



ที่ พณ ๐๓๐๗/ว. ๑๖๙



ถึง สภาอุตสาหกรรมแห่งประเทศไทย

กรมการค้าต่างประเทศขอส่งสำเนาหนังสือของกระทรวงพาณิชย์สหรัฐอเมริกา (US Department of Commerce: DOC) เลขที่ ๔๓๓๐๐๔๓-๐๑ ลงวันที่ ๑๑ มกราคม ๒๕๖๖ เรื่อง ประกาศให้บริษัทตอบแบบสอบถามเบื้องต้นเกี่ยวกับปริมาณและมูลค่า (Quantity and Value Questionnaire) ที่อยู่ภายใต้การไต่สวนการหลบเลี่ยงมาตรการตอบโต้การทุ่มตลาดและการอุดหนุน (Anti-Circumvention: AC) แบบรายประเทศ (Country-wide basis) สำหรับสินค้าลวดเย็บ (Collated steel staples) ที่ส่งออกจากไทยและเวียดนาม โดยบริษัทที่มีรายชื่อให้ตอบแบบสอบถาม จำนวน ๔ ราย ได้แก่ (๑) บจก. วายเอฟ เทคโนโลยี คอร์ปอเรชั่น (ประเทศไทย) (๒) บจก. ยูเอ็ม อินดัสทรี (๓) บจก. เจียเป่า เมททัล และ (๔) บจก. คัมเบส (ไทยแลนด์)

สำหรับผู้ที่ไม่มีรายชื่อแต่ประสงค์จะตอบแบบสอบถาม สามารถติดต่อ DOC เพื่อขอตอบแบบสอบถามได้ด้วยตนเอง (Voluntary response) โดยสามารถดาวน์โหลดเอกสารที่เกี่ยวข้องได้ทาง ACCESS (<https://access.trade.gov/login.aspx>) โดยมีรายละเอียดประกาศตาม QR Code ที่ปรากฏด้านล่างนี้ มาเพื่อทราบและแจ้งให้สมาชิกทราบโดยทั่วกัน



ประกาศให้บริษัทตอบแบบสอบถาม



กองบริหารการนำเข้าและรับรองถิ่นกำเนิด
กลุ่มตรวจสอบการหลบเลี่ยงมาตรการเยียวยาทางการค้า ๒
โทร. ๐ ๒๕๕๗ ๕๐๘๖
โทรสาร ๐ ๒๕๕๗ ๔๘๐๗
Email: dft.ac2@gmail.com





A-570-112
Anti-Circumvention Inquiry
Circ. - YF
Public Document
AD/CVD/OVIII: BS/MG

January 11, 2023

YF Technology Corporation Ltd.
c/o Xiaohua Hou
Commerce & Finance Law Offices
12-14th Floor, China World Office 2,
No. 1 Jianguomenwai Avenue,
Beijing 100004, China

Re: Antidumping and Countervailing Duty Orders on Certain Collated Steel Staples from the People's Republic of China: Quantity and Value Questionnaire for Circumvention Inquiry With Respect to Thailand

Dear Sir or Madam:

On December 14, 2022, the Department of Commerce (Commerce) initiated country-wide circumvention inquiries¹ to determine whether certain collated steel staples (collated staples) that are completed in Thailand or the Socialist Republic of Vietnam (Vietnam) using inputs from the People's Republic of China (China) are circumventing the antidumping duty (AD) and countervailing duty (CVD) orders on collated staples from China.² Commerce initiated these circumvention inquiries based on information that it analyzed pursuant to section 781(b) of the Tariff Act of 1930, as amended (the Act). Section 781(b) of the Act, which relates to the prevention of circumvention, provides that Commerce may include certain merchandise that is completed or assembled in a foreign country other than the country to which an AD or CVD order applies within the scope of such order under certain circumstances.

¹ See Notice, "*Certain Collated Steel Staples From the People's Republic of China: Initiation of Circumvention Inquiries on the Antidumping and Countervailing Duty Orders*," 87 FR 78047 (December 21, 2022) (*Initiation Notice*). For a full discussion of the basis for Commerce's decision to initiate this circumvention inquiry, see Memorandum from James Maeder to Lisa Wang, "*Certain Collated Steel Staples from the People's Republic of China: Initiation of Circumvention Inquiries on the Antidumping Duty and Countervailing Duty Orders*," dated December 14, 2022 (*Initiation Memo*).

² See *Certain Collated Steel Staples from the People's Republic of China: Antidumping Duty Order*, 85 FR 43815 (July 20, 2020); and *Certain Collated Steel Staples from the People's Republic of China: Countervailing Duty Order*, 85 FR 43813 (July 20, 2020) (collectively, *Orders*).



INTERNATIONAL
TRADE
ADMINISTRATION

Because we have information that indicates your company may have produced collated staples, and/or exported collated staples to the United States from, one of the countries under consideration in this inquiry (*i.e.*, Thailand), we request that your company respond to the items in Attachment I of this letter and complete the quantity and value table in Attachment II of this letter. A description of the merchandise covered by the inquiries is in Attachment III of this letter. The scope of the merchandise covered by the *Orders* is in Attachment IV of this letter.

General instructions for responding to this letter are in Attachment V of this letter. Receipt of this letter does not indicate that your company (or the producer of collated staples if the producer is not the same as your company) has been, or will be, selected to receive further questionnaires. In addition, please be aware that your company's response to this letter may be subject to an on-site verification by Commerce officials. The information requested in this letter should be submitted to Commerce no later than **5:00 p.m. Eastern Time (ET) on January 23, 2023**. Pursuant to 19 CFR 351.303(c)(2) and 351.304(c), your company must submit appropriate public summaries of the proprietary data in its response no later than 5:00 p.m. ET on the first business day after the above deadline.

All submissions to Commerce must be accompanied by a certificate of accuracy from company officials and, if represented by legal counsel or other representative, a certificate of accuracy from the representative. Additionally, the appropriate versions of all submissions to Commerce must be served on all parties on the public service list, and as needed, on the Administrative Protective Order (APO) service list. Both the public service list and the APO service list may be found on Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS) under case number A-570-112. Certificates of service and accuracy are in Attachment VI of this letter. Note that Commerce has temporarily modified certain of its requirements for serving documents containing business proprietary information, until further notice.³

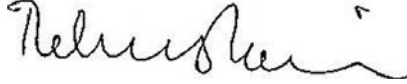
In the unlikely event that you receive this questionnaire after the deadline to respond to it, you **MUST** contact one of the Commerce officials identified below within five days of receipt of the questionnaire to receive further instructions and a revised deadline for submission of the required information. Failure to do so may result in the presumption that you failed to cooperate by not acting to the best of your ability to comply with the request for information, and may result in the use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

If you fail to respond to this questionnaire, or fail to provide the requested information, Commerce may find that you failed to cooperate by not acting to the best of your ability to comply with the request for information, and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

³ See *Temporary Rule Modifying AD/CVD Service Requirements Due to COVID-19; Extension of Effective Period*, 85 FR 29615 (May 18, 2020); and *Temporary Rule Modifying AD/CVD Service Requirements Due to COVID-19; Extension of Effective Period*, 85 FR 41363 (July 10, 2020).

If you have any questions regarding this matter, please contact Brian Smith at (202) 482-1766 or Max Goldman at (202) 482-0224.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Trainor". The signature is fluid and cursive, with a small mark above the final letter.

Rebecca Trainor
Program Manager
AD/CVD Operations, Office VIII
Enforcement and Compliance

Enclosure

ATTACHMENT I

Please fully respond to each of the items listed below. If you did not sell or export the merchandise covered by the circumvention inquiry to the United States during any of the periods identified in the table in Attachment II, please state that in response to the applicable items below.

Quantity and value data pertaining to other companies that may be affiliated with your company, that you believe should be treated together with your company as a single entity, should be separately reported by those companies. Thus, even if you believe that you should be treated as a single entity along with other companies that may be affiliated with your company, please do not report aggregate quantity and value data for all of the companies that you believe should be treated as a single entity. However, if you believe that you should be treated as a single entity along with other companies, you may identify those other companies that have separately responded to this questionnaire and explain why you believe that those companies, and your company, should all be treated as a single entity for purposes of providing the shipment data that was requested in this questionnaire.

1. In the table in Attachment II, please report the total quantity (in kilograms) and total value (in U.S. dollars) of your shipments to the United States of collated staples that were produced, assembled or completed using steel wire or wire band from China for each period identified in the table. Also, provide the input percentages that are requested.
 - a. Identify the records that you relied upon to obtain the data that you reported and explain how you aggregated the data from those records.
2. Did you produce, export, or produce and export the collated staple products for which you reported shipment information in the table in Attachment II?
3. If you did not produce the collated staple products for which you reported shipment information in the table in Attachment II, please identify the producer of the completed collated staples for which you reported shipment information in the table in Attachment II.
 - a. For each producer that you identified, please separately report the total quantity, in kilograms, of collated staples that you purchased from the producer for each period identified in the table in Attachment II.
4. Please identify any producers or exporters of completed collated staples that are located in the country that you identified in the table in Attachment II that are affiliated with your company under section 771 (33) of the Act.
 - a. For each producer and exporter identified, please state whether the producer or exporter produced or assembled collated staple products using inputs from China,

and/or exported such completed products, during the period June 1, 2019 through November 30, 2022.

5. Did the producer of the collated staple products for which you reported shipment information in the table in Attachment II have a tolling agreement with another party for any part of the production process?
 - a. If it did, please identify the party with which the producer had a tolling agreement.
 - b. Identify the production processes performed by the toller.
 - c. Identify any material inputs, other than consumables, used in production by the toller that were obtained from China.

ATTACHMENT II

QUANTITY & VALUE TABLE (also located in accompanying electronic file)

Country:	Identify the country in which you reported the completed collated staples produced and/or assembled using inputs from China									
Time Period	Fully Describe Below Each Completed Item During the Specified Period. You May Add Additional Rows If Necessary	Value of Shipments to the United States (US\$)	Volume of Shipments to the United States (Kilograms)	Based on quantity, identify the percentage of each of the following inputs used to produce the completed merchandise shipped to the United States which was obtained from China. You may add additional fields as necessary.						
				Tolling	Production Item n	Production Item $n+1$	Production Item $n+2$	Production Item $n+3$	Production Item $n+4$	Production Item $n+5$
6/1/2019-12/31/2019	Description of Completed Item									
1/1/2020-12/31/2020	Description of Completed Item									
1/1/2021-12/31/2021	Description of Completed Item									
1/1/2022-11/30/2022	Description of Completed Item									

ATTACHMENT III

DESCRIPTION OF THE PRODUCTS EXAMINED IN THE INQUIRY

These circumvention inquiries cover collated staples using Chinese-origin steel wire and wire band that are completed or assembled (*e.g.*, processing galvanized steel wire or wire bands through staple-forming machines) in Thailand or Vietnam, before being exported from those countries to the United States.

ATTACHMENT IV

DESCRIPTION OF PRODUCTS COVERED BY THE ANTIDUMPING AND COUNTERVAILING DUTY *ORDERS* ON CERTAIN COLLATED STEEL STAPLES FROM CHINA

The merchandise subject to these *Orders* is certain collated steel staples. Certain collated steel staples subject to these *Orders* are made from steel wire having a nominal diameter from 0.0355 inch to 0.0830 inch, inclusive, and have a nominal leg length from 0.25 inch to 3.0 inches, inclusive, and a nominal crown width from 0.187 inch to 1.125 inch, inclusive. Certain collated steel staples may be manufactured from any type of steel, and are included in the scope of the order regardless of whether they are uncoated or coated, and regardless of the type or number of coatings, including but not limited to coatings to inhibit corrosion.

Certain collated steel staples may be collated using any material or combination of materials, including but not limited to adhesive, glue, and adhesive film or adhesive or paper tape.

Certain collated steel staples are generally made to American Society for Testing and Materials (ASTM) specification ASTM F1667-18a, but can also be made to other specifications.

Excluded from the scope of the order are any carton-closing staples covered by the scope of the existing antidumping duty order on Carton-Closing Staples from the People's Republic of China. *See Carton-Closing Staples from the People's Republic of China: Antidumping Duty Order, 83 FR 20792 (May 8, 2018).*

Also excluded are collated fasteners commonly referred to as “C-ring hog rings” and “D-ring hog rings” produced from stainless or carbon steel wire having a nominal diameter of 0.050 to 0.081 inches, inclusive. C-ring hog rings are fasteners whose legs are not perpendicular to the crown, but are curved inward resulting in the fastener forming the shape of the letter “C.” D-ring hog rings are fasteners whose legs are straight but not perpendicular to the crown, instead intersecting with the crown at an angle ranging from 30 degrees to 75 degrees. The hog rings subject to the exclusion are collated using glue, adhesive, or tape. The hog rings subject to this exclusion have either a 90 degree blunt point or 15-75 degree divergent point.

Certain collated steel staples subject to these *Orders* are currently classifiable under subheading 8305.20.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). While the HTSUS subheading and ASTM specification are provided for convenience and for customs purposes, the written description of the subject merchandise is dispositive.

ATTACHMENT V GENERAL INSTRUCTIONS

Instructions for Filing the Response

The following instructions apply to your response to this questionnaire and all other documents that you submit to Commerce during the course of this proceeding, such as responses to additional questionnaires, extension requests, and case briefs.

***Note:** Please label the electronic files that you upload in a manner indicating their specific contents. For example, ABC Ltd March 15 QR – Exhibits 10-15, rather than ABC Ltd March 15 QR – part 3. If possible, please do not split exhibits between electronic files.*

A. Due Date

1. All submissions must be made electronically using Commerce’s ACCESS website at <http://access.trade.gov>. If an exception to the electronic filing requirement applies, you must address and manually submit your response to the address indicated below in the section on “Manual Filing.” To determine if your response qualifies for manual filing, see the section on “Manual Filing” below. All laws, regulations, and other descriptive materials that supplement your responses should be submitted on the same date as the initial response.
2. The **business proprietary** response should be submitted on the day specified in the cover letter accompanying this questionnaire. The **public version** of the response may be filed one business day after the proprietary response is due.
3. An electronically filed document must be received successfully in its entirety by ACCESS by 5 p.m. Eastern Time (ET) on the due date, unless an earlier time is specified. Where applicable, a submitter must manually file a document between the hours of 8:30 a.m. and 5 p.m. ET on the due date, unless an earlier time is specified.

B. Format

1. You are required to state in the upper right-hand corner of your cover letter the following information in the following format:
 - a. on the first line, indicate the case number stated on the cover page to this questionnaire;
 - b. on the second line, indicate the total number of pages in the document including cover pages, appendices, and any unnumbered pages;

- c. on the third line, indicate the specific segment of the proceeding, (*e.g.*, investigation, administrative review, scope inquiry, suspension agreement, *etc.*) and, if applicable, indicate the complete period covered by the segment (MM/DD/YY - MM/DD/YY);
 - d. on the fourth line, indicate the Commerce office conducting the proceeding;
 - e. on the fifth and subsequent lines, indicate whether any portion of the document contains business proprietary information and, if so, list the page numbers containing business proprietary information; and indicate the business proprietary/public status of the document and whether you agree or object to release of the submitted information under **administrative protective order** (APO) by stating one of the following:
 - “Business Proprietary Document -- May Be Released Under APO,”
 - “Business Proprietary Document -- May Not Be Released Under APO,”
 - “Business Proprietary/APO Version-- May Be Released Under APO,” as applicable,
 - “Public Version,” or
 - “Public Document.”
2. Please include a “Re:” line on the cover letter of your response, or any other submissions you make during this proceeding. In the Re: line, briefly summarize the purpose of your submission, *e.g.*, “response to Quantity and Value Questionnaire,” “case brief.”
 3. Prepare your response in typed form and in English (*see* 351.303(d) and (e) for these and other formatting requirements). Include an original and translated version of all pertinent portions of non-English language documents that accompany your response, including financial statements.
 4. Repeat the item to which you are responding in your narrative submission and place your answer directly below it. Commerce will provide an electronic version of this questionnaire for your convenience.
 5. Please respond to each request for information. If a particular item/question does not apply, please state so, and explain why in your response. Failure to do so could lead to the use of adverse inferences for that particular item/question.
 6. In each of your answers, please identify your source of information. Please include with your response copies of source documents necessary to understand your response. For additional information sources not included in your response, indicate the location where the documents or electronic data systems are maintained. If

information is maintained at multiple locations, please list in an appendix to your response these locations along with notes indicating the information maintained at each location. This information is used by Commerce to prepare for **verification**.

7. Include all worksheets, financial reports, and other requested documents as appendices to your response.
8. Provide a table of attachments. Assign a number to each attachment and include a descriptive name for each attachment and its number in the table.
9. All monetary amounts should be shown in the currency in which they were originally denominated, and in the currency in which they are registered in your accounts (if the two are different). Also, report the actual exchange rate used for a particular conversion. For all values adjusted for inflation, please provide the data in both nominal and adjusted terms and explain how these values were adjusted.

Identify all units of measurement, currencies, and conversion factors used in your narrative response, worksheets, or other appendices.

10. It is your responsibility to contact the official in charge if subsequent to your filing there are events that affect your response (*e.g.*, changes in your cost accounting system are relevant to antidumping proceedings, and changes as a result of an audit are relevant to both antidumping and CVD proceedings).

C. Manual Filing

**** Currently, alternative arrangements for manual filing must be made. If you are unable to file your submission electronically in ACCESS such that alternative arrangements are needed, please contact an official in charge at least 72 hours before the due date. For data files larger than 50 MB, email the ACCESS Help Desk at access@trade.gov so that they may assist you in reducing the size of your file.****

1. All submissions must be filed electronically. Only under the following four circumstances will Commerce accept a hardcopy response that is manually filed:
 - Documents exceeding 500 pages in length may be filed manually (in paper form) in the APO/Dockets Unit. This is referred to as a “bulky document.”
 - Data files greater than 50 MB must be filed manually on CD-ROM or DVD.
 - If the ACCESS system is unable to accept filings continuously or intermittently over the course of any period of time greater than one hour between 12:00 p.m. and 4:30 p.m. ET or for any duration of time between

4:31 p.m. and 5:00 p.m. ET, then a person may manually file the document in the APO/Dockets Unit. Commerce will provide notice of such technical failures on the ACCESS Help Desk line at 202-482-3150 and on the Enforcement and Compliance website, which is <http://www.trade.gov/enforcement>.

- Apart from the above, if you are unable to comply with the electronic filing requirement, as provided in 19 CFR 351.103(c) of Commerce's regulations, and in accordance with section 782(c) of the Tariff Act of 1930, as amended (the Act), you must promptly notify the official in charge and submit a full written explanation of the reasons you are unable to file the document electronically. You must also suggest alternative forms in which to submit the information. Commerce will consider the ability of a submitter and may modify the electronic filing requirement on a case-by-case basis.
2. All manually filed documents must be accompanied by a cover sheet generated in ACCESS. For manually filed bulky documents, separator sheets must also be generated and used.
 3. If your response qualifies as a bulky document and you opt to file it manually, you must file two identical paper copies of the document. For all other authorized manual submissions, only one paper copy is required.
 4. Manual submissions must be addressed and submitted to:

Secretary of Commerce

Attention: Enforcement and Compliance, AD/CVD Operations Office (*specify office number indicated on the cover page of this questionnaire*)

APO/Dockets Unit, Room 18022

U.S. Department of Commerce

1401 Constitution Avenue, N.W.

Washington, D.C. 20230

D. Certification

1. Submit the required **certification of accuracy**. Providers of information and the person(s) submitting it, if different (*e.g.*, a legal representative), must certify that they have read the submission and that the information submitted is accurate and complete. Commerce cannot accept questionnaire responses that do not contain the certification statements. Forms for such certification are included in an appendix to this questionnaire. You may photocopy this form and submit a completed copy with each of your submissions.

2. Provide the required **certificate of service** (included in an appendix) with each business proprietary document and public version submitted to Commerce.
3. Signed certifications of accuracy and certificates of service should be scanned and appended to the appropriate electronic documents filed in ACCESS.

E. Business Proprietary Information and Summarization of Business Proprietary Information

1. Request business proprietary treatment for information submitted that you do not wish to be made publicly available. As a general rule, Commerce places all correspondence and submissions received in the course of an antidumping or countervailing duty proceeding in a public reading file. However, information deemed to be proprietary information will not be made available to the public. If you wish to make a request for proprietary treatment for particular information, refer to sections 351.304, 351.305, and 351.306 of Commerce's regulations. You must submit the request for proprietary treatment at the same time as the claimed business proprietary information is submitted to Commerce.
2. Utilize the "one-day lag rule" under section 351.303(c)(2) of Commerce's regulations if you wish an additional day to review the final bracketing of business proprietary information in a document and to prepare the required public version. The filing requirements under the one-day lag rule provide for a party to file only the business proprietary document within the applicable time limit (section 351.303(c)(2)(i)). By the close of business one business day after the date the business proprietary document is filed, the person must file the complete final business proprietary document (section 351.303(c)(2)(ii)). The final business proprietary document must be identical to the original document except for any bracketing corrections.
3. By the close of business one business day after the date the business proprietary document is filed (refer to the "one-day lag rule" in the preceding paragraph), submit the public version of your response (section 351.303(c)(2)(iii)). A public version must contain:
 - a. a non-proprietary (public) version of your response that is in sufficient detail to permit a reasonable understanding of the information submitted in confidence, and/or
 - b. an itemization of particular information that you believe you are unable to summarize. State the reasons why you cannot summarize each piece of information.

***Note:** The summarization requirement does not apply solely to the narrative portion of your response. It applies equally to worksheets and other appendices to your*

response, and even to sales and cost databases submitted in antidumping proceedings. Generally, numerical data, such as that provided in sales and cost databases in antidumping proceedings, are adequately summarized only if grouped or presented in terms of indices or figures ranged within 10 percent of the actual figure. If a particular portion of data is voluminous, use ranged figures for at least one percent of the voluminous portion.

Responses, or portions thereof, that are not adequately summarized may be rejected from the record of this proceeding.

4. Submit the statements required regarding limited release of business proprietary information under the provisions of an APO. U.S. law permits limited disclosure to representatives of parties (e.g., legal counsel) of certain business proprietary information, including electronic business proprietary information, under an APO. (Note that data received under an APO cannot be shared with others who are not covered by the APO.) Under the provisions governing APO disclosure, you must submit either:
 - a. a statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or
 - b. a statement itemizing those portions of the information which you believe should not be released under APO, together with arguments supporting your objections to that release.

We are required by our regulations to reject, at the time of filing, submissions of business proprietary information that do not contain one of these statements. As discussed above, you must state in the upper right-hand corner of the cover letter accompanying your questionnaire response whether you agree or object to release of the submitted information under APO (e.g., May Be Released Under APO or May Not Be Released Under APO). (See section 351.304 of Commerce's regulations for specific instructions.⁴)

5. Place brackets (“[]”) around information for which you request business proprietary treatment. Place double brackets (“[[]]”) around information for which you request proprietary treatment and which you do not agree to release under APO.
6. Provide to all parties whose representatives have been granted APO access and who are listed on Commerce's most recent APO Service List, a complete copy of the submission--proprietary document and public version, except for that information

⁴ If you do not agree to release under APO all or part of the proprietary information, but we determine that the information should be released, you will have the opportunity to withdraw the information (see section 351.304(d) of our regulations). However, any information which you withdraw will be taken out of the official record and will not be used in our determination.

which you do not agree to release under APO. APO service lists, as well as public service lists, are maintained at <http://access.trade.gov>, case A-570-979. If you exclude information because you do not agree to release it under APO, you must submit the complete business proprietary version, wherein information in double brackets has been excluded. This version of the response must be marked "Business Proprietary/APO Version - May Be Released Under APO" on the cover page. For parties that do not have access to information under APO, please provide a public version only.

Note: A chart summarizing AD/CVD document filing requirements can be found at <http://enforcement.trade.gov/filing/index.html>. Detailed and supplemental information concerning APOs, including the APO Handbook, a complete set of APO regulations, and APO application forms and service lists, can be found at <http://enforcement.trade.gov/apo/index.html>

F. Government Confidential Information

Any government confidential information submitted to Commerce should be clearly labeled, preferably with the national security classification mark of the responsible authority. The appropriate authority should also submit a statement explaining, in detail, why the information is confidential.

Please note that any company-specific information submitted by government authorities, for which the government is acting merely as a conduit, is not entitled to government confidential treatment; such information is covered by the business proprietary information guidelines outlined above.

G. Verification

All information submitted may be subject to verification. Failure to allow full and complete verification of any information may affect the consideration accorded to that or any other verified or non-verified item in the responses.

ATTACHMENT VI

CERTIFICATIONS OF FACTUAL ACCURACY AND CERTIFICATE OF SERVICE

CERTIFICATIONS OF FACTUAL ACCURACY

FOR PROCEEDINGS INITIATED ON OR AFTER AUGUST 16, 2013

§ 351.303 Filing, document identification, format, translation, service, and certification of documents.

* * * * *

(g) *Certifications.* Each submission containing factual information must include the following certification from the person identified in paragraph (g)(1) of this section and, in addition, if the person has legal counsel or another representative, the certification in paragraph (g)(2) of this section. The certifying party must maintain the original signed certification for a period of five years from the date of filing the submission to which the certification pertains. The original signed certification must be available for inspection by U.S. Department of Commerce officials. Copies of the certifications must be included in the submission filed at Commerce.

(1) For the person(s) officially responsible for presentation of the factual information:

(i) **COMPANY CERTIFICATION:***

I, **(PRINTED NAME AND TITLE)**, currently employed by **(COMPANY NAME)**, certify that I prepared or otherwise supervised the preparation of the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE)** due on **(DATE)** OR filed on **(DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN {}): {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}** or **{THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}** or **{THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}**). I certify that the public information and any business proprietary information of **(CERTIFIER'S COMPANY NAME)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information 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 a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: _____

Date: _____

* For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, e.g., “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

(ii) GOVERNMENT CERTIFICATION:**

I, **(PRINTED NAME AND TITLE)**, currently employed by the government of **(COUNTRY)**, certify that I prepared or otherwise supervised the preparation of the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN { }): {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}**). I certify that the public information and any business proprietary information of the government of **(COUNTRY)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. 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.

Signature: _____

Date: _____

** For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, e.g., “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

(2) For the legal counsel or other representative:

REPRESENTATIVE CERTIFICATION:***

I, (PRINTED NAME), with (LAW FIRM or OTHER FIRM), (INSERT ONE OF THE FOLLOWING OPTIONS IN {}: {COUNSEL TO} or {REPRESENTATIVE OF}) (COMPANY NAME, OR GOVERNMENT OF COUNTRY, OR NAME OF ANOTHER PARTY), certify that I have read the attached submission of (IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE) pursuant to the (INSERT ONE OF THE FOLLOWING OPTIONS IN {}: {THE (ANTIDUMPING OR COUNTERVAILING DUTY) INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}). In my capacity as (INSERT ONE OF THE FOLLOWING OPTIONS IN {}: {COUNSEL} or {ADVISER, PREPARER, OR REVIEWER}) of 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.

Signature: _____

Date: _____

*** For multiple representative certifications, all representatives and their firms should be listed in the first sentence of the certification and all representatives should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, e.g., “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

CERTIFICATE OF SERVICE

I, _____, hereby certify that a copy of the

(name of certifying official)

foregoing submission on behalf of _____,

(company name)

dated _____, was served by first class mail or by hand delivery (circle the method

used) on the following parties:

(Business Proprietary Version)

On Behalf of

Name and address

(Public Version)

On Behalf of

Name and address

(Signature of Certifying Official)