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December 10, 2001

The Honorable Donald L. Evans
Secretary of Commerce
Attention: Import Administration
Central Records Unit, Room 1870
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Silicomanganese from Kazakhstan; Comments on Market-Economy Claim

Dear Mr. Secretary:

In its preliminary determination in the above-referenced investigation, the Department of Commerce determined to continue treating Kazakhstan as a nonmarket-economy (“NME”) country.¹ In addition, the Department invited public comment “with respect to Kazakhstan on factors listed in section 771(18) of the Act, which the Department must take into account in making a market/nonmarket economy determination.”² Such comments are due today, December 10, 2001.

In three submissions in this investigation,³ Petitioners have provided extensive comments and factual information with respect to Kazakhstan on the factors listed in section

¹ *Notice of Preliminary Determination of Sales at Less Than Fair Value: Silicomanganese From Kazakhstan*, 66 Fed. Reg. 56,639, 56,641 (November 9, 2001).

² *Id.*

³ Letter from Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, Counsel for Petitioners, to the Honorable Donald L. Evans, Secretary of Commerce (July 30, 2001) (response to the June 28, 2001 and July 5, 2001 market-economy claims of Transnational Company Kazchrome and Aksu Ferroalloy Plant (“Kazchrome”) and the Government of Kazakhstan,

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771(18)(A) of the Tariff Act of 1930.⁴ For the numerous and very good reasons explained in Petitioners' prior submissions, the Department should continue to treat Kazakhstan as a NME country in this investigation.

Thank you for your consideration of this letter.

Very truly yours,

William D. Kramer
Clifford E. Stevens, Jr.
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respectively); Letter from Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, Counsel for Petitioners, to the Honorable Donald L. Evans, Secretary of Commerce (August 23, 2001) (providing factual information cited in Petitioners' July 30 submission); Letter from Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, Counsel for Petitioners, to the Honorable Donald L. Evans, Secretary of Commerce (August 29, 2001) (response to Kazchrome's August 14, 2001 response to Petitioners' July 30 submission).

⁴ 19 U.S.C. § 1677(18)(A).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing letter was served on the following party by hand delivery on this 10th day of December, 2001:

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