

**CHAPTER 11**  
**I.T. RESOURCES & SUPPORT SERVICES, DATA-HANDLING PROCEDURES,**  
**MARGIN CALCULATIONS AND PANEL REVIEWS**

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**References:**

Handbook on Data-Handling Procedures  
Panel Review Checklist

**INTRODUCTION**

This chapter covers information technology (IT)-related functions within Import Administration. Topics covered include: (1) IT resources and support services; (2) procedures for handling data submitted by outside parties; (3) performing antidumping margin calculations; and (4) calculation review panel procedures.

**I. I.T. RESOURCES AND SUPPORT SERVICES**

**A. Computer Support Team**

Up until the mid-1990s in Import Administration (IA), database files were stored at secure locations on a mainframe computer, and a small team of experienced SAS© programmers performed all margin calculations. Now, individual case analysts receive data submitted by outside parties and perform margin calculations on their desktop PCs. In such a decentralized environment, safeguarding data and maintaining consistency in IA calculation methodology require extra precautions.

The purpose of the Computer Support Team (CST) is to help case analysts maintain data integrity and achieve calculation consistency. To this end, the CST develops procedures for the handling of data submitted by outside parties, creates and maintains standard antidumping (AD)

programs, assists case analysts with their calculations, develops archival procedures for calculations, provides training on SAS© programming and other software applications, and develops guidelines on the use of IT resources. In addition, the CST creates quarterly updates of the exchange rates used in AD margin calculations, provides U.S. import statistics, and serves as a liaison to other offices, such as the Office of Information & Technology, the Customs Unit, and User Assistance. (Please see Attachment 11-1 for a synopsis of the functions of the CST and other IT-related units.)

Each IA office is assigned a CST member as its primary IT support contact; however, the CST members can assist analysts from any office. So, if you are unable to get a hold of your designated CST member, do not hesitate to contact any of the other members of the CST. For a list of CST members & assigned offices, please see Attachment 11-1.

## **B. Information Technology Unit**

The Information Technology Unit (ITU) is the arm within the International Trade Administration (ITA) that interfaces with Commerce's Office of the Chief Information Officer (OCIO). Accordingly, it is the ITU that is charged with implementing the OCIO's guidelines on IT hardware, software and architecture. The ITU also maintains the ITA website, including the IA portion.

On a more practical level, it is the ITU that purchases computer hardware and software for all the units within ITA, including IA. Other activities of the ITU that are of particular relevance to IA include:

- Maintaining the AD and CVD archives;
- Issuing laptops to analysts;
- Designing the overall structure of Lotus Notes; and
- Working with the CST in managing the IA network.

For a list of ITU activities and contacts, please see Attachment 11-1.

**Laptops:** To check out a laptop, you must contact the ITU five business days in advance of the time you require it. If you wish to have SAS© installed on the laptop, you must additionally obtain approval from the Director of the ITU; approval is not required to have the SAS© Viewer installed. Upon receipt of the laptop, just call User Assistance (see below) to have either the SAS© Viewer or SAS© installed, if necessary.

## **C. User Assistance/Help Desk**

User Assistance (UA), a.k.a. the ITA Help Desk, is the office you call when you are having troubles with your computer or laptop, the software on either, a printer, or with your access to the shared network drives. Basically, UA is in charge of making sure that the equipment the ITU

issues you actually works for you. You can reach UA by telephone (482-1955) or by email (just type "Help Desk" in the address line in Lotus Notes mail).

## **D. Computer and Network Resources**

### 1. Your Desktop PC

Most of the disk space on your PC is locked by the IA administrators. As a result, you will not be able to install or uninstall applications on your PC. You will have access to a small amount of space on the C-drive of your computer under the "My Documents" folder; however, it is not recommended that you keep much there. Files kept on the C-drive of your computer are only accessible via that PC; accordingly, you will not be able to see files stored on your C-drive when you access the IA network remotely or are logged into another PC on the IA network. You should periodically back up the files on your C-drive by either copying them to some type of external media (*e.g.*, a CD) or to a network drive.

### 2. The IA Network

In addition to the limited space on your PC, you also have access to the IA network. IA's network administrators back up the network on a daily basis. So, if you accidentally delete a file of great importance and that file was previously stored on the network, you stand a good chance of getting that file back. Needless to say, requests for such file retrieval should be kept to a bare minimum.

The drives on the IA network of greatest importance to you are the H-drive, I-drive and J-drive. What follows is a description of each.

### 3. The H-Drive

Each person in IA is assigned a personal place on the H-drive. This space is specific to you. Other people, when logged into the IA network, will neither be able to see nor access your space on the H-drive. To see this directory, just click on the H-drive. This is a good place to store copies of your work because the H-drive, being a network drive, is backed up each night by the network administrators.

### 4. The I-Drive

Under the I-drive are separate subdirectories for each group within IA. You should have read and write access to the subdirectory pertaining to the whole of your group, and only to your group. For example, if you are in Office 1, which is part of Group 1, then the I-drive to which you will have access is: I:\Grp1Off1. If you do not have read and write access to appropriate portion of the I-drive, please contact UA.

The I-drive is where you keep files to which co-workers may need access. At the end of each work day, you should copy such files to the I-drive. Unlike the hard-drive of your computer, the I-drive, being a network drive, will be backed up by the network administrators.

## 5. The J-Drive

The J-drive is the one drive that all IA personnel can see. It is set up this way for two purposes. First of all, it is the place where files are stored to which all people within IA need access. Examples include the standard AD margin calculations programs, exchange rates, a copy of this AD Manual, etc. Secondly, the J-drive is used to facilitate communication between people from different groups within IA who are working together on a common project. In such circumstances, and upon approval from the CST or ITU, a special subdirectory on the J-drive can be created. Once the need for J-drive subdirectory is over, you should delete it immediately.

## 6. Responsible Use of Network Resources

Once files and/or subdirectories are no longer needed, you are to remove them from the network drives. For example, when the files for a particular AD proceeding are archived and the case is closed, you should delete any H-drive and I-drive files/subdirectories pertaining to that proceeding. Of course, there may be exceptions for files that may be useful in subsequent proceedings, such as particularly seminal memoranda, one copy of the final FR, etc. However, in almost no case should multiple draft versions of FR notices and calculations be kept on a network drive long after a preliminary or final decision has been signed.

## II. PROCEDURES FOR HANDLING DATA SUBMITTED BY OUTSIDE PARTIES

When an outside party submits electronic data to IA, it places one copy of the data in a separate envelope and attaches it to a paper submission, then deposits both with the Administrative Protective Orders (APO)/Dockets Office. The APO/Dockets Office records the receipt of the paper submission and attached electronic submission in a log book. After sending the required number of paper copies to the Central Records Unit (CRU), the APO/Dockets Office sends the remaining paper copies and the electronic data to the appropriate AD/CVD Operations Office within IA. It is important to note that no copy of the electronic submission is either retained by the APO/Dockets Office or sent to the CRU. In other words, the one and only copy of the electronic data is sent to the Operations Office in charge of the proceeding. In market-economy (ME) offices, submitted data is sent directly to the case analyst. In the non-market economy (NME) offices, it is sent to a central location.

The following procedures are designed to safeguard data submitted by outside parties and protect its integrity. All analysts within IA that receive such data are required to follow these procedures

### Steps to Follow Upon Receipt of Data:

1. Scan the media for viruses;
2. Copy all files to a network drive (for ME files, use the I-drive; for NME, the Safehouse drive), making sure the copies are in read-only format;
3. Archive the original media submitted by the outside party;
4. When necessary, convert files to SAS© datasets;
5. Run the appropriate ME or NME Data Integrity Program.

You can find detailed instructions on how to archive material in the "Handbook on Data-Handling Procedures" at:

J:\SAS AD Files\Procedures and Tools\IA Procedure Manual.

Also, in-house training is offered regularly as part of the Introductory SAS© course. Basically, you use a Media Request Form to archive data. The forms are generated from within the company-specific file in the AD/CVD Case Management database in Lotus Notes. Once inside the company file, just click on the button that says "Media Request Form" and a blank form will appear.

Should you need to retrieve previously archived data, you need only complete another Media Request Form. Instructions on how to do this are also found in the "Handbook on Data-Handling Procedures" mentioned in the paragraph immediately above.

The Data Integrity Programs are found on the J-Drive as follows:

ME: J:\SAS AD Files\ME Programs\ME Data Integrity Check

NME: J:\SAS AD Files\NME Programs\Analysis\NME Data Integrity Check

Classroom training on how to use these programs is offered on a regular basis by the CST. Also, you can contact a member of the CST at any time to get immediate assistance.

If you have questions on the procedures for handling data, please contact a member of the CST. From scanning disks for viruses, to archiving data, to using the Data Integrity Program, the CST is willing to assist you.

### **III. MARGIN CALCULATIONS**

The basic elements needed to generate an accurate antidumping margin are: good data and correct calculation methodology. In order to achieve this, a lot of effort is required by the analyst.

#### **A. Vetting a Database Prior to Use**

The old adage, "garbage in, garbage out," is something we want to avoid in our margin calculations. To this end, there are steps you are to take to make sure the data you use will not produce garbage results. These steps are:

1. Run the Data Integrity Check program on the data;
2. Know in what form the data should be according to IA requirements;
3. Check the narrative response to see that the methodology employed conforms to IA's requirements;
4. Once you have confirmed that the narrative description follows correct IA methodology, check the data itself to make sure that it corresponds to what is said in the narrative.

The results of the Data Integrity Program in Step 1 give you information about the contents of a database on a gross level. The number of observations in the data, the variables therein and their formats, whether or not there are missing pieces of data, total volume & value of transactions, and minimum, maximum and simple average amounts for numeric fields are some of the macro-level pieces of information generated. Without going into detail about the many other pieces of information generated by the Data Integrity Program, let it suffice to say that generating the results of the Data Integrity Program is a good first step in understanding your data. New analysts should work closely with experienced analysts in order to understand the results of the Data Integrity Program, and to relate those results to the narrative responses and IA methodology.

*Note: With respect to Steps 2-4, please see Chapter 5 of this AD Manual re: analyzing respondent submissions.*

## **B. Standard Margin Calculation Programs**

Once you have determined that the data you have are viable, you are ready to calculate the AD margin. In order to maintain consistency across all of IA, the CST has developed standard margin calculation programs that all analysts are to use. These programs are stored on the J-drive as follows:

ME: J:\SAS AD Files\ME Programs\ME Margin Calculation Programs\Current Versions  
NME: J:\SAS AD Files\NME Programs

For each proceeding, you must begin with a fresh copy of the standard program from the J-drive. This is to ensure that any recent policy changes are reflected in your calculations. Do not use a program from a prior review--you are in danger of missing recent policy changes, or carrying through non-standard language that was necessary in that old proceeding, but is not needed in the current one. While the standard programs have been designed to handle most circumstances, some tailoring is frequently needed to account for company-specific circumstances not easily handled by the generic programming language.

In-house training on using the standard programs is available on a regular basis. In addition to taking the in-house training, it is useful for new analysts to work with either a senior analyst or a CST member when loading their data into the standard programs.

## **C. Archiving Calculations**

When your calculations are finalized (*i.e.*, calculations are signed off by the internal and external calculation review panels (see below), and the Assistant Secretary for IA has signed the Federal Register notice), you must archive the calculations along with any supporting files (*e.g.*, exchange rate database, calculation memoranda, surrogate valuation data). To archive material, you use a Media Request Form generated from within the company-specific file in the AD/CVD Case Management database in Lotus Notes. Detailed instructions on archiving material are found in the "Handbook on Data-Handling Procedures" at:

J:\SAS AD Files\Procedures and Tools\IA Procedure Manual.

Also, in-house training is offered regularly as part of the Introductory SAS© course.

#### **IV. CALCULATION REVIEW PANELS**

The Calculation Review Panel (CRP) process is an integral part of IA's efforts to control quality and maintain consistency in its AD margin calculations. All preliminary and final AD determinations/results must be reviewed by both an internal and external CRP prior to signature by the Assistant Secretary for IA.

##### **A. Internal Calculation Review Panel**

Usually, other members of the analyst's office make up the constituents of the Internal CRP. The internal CRP focuses on the data that goes into the Margin Programs as opposed to the methodology employed in the calculations. For example, an internal CRP will check that the analyst has used the correct datasets and variables, all case-specific changes to the data are explained and checked to source documents, prices and price adjustments are consistent in terms of currencies and units, etc.

##### **B. External Calculation Review Panel**

The external CRP is composed of people from outside the case analyst's office. Complementing the work of the internal CRP, the external CRP examines whether the correct methodology was employed, and focuses on more macro aspects of the calculations, such as making sure that sales are not inappropriately dropped from analysis, any unusual data and output are explained, etc. In addition, the external CRP checks that the calculations are accurately described in the FR notice and any calculation memoranda.

##### **C. Procedures for Calculation Review Panels**

As the first step, the analyst should give copies of the following items to the internal CRP:

- A blank Calculation Review Panel Checklist
- Results from the Data Integrity Program
- Print-Outs of the Log and Output from the Margin Calculation Program
- The Federal Register Notice
- All Calculation Memoranda
- Any Other Supporting Material (*e.g.*, Verification Exhibits)

Once the internal panel is completed, the analyst should pass the now partially completed Calculation Review Panel Checklist and the rest of the supporting materials to the external CRP.

When the both the internal and external CRPs are finished, all errors and suggested changes must be discussed between the program manager, case analyst and panel leader(s). Once all adjustments to the calculations deemed necessary are made, the appropriate CRP will review the

changes before signing off on the calculations.

#### **D. The Calculation Review Panel Checklists**

The market-economy and non-market economy checklists are very extensive documents with specific, step-by-step instructions. For the market-economy and non-market economy checklists, you can find the current versions in Lotus Notes under the “AD ME Standard Documents” database and “NME Library” database, respectively.