbal negotiations with customers for this period, it was communicated to the customers that sales would be made on CFR basis. As such, there are no sales term-related correspondence / emails about this preference.

- c. Provide the sales contract between Kaptan and each customer, [], prior to and following any changes in sales terms during the POR.

As noted above, there has been no change to sales terms specific to these sales. The sales terms remained the same from the start of the negotiations and never changed.

Kaptan provides in Exhibit S1-35 the contracts with these two customers for the shipments in March 2018 for [] and March and May 2018 for [].

- d. Indicate which party paid U.S. section 232 duties. Provide proof of payment for duties paid during the POR.

As noted above in response to question 7 and 34, the latest entry in the POR for which Kaptan was the importer of record was on February 20, 2018, which was before the Section 232 duties were imposed. Hence, no 232 duties were paid for Kaptan's shipments that entered in this POR. In general terms, Kaptan pays the Section 232 remedial duties when it is the importer of record.

In question 37 below, the Department asks Kaptan to report all sales with purchase order or invoice date within the POR. Even though it is the Department's consistent and longstanding practice in EP cases to calculate the dumping margin only based on entries during the POR, Kaptan complies with this request and adds the shipment made on vessel [] that entered the U.S. in July 2018, after the POR. Kaptan was the importer of record for part of this shipment and paid the Section 232 duties. These duties are reported in field SEC232U. The proof of payment of the Section 232 duties for this shipment is provided in Exhibit S1-36.

37. For your U.S. sales, report all instances in which material contract terms changed after the Purchase Order/Contract date. Document how that change was reflected for the first time in the invoice date.

During the POR, Kaptan sold over 150,000 tons to the U.S. comprising of 43 different contracts 82 individual invoices. The information is too voluminous to manually review and identify each and every change between contract and invoice. However, a key sales term, latest shipment date as per contract, is often not met. In Exhibit S1-37 Kaptan provides five examples:

CONTRACT NO	LATEST SHIPMENT DATE	ACTUAL SHIPMENT DATE
KDC/2016-313/RDB	[]	[]
KDC/2017-026/RDB	[]	[]

KDC/2017-132/RDB	[]	[]
KDC/2017-022/RDB	[]	[]
KDC/2017-133/RDB	[]	[]

38. Include an additional field to report the purchase order date in your U.S. sales database and report all sales with purchase order or invoice date within the POR.

Kaptan provides in Exhibit S1-38 the revised version of its U.S. sales data as requested. The field of CONTDUTU is added to report purchase order dates.

39. Provide the [] for the sample U.S. sales documentation provided in Exhibit A-8. Provide any other contract relevant to this sale with the U.S. customer.

Kaptan provides the full purchase order for the sample U.S. sales documentation in Exhibit S1-39.

40. Provide actual freight invoices from the freight provider for each vessel listed in Exhibit C-13 to justify your calculations.

Please see Exhibit S1-40 for actual freight invoices for each vessel.

41. Provide an updated U.S. sales database reporting the [] in field DESTU and the corresponding U.S. state in field STATEU of the customer identified in Exhibit C-5 and your U.S. sales database.

Kaptan has reported the location where Kaptan transferred possession to the customer per the contract, since Kaptan does not have knowledge of the ultimate destination to which the customer may have transported the rebar.

42. Provide supporting documentation to prove that your loading contracts with Martas Marmara Ereglisi Liman Tesisleri A.S., an affiliated party, were at arm's length.

Kaptan provides two loading invoices issued by Martaş within the same month in Exhibit S1-41. Martaş charges a higher unit price to Kaptan Demir than to unaffiliated customer []; therefore, the loading invoices were at arm's length.

43. Provide the warranty expenses for the three most recently completed fiscal years for

U.S. sales as directed by Commerce in Field Number 46.0 "WARRU."

Not applicable. Kaptan did not incur any warranty expenses for sales made to the U.S. during the POR.

44. Explain why you are unable to []

Since Kaptan was not the importer of record for the 60 U.S. sales, there is no entry information available to Kaptan to report entry date for those sales.

45. Confirm that [] and revise the sales database as necessary.

Kaptan confirms that [].

Exhibit S1-1 - Revised Organization Chart

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-2 Purchases and Sales from Affiliates

Purchases from Affiliated Companies during the POR

Vendor Name

ASET MADENCİLİK SANAYİ VE TİCA

ÇEBİ DENİZCİLİK VE TİCARET A.Ş

ÇEBİ DEPOLAMA VE TİCARET A.Ş.

ÇEBİ ENERJİ ELEKTRİK ÜRETİMİ A

ÇEBİ KAPTAN DENİZCİLİK VE TİCA

ÇEBİ MÜH.MÜŞV.DANIŞ.VE İNŞ.LTD

ÇEBİ TRANS VE LOJİSTİK TİC. A.

[]

KAPTAN GERİ DÖNÜŞÜM TEKNOLOJİL
KAPTAN İŞ MAK.HURDA ALIM SATIM
KAPTAN METAL DIŞ TİCARET VE NA

MARTAŞ MARMARA EREĞLİSİ LİMAN

NUR GEMİCİLİK VE TİCARET A.Ş.

UZAY YAYINCILIK VE TİC.LTD.ŞTİ

YAŞAR ÇEBİ İNŞAAT VE TURİZM A.

Sales to Affiliated Companies during the POR

Customer	Description-ENG	Amount TL	Qty
ASET MADENCİLİK SANAYİ VE TİC.			
ÇEBİ DENİZCİLİK VE TİCARET A.Ş.			
ÇEBİ DEPOLAMA VE TİCARET A.Ş.			
ÇEBİ ENERJİ ELEKTRİK ÜRETİMİ A.			
ÇEBİ GEMİ İŞLETMECİLİĞİ VE TİC.			
ÇEBİ KAPTAN DENİZCİLİK VE TİC.			
ÇEBİ TRANS VE LOJİSTİK TİC. A.			
EFESAN DEMİR SANAYİ VE TİCARET			
KAPTAN GERİ DÖNÜŞÜM TEKNOLOJİ			
KAPTAN METAL DIŞ TİCARET VE NA			
MARTAŞ MARMARA EREĞLİSİ LİMAN			
MARTAŞ RO RO DENİZCİLİK VE TİC.			
MARZINC MARMARA GERİ KAZANIM S			
NUR GEMİCİLİK VE TİCARET A.Ş.			
SÜRMENE GEMİ DONATI VE TAHL.TA			
YAŞAR ÇEBİ İNŞAAT VE TURİZM A.			

Exhibit S1-3 Distribution Flowchart (HM)

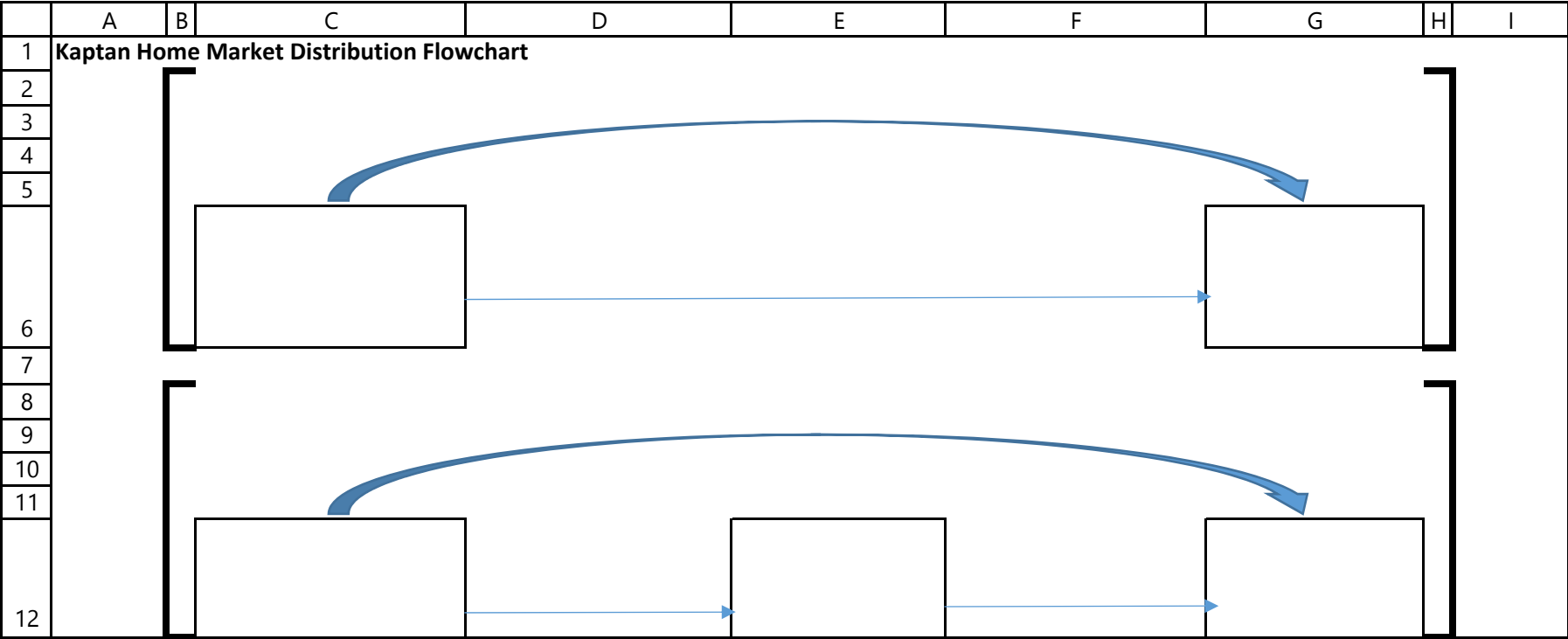


Exhibit S1-4 Distribution Flowchart (US)

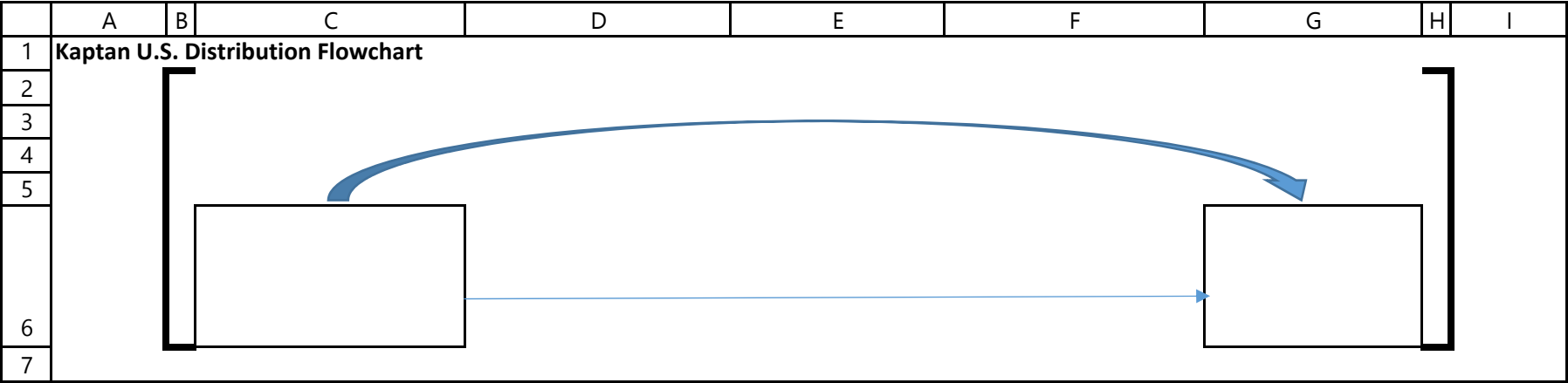


Exhibit S1-5 Selling Functions Chart

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-6 Affiliated Party Financial Statements

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-7 Cebi Trans Documentation

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-8 Unaffiliated Freight Documentation

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-9 List of Freight Companies

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-10 Cebi Trans Contract

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-11 Sample Invoices from Unaffiliated Freight Companies

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-12 Freight Arm's Length Chart

Arm's Length in Freight Invoices

Exhibit S-7				Exhibit S1-8		
Reference in HM for Exhibit S-7	Exhibit S- 7 CEBI TRANS SEQ1H	Freight (TL/MT)	Destination	Exhibit S1-8 Unaffiliated Providers	Freight (TL/MT)	Destination
SEQ1H	45756			ref:1		
SEQ1H	46847			ref:2		
SEQ1H	46854			ref:5		

Exhibit S1-13 Freight Invoices for Missing DESTH

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-14 Revised Home Market Sales Listing (Actual Weight Basis)

ACTUAL QUANTITY
KAPTAN_AR1718_HMACT02 (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

1

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH		QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH	
1							22	0	24		1264		30,754	
2							2	0	2		1113		2,541	
3							4	0	4		1160		5,056	
4							4	0	4		1143		5,202	
5							2	0	2		1254		2,305	
6							6	0	6		1259		6,479	
7							4	0	4		1108		4,506	
8							2	0	2		1091		2,228	
9							2	0	2		1152		2,598	
10							8	0	8		1218		10,191	
11							10	0	9		1150		11,021	
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH				
1	28,772	0.00	0.00		0.00	1.00	0.00	5.00	9.00					
2	2,505	0.00	11.00		-11.00	1.00	0.00	5.00	9.00					
3	4,959	0.00	10.00		-8.00	0.00	0.00	5.00	9.00					
4	5,090	0.00	11.00		-7.00	1.00	0.00	6.00	9.00					
5	2,404	0.00	10.00		-7.00	0.00	0.00	5.00	9.00					
6	6,639	0.00	11.00		-7.00	0.00	0.00	5.00	9.00					
7	5,075	0.00	11.00		-8.00	0.00	0.00	5.00	9.00					
8	2,503	0.00	9.00		-7.00	0.00	0.00	5.00	10.00					
9	2,629	0.00	10.00		-8.00	1.00	0.00	6.00	9.00					
10	8,757	0.00	10.00		-7.00	0.00	0.00	5.00	9.00					
11	12,299	0.00	11.00		-8.00	0.00	0.00	6.00	10.00					

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

2

SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
	12												
	13												
	14												
	15												
	16												
	17												
	18												
	19												
	20												
	21												
	22												
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
	12												
	13												
	14												
	15												
	16												
	17												
	18												
	19												
	20												
	21												
	22												
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH		QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH
	12						4	0	4		1332		4,255
	13						2	0	2		1221		2,912
	14						12	0	12		1158		13,837
	15						2	0	2		1157		2,296
	16						6	0	6		1096		6,406
	17						4	0	4		1126		4,822
	18						4	0	4		1249		4,760
	19						10	0	10		1034		10,548
	20						9	0	8		1064		9,118
	21						2	0	2		1179		2,275
	22						7	0	8		1441		13,111
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
	12	5,083	0.00	9.00	-8.00	1.00	0.00	5.00	9.00				
	13	2,584	0.00	10.00	-8.00	1.00	0.00	6.00	10.00				
	14	13,588	0.00	10.00	-8.00	0.00	0.00	6.00	9.00				
	15	2,578	0.00	9.00	-7.00	0.00	0.00	5.00	9.00				
	16	6,536	0.00	10.00	8.00	0.00	0.00	5.00	9.00				
	17	4,430	0.00	11.00	8.00	0.00	0.00	5.00	9.00				
	18	4,799	0.00	10.00	8.00	0.00	0.00	5.00	10.00				
	19	9,968	0.00	22.00	-12.00	1.00	0.00	5.00	10.00				
	20	8,962	0.00	19.00	-11.00	0.00	0.00	5.00	9.00				
	21	2,143	0.00	19.00	-12.00	0.00	0.00	5.00	9.00				
	22	13,524	0.00	10.00	-10.00	1.00	0.00	7.00	10.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

3

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
	23													
	24													
	25													
	26													
	27													
	28													
	29													
	30													
	31													
	32													
	33													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
	23													
	24													
	25													
	26													
	27													
	28													
	29													
	30													
	31													
	32													
	33													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH		
	23					6	0	6		1186		6,739		
	24					13	0	11		1095		13,659		
	25					6	0	6		994		6,598		
	26					6	0	6		992		6,056		
	27					17	0	16		984		16,994		
	28					2	0	2		1095		2,028		
	29					2	0	2		990		2,182		
	30					9	0	10		1066		10,604		
	31					4	0	4		1097		4,467		
	32					6	0	6		1025		6,291		
	33					10	0	10		991		10,989		
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH				
	23	5,983	0.00	9.00	-7.00	0.00	0.00	4.00	9.00					
	24	13,020	0.00	9.00	-8.00	0.00	0.00	5.00	9.00					
	25	5,754	0.00	36.00	-1.00	0.00	0.00	5.00	8.00					
	26	7,244	0.00	20.00	-4.00	0.00	0.00	4.00	10.00					
	27	18,750	0.00	20.00	-4.00	0.00	0.00	4.00	10.00					
	28	2,296	0.00	21.00	-4.00	0.00	0.00	4.00	9.00					
	29	2,219	0.00	21.00	-4.00	0.00	0.00	5.00	9.00					
	30	10,046	0.00	19.00	-3.00	0.00	0.00	5.00	10.00					
	31	3,947	0.00	20.00	-4.00	0.00	0.00	5.00	10.00					
	32	6,112	0.00	18.00	-3.00	0.00	0.00	5.00	10.00					
	33	11,010	0.00	21.00	-3.00	0.00	0.00	5.00	9.00					

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

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SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
32536														
32537														
32538														
32539														
32540														
32541														
32542														
32543														
32544														
32545														
32546														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
32536														
32537														
32538														
32539														
32540														
32541														
32542														
32543														
32544														
32545														
32546														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH		
32536						15	0	15		2020		30,605		
32537						4	0	4		1840		7,793		
32538						4	0	4		2158		8,295		
32539						2	0	2		2195		4,379		
32540						16	0	16		1915		30,698		
32541						8	0	7		1992		14,870		
32542						8	0	7		1953		14,203		
32543						8	0	7		2176		15,717		
32544						4	0	4		2107		8,503		
32545						4	0	4		1867		8,470		
32546						8	0	8		2021		16,132		
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH				
32536	32,118	0.00	11.00		-10.00	1.00	0.00	9.00	10.00					
32537	7,740	0.00	11.00		-9.00	1.00	0.00	8.00	10.00					
32538	7,522	0.00	11.00		-9.00	1.00	0.00	9.00	10.00					
32539	4,317	0.00	12.00		-9.00	1.00	0.00	8.00	9.00					
32540	28,777	0.00	11.00		1.00	1.00	0.00	8.00	9.00					
32541	14,243	0.00	10.00		1.00	1.00	0.00	9.00	9.00					
32542	14,230	0.00	15.00		2.00	1.00	0.00	9.00	10.00					
32543	15,724	0.00	16.00		2.00	1.00	0.00	9.00	9.00					
32544	8,263	0.00	14.00		2.00	1.00	0.00	9.00	10.00					
32545	8,536	0.00	15.00		2.00	1.00	0.00	8.00	10.00					
32546	16,601	0.00	10.00		3.00	1.00	0.00	8.00	10.00					

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

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SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH	STEELH	MSYSTRH	COATH	MARTH	DIAMH
32547												
32548												
32549												
32550												
32551												
32552												
32553												
32554												
32555												
32556												
32557												
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH	
32547												
32548												
32549												
32550												
32551												
32552												
32553												
32554												
32555												
32556												
32557												
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH
32547						4	0	4		1865		7,587
32548						10	0	9		1831		17,882
32549						8	0	7		2190		14,505
32550						13	0	13		2176		26,837
32551						4	0	4		2073		7,259
32552						16	0	18		2126		31,614
32553						10	0	10		1922		18,624
32554						12	0	13		1995		24,230
32555						5	0	5		2069		10,752
32556						14	0	15		2077		25,244
32557						10	0	10		1852		19,558
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH		
32547	8,597	0.00	11.00		3.00	1.00	0.00	9.00	9.00			
32548	18,599	0.00	11.00		3.00	1.00	0.00	9.00	10.00			
32549	15,576	0.00	25.00		-11.00	1.00	0.00	9.00	9.00			
32550	29,142	0.00	25.00		-11.00	1.00	0.00	10.00	10.00			
32551	7,238	0.00	23.00		-10.00	1.00	0.00	9.00	9.00			
32552	31,950	0.00	0.00		5.00	1.00	0.00	9.00	10.00			
32553	19,251	0.00	0.00		5.00	1.00	0.00	8.00	9.00			
32554	21,554	0.00	0.00		5.00	1.00	0.00	8.00	10.00			
32555	10,679	0.00	0.00		5.00	1.00	0.00	9.00	10.00			
32556	26,950	0.00	0.00		4.00	1.00	0.00	9.00	10.00			
32557	19,184	0.00	0.00		4.00	1.00	0.00	9.00	10.00			

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

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SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
32558													
32559													
32560													
32561													
32562													
32563													
32564													
32565													
32566													
32567													
32568													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
32558													
32559													
32560													
32561													
32562													
32563													
32564													
32565													
32566													
32567													
32568													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH		QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH
32558							8	0	9		2000		14,766
32559							2	0	2		2048		3,592
32560							3	0	4		2076		6,809
32561							4	0	4		1815		7,203
32562							15	0	15		1993		30,593
32563							5	0	6		1941		10,711
32564							2	0	2		2031		3,728
32565							2	0	2		2114		3,870
32566							2	0	2		1993		4,105
32567							6	0	6		1817		10,946
32568							15	0	14		2018		30,093
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
32558	15,455	0.00	0.00		5.00	1.00	0.00	8.00	9.00				
32559	3,773	0.00	0.00		5.00	1.00	0.00	9.00	10.00				
32560	7,431	0.00	25.00		6.00	1.00	0.00	9.00	9.00				
32561	7,694	0.00	23.00		6.00	1.00	0.00	8.00	10.00				
32562	32,351	0.00	27.00		6.00	1.00	0.00	9.00	9.00				
32563	12,675	0.00	23.00		6.00	1.00	0.00	8.00	9.00				
32564	3,682	0.00	14.00		3.00	1.00	0.00	9.00	9.00				
32565	3,841	0.00	14.00		3.00	1.00	0.00	8.00	10.00				
32566	4,305	0.00	13.00		3.00	1.00	0.00	9.00	9.00				
32567	11,399	0.00	13.00		3.00	1.00	0.00	9.00	9.00				
32568	28,256	0.00	13.00		3.00	1.00	0.00	8.00	9.00				

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Actual)

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SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65071													
65072													
65073													
65074													
65075													
65076													
65077													
65078													
65079													
65080													
65081													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
65071													
65072													
65073													
65074													
65075													
65076													
65077													
65078													
65079													
65080													
65081													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH	
65071						18	0	20		2494		50,500	
65072						22	0	21		2349		46,764	
65073						20	0	19		2518		43,553	
65074						22	0	23		2251		58,758	
65075						24	0	22		2550		51,372	
65076						8	0	8		2451		17,625	
65077						26	0	24		2377		54,042	
65078						16	0	15		2440		34,397	
65079						6	0	6		2133		14,330	
65080						2	0	2		2376		4,533	
65081						4	0	4		2578		9,617	
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
65071	44,731	0.00	38.00		-94.00	0.00	9.00	10.00	10.00				
65072	47,018	0.00	33.00		-88.00	0.00	10.00	11.00	9.00				
65073	51,283	0.00	32.00		-101.00	0.00	11.00	10.00	9.00				
65074	55,364	0.00	26.00		-92.00	0.00	10.00	11.00	10.00				
65075	48,605	0.00	35.00		-102.00	0.00	11.00	9.00	10.00				
65076	20,148	0.00	29.00		-96.00	0.00	11.00	10.00	9.00				
65077	59,321	0.00	30.00		-99.00	0.00	9.00	10.00	9.00				
65078	35,436	0.00	29.00		-92.00	0.00	10.00	10.00	9.00				
65079	14,144	0.00	27.00		-93.00	0.00	10.00	10.00	9.00				
65080	4,714	0.00	29.00		-101.00	0.00	10.00	10.00	10.00				
65081	9,715	0.00	31.00		-86.00	0.00	10.00	11.00	9.00				

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
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Home Market Sales Data (Actual)

8

SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65082													
65083													
65084													
65085													
65086													
65087													
65088													
65089													
65090													
65091													
65092													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
65082													
65083													
65084													
65085													
65086													
65087													
65088													
65089													
65090													
65091													
65092													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH	
65082						2	0	2		2273		4,476	
65083						20	0	23		2239		50,856	
65084						27	0	26		2132		69,088	
65085						21	0	24		2521		58,391	
65086						22	0	22		2154		51,684	
65087						9	0	9		2302		20,826	
65088						20	0	19		2189		45,183	
65089						8	0	7		2202		17,890	
65090						4	0	4		2238		9,784	
65091						2	0	2		2379		4,150	
65092						8	0	8		2424		21,091	
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
65082	4,840	0.00	28.00		-98.00	0.00	10.00	9.00	9.00				
65083	46,471	0.00	28.00		-93.00	0.00	10.00	10.00	9.00				
65084	67,434	0.00	25.00		-102.00	0.00	10.00	11.00	9.00				
65085	57,474	0.00	24.00		-94.00	0.00	11.00	11.00	10.00				
65086	52,030	0.00	27.00		-95.00	0.00	10.00	11.00	9.00				
65087	22,448	0.00	27.00		-98.00	0.00	10.00	10.00	10.00				
65088	49,503	0.00	27.00		-91.00	0.00	10.00	10.00	9.00				
65089	20,063	0.00	26.00		-99.00	0.00	11.00	11.00	9.00				
65090	9,804	0.00	25.00		-91.00	0.00	10.00	10.00	10.00				
65091	3,955	0.00	24.00		-96.00	0.00	10.00	11.00	9.00				
65092	20,618	0.00	18.00		-125.00	0.00	11.00	11.00	10.00				

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STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
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Home Market Sales Data (Actual)

9

SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65093													
65094													
65095													
65096													
65097													
65098													
65099													
65100													
65101													
65102													
65103													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
65093													
65094													
65095													
65096													
65097													
65098													
65099													
65100													
65101													
65102													
65103													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	TOTVALH	
65093						6	0	6		2395		16,015	
65094						2	0	2		2283		5,210	
65095						2	0	2		2613		5,163	
65096						2	0	2		2517		5,003	
65097						2	0	2		2399		5,069	
65098						2	0	2		2584		4,973	
65099						2	0	2		2548		4,707	
65100						24	0	20		2703		52,990	
65101						27	0	27		2710		58,923	
65102						23	0	22		2730		61,854	
65103						22	0	23		2498		59,764	
SEQ1H	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
65093	14,268	0.00	18.00		-113.00	0.00	10.00	11.00	9.00				
65094	4,866	0.00	18.00		-133.00	0.00	11.00	11.00	9.00				
65095	4,779	0.00	16.00		-132.00	0.00	10.00	12.00	10.00				
65096	5,126	0.00	15.00		-124.00	0.00	11.00	11.00	10.00				
65097	5,007	0.00	17.00		-126.00	0.00	11.00	10.00	9.00				
65098	4,552	0.00	18.00		-123.00	0.00	11.00	11.00	10.00				
65099	4,838	0.00	16.00		-115.00	0.00	11.00	12.00	10.00				
65100	51,440	0.00	28.00		-122.00	0.00	12.00	11.00	10.00				
65101	69,671	0.00	28.00		-128.00	0.00	11.00	10.00	9.00				
65102	62,345	0.00	31.00		-133.00	0.00	10.00	12.00	9.00				
65103	53,918	0.00	30.00		-124.00	0.00	10.00	11.00	9.00				

(PUBLIC VERSION)

Exhibit S1-15 Sample Freight Documentation for Tekirdag and Istanbul

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-16 Plant to Port Distance

Yeniçiftlik

Kaptan Demir Çelik
End. ve Tic. A.Ş M...

E84

D567

E84

7 dk.
6,4 km

Martaş Liman Tesisleri

12 dk.
6,5 km

Exhibit S1-18 Freight Reconciliations

PART 1

HOME MARKET INLAND FREIGHT RECONCILIATION

Inland Freight for Domestic Customers

Kaptan Demir

Freight for Domestic Customers
760040302 Account : Rebar Domestic Freight
Unreconciled Difference
Reconciliation

Amount TL	
[	A
	B
	C
	D=A-B-C

Kaptan Demir

760040302

Rebar-Handling/Loading

Account Code

760040302

Description TR

Nervürlü Demir Taş.Yük

Description ENG

Rebar-Handling/Loading

ADMapping

DIRECTSELLING

PnL

E.2 Sales, Marketing and Distribution Expenses

201610-201807

A

Less

Domestic Freight for Tolling Rebar

B

C=A+B

PUBLIC VERSION

PART 2

INLAND FREIGHT TO PORT RECONCILIATION (US)

Account No: 760040202

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

PART 3

OCEAN FREIGHT RECONCILIATION

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-19 Revised Short Term TL Borrowing Rate

Short Term TL Loans Weighted Average Interest Rate Calculation
for the POI (3/7/17-06/30/18);
(Weighted average calculation is based on number of days in reporting period for each loan)

Bank Name	Opening Date	Closing date	Days	Days in POI	Principal	Interest Paid	Interest Rate	Principal x Days in POR	Interest Rate x Principal x Days in POR
			A	B	C	D	E=(365x D) / (A x C)	F= C x B	G = B x C x E
3									
4									
5									
7									
9									
10									
11									
12									
13									
14									
16									
17									
18									
19									
21									
22									
23									
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103									
104									
105									
106									
107									
108									
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111									
112									
113									
115									
116									
117									
118									
119									
120									
121									
122									
123									
124									
125									
126									

Short Term TL Loans Weighted Average Interest Rate Calculation
for the POI (3/7/17-06/30/18);
(Weighted average calculation is based on number of days in reporting period for each loan)

Bank Name	Opening Date	Closing date	Days	Days in POI	Principal	Interest Paid	Interest Rate	Principal x Days in POR	Interest Rate x Principal x Days in POR
			A	B	C	D	E=(365x D) / (A x C)	F= C x B	G = B x C x E
127									
128									
129									
130									
131									
132									
133									
134									
135									
136									
137									
138									
139									
140									
141									
142									
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144									
145									
146									
147									
148									
149									
150									
151									
153									
154									
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156									
157									
158									
159									
160									
162									
163									
164									
165									
166									
167									
168									
169									
170									
171									
172									
173									
174									
175									
176									
177									
178									
179									
180									
181									
182									
183									
184									
185									
186									
187									
188									
189									
190									
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192									
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198									
199									
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202									
204									
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207									
208									
209									
210									
211									
212									
213									
216									
217									
218									
219									
220									
221									
224									
230									
231									
233									
								0	0
WA ST Borr Rate (Sum G / Sum F)									

Short Term TL Loans Weighted Average Interest Rate Calculation
for the POI (3/7/17-06/30/18);
(Weighted average calculation is based on number of days in reporting period for each loan)

Bank Name	Opening Date	Closing date	Days	Days in POI	Principal	Interest Paid	Interest Rate	Principal x Days in POR	Interest Rate x Principal x Days in POR
			A	B	C	D	$E = (365 \times D) / (A \times C)$	$F = C \times B$	$G = B \times C \times E$
									I

Exhibit S1-20 Billing Adjustment Type

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-21 Supporting Documents for Billing Adjustments

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-22 Billing Adjustment for SEQ1H 36384-36392

Part A: 611010102 Account

Document No	Date	Description-TR	Amount TL	Original Invoice No	Qty	BILLADJH	Invoice No
				Please see SEQ1H:36384-36392		(84.75)	

Exhibit S1-23 Billing Adjustments for Selected Customer

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-24 Billing Adjustment Invoices 351187-351257-351747

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-25 Kaptan Metal ISE Detail

Acc	Account No	Description-TR	Description-ENG	POR
600	600030102	Ticari İnş.Demiri Satışları	Purchased Reinforcing Deformed Steel Bars	
600	600090990	Sair Hizmet Satışları	Miscellaneous Service Sales	
600 Total				
601	601030102	Ticari İnş.Demiri Satışları	Purchased Reinforcing Steel Bars	
601	601030201	Ticari Lama Demir Satışları	Purchased Sheet Iron	
601	601030202	Ticari Kare Demiri Satışları	Purchased-Square Iron	
601	601030203	Ticari Köşebent Demiri Satışla	Purchased Angle Iron	
601	601030501	Ticari Kütük Demir Satışları	Traded Billet Sales	
601	601030901	Sair Ticari Mal Satışları	Miscellaneous Traded Goods Sales	
601	601090210	Deniz Yolu Taşımacılık Hizmetl	Maritime Transport	
601	601090901	Diğer Hizmet Satışları	Other Services Sales	
601 Total				
770	770010101	Normal Çalışma Ücretleri	Wages	
770	770010102	Hafta Ve Genel Tatil Ücretleri	Week And General Holiday Fees	
770	770010103	Fazla Çalışma Ücretleri	Over Time Pay	
770	770010104	Prim Ve İkramiyeler	Bonuses	
770	770010105	Ücretli İzin Bedelleri	Paid Vacation Fees	
770	770010220	İzin Yardımları	Allowances	
770	770010301	S.G.K. Primleri İşveren Payı	Social Security Employer Share	
770	770010302	S.G.K. Destekleme Primleri İşv	S.G.K. Support Premium Employer	
770	770010303	İşsizlik Sigorta Primi İşveren	Unemployment Insurance Primary Employer	
770	770010410	Yönetim Kurulu Ücretleri	Board Fees	
770	770020101	Banka Ve Havale Giderleri	Bank And Money Transfer Expenses	
770	770020102	Dava, Takip Ve İstisare Giderl	Legal Fees	
770	770020104	İkram, Temsil Ve Ağırılama Gide	Catering, Representation and Hospitality Gide	
770	770020105	İlan Ve Neşriyat Giderleri	Announcement And Disbursement Expenditures	
770	770020106	Kırtasiye Ve Büro Levazımat Gi	Stationery Office Supplies	
770	770020107	Kiralar	Rents	
770	770020108	Müşavirlik Giderleri	Consulting	
770	770020109	Oda, Borsa, Birlik Ve Sendika	Chamber, Stock Exchange, Union and Trade Union Memberships	
770	770020111	P.T.T. Ve Diğer Haberleşme Gid	Postal And Other Communication Expenses	
770	770020112	Sigorta ve Sigortalama Giderle	Insurance And Insurance Expenses	
770	770020113	Teksir, Fotokopi Ve Matbuat Gi	Duplication, Photocopy and Printing Expenses	
770	770020114	Tercüme Giderleri	Translation Expenses	
770	770020115	Reuters Ve İnternet Ajans Gide	Reuters And Internet Agency Expenses	
770	770020116	Seminer Ve Eğitim Giderleri	Seminar and Training Expenses	
770	770020117	Personel Yemek Giderleri	Personnel Food Expenses	
770	770030101	Damga Pulu, Damga Vergisi	Stamp , Stamp Tax	
770	770030102	Emlak Vergisi	Property tax	
770	770030104	Noter Harç Ve Giderleri	Notary fees and expenses	
770	770030109	Sair Vergi, Resim Ve Harçlar	Other Taxes, Pictures and Fees	
770	770040101	Demirbaş Bakım-Onarım Giderler	Furniture and Fixtures Assets Maintenance-Repair Expenses	
770	770040102	Taşıt Araçları Bakım-Onarım Gi	Vehicle Maintenance and Repair Expenses	
770	770040104	Bilgi İşlem Giderleri	IT Expenses	
770	770040105	Elektrik,Su ve D.Gaz Giderleri	Electricity, Water and Other Gas Expenses	
770	770040110	Kanunen Kabul Edilmeyen Giderl	Undeductible	
770	770040111	Şehiriçi Yol Giderleri	Travel (Istanbul)	
770	770040113	Taşıt Araçları Yakıt Giderleri	Vehicle Fuel Expenses	
770	770040115	Yurtdışı Yol Ve Seyahat Giderl	Overseas Travel	
770	770040116	Yurtiçi Yol Ve Seyahat Giderle	Domestic Travel	
770	770040120	Taşıt Kiralama Giderle	Rent a Vehicle Expenses	
770	770040190	Diğer Çeşitli Giderler	Other Various Expenses	
770	770050102	Bina Amortismanları	Building Depreciation	
770	770050104	Demirbaş Amortismanları	Furniture and Fixtures Depreciation	
770 Total				

Exhibit S1-26 Home Market Sales Documentation (Grade)

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-27 Home Market Sales Documentation (Non Turkish Grade)

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-28 Arms Length Test Documentation

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-29 Actual-Theoretical Weight Ratio Summary

Actual/Theoretical % Summary

[illegible]

Exhibit S1-30 Revised Home Market Sales Listing

THEORETICAL QUANTITY
KAPTAN_AR1718_HMTH02 (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

1

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
1						27	23	0	25		1192			
2						2	2	0	2		1167			
3						4	4	0	4		1250			
4						4	4	0	4		1087			
5						2	2	0	2		1270			
6						6	6	0	6		1234			
7						4	4	0	4		1128			
8						2	2	0	2		1213			
9						2	2	0	2		1184			
10						8	8	0	8		1123			
11						11	10	0	10		1308			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
1	32,271	30,351	0.00	0.00		0.00	1.00	0.00	6.00	10.00				
2	2,530	2,227	0.00	11.00		-10.00	0.00	0.00	5.00	9.00				
3	4,338	4,958	0.00	11.00		-8.00	0.00	0.00	6.00	10.00				
4	5,101	5,165	0.00	11.00		-7.00	1.00	0.00	5.00	9.00				
5	2,365	2,339	0.00	10.00		-8.00	0.00	0.00	5.00	10.00				
6	7,353	7,749	0.00	11.00		-7.00	0.00	0.00	5.00	9.00				
7	4,955	5,155	0.00	9.00		-8.00	0.00	0.00	5.00	9.00				
8	2,187	2,473	0.00	11.00		-7.00	0.00	0.00	6.00	9.00				
9	2,584	2,426	0.00	10.00		-7.00	0.00	0.00	6.00	9.00				
10	10,019	9,965	0.00	9.00		-7.00	1.00	0.00	5.00	10.00				
11	12,773	12,904	0.00	9.00		-7.00	1.00	0.00	5.00	8.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

2

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
	12													
	13													
	14													
	15													
	16													
	17													
	18													
	19													
	20													
	21													
	22													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
	12													
	13													
	14													
	15													
	16													
	17													
	18													
	19													
	20													
	21													
	22													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
	12					4	4	0	4		1274			
	13					2	2	0	2		1317			
	14					12	11	0	11		1283			
	15					2	2	0	2		1194			
	16					6	7	0	7		1053			
	17					4	4	0	4		1058			
	18					4	4	0	4		1095			
	19					10	10	0	9		1058			
	20					8	8	0	7		1184			
	21					2	2	0	2		1145			
	22					8	8	0	8		1434			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
	12	4,410	4,466	0.00	10.00	-8.00	0.00	0.00	6.00	8.00				
	13	2,565	2,596	0.00	10.00	-7.00	0.00	0.00	6.00	9.00				
	14	15,326	13,409	0.00	11.00	-7.00	0.00	0.00	6.00	10.00				
	15	2,560	2,345	0.00	9.00	-7.00	1.00	0.00	6.00	10.00				
	16	6,250	6,566	0.00	9.00	8.00	0.00	0.00	5.00	9.00				
	17	4,260	4,426	0.00	9.00	8.00	0.00	0.00	5.00	9.00				
	18	4,475	4,260	0.00	9.00	9.00	1.00	0.00	5.00	10.00				
	19	11,212	11,444	0.00	20.00	-11.00	0.00	0.00	5.00	9.00				
	20	8,052	8,143	0.00	19.00	-12.00	0.00	0.00	5.00	9.00				
	21	2,213	2,045	0.00	19.00	-13.00	0.00	0.00	5.00	9.00				
	22	12,773	11,626	0.00	9.00	-10.00	1.00	0.00	8.00	10.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

3

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
	23													
	24													
	25													
	26													
	27													
	28													
	29													
	30													
	31													
	32													
	33													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
	23													
	24													
	25													
	26													
	27													
	28													
	29													
	30													
	31													
	32													
	33													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
	23					6	6	0	6		1204			
	24					13	13	0	11		1066			
	25					7	6	0	6		1145			
	26					6	6	0	7		1089			
	27					17	15	0	17		1176			
	28					2	2	0	2		1169			
	29					2	2	0	2		989			
	30					9	10	0	10		1040			
	31					4	4	0	4		1030			
	32					5	6	0	6		1149			
	33					10	9	0	10		1051			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
	23	6,094	6,049	0.00	10.00	-7.00	0.00	0.00	5.00	8.00				
	24	12,203	13,422	0.00	9.00	-7.00	0.00	0.00	5.00	9.00				
	25	5,827	6,315	0.00	35.00	-2.00	0.00	0.00	4.00	10.00				
	26	7,109	6,187	0.00	18.00	-4.00	0.00	0.00	5.00	10.00				
	27	15,962	17,556	0.00	20.00	-4.00	0.00	0.00	4.00	9.00				
	28	2,095	2,234	0.00	19.00	-4.00	0.00	0.00	5.00	9.00				
	29	2,191	2,201	0.00	19.00	-4.00	0.00	0.00	4.00	9.00				
	30	11,373	11,128	0.00	19.00	-3.00	0.00	0.00	5.00	10.00				
	31	4,614	4,153	0.00	19.00	-3.00	0.00	0.00	5.00	10.00				
	32	7,027	6,038	0.00	20.00	-4.00	0.00	0.00	4.00	9.00				
	33	10,553	10,871	0.00	21.00	-3.00	0.00	0.00	4.00	9.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

4

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
32536														
32537														
32538														
32539														
32540														
32541														
32542														
32543														
32544														
32545														
32546														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
32536														
32537														
32538														
32539														
32540														
32541														
32542														
32543														
32544														
32545														
32546														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
32536						15	15	0	16		1789			
32537						4	4	0	4		1958			
32538						4	4	0	4		2085			
32539						2	2	0	2		1958			
32540						17	17	0	15		1815			
32541						8	8	0	8		2171			
32542						8	7	0	8		2078			
32543						9	9	0	8		1845			
32544						4	4	0	4		1886			
32545						4	4	0	4		1841			
32546						8	8	0	8		1843			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
32536	27,777	28,921	0.00	11.00		-9.00	1.00	0.00	9.00	9.00				
32537	7,313	7,983	0.00	11.00		-10.00	1.00	0.00	9.00	9.00				
32538	8,470	7,402	0.00	10.00		-9.00	1.00	0.00	8.00	9.00				
32539	3,632	3,880	0.00	10.00		-9.00	1.00	0.00	9.00	10.00				
32540	32,522	32,814	0.00	11.00		1.00	1.00	0.00	9.00	8.00				
32541	16,946	16,853	0.00	10.00		1.00	1.00	0.00	9.00	9.00				
32542	14,186	14,044	0.00	16.00		2.00	1.00	0.00	8.00	10.00				
32543	14,184	15,902	0.00	15.00		2.00	1.00	0.00	9.00	9.00				
32544	7,819	8,179	0.00	14.00		2.00	1.00	0.00	9.00	10.00				
32545	7,605	7,913	0.00	16.00		2.00	1.00	0.00	8.00	10.00				
32546	14,770	15,772	0.00	12.00		3.00	1.00	0.00	8.00	10.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

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SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
32547														
32548														
32549														
32550														
32551														
32552														
32553														
32554														
32555														
32556														
32557														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH				CUSRELB	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
32547														
32548														
32549														
32550														
32551														
32552														
32553														
32554														
32555														
32556														
32557														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
32547						4	4	0	4		1899			
32548						9	10	0	9		1996			
32549						8	7	0	8		1964			
32550						13	12	0	13		1924			
32551						4	4	0	4		1807			
32552						17	18	0	19		2073			
32553						10	11	0	11		2027			
32554						12	12	0	11		1841			
32555						6	5	0	5		1827			
32556						14	13	0	13		2121			
32557						9	10	0	11		1971			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
32547	8,644	7,358	0.00	11.00		3.00	1.00	0.00	9.00	9.00				
32548	17,927	19,364	0.00	12.00		3.00	1.00	0.00	9.00	8.00				
32549	15,019	14,749	0.00	24.00		-10.00	1.00	0.00	8.00	9.00				
32550	24,678	26,317	0.00	26.00		-9.00	1.00	0.00	9.00	9.00				
32551	7,489	7,383	0.00	25.00		-10.00	1.00	0.00	9.00	10.00				
32552	35,088	36,454	0.00	0.00		4.00	1.00	0.00	9.00	9.00				
32553	19,927	19,418	0.00	0.00		4.00	1.00	0.00	8.00	10.00				
32554	25,135	22,703	0.00	0.00		5.00	1.00	0.00	9.00	9.00				
32555	9,500	10,797	0.00	0.00		5.00	1.00	0.00	8.00	9.00				
32556	27,122	29,261	0.00	0.00		5.00	1.00	0.00	9.00	10.00				
32557	19,445	18,261	0.00	0.00		5.00	1.00	0.00	8.00	9.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

6

SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
32558													
32559													
32560													
32561													
32562													
32563													
32564													
32565													
32566													
32567													
32568													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
32558													
32559													
32560													
32561													
32562													
32563													
32564													
32565													
32566													
32567													
32568													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	
32558						8	9	0	8		2097		
32559						2	2	0	2		1788		
32560						4	4	0	4		1778		
32561						4	4	0	4		2049		
32562						15	14	0	17		1930		
32563						6	6	0	6		1798		
32564						2	2	0	2		2031		
32565						2	2	0	2		2203		
32566						2	2	0	2		2145		
32567						5	6	0	6		1873		
32568						13	15	0	15		1915		
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH		
32558	16,421	15,355	0.00	0.00		4.00	1.00	0.00	8.00	9.00			
32559	4,118	3,954	0.00	0.00		4.00	1.00	0.00	8.00	10.00			
32560	6,952	7,342	0.00	25.00		6.00	1.00	0.00	8.00	8.00			
32561	8,242	8,443	0.00	25.00		6.00	1.00	0.00	9.00	9.00			
32562	30,956	32,852	0.00	23.00		6.00	1.00	0.00	9.00	10.00			
32563	12,794	12,802	0.00	27.00		5.00	1.00	0.00	9.00	9.00			
32564	4,042	3,566	0.00	15.00		3.00	1.00	0.00	8.00	9.00			
32565	3,582	3,691	0.00	13.00		3.00	1.00	0.00	8.00	10.00			
32566	3,829	4,228	0.00	14.00		3.00	1.00	0.00	8.00	10.00			
32567	11,839	10,952	0.00	14.00		3.00	1.00	0.00	9.00	9.00			
32568	26,997	26,235	0.00	13.00		3.00	1.00	0.00	9.00	9.00			

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

7

SEQ1H	SEQH	PRODCODH	CONNUMH		OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65071													
65072													
65073													
65074													
65075													
65076													
65077													
65078													
65079													
65080													
65081													
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
65071													
65072													
65073													
65074													
65075													
65076													
65077													
65078													
65079													
65080													
65081													
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH	
65071						19	21	0	20		2429		
65072						22	19	0	19		2146		
65073						19	20	0	22		2196		
65074						25	26	0	23		2343		
65075						22	20	0	22		2142		
65076						8	8	0	8		2151		
65077						22	23	0	22		2237		
65078						17	17	0	16		2468		
65079						6	6	0	6		2389		
65080						2	2	0	2		2530		
65081						4	4	0	4		2567		
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH		
65071	50,219	47,279	0.00	32.00		-89.00	0.00	11.00	10.00	9.00			
65072	43,363	47,402	0.00	34.00		-98.00	0.00	10.00	10.00	10.00			
65073	45,207	50,439	0.00	34.00		-86.00	0.00	11.00	11.00	9.00			
65074	56,947	56,205	0.00	27.00		-94.00	0.00	11.00	11.00	10.00			
65075	46,839	55,743	0.00	36.00		-103.00	0.00	10.00	11.00	10.00			
65076	19,517	19,224	0.00	27.00		-88.00	0.00	10.00	10.00	10.00			
65077	57,284	59,814	0.00	28.00		-97.00	0.00	11.00	11.00	9.00			
65078	35,085	38,133	0.00	26.00		-95.00	0.00	10.00	9.00	9.00			
65079	15,037	13,276	0.00	29.00		-85.00	0.00	9.00	10.00	9.00			
65080	4,861	4,395	0.00	30.00		-99.00	0.00	11.00	11.00	8.00			
65081	9,766	9,047	0.00	26.00		-93.00	0.00	11.00	10.00	9.00			

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

8

SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65082														
65083														
65084														
65085														
65086														
65087														
65088														
65089														
65090														
65091														
65092														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH				CUSRELH	CUSCATH	SALINDTH	SALEDATH	INVOICEH		
65082														
65083														
65084														
65085														
65086														
65087														
65088														
65089														
65090														
65091														
65092														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
65082						2	2	0	2		2271			
65083						20	20	0	21		2216			
65084						27	26	0	30		2390			
65085						24	26	0	26		2536			
65086						25	23	0	24		2586			
65087						11	10	0	11		2576			
65088						18	18	0	19		2186			
65089						8	7	0	7		2219			
65090						4	4	0	4		2414			
65091						2	2	0	2		2549			
65092						8	7	0	8		2347			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
65082	4,206	4,218	0.00	29.00		-100.00	0.00	11.00	11.00	9.00				
65083	49,135	55,220	0.00	30.00		-94.00	0.00	10.00	10.00	10.00				
65084	58,756	65,128	0.00	27.00		-85.00	0.00	10.00	11.00	9.00				
65085	60,325	51,730	0.00	27.00		-86.00	0.00	9.00	10.00	9.00				
65086	54,988	51,124	0.00	26.00		-90.00	0.00	10.00	10.00	9.00				
65087	24,309	20,842	0.00	25.00		-93.00	0.00	10.00	11.00	9.00				
65088	51,168	42,205	0.00	28.00		-86.00	0.00	10.00	11.00	9.00				
65089	17,270	19,115	0.00	25.00		-104.00	0.00	11.00	9.00	9.00				
65090	10,151	9,995	0.00	28.00		-100.00	0.00	9.00	9.00	10.00				
65091	4,398	4,527	0.00	26.00		-94.00	0.00	9.00	11.00	8.00				
65092	20,293	19,735	0.00	17.00		-117.00	0.00	11.00	10.00	9.00				

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Home Market Sales Data (Theoretical)

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SEQ1H	SEQH	PRODCODH	CONNUMH			OVERRUNH	PRIMEH	SPECGRADEH		STEELH	MSYSTRH	COATH	MARTH	DIAMH
65093														
65094														
65095														
65096														
65097														
65098														
65099														
65100														
65101														
65102														
65103														
SEQ1H	DIAMMMH	FORMH	CUSCODH	CCUSCODH			CUSREXH	CUSCATH	SALINDTH	SALEDATH	INVOICEH			
65093														
65094														
65095														
65096														
65097														
65098														
65099														
65100														
65101														
65102														
65103														
SEQ1H	INVOICE2H	SHIPDATH	PAYDATEH	SALETERH	PAYTERMH	QTYH	TQTYH	RETURNH	NETQTYH	QTYUNITH	GRSUPRH	CURRH		
65093						6	6	0	6		2399			
65094						2	2	0	2		2589			
65095						2	2	0	2		2594			
65096						2	2	0	2		2438			
65097						2	2	0	2		2239			
65098						2	2	0	2		2280			
65099						2	2	0	2		2703			
65100						20	24	0	21		2267			
65101						28	25	0	24		2667			
65102						25	22	0	25		2234			
65103						22	25	0	24		2594			
SEQ1H	TOTVALH	TOTVAL2H	BILLADJH	INLFTCH	DESTH	CREDITH	INDIRSH	INDIRS1H	INVCARH	PACKH	SELLERH			
65093	13,385	15,426	0.00	18.00		-135.00	0.00	11.00	12.00	10.00				
65094	5,457	5,290	0.00	16.00		-134.00	0.00	11.00	11.00	9.00				
65095	4,395	5,129	0.00	18.00		-135.00	0.00	11.00	12.00	10.00				
65096	5,381	4,979	0.00	16.00		-117.00	0.00	11.00	12.00	10.00				
65097	4,869	4,503	0.00	16.00		-120.00	0.00	11.00	11.00	10.00				
65098	4,858	4,801	0.00	16.00		-116.00	0.00	10.00	10.00	9.00				
65099	5,336	4,523	0.00	17.00		-116.00	0.00	10.00	11.00	9.00				
65100	55,606	50,789	0.00	28.00		-122.00	0.00	10.00	11.00	10.00				
65101	59,066	67,888	0.00	28.00		-129.00	0.00	11.00	11.00	9.00				
65102	60,142	55,137	0.00	25.00		-114.00	0.00	10.00	10.00	10.00				
65103	56,396	63,019	0.00	29.00		-118.00	0.00	10.00	11.00	9.00				

(PUBLIC VERSION)

Exhibit S1-31 Revised COP Listing

ACTUAL QUANTITY
KAPTAN_AR1718_COP02_ACT (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Cost of Production Data (Actual)

1

Obs	CONNUM	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB	FOHB
1								36,844	1,421.00	61.00	19.00	197.00	4.00
2								72,421	1,612.00	61.00	23.00	223.00	5.00
3								326	1,276.00	64.00	21.00	262.00	4.00
4								2,543	1,120.00	62.00	18.00	186.00	4.00
5								12,039	1,328.00	63.00	20.00	254.00	4.00
6								0	1,426.00	64.00	22.00	199.00	4.00
7								86,391	1,235.00	71.00	22.00	199.00	4.00
8								672,876	1,559.00	70.00	23.00	220.00	5.00
9								236,304	1,355.00	61.00	25.00	224.00	5.00
10								233	1,594.00	59.00	24.00	234.00	4.00
11								18,666	1,363.00	78.00	20.00	235.00	4.00
12								61,858	1,349.00	76.00	21.00	241.00	5.00
13								2,811	1,371.00	74.00	23.00	252.00	5.00
14								5,891	1,457.00	58.00	21.00	215.00	4.00
15								58,162	1,388.00	70.00	22.00	233.00	4.00
16								19,589	1,366.00	83.00	20.00	250.00	4.00
17								14,461	1,847.00	83.00	25.00	234.00	4.00
18								585	1,258.00	112.00	23.00	241.00	4.00
19								766	1,098.00	105.00	24.00	222.00	4.00
20								870	1,285.00	124.00	24.00	263.00	4.00
21								8,942	1,470.00	61.00	21.00	249.00	4.00

Obs	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
1	192.00	-69.00	21.00	112.00	2.00	2,050.00	19.00	11.00	0.00	1,915.00
2	14.00	-76.00	16.00	64.00	2.00	2,090.00	18.00	10.00	0.00	1,909.00
3	0.00	-66.00	16.00	59.00	2.00	1,540.00	14.00	9.00	0.00	1,575.00
4	239.00	-70.00	19.00	115.00	2.00	1,619.00	15.00	11.00	0.00	1,779.00
5	24.00	-67.00	17.00	67.00	3.00	1,878.00	16.00	10.00	0.00	1,619.00
6	147.00	-74.00	20.00	109.00	2.00	1,835.00	18.00	11.00	0.00	2,052.00
7	173.00	-71.00	19.00	105.00	2.00	1,915.00	16.00	12.00	0.00	1,879.00
8	17.00	-68.00	15.00	64.00	2.00	1,883.00	15.00	11.00	0.00	1,985.00
9	0.00	-66.00	13.00	55.00	2.00	1,782.00	16.00	11.00	0.00	1,822.00
10	0.00	-72.00	18.00	67.00	3.00	1,962.00	17.00	11.00	0.00	1,727.00
11	180.00	-68.00	21.00	116.00	2.00	1,804.00	17.00	11.00	0.00	2,103.00
12	19.00	-64.00	16.00	58.00	3.00	1,696.00	17.00	11.00	0.00	1,774.00
13	0.00	-74.00	14.00	55.00	3.00	1,723.00	14.00	10.00	0.00	1,660.00
14	154.00	-80.00	21.00	115.00	2.00	2,067.00	16.00	11.00	0.00	1,941.00
15	22.00	-74.00	16.00	62.00	2.00	1,964.00	17.00	10.00	0.00	1,913.00
16	0.00	-66.00	13.00	51.00	2.00	1,646.00	16.00	10.00	0.00	1,784.00
17	0.00	-74.00	15.00	67.00	3.00	1,925.00	17.00	13.00	0.00	2,236.00
18	0.00	-75.00	15.00	57.00	3.00	1,701.00	15.00	10.00	0.00	1,460.00
19	21.00	-63.00	16.00	63.00	3.00	1,656.00	14.00	9.00	0.00	1,767.00
20	0.00	-72.00	14.00	51.00	2.00	1,550.00	16.00	10.00	0.00	1,662.00
21	0.00	-76.00	17.00	59.00	3.00	1,744.00	17.00	10.00	0.00	1,854.00

(PUBLIC VERSION)

ACTUAL QUANTITY
KAPTAN_AR1718_COPQTR02_ACT (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Actual)

1

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
1									4,183	1,129.00	61.00	20.00	218.00
2									7,146	1,241.00	67.00	20.00	224.00
3									6,319	1,358.00	61.00	21.00	229.00
4									16,641	1,328.00	65.00	19.00	235.00
5									5,847	1,714.00	66.00	20.00	212.00
6									5,307	1,284.00	57.00	23.00	235.00
7									12,826	1,199.00	63.00	23.00	221.00
8									5,223	1,251.00	57.00	21.00	257.00
9									9,482	1,353.00	66.00	24.00	251.00
10									16,240	1,596.00	59.00	23.00	253.00
11									34,419	1,758.00	58.00	21.00	224.00
12									261	1,270.00	58.00	23.00	260.00
13									82	1,362.00	56.00	23.00	225.00
14									296	1,038.00	55.00	18.00	205.00
15									1,236	1,083.00	66.00	20.00	198.00
16									0	1,402.00	59.00	20.00	219.00
17									1,024	1,287.00	58.00	18.00	191.00
18									740	1,255.00	64.00	24.00	214.00
19									5,726	1,317.00	64.00	21.00	239.00
20									0	1,613.00	61.00	22.00	228.00
21									5,183	1,491.00	66.00	21.00	234.00
22									10,435	1,231.00	60.00	20.00	236.00
23									20,753	1,080.00	61.00	22.00	212.00
24									14,479	1,330.00	60.00	19.00	202.00
25									19,459	1,254.00	70.00	21.00	219.00
26									17,681	1,238.00	61.00	19.00	219.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
1	4.00	233.00	-70.00	21.00	106.00	2.00	1,728.00	19.00	10.00	0.00	1,687.00
2	4.00	6.00	-68.00	20.00	111.00	2.00	1,806.00	19.00	10.00	0.00	1,790.00
3	4.00	255.00	-73.00	19.00	110.00	2.00	2,008.00	17.00	11.00	0.00	1,775.00
4	4.00	340.00	-74.00	18.00	117.00	2.00	2,084.00	19.00	13.00	0.00	2,257.00
5	4.00	0.00	-68.00	18.00	112.00	2.00	2,307.00	18.00	13.00	0.00	2,064.00
6	5.00	7.00	-74.00	16.00	68.00	2.00	1,571.00	19.00	9.00	0.00	1,576.00
7	4.00	22.00	-68.00	15.00	68.00	2.00	1,461.00	18.00	9.00	0.00	1,700.00
8	4.00	1.00	-74.00	17.00	60.00	2.00	1,558.00	19.00	9.00	0.00	1,716.00
9	4.00	39.00	-77.00	15.00	63.00	2.00	1,704.00	16.00	12.00	0.00	1,740.00
10	4.00	31.00	-77.00	15.00	68.00	3.00	2,058.00	18.00	11.00	0.00	1,825.00
11	4.00	0.00	-66.00	15.00	69.00	3.00	2,342.00	17.00	14.00	0.00	2,096.00
12	4.00	0.00	-68.00	15.00	52.00	3.00	1,659.00	13.00	8.00	0.00	1,712.00
13	4.00	0.00	-63.00	16.00	56.00	3.00	1,649.00	14.00	10.00	0.00	1,695.00
14	4.00	64.00	-73.00	22.00	113.00	2.00	1,675.00	18.00	9.00	0.00	1,734.00
15	3.00	216.00	-73.00	20.00	125.00	2.00	1,655.00	15.00	10.00	0.00	1,627.00
16	4.00	251.00	-82.00	21.00	118.00	2.00	1,937.00	17.00	12.00	0.00	2,105.00
17	4.00	321.00	-72.00	18.00	123.00	2.00	1,946.00	17.00	13.00	0.00	1,917.00
18	4.00	7.00	-68.00	16.00	68.00	3.00	1,400.00	17.00	10.00	0.00	1,487.00
19	4.00	23.00	-71.00	16.00	59.00	2.00	1,438.00	15.00	9.00	0.00	1,749.00
20	5.00	39.00	-75.00	14.00	70.00	2.00	1,994.00	16.00	11.00	0.00	1,829.00
21	4.00	33.00	-76.00	16.00	63.00	3.00	1,814.00	15.00	12.00	0.00	2,048.00
22	4.00	72.00	-80.00	20.00	122.00	2.00	1,447.00	17.00	9.00	0.00	1,445.00
23	4.00	215.00	-72.00	20.00	122.00	2.00	1,689.00	16.00	9.00	0.00	1,563.00
24	4.00	6.00	-81.00	19.00	112.00	2.00	1,658.00	15.00	10.00	0.00	1,669.00
25	4.00	250.00	-74.00	20.00	107.00	2.00	2,047.00	15.00	10.00	0.00	2,000.00
26	4.00	327.00	-79.00	20.00	115.00	2.00	1,940.00	17.00	13.00	0.00	1,979.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Actual)

2

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
27									18,095	1,918.00	74.00	20.00	227.00
28									29,189	1,158.00	58.00	21.00	225.00
29									117,128	1,154.00	71.00	21.00	225.00
30									132,935	1,375.00	65.00	24.00	250.00
31									157,526	1,504.00	59.00	24.00	257.00
32									128,004	1,449.00	71.00	24.00	229.00
33									123,360	1,960.00	61.00	22.00	251.00
34									16,031	1,270.00	68.00	22.00	241.00
35									41,054	1,153.00	63.00	21.00	253.00
36									41,121	1,368.00	64.00	23.00	224.00
37									58,216	1,363.00	57.00	21.00	252.00
38									39,834	1,786.00	69.00	25.00	246.00
39									36,232	1,932.00	69.00	21.00	236.00
40									40	1,148.00	67.00	24.00	248.00
41									44	1,588.00	62.00	21.00	247.00
42									144	1,776.00	62.00	22.00	224.00
43									565	1,213.00	68.00	21.00	199.00
44									6,213	957.00	75.00	21.00	228.00
45									1,625	1,287.00	69.00	20.00	234.00
46									0	1,387.00	71.00	21.00	238.00
47									4,824	1,365.00	66.00	19.00	211.00
48									4,543	1,786.00	64.00	19.00	224.00
49									11,911	1,304.00	70.00	24.00	227.00
50									29,933	1,114.00	65.00	23.00	236.00
51									4,274	1,152.00	74.00	25.00	242.00
52									0	1,547.00	70.00	24.00	262.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
27	4.00	0.00	-80.00	18.00	104.00	2.00	2,140.00	18.00	12.00	0.00	2,266.00
28	4.00	8.00	-68.00	16.00	58.00	3.00	1,653.00	16.00	9.00	0.00	1,529.00
29	4.00	21.00	-74.00	15.00	63.00	2.00	1,645.00	16.00	9.00	0.00	1,730.00
30	4.00	1.00	-72.00	17.00	67.00	2.00	1,491.00	15.00	9.00	0.00	1,777.00
31	4.00	39.00	-73.00	16.00	64.00	3.00	1,671.00	15.00	11.00	0.00	1,761.00
32	4.00	33.00	-70.00	16.00	64.00	3.00	1,808.00	15.00	12.00	0.00	1,976.00
33	4.00	0.00	-67.00	15.00	65.00	3.00	2,263.00	17.00	12.00	0.00	2,091.00
34	4.00	0.00	-67.00	13.00	56.00	3.00	1,633.00	16.00	10.00	0.00	1,560.00
35	4.00	0.00	-66.00	13.00	51.00	3.00	1,522.00	17.00	9.00	0.00	1,708.00
36	4.00	0.00	-74.00	14.00	50.00	2.00	1,699.00	16.00	10.00	0.00	1,743.00
37	4.00	0.00	-71.00	13.00	56.00	2.00	1,656.00	17.00	10.00	0.00	1,945.00
38	4.00	0.00	-69.00	13.00	56.00	2.00	1,916.00	15.00	11.00	0.00	1,969.00
39	4.00	0.00	-75.00	13.00	55.00	3.00	2,174.00	16.00	12.00	0.00	1,988.00
40	4.00	0.00	-75.00	16.00	70.00	3.00	1,662.00	16.00	9.00	0.00	1,624.00
41	5.00	0.00	-71.00	19.00	62.00	3.00	1,877.00	16.00	11.00	0.00	1,901.00
42	5.00	0.00	-76.00	19.00	67.00	3.00	1,905.00	18.00	11.00	0.00	1,855.00
43	4.00	64.00	-75.00	20.00	123.00	2.00	1,603.00	16.00	10.00	0.00	1,586.00
44	4.00	223.00	-73.00	19.00	108.00	2.00	1,762.00	18.00	10.00	0.00	1,554.00
45	4.00	6.00	-80.00	19.00	113.00	2.00	1,601.00	16.00	10.00	0.00	1,740.00
46	4.00	254.00	-72.00	19.00	115.00	2.00	1,810.00	16.00	12.00	0.00	1,845.00
47	4.00	335.00	-71.00	20.00	103.00	2.00	2,245.00	17.00	13.00	0.00	1,978.00
48	4.00	0.00	-74.00	19.00	110.00	2.00	2,329.00	17.00	14.00	0.00	2,102.00
49	4.00	7.00	-76.00	16.00	69.00	3.00	1,564.00	17.00	9.00	0.00	1,474.00
50	5.00	22.00	-69.00	16.00	60.00	2.00	1,660.00	16.00	10.00	0.00	1,585.00
51	4.00	1.00	-72.00	14.00	64.00	3.00	1,639.00	17.00	10.00	0.00	1,765.00
52	5.00	40.00	-63.00	16.00	66.00	3.00	1,670.00	16.00	10.00	0.00	1,882.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Actual)

3

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
53									13,680	1,725.00	72.00	24.00	225.00
54									8,895	1,691.00	73.00	22.00	261.00
55									1,393	1,172.00	74.00	22.00	250.00
56									808	1,198.00	68.00	23.00	247.00
57									32	1,335.00	70.00	24.00	258.00
58									0	1,574.00	63.00	23.00	263.00
59									127	1,601.00	75.00	23.00	250.00
60									225	1,987.00	72.00	21.00	245.00
61									101	1,218.00	57.00	22.00	233.00
62									817	948.00	63.00	21.00	231.00
63									976	1,309.00	55.00	19.00	223.00
64									1,384	1,180.00	59.00	21.00	223.00
65									1,080	1,465.00	59.00	20.00	241.00
66									1,550	1,849.00	62.00	19.00	208.00
67									1,546	1,240.00	67.00	22.00	256.00
68									12,456	1,289.00	67.00	21.00	251.00
69									9,165	1,265.00	78.00	21.00	229.00
70									25,804	1,401.00	68.00	23.00	246.00
71									6,680	1,661.00	75.00	21.00	244.00
72									6,085	1,772.00	71.00	21.00	254.00
73									664	1,311.00	78.00	24.00	236.00
74									2,605	1,323.00	92.00	23.00	265.00
75									4,918	1,213.00	88.00	24.00	220.00
76									4,976	1,541.00	79.00	21.00	231.00
77									3,191	1,474.00	85.00	21.00	250.00
78									2,448	1,814.00	86.00	23.00	229.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
53	4.00	29.00	-65.00	15.00	65.00	3.00	2,100.00	15.00	12.00	0.00	2,156.00
54	4.00	0.00	-72.00	16.00	65.00	3.00	1,996.00	15.00	13.00	0.00	2,138.00
55	4.00	0.00	-66.00	14.00	58.00	3.00	1,487.00	15.00	9.00	0.00	1,662.00
56	4.00	0.00	-65.00	16.00	56.00	2.00	1,645.00	14.00	10.00	0.00	1,583.00
57	4.00	0.00	-72.00	14.00	60.00	2.00	1,492.00	16.00	10.00	0.00	1,657.00
58	4.00	0.00	-76.00	15.00	60.00	3.00	1,789.00	15.00	11.00	0.00	1,826.00
59	4.00	0.00	-71.00	13.00	54.00	2.00	2,142.00	15.00	12.00	0.00	2,174.00
60	4.00	0.00	-73.00	14.00	60.00	2.00	1,972.00	15.00	12.00	0.00	2,152.00
61	4.00	66.00	-74.00	19.00	119.00	2.00	1,439.00	17.00	9.00	0.00	1,664.00
62	4.00	199.00	-69.00	20.00	105.00	2.00	1,724.00	18.00	10.00	0.00	1,611.00
63	4.00	5.00	-75.00	21.00	122.00	2.00	1,608.00	16.00	10.00	0.00	1,808.00
64	4.00	248.00	-74.00	20.00	106.00	2.00	1,934.00	19.00	11.00	0.00	1,783.00
65	4.00	288.00	-79.00	21.00	123.00	2.00	2,208.00	17.00	11.00	0.00	2,111.00
66	4.00	0.00	-79.00	20.00	120.00	2.00	2,343.00	19.00	13.00	0.00	2,154.00
67	4.00	7.00	-71.00	17.00	59.00	2.00	1,456.00	16.00	9.00	0.00	1,437.00
68	4.00	22.00	-64.00	16.00	65.00	3.00	1,608.00	17.00	10.00	0.00	1,615.00
69	4.00	1.00	-66.00	14.00	60.00	2.00	1,641.00	17.00	11.00	0.00	1,633.00
70	4.00	41.00	-65.00	14.00	68.00	2.00	1,744.00	17.00	10.00	0.00	1,735.00
71	4.00	33.00	-73.00	16.00	61.00	2.00	2,134.00	16.00	11.00	0.00	2,015.00
72	4.00	0.00	-68.00	16.00	56.00	2.00	2,061.00	16.00	14.00	0.00	2,131.00
73	5.00	0.00	-69.00	14.00	53.00	2.00	1,688.00	15.00	9.00	0.00	1,721.00
74	4.00	0.00	-76.00	12.00	49.00	2.00	1,479.00	18.00	10.00	0.00	1,576.00
75	5.00	0.00	-66.00	13.00	50.00	2.00	1,672.00	16.00	9.00	0.00	1,791.00
76	4.00	0.00	-72.00	14.00	50.00	2.00	1,968.00	15.00	12.00	0.00	1,980.00
77	4.00	0.00	-76.00	15.00	53.00	3.00	2,007.00	16.00	12.00	0.00	2,058.00
78	5.00	0.00	-64.00	15.00	56.00	2.00	2,179.00	15.00	14.00	0.00	2,057.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Actual)

4

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
79									503	1,322.00	82.00	22.00	255.00
80									3,119	1,523.00	90.00	24.00	245.00
81									3,565	1,626.00	92.00	24.00	257.00
82									6,810	1,961.00	92.00	24.00	227.00
83									633	1,276.00	108.00	23.00	255.00
84									620	1,270.00	122.00	20.00	250.00
85									56	1,252.00	107.00	23.00	228.00
86									622	1,205.00	109.00	23.00	228.00
87									229	1,373.00	119.00	24.00	264.00
88									212	1,156.00	65.00	22.00	263.00
89									2,483	1,210.00	58.00	22.00	247.00
90									630	1,212.00	63.00	24.00	259.00
91									742	1,475.00	56.00	25.00	242.00
92									2,144	1,702.00	64.00	25.00	239.00
93									2,568	1,768.00	66.00	22.00	253.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
79	4.00	0.00	-70.00	15.00	63.00	3.00	1,634.00	20.00	10.00	0.00	1,532.00
80	5.00	0.00	-65.00	18.00	61.00	3.00	2,015.00	17.00	12.00	0.00	1,855.00
81	5.00	0.00	-63.00	16.00	70.00	3.00	2,176.00	20.00	11.00	0.00	2,072.00
82	5.00	0.00	-71.00	16.00	66.00	3.00	2,086.00	18.00	13.00	0.00	2,193.00
83	4.00	0.00	-66.00	15.00	63.00	2.00	1,649.00	15.00	10.00	0.00	1,766.00
84	4.00	20.00	-67.00	15.00	71.00	2.00	1,497.00	14.00	9.00	0.00	1,769.00
85	4.00	1.00	-76.00	15.00	63.00	3.00	1,527.00	14.00	10.00	0.00	1,806.00
86	5.00	0.00	-73.00	14.00	50.00	2.00	1,585.00	14.00	10.00	0.00	1,657.00
87	4.00	0.00	-71.00	13.00	58.00	2.00	1,739.00	13.00	10.00	0.00	1,635.00
88	4.00	0.00	-75.00	14.00	63.00	3.00	1,468.00	17.00	9.00	0.00	1,662.00
89	5.00	0.00	-68.00	17.00	55.00	3.00	1,684.00	17.00	10.00	0.00	1,524.00
90	4.00	0.00	-73.00	16.00	60.00	3.00	1,545.00	16.00	9.00	0.00	1,789.00
91	5.00	0.00	-66.00	17.00	65.00	2.00	1,676.00	17.00	10.00	0.00	1,923.00
92	4.00	0.00	-73.00	17.00	61.00	3.00	1,893.00	18.00	12.00	0.00	1,856.00
93	4.00	0.00	-65.00	17.00	56.00	3.00	2,003.00	16.00	13.00	0.00	1,982.00

(PUBLIC VERSION)

THEORETICAL QUANTITY
KAPTAN_AR1718_COP02_TH (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Cost of Production Data (Theoretical)

1

Obs	CONNUM	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB	FOHB
1								42,594	1,319.00	54.00	18.00	210.00	4.00
2								88,253	1,390.00	56.00	20.00	240.00	4.00
3								350	1,137.00	61.00	21.00	253.00	4.00
4								2,821	1,196.00	55.00	17.00	188.00	4.00
5								13,303	1,230.00	56.00	20.00	248.00	4.00
6								0	1,372.00	68.00	18.00	206.00	4.00
7								105,474	1,188.00	65.00	20.00	213.00	4.00
8								737,623	1,303.00	66.00	22.00	251.00	4.00
9								242,381	1,321.00	57.00	24.00	232.00	4.00
10								259	1,605.00	61.00	23.00	226.00	4.00
11								17,581	1,327.00	62.00	20.00	194.00	3.00
12								71,270	1,197.00	61.00	22.00	237.00	4.00
13								3,131	1,206.00	62.00	23.00	243.00	5.00
14								6,172	1,330.00	60.00	22.00	207.00	4.00
15								64,551	1,425.00	62.00	20.00	248.00	4.00
16								18,585	1,575.00	87.00	23.00	221.00	4.00
17								13,669	1,823.00	85.00	21.00	237.00	4.00
18								682	1,176.00	118.00	22.00	246.00	5.00
19								711	1,317.00	110.00	22.00	237.00	4.00
20								881	1,304.00	124.00	21.00	253.00	4.00
21								8,536	1,627.00	64.00	22.00	233.00	4.00

Obs	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
1	186.00	-67.00	18.00	105.00	2.00	1,883.00	18.00	12.00	0.00	1,695.00
2	15.00	-62.00	15.00	55.00	2.00	1,793.00	16.00	10.00	0.00	1,778.00
3	0.00	-62.00	16.00	56.00	3.00	1,562.00	14.00	9.00	0.00	1,493.00
4	212.00	-69.00	18.00	107.00	2.00	1,735.00	16.00	11.00	0.00	1,719.00
5	23.00	-72.00	14.00	59.00	3.00	1,624.00	14.00	9.00	0.00	1,738.00
6	152.00	-66.00	19.00	107.00	2.00	1,887.00	15.00	11.00	0.00	1,913.00
7	165.00	-71.00	18.00	103.00	2.00	1,692.00	15.00	11.00	0.00	1,695.00
8	20.00	-72.00	15.00	67.00	3.00	1,795.00	15.00	11.00	0.00	1,869.00
9	0.00	-74.00	14.00	51.00	2.00	1,916.00	15.00	10.00	0.00	1,897.00
10	0.00	-72.00	16.00	61.00	3.00	1,917.00	18.00	11.00	0.00	1,712.00
11	154.00	-73.00	19.00	109.00	2.00	1,709.00	17.00	12.00	0.00	1,648.00
12	17.00	-61.00	14.00	62.00	3.00	1,511.00	15.00	9.00	0.00	1,711.00
13	0.00	-64.00	13.00	56.00	2.00	1,457.00	15.00	9.00	0.00	1,564.00
14	131.00	-69.00	21.00	105.00	2.00	1,924.00	18.00	10.00	0.00	2,017.00
15	22.00	-74.00	15.00	64.00	2.00	1,593.00	17.00	10.00	0.00	1,741.00
16	0.00	-64.00	15.00	48.00	2.00	1,830.00	17.00	10.00	0.00	1,777.00
17	0.00	-72.00	16.00	59.00	3.00	2,191.00	17.00	13.00	0.00	2,212.00
18	0.00	-63.00	15.00	61.00	2.00	1,418.00	14.00	10.00	0.00	1,628.00
19	20.00	-71.00	17.00	64.00	2.00	1,606.00	16.00	10.00	0.00	1,823.00
20	0.00	-72.00	15.00	59.00	2.00	1,498.00	14.00	9.00	0.00	1,567.00
21	0.00	-64.00	17.00	59.00	3.00	1,763.00	16.00	10.00	0.00	1,750.00

(PUBLIC VERSION)

THEORETICAL QUANTITY
KAPTAN_AR1718_COPQTR02_TH (Public Printout)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Theoretical)

1

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
1									4,246	1,012.00	63.00	21.00	194.00
2									7,354	1,257.00	59.00	18.00	202.00
3									7,523	1,284.00	53.00	20.00	216.00
4									16,642	1,419.00	55.00	18.00	200.00
5									7,248	1,602.00	62.00	20.00	221.00
6									5,726	1,267.00	64.00	20.00	246.00
7									12,718	1,132.00	63.00	23.00	211.00
8									5,776	1,336.00	54.00	22.00	219.00
9									8,967	1,392.00	59.00	21.00	227.00
10									16,689	1,475.00	61.00	20.00	211.00
11									32,764	1,894.00	57.00	22.00	228.00
12									251	1,188.00	56.00	21.00	236.00
13									90	1,269.00	63.00	25.00	262.00
14									259	1,135.00	53.00	20.00	191.00
15									1,259	1,058.00	54.00	20.00	211.00
16									0	1,120.00	53.00	19.00	214.00
17									1,164	1,313.00	60.00	18.00	205.00
18									731	1,055.00	57.00	21.00	227.00
19									6,933	1,266.00	64.00	23.00	226.00
20									0	1,356.00	64.00	21.00	213.00
21									5,239	1,609.00	54.00	23.00	229.00
22									10,366	1,210.00	55.00	20.00	224.00
23									19,165	979.00	68.00	21.00	225.00
24									13,145	1,353.00	58.00	22.00	197.00
25									17,816	1,332.00	70.00	20.00	220.00
26									17,586	1,278.00	71.00	21.00	232.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
1	3.00	205.00	-66.00	19.00	97.00	2.00	1,611.00	16.00	8.00	0.00	1,707.00
2	4.00	5.00	-73.00	17.00	102.00	2.00	1,527.00	15.00	10.00	0.00	1,734.00
3	3.00	247.00	-65.00	19.00	111.00	2.00	1,806.00	15.00	10.00	0.00	1,878.00
4	4.00	325.00	-75.00	19.00	99.00	2.00	1,768.00	15.00	11.00	0.00	1,825.00
5	4.00	0.00	-73.00	20.00	102.00	2.00	1,869.00	16.00	13.00	0.00	2,150.00
6	4.00	7.00	-67.00	14.00	65.00	2.00	1,549.00	16.00	9.00	0.00	1,419.00
7	5.00	23.00	-70.00	13.00	60.00	2.00	1,398.00	16.00	9.00	0.00	1,501.00
8	4.00	1.00	-65.00	16.00	61.00	2.00	1,455.00	18.00	10.00	0.00	1,451.00
9	4.00	36.00	-67.00	16.00	57.00	2.00	1,859.00	18.00	11.00	0.00	1,659.00
10	5.00	33.00	-67.00	15.00	65.00	2.00	2,001.00	17.00	12.00	0.00	2,030.00
11	4.00	0.00	-66.00	14.00	61.00	2.00	2,163.00	17.00	13.00	0.00	2,162.00
12	4.00	0.00	-70.00	15.00	62.00	2.00	1,473.00	14.00	10.00	0.00	1,629.00
13	4.00	0.00	-67.00	15.00	52.00	3.00	1,536.00	13.00	9.00	0.00	1,512.00
14	3.00	62.00	-68.00	20.00	116.00	2.00	1,500.00	16.00	9.00	0.00	1,628.00
15	4.00	191.00	-64.00	18.00	104.00	2.00	1,515.00	15.00	9.00	0.00	1,417.00
16	4.00	263.00	-69.00	18.00	102.00	2.00	1,836.00	14.00	12.00	0.00	1,718.00
17	4.00	333.00	-65.00	18.00	115.00	2.00	1,737.00	17.00	11.00	0.00	2,090.00
18	4.00	6.00	-68.00	14.00	59.00	2.00	1,539.00	14.00	8.00	0.00	1,564.00
19	4.00	22.00	-62.00	14.00	60.00	2.00	1,509.00	14.00	9.00	0.00	1,589.00
20	4.00	39.00	-63.00	16.00	58.00	3.00	1,710.00	14.00	10.00	0.00	1,723.00
21	4.00	28.00	-66.00	14.00	56.00	2.00	1,744.00	14.00	11.00	0.00	1,899.00
22	4.00	72.00	-69.00	18.00	116.00	2.00	1,578.00	17.00	9.00	0.00	1,435.00
23	3.00	205.00	-73.00	18.00	105.00	2.00	1,608.00	16.00	9.00	0.00	1,668.00
24	4.00	6.00	-66.00	18.00	106.00	2.00	1,720.00	16.00	9.00	0.00	1,526.00
25	4.00	260.00	-76.00	20.00	105.00	2.00	1,883.00	17.00	10.00	0.00	1,959.00
26	4.00	302.00	-71.00	18.00	106.00	2.00	2,134.00	17.00	11.00	0.00	1,811.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Theoretical)

2

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
27									18,809	1,893.00	66.00	20.00	200.00
28									27,748	1,281.00	68.00	21.00	228.00
29									115,416	1,295.00	57.00	23.00	248.00
30									125,264	1,188.00	68.00	22.00	215.00
31									151,094	1,352.00	59.00	21.00	237.00
32									124,972	1,519.00	69.00	21.00	233.00
33									128,469	1,747.00	59.00	21.00	213.00
34									13,807	1,085.00	60.00	21.00	255.00
35									36,472	1,130.00	66.00	21.00	261.00
36									36,566	1,355.00	66.00	22.00	241.00
37									56,615	1,623.00	61.00	23.00	237.00
38									34,278	1,454.00	57.00	21.00	217.00
39									35,684	1,741.00	60.00	23.00	260.00
40									37	1,201.00	57.00	22.00	254.00
41									51	1,465.00	61.00	24.00	228.00
42									151	1,707.00	57.00	23.00	258.00
43									522	1,058.00	72.00	18.00	211.00
44									6,469	898.00	66.00	20.00	188.00
45									1,759	1,099.00	66.00	20.00	221.00
46									0	1,239.00	62.00	21.00	188.00
47									4,671	1,305.00	71.00	20.00	194.00
48									4,513	1,625.00	64.00	21.00	220.00
49									10,729	1,069.00	66.00	22.00	248.00
50									30,349	1,203.00	71.00	20.00	226.00
51									4,220	1,208.00	72.00	21.00	213.00
52									0	1,363.00	57.00	23.00	204.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
27	4.00	0.00	-72.00	18.00	116.00	2.00	1,988.00	16.00	13.00	0.00	2,172.00
28	4.00	7.00	-63.00	15.00	64.00	2.00	1,624.00	16.00	10.00	0.00	1,419.00
29	4.00	21.00	-71.00	15.00	60.00	2.00	1,666.00	17.00	9.00	0.00	1,553.00
30	4.00	1.00	-62.00	14.00	63.00	2.00	1,567.00	17.00	10.00	0.00	1,462.00
31	4.00	37.00	-66.00	14.00	66.00	2.00	1,818.00	15.00	10.00	0.00	1,863.00
32	5.00	28.00	-73.00	14.00	67.00	2.00	1,774.00	16.00	11.00	0.00	1,856.00
33	4.00	0.00	-71.00	16.00	66.00	3.00	2,024.00	17.00	12.00	0.00	2,259.00
34	5.00	0.00	-72.00	13.00	55.00	2.00	1,496.00	17.00	8.00	0.00	1,615.00
35	4.00	0.00	-71.00	14.00	47.00	2.00	1,490.00	15.00	10.00	0.00	1,722.00
36	4.00	0.00	-69.00	14.00	53.00	2.00	1,658.00	15.00	10.00	0.00	1,649.00
37	5.00	0.00	-70.00	14.00	51.00	3.00	1,895.00	17.00	12.00	0.00	1,729.00
38	4.00	0.00	-67.00	14.00	57.00	2.00	1,963.00	15.00	10.00	0.00	2,028.00
39	4.00	0.00	-72.00	13.00	49.00	2.00	2,081.00	17.00	12.00	0.00	2,194.00
40	5.00	0.00	-73.00	17.00	68.00	3.00	1,519.00	16.00	8.00	0.00	1,555.00
41	5.00	0.00	-73.00	18.00	70.00	3.00	1,791.00	16.00	11.00	0.00	1,797.00
42	5.00	0.00	-63.00	18.00	65.00	3.00	1,926.00	15.00	11.00	0.00	2,048.00
43	4.00	66.00	-72.00	20.00	112.00	2.00	1,512.00	16.00	8.00	0.00	1,408.00
44	4.00	194.00	-74.00	17.00	104.00	2.00	1,702.00	16.00	10.00	0.00	1,492.00
45	4.00	5.00	-69.00	20.00	117.00	2.00	1,580.00	16.00	10.00	0.00	1,723.00
46	4.00	276.00	-75.00	19.00	116.00	2.00	1,793.00	16.00	11.00	0.00	1,748.00
47	4.00	332.00	-65.00	20.00	115.00	2.00	1,849.00	16.00	10.00	0.00	2,003.00
48	4.00	0.00	-68.00	19.00	105.00	2.00	1,898.00	15.00	13.00	0.00	2,117.00
49	4.00	7.00	-71.00	15.00	66.00	2.00	1,457.00	14.00	8.00	0.00	1,366.00
50	4.00	19.00	-62.00	16.00	60.00	2.00	1,422.00	15.00	10.00	0.00	1,473.00
51	4.00	1.00	-71.00	14.00	56.00	3.00	1,655.00	14.00	9.00	0.00	1,581.00
52	4.00	34.00	-66.00	15.00	58.00	2.00	1,935.00	15.00	11.00	0.00	1,713.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Theoretical)

3

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
53									13,789	1,589.00	70.00	21.00	236.00
54									10,430	1,729.00	66.00	21.00	226.00
55									1,522	1,233.00	67.00	23.00	232.00
56									934	1,177.00	67.00	20.00	215.00
57									34	1,243.00	71.00	23.00	244.00
58									0	1,567.00	65.00	22.00	212.00
59									134	1,518.00	62.00	23.00	252.00
60									261	1,789.00	65.00	23.00	211.00
61									102	1,165.00	59.00	21.00	230.00
62									905	1,051.00	58.00	20.00	230.00
63									1,145	1,363.00	58.00	21.00	193.00
64									1,398	1,361.00	54.00	18.00	231.00
65									1,037	1,421.00	59.00	19.00	197.00
66									1,673	1,645.00	54.00	18.00	230.00
67									1,680	1,086.00	67.00	21.00	219.00
68									10,961	1,310.00	60.00	21.00	257.00
69									9,491	1,369.00	75.00	20.00	242.00
70									26,798	1,312.00	58.00	21.00	212.00
71									7,185	1,715.00	62.00	20.00	256.00
72									5,722	1,723.00	66.00	22.00	235.00
73									698	1,196.00	85.00	22.00	266.00
74									2,763	1,266.00	79.00	25.00	256.00
75									4,452	1,183.00	94.00	22.00	251.00
76									5,478	1,380.00	81.00	23.00	234.00
77									3,054	1,756.00	83.00	21.00	220.00
78									2,423	1,724.00	87.00	23.00	229.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
53	4.00	28.00	-70.00	14.00	62.00	3.00	2,002.00	15.00	11.00	0.00	2,057.00
54	4.00	0.00	-68.00	15.00	58.00	2.00	2,215.00	15.00	12.00	0.00	1,999.00
55	4.00	0.00	-64.00	13.00	56.00	2.00	1,572.00	15.00	9.00	0.00	1,646.00
56	4.00	0.00	-67.00	16.00	51.00	3.00	1,449.00	15.00	9.00	0.00	1,550.00
57	4.00	0.00	-66.00	15.00	58.00	2.00	1,650.00	15.00	8.00	0.00	1,506.00
58	4.00	0.00	-62.00	13.00	51.00	2.00	1,626.00	14.00	11.00	0.00	1,740.00
59	4.00	0.00	-60.00	15.00	52.00	2.00	1,736.00	14.00	12.00	0.00	2,088.00
60	5.00	0.00	-60.00	15.00	52.00	2.00	2,147.00	14.00	12.00	0.00	2,098.00
61	4.00	71.00	-69.00	20.00	117.00	2.00	1,663.00	17.00	10.00	0.00	1,673.00
62	4.00	207.00	-72.00	18.00	103.00	2.00	1,691.00	17.00	10.00	0.00	1,450.00
63	3.00	6.00	-74.00	20.00	102.00	2.00	1,492.00	15.00	9.00	0.00	1,718.00
64	4.00	245.00	-78.00	19.00	113.00	2.00	1,727.00	18.00	11.00	0.00	1,706.00
65	4.00	293.00	-75.00	20.00	116.00	2.00	2,059.00	16.00	11.00	0.00	2,191.00
66	4.00	0.00	-76.00	17.00	108.00	2.00	2,017.00	16.00	12.00	0.00	2,298.00
67	4.00	7.00	-63.00	15.00	66.00	2.00	1,606.00	15.00	9.00	0.00	1,417.00
68	4.00	23.00	-75.00	15.00	64.00	2.00	1,667.00	17.00	9.00	0.00	1,650.00
69	4.00	1.00	-76.00	14.00	57.00	2.00	1,711.00	15.00	10.00	0.00	1,639.00
70	5.00	39.00	-76.00	16.00	62.00	2.00	1,970.00	18.00	11.00	0.00	1,884.00
71	4.00	30.00	-74.00	14.00	65.00	3.00	2,026.00	17.00	12.00	0.00	2,056.00
72	4.00	0.00	-63.00	16.00	59.00	2.00	2,095.00	17.00	12.00	0.00	2,374.00
73	4.00	0.00	-69.00	15.00	48.00	2.00	1,589.00	18.00	9.00	0.00	1,657.00
74	4.00	0.00	-68.00	14.00	56.00	2.00	1,600.00	17.00	10.00	0.00	1,573.00
75	5.00	0.00	-76.00	14.00	50.00	3.00	1,652.00	17.00	9.00	0.00	1,617.00
76	4.00	0.00	-76.00	13.00	58.00	2.00	1,954.00	17.00	10.00	0.00	2,039.00
77	4.00	0.00	-77.00	14.00	48.00	2.00	1,947.00	15.00	12.00	0.00	2,145.00
78	5.00	0.00	-72.00	14.00	54.00	2.00	2,304.00	15.00	12.00	0.00	2,431.00

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
Quarterly Cost of Production Data (Theoretical)

4

Obs	CONNUM	QTR	STEEL	MSYSTR	COAT	MART	DIAM	FORM	PRODQTY	DMB	DMBALLOY	DLB	VOHB
79									487	1,317.00	86.00	23.00	218.00
80									2,918	1,468.00	91.00	21.00	240.00
81									3,656	1,485.00	96.00	22.00	247.00
82									6,621	1,788.00	98.00	21.00	243.00
83									698	1,256.00	121.00	21.00	252.00
84									700	1,113.00	118.00	24.00	249.00
85									52	1,348.00	127.00	24.00	236.00
86									624	1,285.00	114.00	21.00	245.00
87									251	1,332.00	110.00	20.00	260.00
88									212	1,148.00	67.00	21.00	217.00
89									2,773	1,200.00	57.00	23.00	218.00
90									618	1,330.00	61.00	23.00	224.00
91									808	1,574.00	59.00	22.00	222.00
92									2,468	1,732.00	59.00	24.00	242.00
93									2,412	1,980.00	56.00	24.00	216.00

Obs	FOHB	DMIMPB	RMOFFSET	DL	VOH	FOH	TOTCOM	DTYDRAW	GNA	INTEX	TOTCOP
79	4.00	0.00	-72.00	16.00	63.00	3.00	1,676.00	19.00	10.00	0.00	1,624.00
80	4.00	0.00	-76.00	15.00	70.00	3.00	2,053.00	18.00	11.00	0.00	2,083.00
81	4.00	0.00	-74.00	18.00	60.00	3.00	2,119.00	17.00	11.00	0.00	2,003.00
82	4.00	0.00	-63.00	18.00	67.00	3.00	2,382.00	18.00	14.00	0.00	2,091.00
83	4.00	0.00	-70.00	15.00	54.00	3.00	1,380.00	13.00	9.00	0.00	1,612.00
84	4.00	24.00	-69.00	16.00	69.00	3.00	1,720.00	16.00	9.00	0.00	1,821.00
85	5.00	1.00	-68.00	15.00	70.00	3.00	1,800.00	16.00	10.00	0.00	1,594.00
86	5.00	0.00	-65.00	15.00	58.00	2.00	1,565.00	16.00	10.00	0.00	1,649.00
87	4.00	0.00	-71.00	15.00	53.00	2.00	1,617.00	16.00	11.00	0.00	1,650.00
88	4.00	0.00	-71.00	16.00	62.00	3.00	1,508.00	18.00	9.00	0.00	1,483.00
89	4.00	0.00	-63.00	16.00	64.00	3.00	1,420.00	18.00	9.00	0.00	1,530.00
90	4.00	0.00	-74.00	14.00	57.00	3.00	1,547.00	17.00	10.00	0.00	1,482.00
91	5.00	0.00	-66.00	17.00	65.00	3.00	1,708.00	15.00	11.00	0.00	1,717.00
92	5.00	0.00	-62.00	15.00	63.00	2.00	2,103.00	16.00	11.00	0.00	2,147.00
93	4.00	0.00	-68.00	16.00	60.00	3.00	2,209.00	16.00	13.00	0.00	2,360.00

(PUBLIC VERSION)

Exhibit S1-32 U.S. Actual Weight Documentation

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-33 Plant Reports

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-34 Production Quantity

CONNUM:4-2-6-2-2-2

Sales Data Sales Data Sales Data

Sales Data Sales Data

Sales
Quantity (kg)
a

Grade

Sales Data

Sales Data

Sales Data

Please see Rolling Mill Data
OWNPROD/
SALESQTPV

PercentProd
b

Tot ProdQty
c=a*b

Please see "q" and "s" in "Production Summary Table"

Rolling Mill Data

Rolling Mill Data

Rolling Mill Data

C_KG/MIN
f

ProdQty C
h=c*d

ProdQty E
j=c*e

Sum (h)	Sum(i)
1	1
2	1
3	1
4	1
5	1
6	1
7	1
8	1
9	1
10	1
11	1
12	1
13	1
14	1
15	1
16	1
17	1
18	1
19	1
20	1
21	1
22	1
23	1
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90	1
91	1
92	1
93	1
94	1
95	1
96	1
97	1
98	1
99	1
100	1

Sum (h)

Sum (h) Sum(i)

CONNUM:4-2-6-1-2-2

Sales Data Sales Data Sales Data

Sales Data Sales Data

Sales
Quantity (kg)

Grade

Sales Data

Sales Data

Sales Data

Please see Rolling Mill Data
OWNPROD/
SALESOTYPV

PercentProd
b

Tot ProdQty
c-a*b

Please see "q" and "s" in "Production Summary Table"

Rolling Mill Data

Rolling Mill Data

Rolling Mill Data

C_KG/MIN
f

ProdQty C
b=c*d

ProdQty E
i-c*o

Sum (h)	Sum(i)
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
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90	90
91	91
92	92
93	93
94	94
95	95
96	96
97	97
98	98
99	99
100	100

Sum (h)

Sum (h) Sum(i)

Sales Summary Extract

KEY

Sales Quantity (kg)

Ref: S1

[Redacted]

Reference S1-2

[Redacted]

Reference S1-1

Production Summary

Connum Reference	KEY	Rolling Mill C	Rolling Mill C	Rolling Mill E	Rolling Mill E	Total		PROD	SALESQTY	SALESQTYPV	PRODRATIO	C%	E%
		Production Quantity	Production time	Production Quantity	Production time	Total Production Quantity	Production Time			z			
		r	n	t	p	x		y=x	Ref: S1	If (S1>0,S1,otherwise=y)	q=y/z	s=r/y	u=t/y

Reference S1-2

Reference S1-1

Exhibit S1-35 Contracts

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-36 Proof of Payment for Section 232 Duties

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-37 Material Contract Terms Change Documentation

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-38 Revised U.S. Sales Listing and Prints

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

1

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
1														
2														
3														
4														
5														
6														
7														
8														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
1														
2														
3														
4														
5														
6														
7														
8														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
1					92	94		496	438	52,892	4.00	0.00	10.00	1.00
2					89	105		540	448	45,367	5.00	0.00	11.00	1.00
3					108	107		458	462	50,149	4.00	0.00	9.00	1.00
4					103	106		491	458	47,039	4.00	0.00	11.00	1.00
5					100	104		520	469	45,096	4.00	0.00	10.00	1.00
6					453	570		487	483	270,289	4.00	0.00	10.00	1.00
7					41	39		458	481	18,963	5.00	0.00	11.00	1.00
8					61	65		465	463	28,576	4.00	0.00	10.00	1.00
SEQU	EXPFEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
1	0.00	21.00	1.00	0.00			29.00	0.00			2.00	0.00	0.00	0.00
2	0.00	22.00	1.00	0.00			25.00	0.00			2.00	0.00	0.00	0.00
3	0.00	21.00	1.00	0.00			27.00	0.00			2.00	0.00	0.00	0.00
4	0.00	20.00	1.00	0.00			25.00	0.00			2.00	0.00	0.00	0.00
5	0.00	20.00	1.00	0.00			28.00	0.00			2.00	0.00	0.00	0.00
6	0.00	21.00	1.00	0.00			28.00	0.00			2.00	0.00	0.00	0.00
7	0.00	20.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
8	0.00	20.00	1.00	0.00			30.00	0.00			2.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDU			
1	11.00	0.00				5.00								
2	13.00	0.00				5.00								
3	13.00	0.00				5.00								
4	12.00	0.00				5.00								
5	14.00	0.00				5.00								
6	13.00	0.00				1.00								
7	12.00	0.00				12.00								
8	14.00	0.00				8.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

2

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
9														
10														
11														
12														
13														
14														
15														
16														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU		SALEDATU	INVOICEU	GCBNOU	SHIPDATU	PAYDATEU		
9														
10														
11														
12														
13														
14														
15														
16														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
9					21	21		537	445	10,020	4.00	0.00	10.00	1.00
10					65	66		470	448	29,026	4.00	0.00	11.00	1.00
11					66	58		513	488	30,171	4.00	0.00	11.00	1.00
12					20	22		530	449	10,469	4.00	0.00	10.00	1.00
13					12	11		519	519	5,372	4.00	0.00	9.00	1.00
14					9	10		457	484	5,071	4.00	0.00	9.00	1.00
15					41	40		519	467	21,786	4.00	0.00	10.00	1.00
16					66	69		506	515	32,754	4.00	0.00	10.00	1.00
SEQU	EXPFEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
9	0.00	24.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
10	0.00	24.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
11	0.00	20.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
12	0.00	21.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
13	0.00	24.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
14	0.00	21.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
15	0.00	23.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
16	0.00	21.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDTU			
9	13.00	0.00				26.00								
10	12.00	0.00				8.00								
11	12.00	0.00				7.00								
12	14.00	0.00				24.00								
13	12.00	0.00				42.00								
14	13.00	0.00				50.00								
15	13.00	0.00				11.00								
16	14.00	0.00				8.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

3

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
17														
18														
19														
20														
21														
22														
23														
24														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
17														
18														
19														
20														
21														
22														
23														
24														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
17					44	39		515	436	20,698	5.00	0.00	10.00	1.00
18					58	64		520	464	28,012	4.00	0.00	10.00	1.00
19					20	21		546	507	10,190	4.00	0.00	11.00	1.00
20					43	42		510	474	20,905	4.00	0.00	11.00	1.00
21					38	46		542	482	20,509	4.00	0.00	9.00	1.00
22					18	22		505	512	10,151	4.00	0.00	11.00	1.00
23					287	296		480	509	123,879	4.00	0.00	10.00	1.00
24					178	189		522	488	83,184	4.00	0.00	11.00	1.00
SEQU	EXPFEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
17	0.00	24.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
18	0.00	20.00	1.00	0.00			30.00	0.00			2.00	1.00	0.00	0.00
19	0.00	22.00	1.00	0.00			30.00	0.00			2.00	1.00	0.00	0.00
20	0.00	20.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
21	0.00	23.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
22	0.00	21.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
23	0.00	24.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
24	0.00	21.00	1.00	0.00			30.00	0.00			2.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDU			
17	14.00	0.00				11.00								
18	12.00	0.00				8.00								
19	12.00	0.00				25.00								
20	12.00	0.00				11.00								
21	12.00	0.00				11.00								
22	11.00	0.00				22.00								
23	13.00	0.00				2.00								
24	12.00	0.00				3.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

4

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
318														
319														
320														
321														
322														
323														
324														
325														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
318														
319														
320														
321														
322														
323														
324														
325														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
318					1,127	1,169		510	496	656,599	4.00	0.00	9.00	1.00
319					793	858		572	479	379,417	5.00	0.00	10.00	1.00
320					90	102		534	457	54,216	4.00	0.00	10.00	1.00
321					1,220	1,244		487	550	584,939	5.00	0.00	9.00	1.00
322					247	256		511	485	128,893	5.00	0.00	10.00	1.00
323					194	191		581	520	100,656	4.00	0.00	9.00	1.00
324					121	148		488	538	69,505	4.00	0.00	9.00	1.00
325					15	15		484	549	6,869	5.00	0.00	10.00	1.00
SEQU	EXPFEEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
318	0.00	21.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
319	0.00	20.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
320	0.00	20.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
321	0.00	19.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
322	0.00	18.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
323	0.00	21.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
324	0.00	19.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
325	0.00	18.00	1.00	0.00			28.00	0.00			2.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDTU			
318	14.00	0.00				0.00								
319	12.00	0.00				1.00								
320	12.00	0.00				6.00								
321	12.00	0.00				0.00								
322	12.00	0.00				2.00								
323	12.00	0.00				3.00								
324	12.00	0.00				4.00								
325	13.00	0.00				34.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

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SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
326														
327														
328														
329														
330														
331														
332														
333														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
326														
327														
328														
329														
330														
331														
332														
333														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
326					270	249		527	515	135,456	5.00	0.00	11.00	1.00
327					705	626		553	470	324,083	4.00	0.00	9.00	1.00
328					250	254		516	535	122,999	4.00	0.00	9.00	1.00
329					262	271		547	500	142,997	5.00	0.00	11.00	1.00
330					487	525		475	445	252,446	4.00	0.00	10.00	1.00
331					551	582		493	530	265,862	4.00	0.00	10.00	1.00
332					196	208		502	467	103,014	4.00	0.00	10.00	1.00
333					433	426		525	481	214,438	5.00	0.00	10.00	1.00
SEQU	EXPFEEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
326	0.00	20.00	1.00	0.00			28.00	0.00			2.00	1.00	0.00	0.00
327	0.00	18.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
328	0.00	18.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
329	0.00	21.00	1.00	0.00			27.00	0.00			2.00	1.00	0.00	0.00
330	0.00	21.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
331	0.00	18.00	1.00	0.00			30.00	0.00			2.00	1.00	0.00	0.00
332	0.00	20.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
333	0.00	20.00	1.00	0.00			26.00	0.00			2.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDU			
326	13.00	0.00				2.00								
327	14.00	0.00				1.00								
328	14.00	0.00				2.00								
329	14.00	0.00				2.00								
330	13.00	0.00				1.00								
331	13.00	0.00				1.00								
332	12.00	0.00				3.00								
333	12.00	0.00				1.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

6

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
334														
335														
336														
337														
338														
339														
340														
341														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
334														
335														
336														
337														
338														
339														
340														
341														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
334					247	296		526	529	142,483	4.00	0.00	9.00	1.00
335					134	161		534	500	73,054	4.00	0.00	11.00	1.00
336					205	225		511	464	111,410	4.00	0.00	9.00	1.00
337					100	92		483	541	45,719	4.00	0.00	10.00	1.00
338					101	103		536	520	51,262	4.00	0.00	9.00	1.00
339					47	49		524	523	25,913	5.00	0.00	11.00	1.00
340					180	181		549	458	89,570	4.00	0.00	11.00	1.00
341					480	476		472	499	241,282	5.00	0.00	9.00	1.00
SEQU	EXPFEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
334	0.00	19.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
335	0.00	18.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
336	0.00	20.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
337	0.00	18.00	1.00	0.00			29.00	0.00			2.00	1.00	0.00	0.00
338	0.00	20.00	1.00	0.00			25.00	0.00			2.00	1.00	0.00	0.00
339	0.00	18.00	1.00	0.00			28.00	0.00			2.00	1.00	0.00	0.00
340	0.00	19.00	1.00	0.00			25.00	0.00			2.00	2.00	0.00	0.00
341	0.00	18.00	1.00	0.00			30.00	0.00			2.00	2.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDU			
334	12.00	0.00				2.00								
335	13.00	0.00				3.00								
336	14.00	0.00				3.00								
337	12.00	0.00				5.00								
338	12.00	0.00				6.00								
339	12.00	0.00				11.00								
340	14.00	0.00				3.00								
341	13.00	0.00				1.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

7

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEELU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
636														
637														
638														
639														
640														
641														
642														
643														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
636														
637														
638														
639														
640														
641														
642														
643														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
636					213	210		652	661	144,910	5.00	0.00	11.00	1.00
637					96	116		604	635	72,860	5.00	0.00	11.00	1.00
638					51	57		591	677	34,685	6.00	0.00	12.00	1.00
639					107	104		631	612	70,968	5.00	0.00	12.00	1.00
640					418	446		614	659	296,085	6.00	0.00	12.00	1.00
641					736	768		669	631	571,716	5.00	0.00	13.00	1.00
642					117	120		664	632	75,800	6.00	0.00	12.00	1.00
643					122	133		609	687	89,909	5.00	0.00	14.00	1.00
SEQU	EXPFEEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
636	0.00	28.00	0.00	0.00			26.00	0.00			0.00	2.00	0.00	0.00
637	0.00	28.00	0.00	0.00			27.00	0.00			0.00	2.00	0.00	0.00
638	0.00	28.00	0.00	0.00			28.00	0.00			0.00	2.00	0.00	0.00
639	0.00	29.00	0.00	0.00			28.00	0.00			0.00	2.00	0.00	0.00
640	0.00	28.00	0.00	0.00			27.00	0.00			4.00	1.00	0.00	0.00
641	0.00	28.00	0.00	0.00			30.00	0.00			4.00	1.00	0.00	0.00
642	0.00	30.00	0.00	0.00			27.00	0.00			4.00	1.00	0.00	0.00
643	0.00	26.00	0.00	0.00			29.00	0.00			3.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDU			
636	12.00	1.00				3.00								
637	13.00	1.00				7.00								
638	14.00	1.00				11.00								
639	13.00	1.00				6.00								
640	12.00	0.00				677.00								
641	13.00	1.00				647.00								
642	14.00	1.00				640.00								
643	12.00	1.00				663.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

8

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
644														
645														
646														
647														
648														
649														
650														
651														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
644														
645														
646														
647														
648														
649														
650														
651														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
644					61	68		591	651	38,799	6.00	0.00	14.00	1.00
645					387	401		904	807	276,014	6.00	0.00	12.00	1.00
646					31	31		814	815	25,701	6.00	0.00	14.00	1.00
647					682	796		847	852	704,185	5.00	0.00	12.00	1.00
648					135	136		789	746	113,456	5.00	0.00	12.00	1.00
649					119	142		904	844	113,761	6.00	0.00	13.00	1.00
650					44	41		893	892	32,385	5.00	0.00	13.00	1.00
651					2	2		911	818	1,535	6.00	0.00	12.00	1.00
SEQU	EXPFEEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
644	0.00	28.00	0.00	0.00			25.00	0.00			4.00	1.00	0.00	0.00
645	0.00	27.00	3.00	159.00			28.00	0.00			4.00	1.00	0.00	0.00
646	0.00	26.00	3.00	154.00			26.00	0.00			4.00	1.00	0.00	0.00
647	0.00	30.00	3.00	165.00			29.00	0.00			3.00	1.00	0.00	0.00
648	0.00	27.00	3.00	159.00			25.00	0.00			3.00	1.00	0.00	0.00
649	0.00	28.00	3.00	158.00			29.00	0.00			4.00	1.00	0.00	0.00
650	0.00	26.00	3.00	172.00			25.00	0.00			4.00	1.00	0.00	0.00
651	0.00	26.00	3.00	151.00			26.00	0.00			4.00	1.00	0.00	1.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDTU			
644	13.00	1.00				599.00								
645	12.00	1.00				621.00								
646	13.00	1.00				580.00								
647	12.00	1.00				686.00								
648	13.00	1.00				628.00								
649	14.00	1.00				618.00								
650	13.00	1.00				662.00								
651	14.00	1.00				609.00								

(PUBLIC VERSION)

STEEL CONCRETE REINFORCING BARS FROM TURKEY (A-489-829)- KAPTAN
Administrative Review - POR: 3/7/17 through 6/30/18
U.S. Sales Data

9

SEQU	PRODCODU	CONNUMU	OVERRUNU	PRIMEU	SPECGRADEU	STEEU	MSYSTRU	COATU	MARTU	DIAMMMU	DIAMU	FORMU	CUSCODU	
652														
653														
654														
655														
656														
657														
658														
659														
SEQU	CCUSCODU			CUSCATU	SALINDTU	ACTGDTU	SALEDATU	INVOICEU		GCBNOU	SHIPDATU	PAYDATEU		
652														
653														
654														
655														
656														
657														
658														
659														
SEQU	SALETERU	PAYTERMU	VESSELU		QTYU	TQTYU	QTYUNITU	GRSUPRU	TGRSUPRU	TOTVALU	DINLFTPU	DBROKU	LOADU	INDSURVU
652					3	3		921	808	2,472	6.00	0.00	13.00	1.00
653					1	1		850	894	785	5.00	0.00	13.00	1.00
654					70	86		888	753	67,224	5.00	0.00	13.00	1.00
655					129	138		806	883	117,196	5.00	0.00	12.00	1.00
656					95	82		777	810	79,435	5.00	0.00	12.00	1.00
657					741	687		710	613	425,970	5.00	0.00	12.00	1.00
658					1,051	1,151		645	577	692,120	5.00	0.00	12.00	1.00
659					257	235		611	631	169,053	5.00	0.00	13.00	1.00
SEQU	EXPFEEU	INTNFRU	USBROKU	SEC232U	DESTU	STATEU	DTYDRAWU	COMMU	SELAGENU	SELARELU	COMM2U	CREDITU	BANKCHARU	DINDIRSU
652	0.00	30.00	3.00	156.00			29.00	0.00			4.00	1.00	0.00	0.00
653	0.00	30.00	3.00	155.00			29.00	0.00			4.00	1.00	0.00	0.00
654	0.00	28.00	3.00	157.00			27.00	0.00			4.00	1.00	0.00	0.00
655	0.00	30.00	3.00	169.00			28.00	0.00			4.00	1.00	0.00	0.00
656	0.00	29.00	3.00	168.00			29.00	0.00			4.00	1.00	0.00	0.00
657	0.00	53.00	0.00	0.00			28.00	11.00			4.00	1.00	0.00	0.00
658	0.00	46.00	0.00	0.00			25.00	12.00			4.00	1.00	0.00	0.00
659	0.00	54.00	0.00	0.00			28.00	11.00			4.00	1.00	0.00	0.00
SEQU	PACKU	DINVCARU	IPCNOU		ENTRYDTU	ENTVALUE	IMPORTER				CONTDTU			
652	12.00	1.00				581.00								
653	13.00	1.00				640.00								
654	12.00	1.00				636.00								
655	12.00	1.00				639.00								
656	12.00	1.00				580.00								
657	12.00	1.00				662.00								
658	14.00	1.00				583.00								
659	13.00	1.00				672.00								

(PUBLIC VERSION)

Exhibit S1-39 Full Purchase Order for Sample U.S. Sale

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-40 Ocean Freight Invoices

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-41 Loading Arm's Length

**CONTAINS BUSINESS PROPRIETARY INFORMATION WHICH IS
NOT AMENABLE TO PUBLIC SUMMARIZATION**

Exhibit S1-42_ Revised Alloy Cost Reallocation_Actual QTY

		REALLOCATION OF ANTHRACITE				REALLOCATION OF VANADIUM				REALLOCATION OF MANGANESE				REALLOCATION OF SILICIUM					
SpecGrade	Prod Qty	Average Carbon %	Carbon Content	Anthracite Cost TL	Anthracite Per Unit Cost TL/Mton	Average Vanadium	Vanadium Content	Vanadium Cost TL	Vanadium Per Unit Cost TL/Mton	Average Mn	Required Mn	Manganese Cost TL	Adjusted Mn Per Unit Cost	Average Si	Required Mn	Silicium Cost TL	Adjusted Si Per Unit Cost	Total Alloy Cost TL	Revised Alloy Cost TL/Mton
	a	b	$c = b * a / 100$	$d = c * (\text{sum d} / \text{sum c})$	$e = d / a$	f	$g = f * a / 100$	$h = g * (\text{sum h} / \text{sum g})$	$i = h / a$	j	$k = j * a / 100$	$l = k * (\text{sum l} / \text{sum k})$	$m = l / a$	n	$o = n * a / 100$	$p = o * (\text{sum p} / \text{sum o})$	$r = p / a$	$s = d + h + l + p$	$t = e + i + m + r$
	Billet Grade																		