

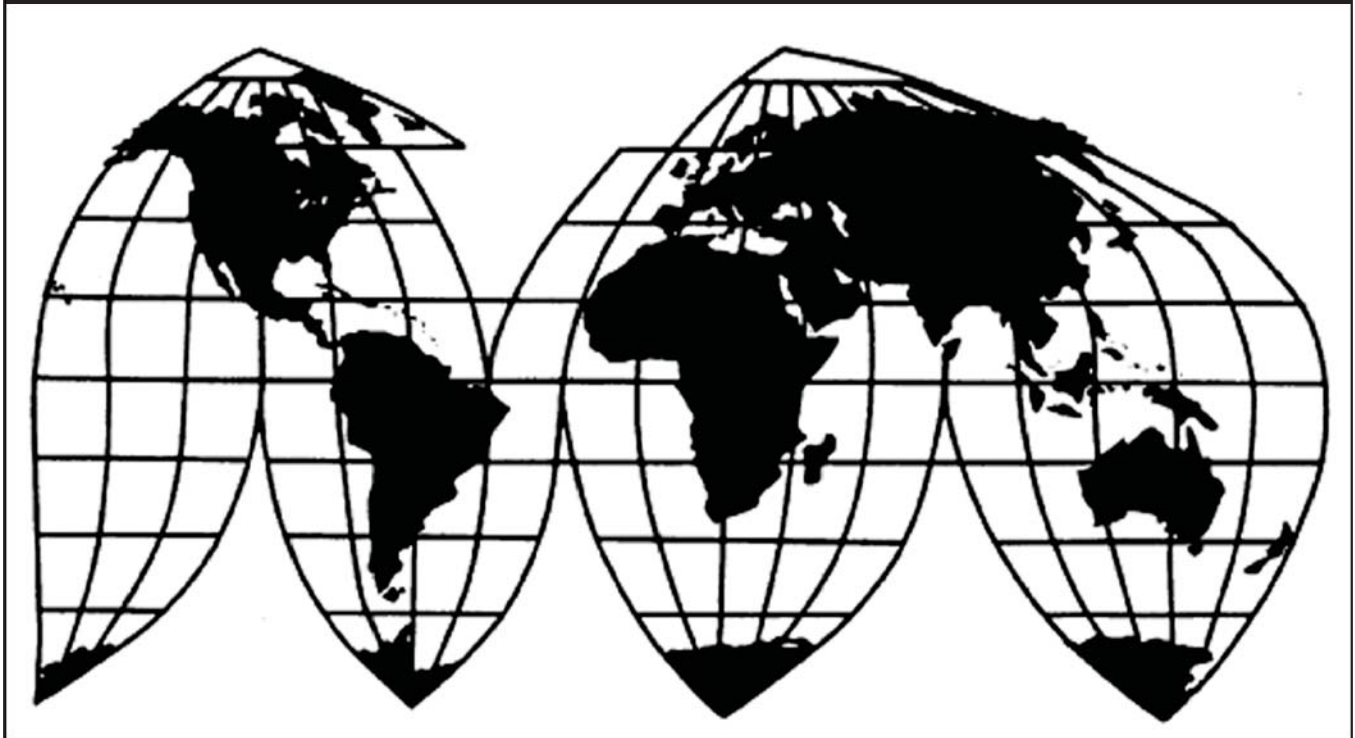
Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland

Investigation Nos. 731-TA-1362-1367 (Final)

Publication 4790

May 2018

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background.....	I-1
Nature and extent of sales at LTFV	I-2
Critical circumstances.....	I-5
Appendix	
A. <i>Federal Register</i> notices	A-1

Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets or by parallel lines in confidential reports and is deleted and replaced with asterisks in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1362-1367 (Final)

Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of cold-drawn mechanical tubing from China, Germany, India, Italy, Korea, and Switzerland, provided for in subheadings 7304.31.30, 7304.31.60, 7304.51.10, 7304.51.50, 7306.30.50, and 7306.50.50 of the Harmonized Tariff Schedule of the United States, that have been found by the Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).^{2 3}

BACKGROUND

The Commission, pursuant to section 735(b) of the Act (19 U.S.C. 1673d(b)), instituted these investigations effective April 19, 2017, following receipt of a petition filed with the Commission and Commerce by ArcelorMittal Tubular Products, Shelby, Ohio; Michigan Seamless Tube, LLC, South Lyon, Michigan; PTC Alliance Corp., Wexford, Pennsylvania; Webco Industries, Inc., Sand Springs, Oklahoma; and Zekelman Industries, Inc., Farrell, Pennsylvania. Effective September 25, 2017, the Commission established a general schedule for the conduct of the final phase of its investigations on cold-drawn mechanical tubing, following preliminary determinations by Commerce that imports of the subject cold-drawn mechanical tubing were subsidized by the governments of China and India. Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 5, 2017 (82 FR 46522). The hearing was held in Washington, DC, on December 6, 2017, and all persons who requested the opportunity were permitted to appear in person or by counsel.

¹ The record is defined in sec. 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

² Chairman Rhonda K. Schmidlein did not vote in these antidumping duty investigations and Commissioner Jason E. Kearns did not participate in these investigations.

³ The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping duty orders on cold-drawn mechanical tubing from China, Italy, and Korea.

Following notification of final determinations by Commerce that imports of cold-drawn mechanical tubing from China, Germany, India, Italy, Korea, and Switzerland were being sold at LTFV within the meaning of section 735(b) of the Act (19 U.S.C. 1673d(a)), notice of the supplemental scheduling of the final phase of the Commission's antidumping duty investigations was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of April 23, 2018 (83 FR 17674).

VIEWS OF THE COMMISSION

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of cold-drawn mechanical tubing (“CDMT”) from China, Germany, India, Italy, Korea, and Switzerland found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).¹ We also find that critical circumstances do not exist with respect to subject imports of CDMT from China, Italy, and Korea for which Commerce made affirmative critical circumstances determinations.

I. Background

The petitions in these investigations, as well as the countervailing duty investigations on imports of CDMT from China and India, were filed on April 19, 2017, by ArcelorMittal Tubular Products; Michigan Seamless Tube, LLC; PTC Alliance Corp.; Webco Industries, Inc.; and Zekelman Industries, Inc. (collectively “petitioners”), domestic producers of CDMT. The investigation schedules became staggered when Commerce extended the deadlines for making its preliminary and final determinations in the antidumping duty investigations, thereby necessitating earlier final determinations in the countervailing duty investigations on CDMT from China and India than in the antidumping duty investigations.² The Commission made

¹ Chairman Schmidlein did not vote in these antidumping duty investigations. Commissioner Kearns did not participate in these investigations.

² *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany, India, Italy, the Republic of Korea, the People’s Republic of China, and Switzerland: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*, 82 Fed. Reg. 42788 (Sept. 12, 2017); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People’s Republic of China: Preliminary Affirmative Determination of Sales at Less-Than-Fair Value and Preliminary Affirmative Determination of Critical Circumstances, in Part, and Postponement of Final Determination*, 82 Fed. Reg. 55574 (Nov. 22, 2017); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*, 82 Fed. Reg. 55558 (Nov. 22, 2017); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 82 Fed. Reg. 55567 (Nov. 22, 2017); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Italy: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 82 Fed. Reg. 55561 (Nov. 22, 2017); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Republic of Korea: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 82 Fed. Reg. 55564 (Nov. 22, 2017); *Cold-Drawn Mechanical Tubing From Switzerland: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Postponement of Final Determination, and Extension of Provisional Measures*, 82 Fed. Reg. 55571 (Nov. 22, 2017).

affirmative determinations on the basis of cumulated imports from all six subject countries in the prior final determinations in the CDMT investigations.³

The Commission's record for the current set of investigations closed on December 29, 2017, at the same time as those for the countervailing duty investigations on subject imports from China and India, except that the final Commerce dumping determinations on subject imports from China, Germany, India, Italy, Korea, and Switzerland and the parties' comments concerning those determinations have been added to the record.⁴

II. Material Injury by Reason of Subject Imports

Section 771(7)(G)(iii) of the Tariff Act of 1930, as amended ("the Act"), provides that the Commission must make its material injury determinations in the instant investigations on the basis of the same record as that in the countervailing duty investigations regarding imports from China and India, except to the extent discussed above.⁵ Therefore, in these investigations, we adopt the findings and analyses in our determinations and views in the final countervailing duty determinations with respect to the issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports.⁶ Accordingly, we determine that the domestic industry producing CDMT is materially injured by reason of LTFV subject imports from China, Germany, India, Italy, Korea, and Switzerland.^{7 8}

³ *Cold-Drawn Mechanical Tubing from China and India*, Inv. Nos. 701-TA-576–577 (Final), USITC Pub. 4755 (Jan. 2018) ("CVD Determinations") at 20.

⁴ See 19 U.S.C. § 1677(7)(G)(iii). Petitioners jointly filed comments. Several importers of subject merchandise filed comments: Salem Steel NA, LLC; Tube Fabrication Industries, Inc.; and voestalpine Rotec Inc. ("Rotec") (collectively "respondents") jointly filed comments. Autoliv ASP, Inc. ("Autoliv") separately filed comments.

The Commission stated that "[s]upplemental party comments may address only Commerce's final antidumping duty determinations" regarding CDMT from China, Germany, India, Italy, Korea, and Switzerland. *Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, Korea, and Switzerland; Supplemental Schedule for the Subject Investigations*, 83 Fed. Reg. 17674, 17675 (Apr. 23, 2018). Notwithstanding this instruction, a portion of Autoliv's supplemental comments repeats an argument from earlier in these investigations that the Commission should define airbag tubing as a separate domestic like product. Autoliv Supplemental Comments, April 27, 2018, at 1–2. These comments by Autoliv are not pertinent to Commerce's final dumping determinations, which contained no revision to the scope of these investigations. Because these comments were beyond the permitted scope of the supplemental comments, we have disregarded Autoliv's comments on the domestic like product.

⁵ 19 U.S.C. § 1677(7)(G)(iii).

⁶ CVD Determinations, USITC Pub. 4755 at 4–38, 42; Confidential CVD Determinations, EDIS Doc. 634838, at 5–55, 60–61.

⁷ Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. § 1677(24)(A)(i).
(continued...)

III. Critical Circumstances

A. Legal Standards and Party Arguments

In its final antidumping duty determinations concerning CDMT from China, Italy, and Korea, Commerce found that critical circumstances exist with respect to certain subject producers and exporters.⁹ Because we have determined that the domestic industry is materially injured by reason of LTFV imports of CDMT from China, Italy, and Korea, we must further determine “whether the imports subject to the affirmative {Commerce critical

During the 12-month period prior to the filing of the petition, April 2016 through March 2017, subject imports from China accounted for *** percent of the quantity of total imports, subject imports from Germany for *** percent, subject imports from India for *** percent, subject imports from Italy for *** percent, subject imports from Korea for *** percent, and subject imports from Switzerland for *** percent, all of which are above the 3 percent individual subject country statutory negligibility threshold applicable to antidumping investigations. Confidential Report, Memorandum INV-PP-168 (“CR”) (Dec. 22, 2017) at Table IV-9; Public Report (“PR”), USITC Pub. 4755 at Table IV-9. Accordingly, we find that the imports from China, Germany, India, Italy, Korea, and Switzerland subject to the antidumping duty investigations are not negligible.

⁸ The statute additionally instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations, Commerce found dumping margins of 44.92 to 186.89 percent for subject imports from China, 3.11 to 209.06 percent for subject imports from Germany, 8.26 to 33.80 percent for subject imports from India, 47.87 to 68.95 percent for subject imports from Italy, 30.67 to 48.00 percent for subject imports from Korea, and 12.50 to 30.48 percent for subject imports from Switzerland. *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People’s Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 Fed. Reg. 16322, 16324 (Apr. 16, 2018); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 Fed. Reg. 16326, 16327 (Apr. 16, 2018); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Affirmative Determination of Sales at Less than Fair Value*, 83 Fed. Reg. 16296, 16297 (Apr. 16, 2018); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Italy: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 Fed. Reg. 16289, 16291 (Apr. 16, 2018); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value, Final Affirmative Determination of Critical Circumstances*, 83 Fed. Reg. 16319, 16320 (Apr. 16, 2018); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Switzerland: Final Determination of Sales at Less Than Fair Value*, 83 Fed. Reg. 16293, 16294 (Apr. 16, 2018). We take into account in our analysis the fact that Commerce has made final findings that all producers in the six subject countries are selling subject imports in the United States at LTFV. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the price effects of subject imports, particularly significant underselling, set out in the final countervailing duty determinations are particularly probative to an assessment of the impact of subject imports. See CVD Determinations, USITC Pub. 4755 at 30–38.

⁹ 83 Fed. Reg. at 16323 (China); 83 Fed. Reg. at 16290 (Italy); 83 Fed. Reg. at 16320 (Korea).

circumstances} determination . . . are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order to be issued.”¹⁰ The Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides that the Commission is to determine “whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order” and specifically “whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order.”¹¹ The legislative history indicates that the critical circumstances provision was designed “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and the preliminary determination by {Commerce}.”¹² An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period of 90 days prior to the suspension of liquidation.¹³

The statute further provides that in making these findings, the Commission shall consider, among other factors it considers relevant,

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the antidumping order will be seriously undermined.¹⁴

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.¹⁵

Petitioners argue that the Commission should find that critical circumstances exist with respect to certain subject imports from China because these imports are likely to seriously undermine the remedial effect of an antidumping duty order “given the persistent economic conditions.”¹⁶

¹⁰ 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

¹¹ URAA SAA, H.R. Rep. No. 103-316, vol. I at 877 (1994).

¹² *ICC Industries, Inc., v. United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int’l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

¹³ 19 U.S.C. §§ 1671d(e)(2), 1673d(e)(2).

¹⁴ 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

¹⁵ See *Certain Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-443, 731-TA-1095-1097, USITC Pub. 3884 (Sept. 2006) at 46-48; *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-1061 (Final), USITC Pub. 3744 (Dec. 2004) at 26; *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 (Aug. 2003) at 20-22.

¹⁶ Petitioners’ Supplemental Comments, April 27, 2018, at 4-5.

Respondents argue that the Commission should make negative critical circumstances findings with respect to certain subject imports from China and Italy.¹⁷ In addition to stating that certain made-to-order aspects of the subject imports or downstream auto parts would prevent subject imports from entering the U.S. market, respondents argue that any increased import and inventory levels were responses to customers' immediate demand, existing customer contracts, or the inability of domestic producers to supply the required CDMT.¹⁸

Importer Autoliv argues that the Commission should make negative critical circumstances findings with respect to subject imports from China and Korea.¹⁹ It contends that the small market share represented by subject imports from China and Korea and the "tight" global supply for Autoliv's airbag tubing do not support a critical circumstances finding.²⁰

B. Analysis

1. Choice of Time Period

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from China, Italy, and Korea. The Commission is not required to analyze the same period that Commerce examined.²¹ Unless the industry under investigation involves seasonality or the Commission decides that circumstances warrant otherwise,²² the Commission generally compares six months of data gathered from the periods immediately preceding and following the petition's filing. The Commission has relied on a shorter comparison period when a preliminary determination by Commerce applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.²³ That situation arises here with respect to subject imports from China.²⁴ Thus, we

¹⁷ Respondents' Supplemental Comments, April 27, 2018, at 5.

¹⁸ Respondents' Supplemental Comments at 3–4. Rotec testified that it exported subject merchandise from China to its Mexican facility producing downstream products. Hearing Tr. at 174–178.

¹⁹ Autoliv Supplemental Comments at 2–3.

²⁰ Autoliv Supplemental Comments at 2–3. See Autoliv Prehearing Brief, November 29, 2017, at 24; Hearing Tr. at 153 (Autoliv representative stating that the company's imports were intended to fulfill orders placed prior to the filing of the petitions); Autoliv Posthearing Brief, December 12, 2017, at 15.

²¹ *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 (June 2007) at 35; *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 (Apr. 1997) at 34.

²² See *1,1,1,2--Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 (Apr. 2017) at 25 (engaging in seasonal analysis because of demand patterns for product).

²³ See *Biodiesel from Argentina and Indonesia*, Inv. Nos. 731-TA-1347–1348 (Final), USITC Pub. 4775 (Apr. 2018) at 6–7; *Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates*, Inv. Nos. 731-TA-1349, 1352, and 1357 (Final), USITC Pub. 4752 (Jan. 2018) at 46–47; *Softwood Lumber Products from Canada*, Inv. Nos. 701-TA-566 and 731-TA-1342 (Final), USITC Pub. 4749 (Dec. 2017) at 44–45; *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545–547, 731-TA-1291–1297 (Final), USITC Pub. 4638 (Sept. 2016) at 49–50; *Certain Corrosion-Resistant Steel Products from China, India*, (continued...)

have determined to compare the volume of subject imports from China for the five-month periods, and the volume of subject imports from Italy and Korea for the six-month periods, prior to and after the filing of the petition.²⁵

2. China

In its final antidumping duty critical circumstances determination for CDMT from China, Commerce determined that critical circumstances exist with respect to subject merchandise produced or exported by the China-wide entity and the nonselected separate-rate respondents, but do not exist with respect to Zhangjiagang Huacheng Import & Export Co., Ltd.²⁶ Subject import volume from those producers in China subject to Commerce's antidumping duty critical circumstances finding was *** short tons for the five-month period prior to the filing of the petition and *** short tons for the five-month period after the filing of the petition, an increase of *** short tons.²⁷ Although the volume of subject imports subject to the critical circumstances finding increased during the post-petition period, apparent U.S. consumption was greater in the January–June 2017 (“interim 2017”) period than in interim 2016.²⁸ U.S. importers' inventories of CDMT from China as of June 30, 2017, were *** short tons, which is lower than the inventory level as of December 31, 2016.²⁹ Taking into account information in the record concerning increasing apparent U.S. consumption during the latter portion of the period of investigation, the size of the U.S. market for CDMT, and the declining inventories, we do not find that the increased volume of subject imports from China subject to Commerce's

Italy, Korea, and Taiwan, Inv. Nos. 701-TA-534–537 and 731-TA-1274–1278 (Final), USITC Pub. 4620 (July 2016) at 35–36; *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531–532 and 731-TA-1270–1273 (Final), USITC Pub. 4604 (Apr. 2016) at 31–32; *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 (Jan. 2015) at 25–26.

²⁴ The petitions in these investigations were filed on April 19, 2017. Commerce made its preliminary countervailing duty determination on CDMT from China on September 25, 2017. *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination*, 82 Fed. Reg. 44562 (Sept. 25, 2017).

²⁵ The five-month periods considered for China are December 2016 through April 2017 and May 2017 through September 2017. The six-month periods considered for Italy and Korea are November 2016 through April 2017 and May 2017 through October 2017.

²⁶ 83 Fed. Reg. at 16323.

²⁷ Supplemental Confidential Report, Memorandum INV-QQ-055 (May 8, 2018) (“SCR”) at Table I-7; Supplemental Public Report, *Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland*, Inv. Nos. 731-TA-1362–1367 (Final), USITC Pub. 4790 (May 2018) (“SPR”) at Table I-7.

²⁸ Apparent U.S. consumption was 227,613 short tons in interim 2016 and 255,358 short tons in interim 2017. CR/PR at Table IV-13. It was 445,089 short tons for the full year in 2016. *Id.*

²⁹ U.S. importers' inventories of CDMT from China as of December 31, 2016, were *** short tons. SCR/SPR at Table I-7, note. The information available in the record concerns inventories of all subject imports from China. We observe that U.S. importers' end-of-period inventories for subject imports from China were also lower in June 2017 than in June 2016. CR/PR at Table VII-31.

critical circumstances finding was sufficiently large to undermine seriously the remedial effect of the order. Consequently, we make a negative critical circumstances determination with regard to subject imports in the antidumping duty investigation of CDMT from China.

3. Italy

In its final antidumping duty critical circumstances determination for CDMT from Italy, Commerce determined that critical circumstances exist with respect to subject merchandise produced or exported by Dalmine, S.p.A. and Metalfer, S.p.A. and do not exist for all other producers or exporters.³⁰ Subject import volume from those producers in Italy subject to Commerce's critical circumstance finding was *** short tons for the six-month period prior to the filing of the petition and *** short tons for the six-month period after the filing of the petition, a decrease of *** short tons.³¹ U.S. importers' inventories of CDMT from Italy as of June 30, 2017, were minimal at *** short tons and lower than the inventory level as of December 31, 2016.³² In light of these declines in imports and inventories, we make a negative critical circumstances determination with regard to subject imports in the antidumping duty investigation of CDMT from Italy.

4. Korea

In its final antidumping duty critical circumstances determination for CDMT from Korea, Commerce determined that critical circumstances exist with respect to subject imports from all producers and exporters.³³ Subject import volume from Korea was *** short tons for the six-month period prior to the filing of the petition and *** short tons for the six-month period after the filing of the petition, an increase of *** short tons.³⁴ The level of U.S. importers' inventories of CDMT from Korea as of June 30, 2017, was *** short tons and lower than the inventory level as of December 31, 2016.³⁵ Taking into account information in the record discussed in section III.B.2. above concerning increasing apparent U.S. consumption during the latter portion of the period of investigation and the size of the U.S. market for CDMT, as well as the declining inventories, we find that the increased volume of subject imports from Korea was not sufficiently large to undermine seriously the remedial effect of the order. Consequently,

³⁰ 83 Fed. Reg. at 16290.

³¹ SCR/SPR at Table I-8.

³² U.S. importers' inventories of CDMT from Italy as of December 31, 2016, were *** short tons. SCR/SPR at Table I-8, note. The information available in the record concerns inventories of all subject imports from Italy. We observe that U.S. importers' end-of-period inventories for subject imports from Italy declined irregularly from 2014 to 2016 and were lower in June 2017 than in June 2016. CR/PR at Table VII-31.

³³ 83 Fed. Reg. at 16320.

³⁴ SCR/SPR at Table I-9.

³⁵ U.S. importers' inventories of CDMT from Korea as of December 31, 2016, were *** short tons. SCR/SPR at Table I-9, note. We observe that U.S. importers' end-of-period inventories for subject imports from Korea were lower in June 2017 than in June 2016. CR/PR at Table VII-31.

we make a negative critical circumstances determination in the antidumping duty investigation of CDMT from Korea.

VI. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of dumped subject imports of CDMT from China, Germany, India, Italy, Korea, and Switzerland. We also find that critical circumstances do not exist with respect to CDMT imports from China, Italy, and Korea subject to Commerce's affirmative critical circumstances determinations.

PART I: INTRODUCTION

BACKGROUND

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by ArcelorMittal Tubular Products, Shelby, Ohio; Michigan Seamless Tube, LLC, South Lyon, Michigan; PTC Alliance Corp., Wexford, Pennsylvania; Webco Industries, Inc., Sand Springs, Oklahoma; and Zekelman Industries, Inc., Farrell, Pennsylvania, on April 19, 2017, alleging that an industry in the United States is materially injured or threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of cold-drawn mechanical tubing of carbon and alloy steel (“CDMT”)¹ from China, Germany, India, Italy, Korea, and Switzerland and by reason of imports that are subsidized by the Governments of China and India. The following tabulation provides information relating to the background of these investigations.²

Effective date	Action
April 19, 2017	Petition filed with Commerce and the Commission; institution of Commission investigations (82 FR 19078, April 25, 2017)
May 9, 2017	Commerce’s notice of initiation of countervailing duty investigations (82 FR 22486, May 16, 2017)
May 9, 2017	Commerce’s notice of initiation of antidumping duty investigations (82 FR 22491, May 16, 2017)
June 5, 2017	Commission’s preliminary determinations (82 FR 26812, June 9, 2017)
September 25, 2017	Commerce’s preliminary countervailing duty determinations with respect to China and India (82 FR 44562; 82 FR 44558); scheduling of final phase of Commission investigations (82 FR 46522, October 5, 2017)
November 22, 2017	Commerce’s preliminary antidumping duty determinations with respect to China (82 FR 55574), Germany (82 FR 55558), India (82 FR 55567), Italy (82 FR 55561), Korea (82 FR 55564), and Switzerland (82 FR 55571)
December 6, 2017	Commission’s hearing
December 11, 2017	Commerce’s final countervailing duty (CVD) determinations with respect to China (82 FR 58175) and India (82 FR 58172)

¹ For a complete description of the merchandise subject in this proceeding, see the section entitled “The Subject Merchandise” in *Part I of Cold-Drawn Mechanical Tubing from China and India*, Investigation Nos. 701-TA-576-577, USITC Publication 4755, January 2018.

² Pertinent *Federal Register* notices are referenced in appendix A, and may be found at the Commission’s website (www.usitc.gov).

Effective date	Action
January 5, 2018	Commission's vote (CVD)
January 24, 2018	Commission's views (CVD)
April 16, 2018	Commerce's final antidumping duty (AD) determinations with respect to China (83 FR 16322), Germany (83 FR 16326), India (83 FR 16296), Italy (83 FR 16289), Korea (83 FR 16319), and Switzerland (83 FR 16293)
May 17, 2018	Commission's vote (AD)
May 31, 2018	Commission's views (AD)

The information contained in this report is intended to be used in conjunction with data presented in the Commission's report on *Cold-Drawn Mechanical Tubing from China and India, Investigation Nos. 701-TA-576-577 (Final)*, USITC Publication 4755, January 2018, and its corresponding confidential version contained in memoranda Nos. INV-PP-168, INV-QQ-001, and INV-QQ-003, Investigation Nos. 701-TA-576-577 and 731-TA-1362-1367 (Final): *Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland*. No new information except for Commerce's final determinations regarding CDMT from China, Germany, India, Italy, Korea, and Switzerland and party comments³ thereon is included in the record for this proceeding.

NATURE AND EXTENT OF SALES AT LTFV

On April 16, 2018, Commerce published notices in the *Federal Register* of its final determinations of sales at LTFV with respect to imports from China, Germany, India, Italy, Korea, and Switzerland.⁴ Tables I-1 through I-6 present Commerce's dumping margins with respect to imports of CDMT from the subject countries.

³ Party comments were filed on behalf of petitioners; Autoliv ASP, Inc.; and Salem Steel NA, LLC, Tube Fabrication Industries, Inc., and voestalpine Rotec, Inc.

⁴ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16322, April 16, 2018; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 16326, April 16, 2018; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Affirmative Determination of Sales at Less Than Fair Value, in Part*, 83 FR 16296, April 16, 2018; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Italy: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16289, April 16, 2018; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 83 FR 16319, April 16, 2018; and *Cold-Drawn Mechanical Tubing From Switzerland: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 16293, April 16, 2018.

Table I-1**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from China**

Producer	Exporter	Final dumping margin (percent)
Jiangsu Huacheng Industry Pipe Making Corporation, and Zhangjiagang Salem Fine Tubing Co., Ltd.	Zhangjiagang Huacheng Import & Export Co., Ltd.	44.92
Anji Pengda Steel Pipe Co., Ltd.	Anji Pengda Steel Pipe Co., Ltd.	44.92
Changshu Fushilai Steel Pipe Co., Ltd.	Changshu Fushilai Steel Pipe Co., Ltd.	44.92
Changshu Special Shaped Steel Tube Co., Ltd.	Changshu Special Shaped Steel Tube Co., Ltd.	44.92
Jiangsu Liwan Precision Tube Manufacturing Co., Ltd.	Suzhou Foster International Co., Ltd.	44.92
Zhangjiagang Precision Tube Manufacturing Co., Ltd. (Zhangjiagang Tube)	Suzhou Foster International Co., Ltd.	44.92
Wuxi Dajin High-Precision Cold-Drawn Steel Tube Co., Ltd.	Wuxi Huijin International Trade Co., Ltd.	44.92
Zhangjiagang Shengdingyuan Pipe-Making Co., Ltd.	Zhangjiagang Shengdingyuan Pipe-Making Co., Ltd.	44.92
Zhejiang Minghe Steel Pipe Co., Ltd.	Zhejiang Minghe Steel Pipe Co., Ltd.	44.92
Zhejiang Dingxin Steel Tube Manufacturing Co., Ltd.	Zhejiang Dingxin Steel Tube Manufacturing Co., Ltd.	44.92
PRC-Wide Entity ¹		186.89

¹ Jiangsu Hongyi Steel Pipe Co., Ltd. is part of the China-wide entity.

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16322, April 16, 2018.

Table I-2**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from Germany**

Producer/Exporter	Final dumping margin (percent)
BENTELER Steel/Tube GmbH/BENTELER Distribution International GmbH ¹	3.11
Mubea Fahrwerksfedern GmbH	209.06
Salzgitter Mannesmann Line Pipe GmbH	209.06
All others	3.11

¹ Commerce found that BENTELER Steel/Tube GmbH and BENTELER Distribution International GmbH are a single entity.

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 16326, April 16, 2018.

Table I-3**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from India**

Producer/Exporter	Final dumping margin (percent)
Goodluck India Limited	33.80
Tube Products of India, Ltd., a unit of Tube Investments of India Limited (collectively TPI)	8.26
All others	8.26

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Affirmative Determination of Sales at Less than Fair Value*, 83 FR 16296, April 16, 2018.

Table I-4**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from Italy**

Producer/Exporter	Final dumping margin (percent)
Dalmine S.p.A	68.95
Metafer S.p.A	68.95
All others	47.87

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Italy: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16289, April 16, 2018.

Table I-5**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from Korea**

Producer/Exporter	Final dumping margin (percent)
Sang Shin Ind. Co., Ltd.	48.00
Yulchon Co., Ltd.	48.00
All others	30.67

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value, Final Affirmative Determination of Critical Circumstances*, 83 FR 16319, April 16, 2018.

Table I-6**CDMT: Commerce's final weighted-average LTFV margins with respect to imports from Switzerland**

Producer/Exporter	Final dumping margin (percent)
Benteler Rothrist AG (Benteler Rothrist)	12.50
Mubea Präzisionsstahlrohr AG (MPST)	30.48
All others	13.55

Source: *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Switzerland: Final Determination of Sales at Less Than Fair Value*, 83 FR 16293, April 16, 2018.

CRITICAL CIRCUMSTANCES⁵

China

In its preliminary determination, Commerce concluded that critical circumstances exist with regard to imports from China of CDMT from Hongyi Steel Pipe Co., Ltd. (Hongyi), the producers/exporters receiving a separate rate, and the China-wide entity, but not with respect to Zhangjiagang Huacheng Import & Export Co., Ltd. (Huacheng).⁶ On April 16, 2018, Commerce issued its final determination that it continues to find that critical circumstances exist with regard to imports from China of CDMT from Hongyi, the producers/exporters receiving a separate rate, and the China-wide entity, but not with respect to Huacheng.⁷

Italy

Commerce preliminarily determined that critical circumstances exist with regard to imports from Italy of CDMT from Dalmine S.p.A. and Metalfer S.p.A., but not with respect to all other producers/exporters in Italy.⁸ In its final determination, Commerce continues to find that critical circumstances exist with regard to imports from Italy of CDMT from Dalmine S.p.A. and Metalfer S.p.A., but not with respect to all other producers/exporters in Italy.⁹

⁵ When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

⁶ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less-Than-Fair Value and Preliminary Affirmative Determination of Critical Circumstances, in Part, and Postponement of Final Determination*, 82 FR 55574, November 22, 2017.

⁷ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16322, April 16, 2018.

⁸ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Italy: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 82 FR 55561, November 22, 2017.

⁹ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Italy: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16289, April 16, 2018.

Korea

Commerce preliminarily found that critical circumstances exist with respect to Sang Shin Ind. Co., Ltd., but not with respect to Yulchon Co., Ltd. or all other producers/exporters in Korea.¹⁰ In its final determination, Commerce made changes to its preliminary determination and found that critical circumstances exist with respect to subject merchandise produced or exported by Sang Shin, Yulchon, and “all others.”¹¹

In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive 90 days from the effective date of Commerce’s preliminary affirmative LTFV determination. Tables I-7 to I-9 and figures I-1 to I-3 present these data.

Table I-7

CDMT: U.S. importers' U.S. imports from China subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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Figure I-1

CDMT: U.S. importers' U.S. imports from China subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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Table I-8

CDMT: U.S. importers' U.S. imports from Italy subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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Figure I-2

CDMT: U.S. importers' U.S. imports from Italy subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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¹⁰ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Republic of Korea: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 82 FR 55564, November 22, 2017.

¹¹ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value, Final Affirmative Determination of Critical Circumstances*, 83 FR 16319, April 16, 2018.

Table I-9

CDMT: U.S. importers' U.S. imports from Korea subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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Figure I-3

CDMT: U.S. importers' U.S. imports from Korea subject to Commerce's final AD critical circumstance findings, November 2016 through October 2017

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APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
82 FR 19078, April 25, 2017	<i>Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, Korea, and Switzerland; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-04-25/pdf/2017-08361.pdf
82 FR 22486, May 16, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India and the People's Republic of China: Initiation of Countervailing Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-09869.pdf
82 FR 22491, May 16, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany, India, Italy, the Republic of Korea, the People's Republic of China, and Switzerland: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-09870.pdf
82 FR 44562, September 25, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-09-25/pdf/2017-20413.pdf
82 FR 44558, September 25, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Preliminary Affirmative Countervailing Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-09-25/pdf/2017-20412.pdf
82 FR 46522, October 5, 2017	<i>Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, Korea, and Switzerland; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-10-05/pdf/2017-21428.pdf
82 FR 55574, November 22, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less-Than-Fair Value and Preliminary Affirmative Determination of Critical Circumstances, in Part, and Postponement of Final Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25294.pdf

Tabulation continued on next page.

Citation	Title	Link
82 FR 55567, November 22, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25292.pdf
82 FR 5558, November 22, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25291.pdf
82 FR 55561, November 22, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Italy: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25289.pdf
82 FR 55564, November 22, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Republic of Korea: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25290.pdf
82 FR 55571, November 22, 2017	<i>Cold-Drawn Mechanical Tubing From Switzerland: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-11-22/pdf/2017-25293.pdf
82 FR 58175, December 11, 2017	<i>Countervailing Duty Investigation of Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Affirmative Determination, and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-12-11/pdf/2017-26608.pdf
82 FR 58172, December 11, 2017	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Affirmative Countervailing Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2017-12-11/pdf/2017-26609.pdf

Tabulation continued on next page.

Citation	Title	Link
83 FR 16322 April 16, 2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Affirmative Final Determination of Sales at Less-Than-Fair Value and Final Determination of Critical Circumstances, in Part</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07849.pdf
83 FR 16326 April 16,2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Federal Republic of Germany: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07850.pdf
83 FR 16296 April 16, 2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Affirmative Determination of Sales at Less than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07851.pdf
83 FR 16289 April 16, 2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Italy: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07848.pdf
83 FR 16319 April 16, 2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value, Final Affirmative Determination of Critical Circumstances</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07854.pdf
83 FR 16293 April 16, 2018	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From Switzerland: Final Determination of Sales at Less Than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07853.pdf
83 FR 17674 April 23, 2018	<i>Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland; Supplemental Schedule for the Subject Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-23/pdf/2018-08396.pdf

