

Mr. Joseph A. Spetrini
Acting Assistant Secretary for Import Administration
U. S. Department of Commerce
Central Records Unit, Room 1870
14th and Constitution Avenue NW
Washington D.C. 20230

RE: Timing of Assessment Instructions for Antidumping Duty Orders Involving Non-Market Economy Countries

Dear Mr. Spetrini,

Bayou Land Seafood, LLC strongly urges that the Department of Commerce promptly resume issuing assessment instructions after the initiation of an administrative review for entries from foreign entities subject to the NME-wide rate and for which the Department did not receive a specific request for review.

The Department of Commerce instructions are essential to assuring timely compliance with the Continued Dumping and Subsidy Offset Act of 2000 (CDSOA). This law provides for distribution of assessed duties to affected domestic producers for qualified expenditures which include health care benefits for employees paid for by employers, pension benefits and funds needed to maintain production in the face of illegal dumping. The timing of the continued dumping and subsidy offset already has a built-in delay and puts Louisiana crawfish processors at an even greater disadvantage if there is additional unwarranted delay.

The timing of the instructions to liquidate is very critical. If these instructions are not issued soon after the July 15 deadline for the filing of these comments, it is unlikely that the U.S. Bureau of Customs and Border Patrol (Customs) will be motivated to act to make the September 30 deadline for transfer of funds.

Thank you for your attention to this matter.

Respectfully submitted,

Adam J. Johnson
Bayou Land Seafood, LLC