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**Business Proprietary Document**

AD/CVD I: PZ

**PUBLIC VERSION**

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MEMORANDUM TO: The File

THROUGH: Dana S. Mermelstein *DSM*  
Program Manager  
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FROM: Peter Zukowski *PZ*  
International Trade Compliance Analyst  
AD/CVD Operations, Office I

SUBJECT: Circular Welded Non-Alloy Steel Pipe from the Republic of  
Korea: Calculation of the Final Margin for Respondents Not  
Selected for Individual Examination

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## I. FINAL RESULTS

Antidumping Duty Margin for Non-Selected Respondents: 9.53%

## II. ANALYSIS

The Department of Commerce initiated this administrative review covering 25 companies.<sup>1</sup> Thus, this review covers two mandatory respondents, Husteel Co., Ltd. (Husteel) and Hyundai Steel Company (Hyundai Steel), and 23 non-selected companies.

Section 735(c)(5)(A) of the Act provides that the estimated “all others” rate shall be an amount equal to the weighted average of the estimated weighted-average dumping margins established for exporters and producers individually examined, excluding any zero or *de minimis* margins, and any margins determined entirely under section 776 of the Act.

In this review, we cannot apply our normal methodology of calculating a weighted-average margin using the results of the review for the two respondents we selected for individual examination due to their requests to protect their business-proprietary information (BPI). In such situations, it is our normal practice to calculate a weighted-average margin using the publicly available figures and antidumping duty margins of the two selected respondents or to use the

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<sup>1</sup> See *Initiation Notice of Antidumping and Countervailing Duty Administrative Reviews*, 83 FR 1329 (January 11, 2018).



simple average of their margins, depending on which result is closer to the actual weighted-average margin of the companies in question.<sup>2</sup>

- A. The weighted-average margin we would have applied to the non-selected respondents listed above if we were able to use the actual net U.S. sales quantities and antidumping duty amounts of Husteel and Hyundai Steel with no concern over disclosing BPI is [ ] percent, which we calculated using the methodology as described below:

|               | Total U.S. Quantity (in MT) | Margin |
|---------------|-----------------------------|--------|
| Husteel       | [ ]                         | 10.91% |
| Hyundai Steel | [ ]                         | 8.14%  |
| Total         | [ ]                         |        |

$$(([\ ] * 10.91\%) + ([\ ] * 8.14\%)) / [\ ] = [\ ] \%$$

- B. To calculate the simple-average margin, we performed the following calculation:

$$\begin{array}{r} \text{Husteel:} \quad \quad \quad 10.91\% \\ \text{Hyundai Steel:} \quad \quad + \quad 8.14\% \\ \hline 19.05\% \div 2 = \mathbf{9.53\%} \end{array}$$

- C. To calculate the weighted-average margin using the ranged sales quantities which Husteel and Hyundai Steel disclosed in the public version of their Quantity and Value responses.<sup>3</sup> Based on these ranged data, we performed the following calculations:

|               | Total U.S. Quantity (in MT) | Margin |
|---------------|-----------------------------|--------|
| Husteel       | 37,905                      | 10.91% |
| Hyundai Steel | 25,000                      | 8.14%  |
| Total         | 62,905                      |        |

$$((37,905 * 10.91\%) + (25,000 * 8.14\%)) / 62,905 = \mathbf{9.81\%}$$

<sup>2</sup> See *Ball Bearings and Parts Thereof from France, et al.: Final Results of Antidumping Duty Administrative Reviews, Final Results of Changed-Circumstances Review, and Revocation of an Order in Part*, 75 FR 53661 (September 1, 2010), and accompanying Issues and Decision Memorandum at Comment 1.

<sup>3</sup> See Letter from Husteel to Commerce, "Certain Circular Welded Non-Alloy Steel Pipe from the Republic of Korea, Case No. A-580-809: Section A Questionnaire Response," dated March 20, 2018, at Exhibit A-1; see also Letter from Hyundai Steel to Commerce, "Certain Circular Welded Non-Allow Steel Pipe from Korea: Hyundai Steel Company's Section A Questionnaire Response," dated March 20, 2018, at Exhibit A-1.

**IV. RECOMMENDATION**

Based on our analysis, we find that the simple average margin is closer than the public, weighted-average average of the antidumping duty margins calculated using the ranged sales values of Husteel and Hyundai Steel to the actual weighted-average margin. Therefore, we recommend applying the simple average margin of 9.53 percent to the above-listed non-selected respondents.

  X    
Agree

\_\_\_\_\_  
Disagree

*Dana S. Mermut for*

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Alex Villanueva  
Senior Director  
AD/CVD Operations, Office I

May 30, 2019

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Date