

TO:

RE: Request for Quantity and Value Information: Administrative Review of the Antidumping Duty Order on Wooden Bedroom Furniture From the People's Republic of China Covering the Period January 1, 2009 through December 31, 2009

To Whom It May Concern:

I am writing to you on behalf of Import Administration, a unit of the United States Department of Commerce (“the Department”). On February 26, 2010, the Department initiated an antidumping duty administrative review of various companies to determine whether wooden bedroom furniture was sold in the United States at less than fair value during the period of January 1, 2009 through December 31, 2009.<sup>1</sup> The list of companies for which a review was initiated is in the Notice of Initiation in Attachment IV to this questionnaire.<sup>2</sup> Due to the large number of companies for which a review was initiated, pursuant to section 777A(c)(2) of the Tariff Act of 1930, as amended, (“the Act”), the Department is considering limiting the number of exporters or producers examined to those exporters and producers accounting for the largest volume of the subject merchandise from the exporting country that can be reasonably examined.

In order to determine which of the exporters and producers listed in the attached Notice of Initiation accounted for the largest volume of the subject merchandise from the People's Republic of China during the period January 1, 2009 through December 31, 2009, we ask you to respond to Attachment I of this Quantity and Value Questionnaire (“Q&V Questionnaire”). Please complete the table in Attachment I by providing the requested information on the quantity and U.S. dollar sales value of all exports to the United States of wooden bedroom furniture during the period January 1, 2009 through December 31, 2009. A definition of the scope of the merchandise subject to this review is included in Attachment II to this Q&V Questionnaire. General instructions for responding to the Q&V Questionnaire are contained in Attachment III. Also, an electronic copy of the Q&V Questionnaire may be found on the internet at the following address: <http://ia.ita.doc.gov/download/prc-wbf/index.html>.

If you believe that you should be treated as a single entity along with other named exporters, please provide the information requested in the table in Attachment I, both in the aggregate for

---

<sup>1</sup> See the notice of “Initiation of Administrative Review of the Antidumping Duty Order on Wooden Bedroom Furniture From the People's Republic of China” in Attachment IV to this questionnaire (Notice of Initiation).

<sup>2</sup> Please note that the Department's regulations at 19 CFR 351.213(d)(1) permit parties that have requested an administrative review to withdraw that request within 90 days of the date of publication of the notice of initiation of the requested review.

all named parties in your group, and individually for each named entity. Please clearly identify which company the company-specific information is from and label the aggregate figures for the group as “Group Total.”

The Department must receive your response to this Q&V Questionnaire no later than March 23, 2010. Full and accurate responses to the Q&V Questionnaire are necessary to ensure that the Department has the requisite information to appropriately select mandatory respondents. **If a company does not respond to this Q&V Questionnaire, the Department may deem the company to be uncooperative and may assign the company an antidumping duty margin using facts available, including using inferences that are adverse to the company’s interests, as provided by section 776 of the Act. Also, all responses to the Q&V Questionnaire may be subject to on-site verification by Department officials.**

Under the Department’s regulations at 19 CFR 351.213(d)(3), the Department may rescind a review with respect to a particular company if the company had no exports, sales, or entries of subject merchandise during the period of review (POR). As noted above, the POR for this case is January 1, 2009 through December 31, 2009. If a company named in the Notice of Initiation in Attachment IV to this questionnaire had no exports, sales, or entries during the POR, it should notify the Department of this fact by the due date for responding to the Q&V Questionnaire. The Department will consider rescinding the review with respect to the company only if the company submits a properly filed and timely statement certifying that it had no exports, sales, or entries of subject merchandise during the POR.<sup>3</sup>

The Department is also requiring all firms for which a review was initiated, that wish to qualify for separate-rate status in this administrative review, to complete, as appropriate, either a Separate Rate Application or Separate Rate Certification as described in the notice of initiation in Attachment IV. The Separate Rate Application and Separate Rate Certification, as well as the due dates by which the Department must receive the application or certification can be found on the Department’s website at <http://ia.ita.doc.gov/nme/sep-rate-files/072909/prc-sr-app-072909.pdf> and <http://ia.ita.doc.gov/nme/sep-rate-files/072909/prc-sr-cert-072909.pdf>, respectively. The dates by which the Department must receive your Separate Rate Application or Separate Rate Certification are also identified in the Notice of Initiation in Attachment IV to this questionnaire. **Please note that the Department will not give consideration to any timely filed Separate Rate Certification or Separate Rate Application made by parties to whom the Department issued a Q&V Questionnaire but who failed to timely respond to the Q&V Questionnaire.**

To assist you in filing your response to this Q&V Questionnaire, we have provided the following checklist which covers many of the major filing requirements (also see the General Instructions in Attachment III). The checklist must be submitted with your response to the Q&V Questionnaire. Confirm that you have complied with the applicable items below by checking the appropriate item.

---

<sup>3</sup> Producers or exporters may also fulfill this requirement by submitting a properly filed and timely Q&V questionnaire response that indicates that the entity or entities had no exports, sales, or entries of subject merchandise during the POR.

## Checklist

### General Items

1. \_\_\_\_ Confirm that you have provided all of the information requested in Attachment I to this questionnaire.
2. \_\_\_\_ You have listed in the table in Attachment I the full name of the company(ies) for which you reported data.
3. \_\_\_\_ If you believe that you should be treated as a single entity along with other named exporters, please provide the information requested in the table in Attachment I, both in the aggregate for all named parties in your group, and individually for each named entity. Please clearly identify which company the company-specific information is from and label the aggregate figures for the group as “Group Total.”
4. \_\_\_\_ **Do not** submit your response via email or facsimile. Your response must be sent to the following address:  
  
Secretary of Commerce  
Attention: Import Administration  
APO/Dockets Unit  
Room 1870  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, DC 20230
5. \_\_\_\_ You have filled out and included with your Q&V Questionnaire response the Certificate of Accuracy which is in Attachment III to this Questionnaire.
6. \_\_\_\_ You have filled out and included with your Q&V Questionnaire response the Certificate of Service which is in Attachment III to this Questionnaire.
7. \_\_\_\_ If you had no exports, sales, or entries of subject merchandise to the United States during the period 1/1/2009 through 12/31/2009, please respond to the Q&V Questionnaire by including the following statement in your questionnaire response:  
  
The following companies had no exports, sales, or entries of subject merchandise to the United States during the period of review (1/1/2009 through 12/31/2009):  
*Please list the full name of each company.*
8. \_\_\_\_ In addition to the above information, please provide the following contact information for each company for which you completed the table in Attachment I of this questionnaire:

Full Company Name:  
Name of Contact Person at the Company (if not represented by legal counsel):  
Full Company Address, **Including Postal Code**:  
Telephone Number:  
Fax Number:  
Email Address:

### **Instructions relating to PUBLIC DOCUMENTS**

If you are willing to allow **all** of the information contained in your Q&V Questionnaire response to be made publicly available, you must comply with items 1 through 4 below:

1. \_\_\_\_ You marked the upper-right hand corner of the cover letter of your questionnaire response as follows:

Case No. A-570-890  
Total Number of Pages: x  
Admin Review 1/1/2009 – 12/31/2009  
Pursuant to Section 751(a)(1) of the Act  
NME Unit Office 4  
**Public Document**

2. \_\_\_\_ **Do not** place brackets (“[ ]”) around any of the information provided in the public document.
3. \_\_\_\_ Your Certificate of Service lists each company on the Public Service list at <http://ia.ita.doc.gov/apo/index.html>.
4. \_\_\_\_ You filed the original and 5 copies of the public document with the Department.

### **Instructions relating to PROPRIETARY DOCUMENTS**

If you wish to treat any of the information contained in your Q&V Questionnaire response as proprietary information that you do not wish to be made publicly available, you must comply with items A and B below:

- A. You submitted a proprietary version of the document which meets requirements 1 through 8 below:

1. \_\_\_\_ The upper-right hand corner of the cover letter of your questionnaire response contains the following information:

Case No. A-570-890  
Total Number of Pages: x  
Admin Review 1/1/2009 – 12/31/2009  
Pursuant to Section 751(a)(1) of the Act  
NME Unit Office 4

**Business Proprietary Version**

Business Proprietary info on pages xx

2. \_\_\_\_\_ In addition to the above markings, you **must** include one of the following statements in the upper-right hand corner of the cover letter of your questionnaire response: (1) **Document May Be Released Under APO** or (2) **Document May Not be Released Under APO**. APO stands for Administrative Protective Order. Administrative Protective Orders permit limited disclosure of proprietary information to representatives of parties (e.g., legal counsel to parties) who have been granted APO access. **You should note that most business proprietary information is usually released by the submitters of the information under APO.** However, if you object to the release under APO of certain information contained in your Q&V Questionnaire response, you **must** list the information which you believe should not be released under APO, together with arguments supporting your objections to release under APO.
3. \_\_\_\_\_ You have included the statement “Business Proprietary Treatment Requested” on the top of each page containing business proprietary information.
4. \_\_\_\_\_ You have placed brackets (“[ ]”) around the information that you consider proprietary which you do not wish to be made publicly available but which may be released under APO.
5. \_\_\_\_\_ If you object to releasing certain proprietary information under APO, place double brackets (“[[ ]]”) around such information and create a separate APO version of the business proprietary document, and submit one APO Version, along with the six complete copies of the business proprietary document. The upper-right hand corner of the cover letter of the APO version of your questionnaire response should contain the following information:

Case No. A-570-890  
Total Number of Pages: x  
Admin Review 1/1/2009 – 12/31/2009  
Pursuant to Section 751(a)(1) of the Act  
NME Unit Office 4  
Business Proprietary info on pages xx  
Business Proprietary Information deleted from pages xx  
**APO Version**

6. \_\_\_\_ Information in double brackets should be removed from the APO version of your questionnaire response. Do not remove information in double brackets from the proprietary version of the questionnaire response filed with the Department.
7. \_\_\_\_ Your Certificate of Service lists each company on the APO Service list at <http://ia.ita.doc.gov/apo/index.html>. If you created an APO version of your questionnaire response, provide the parties on the APO Service list with a copy of the **APO version** of your questionnaire response. If you **did not** create an APO version of your questionnaire response, provide the parties on the APO Service list with a copy of the **proprietary version** of your questionnaire response. **Do not** provide parties on the Public Service list with a copy of either the proprietary version or APO version of your questionnaire response.
8. \_\_\_\_ You filed the original and 6 copies of the proprietary document with the Department.

B. You have created a public version of the proprietary document which meets requirements 1 through 4 below:

1. \_\_\_\_ The upper-right hand corner of the cover letter of your questionnaire response contains the following information:

Case No. A-570-890  
Total Number of Pages: x  
Admin Review 1/1/2009 – 12/31/2009  
NME Unit Office 4  
**Public Version of Proprietary Document**

2. \_\_\_\_ In the public version of the Q&V Questionnaire response, you have summarized all of the numeric data in the proprietary version of the Q&V Questionnaire response that you placed in brackets (“[ ]”). An acceptable method of summarizing the

proprietary numbers in the public version is to report numbers in the public version that differ from the numbers reported in the proprietary version by no more than 10 percent. For example if you reported [200] in the proprietary version, you may summarize this figure in the public version of that document by reporting a number between [220] and [180].

3. \_\_\_\_\_ Your Certificate of Service lists each company on the Public Service list at <http://ia.ita.doc.gov/apo/index.html>.
4. \_\_\_\_\_ You filed the original and 2 copies, for a total of 3 public versions of the proprietary document with the Department.

If you have any questions regarding the Q&V Questionnaire, you may contact the officials listed on the next page.

Sincerely,

Howard Smith  
Program Manager  
AD/CVD Operations, Office 4  
Import Administration

Enclosures

---

**AD/CVD OPERATIONS  
QUANTITY AND VALUE QUESTIONNAIRE**

---

**CASE NAME:** Administrative Review of the Antidumping Duty Order on Wooden Bedroom Furniture from the People's Republic of China ("PRC") A-570-890

**PERIOD OF REVIEW:** January 1, 2009-December 31, 2009

**DEADLINE FOR SUBMISSION OF Q&V QUESTIONNAIRE RESPONSE:** March 23, 2010

**CONTACT INFORMATION FOR THE DEPARTMENT OF COMMERCE:**

Howard Smith  
Program Manager  
AD/CVD Operations, Office 4  
Telephone: (202) 482-5193  
Fax: (202) 482-5105  
Email Address: [Howard.Smith@trade.gov](mailto:Howard.Smith@trade.gov)

Jeffrey Pedersen  
International Trade Compliance Analyst  
AD/CVD Operations, Office 4  
Telephone: (202) 482-2769  
Fax: (202) 482-5105  
Email Address: [Jeffrey.Pedersen@trade.gov](mailto:Jeffrey.Pedersen@trade.gov)

Rebecca Pandolph  
International Trade Compliance Analyst  
AD/CVD Operations, Office 4  
Telephone: (202) 482-3627  
Fax: (202) 482-5105  
Email Address: [Rebecca.Pandolph@trade.gov](mailto:Rebecca.Pandolph@trade.gov)

**FILING ADDRESS FOR Q&V QUESTIONNAIRE RESPONSES:**

Secretary of Commerce  
Attention: Import Administration  
APO/Dockets Unit  
Room 1870  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, DC 20230

## ATTACHMENT I

### FORMAT FOR REPORTING QUANTITY AND VALUE OF SALES

In providing the information in the table below, please provide the total quantity in containers<sup>4</sup> and total value (in U.S. dollars) of all your sales of merchandise covered by the scope of this review (see enclosed scope description in Attachment II), produced in the People’s Republic of China<sup>5</sup>, and exported/shipped to, or entered into, the United States during the period January 1, 2009 through December 31, 2009.

Additionally, if you believe that you should be treated as a single entity along with other named exporters, please provide the table below, both in the aggregate for all named parties in your group, and individually for each named entity. Please clearly identify which company the company-specific information is from and label the aggregate figures for the group as “Group Total.”

Market: United States	Total Quantity (In Containers <sup>6</sup> )	Terms of Sale <sup>7</sup>	Total Value <sup>8</sup> (\$U.S.)
1. Export Price <sup>9</sup>			
2. Constructed Export Price <sup>10</sup>			
3. Further Manufactured <sup>11</sup>			
Total			

<sup>4</sup> Note: The use of the units “containers” is for Q&V purposes and respondent selection. This does not imply that antidumping duty margins will be calculated based on this unit.

<sup>5</sup> Please do not include shipments of wooden bedroom furniture manufactured in Hong Kong in your figures.

<sup>6</sup> One “container” equals one full 40-foot container. If you shipped any product in 20-foot, 40-foot high cubed, or other containers sizes, please convert those container shipments to the equivalent number of 40-foot regular containers (*e.g.*, two 20-foot containers = one 40-foot container; one 40-foot high cubed container = 1.13 40-foot regular container).

<sup>7</sup> To the extent possible, sales values should be reported based on the same terms (*e.g.*, FOB).

<sup>8</sup> Values should be expressed in U.S. dollars. Indicate any exchange rates used and their respective dates and sources.

<sup>9</sup> Generally, a U.S. sale is classified as an export price sale when the first sale to an unaffiliated person occurs before the goods are imported into the United States.

<sup>10</sup> Generally, a U.S. sale is classified as a constructed export price sale when the first sale to an unaffiliated person occurs after importation. However, if the first sale to the unaffiliated person is made by a person in the United States affiliated with the foreign exporter, constructed export price applies even if the sale occurs prior to importation. Do not report the sale to the affiliated party in the United States, rather report the sale made by the affiliated party to the unaffiliated customer in the United States.

<sup>11</sup> Further manufacture or assembly (“further manufactured”) refers to merchandise that undergoes further manufacture or assembly in the United States before sale to the first unaffiliated customer.

## ATTACHMENT II

### DESCRIPTION OF PRODUCTS UNDER REVIEW

The product covered by the order is wooden bedroom furniture. Wooden bedroom furniture is generally, but not exclusively, designed, manufactured, and offered for sale in coordinated groups, or bedrooms, in which all of the individual pieces are of approximately the same style and approximately the same material and/or finish. The subject merchandise is made substantially of wood products, including both solid wood and also engineered wood products made from wood particles, fibers, or other wooden materials such as plywood, strand board, particle board, and fiberboard, with or without wood veneers, wood overlays, or laminates, with or without non-wood components or trim such as metal, marble, leather, glass, plastic, or other resins, and whether or not assembled, completed, or finished.

The subject merchandise includes the following items: (1) wooden beds such as loft beds, bunk beds, and other beds; (2) wooden headboards for beds (whether stand-alone or attached to side rails), wooden footboards for beds, wooden side rails for beds, and wooden canopies for beds; (3) night tables, night stands, dressers, commodes, bureaus, mule chests, gentlemen's chests, bachelor's chests, lingerie chests, wardrobes, vanities, chessers, chifforobes, and wardrobe-type cabinets; (4) dressers with framed glass mirrors that are attached to, incorporated in, sit on, or hang over the dresser; (5) chests-on-chests,<sup>12</sup> highboys,<sup>13</sup> lowboys,<sup>14</sup> chests of drawers,<sup>15</sup> chests,<sup>16</sup> door chests,<sup>17</sup> chiffoniers,<sup>18</sup> hutches,<sup>19</sup> and armoires;<sup>20</sup> (6) desks, computer stands, filing cabinets, book cases, or writing tables that are attached to or incorporated in the subject merchandise; and (7) other bedroom furniture consistent with the above list.

The scope of the order excludes the following items: (1) seats, chairs, benches, couches, sofas, sofa beds, stools, and other seating furniture; (2) mattresses, mattress supports (including box springs), infant cribs, water beds, and futon frames; (3) office furniture, such as desks, stand-up desks, computer cabinets, filing cabinets, credenzas, and bookcases; (4) dining room or kitchen furniture such as dining tables, chairs, servers, sideboards, buffets, corner cabinets, china cabinets, and china hutches; (5) other non-bedroom furniture, such as television cabinets, cocktail tables, end tables, occasional tables, wall systems, book cases, and entertainment systems; (6)

---

<sup>12</sup> A chest-on-chest is typically a tall chest-of-drawers in two or more sections (or appearing to be in two or more sections), with one or two sections mounted (or appearing to be mounted) on a slightly larger chest; also known as a tallboy.

<sup>13</sup> A highboy is typically a tall chest of drawers usually composed of a base and a top section with drawers, and supported on four legs or a small chest (often 15 inches or more in height).

<sup>14</sup> A lowboy is typically a short chest of drawers, not more than four feet high, normally set on short legs.

<sup>15</sup> A chest of drawers is typically a case containing drawers for storing clothing.

<sup>16</sup> A chest is typically a case piece taller than it is wide featuring a series of drawers and with or without one or more doors for storing clothing. The piece can either include drawers or be designed as a large box incorporating a lid.

<sup>17</sup> A door chest is typically a chest with hinged doors to store clothing, whether or not containing drawers. The piece may also include shelves for televisions and other entertainment electronics.

<sup>18</sup> A chiffonier is typically a tall and narrow chest of drawers normally used for storing undergarments and lingerie, often with mirror(s) attached.

<sup>19</sup> A hutch is typically an open case of furniture with shelves that typically sits on another piece of furniture and provides storage for clothes.

<sup>20</sup> An armoire is typically a tall cabinet or wardrobe (typically 50 inches or taller), with doors, and with one or more drawers (either exterior below or above the doors or interior behind the doors), shelves, and/or garment rods or other apparatus for storing clothes. Bedroom armoires may also be used to hold television receivers and/or other audio-visual entertainment systems.

bedroom furniture made primarily of wicker, cane, osier, bamboo or rattan; (7) side rails for beds made of metal if sold separately from the headboard and footboard; (8) bedroom furniture in which bentwood parts predominate;<sup>21</sup> (9) jewelry armories;<sup>22</sup> (10) cheval mirrors;<sup>23</sup> (11) certain metal parts;<sup>24</sup> (12) mirrors that do not attach to, incorporate in, sit on, or hang over a dresser if they are not designed and marketed to be sold in conjunction with a dresser as part of a dresser-mirror set; (13) upholstered beds<sup>25</sup> and (14) toy boxes.<sup>26</sup>

Imports of subject merchandise are classified under subheading 9403.50.9040 of the HTSUS as “wooden . . . beds” and under subheading 9403.50.9080 of the HTSUS as “other . . . wooden furniture of a kind used in the bedroom.” In addition, wooden headboards for beds,

---

<sup>21</sup> As used herein, bentwood means solid wood made pliable. Bentwood is wood that is brought to a curved shape by bending it while made pliable with moist heat or other agency and then set by cooling or drying. See Customs' Headquarters' Ruling Letter 043859, dated May 17, 1976.

<sup>22</sup> Any armoire, cabinet or other accent item for the purpose of storing jewelry, not to exceed 24 in width, 18 in depth, and 49 in height, including a minimum of 5 lined drawers lined with felt or felt-like material, at least one side door (whether or not the door is lined with felt or felt-like material), with necklace hangers, and a flip-top lid with inset mirror. See Issues and Decision Memorandum from Laurel LaCivita to Laurie Parkhill, Office Director, Concerning Jewelry Armoires and Cheval Mirrors in the Antidumping Duty Investigation of Wooden Bedroom Furniture from the People's Republic of China, dated August 31, 2004. See also Wooden Bedroom Furniture from the People's Republic of China: Notice of Final Results of Changed Circumstances Review and Revocation in Part, 71 FR 38621 (July 7, 2006).

<sup>23</sup> Cheval mirrors are any framed, tiltable mirror with a height in excess of 50 that is mounted on a floor-standing, hinged base. Additionally, the scope of the order excludes combination cheval mirror/jewelry cabinets. The excluded merchandise is an integrated piece consisting of a cheval mirror, *i.e.*, a framed tiltable mirror with a height in excess of 50 inches, mounted on a floor-standing, hinged base, the cheval mirror serving as a door to a cabinet back that is integral to the structure of the mirror and which constitutes a jewelry cabinet line with fabric, having necklace and bracelet hooks, mountings for rings and shelves, with or without a working lock and key to secure the contents of the jewelry cabinet back to the cheval mirror, and no drawers anywhere on the integrated piece. The fully assembled piece must be at least 50 inches in height, 14.5 inches in width, and 3 inches in depth. See Wooden Bedroom Furniture From the People's Republic of China: Final Results of Changed Circumstances Review and Determination to Revoke Order in Part, 72 FR 948 (January 9, 2007).

<sup>24</sup> Metal furniture parts and unfinished furniture parts made of wood products (as defined above) that are not otherwise specifically named in this scope (*i.e.*, wooden headboards for beds, wooden footboards for beds, wooden side rails for beds, and wooden canopies for beds) and that do not possess the essential character of wooden bedroom furniture in an unassembled, incomplete, or unfinished form. Such parts are usually classified under the Harmonized Tariff Schedule of the United States (“HTSUS”) subheading 9403.90.7000.

<sup>25</sup> Upholstered beds that are completely upholstered, *i.e.*, containing filling material and completely covered in sewn genuine leather, synthetic leather, or natural or synthetic decorative fabric. To be excluded, the entire bed (headboards, footboards, and side rails) must be upholstered except for bed feet, which may be of wood, metal, or any other material and which are no more than nine inches in height from the floor. See Wooden Bedroom Furniture from the People's Republic of China: Final Results of Changed Circumstances Review and Determination to Revoke Order in Part, 72 FR 7013 (February 14, 2007).

<sup>26</sup> To be excluded the toy box must: (1) be wider than it is tall; (2) have dimensions within 16 inches to 27 inches in height, 15 inches to 18 inches in depth, and 21 inches to 30 inches in width; (3) have a hinged lid that encompasses the entire top of the box; (4) not incorporate any doors or drawers; (5) have slow-closing safety hinges; (6) have air vents; (7) have no locking mechanism; and (8) comply with American Society for Testing and Materials (ASTM) standard F963-03. Toy boxes are boxes generally designed for the purpose of storing children's items such as toys, books, and playthings. See Wooden Bedroom Furniture from the People's Republic of China: Final Results of Changed Circumstances Review and Determination to Revoke Order in Part, 74 FR 8506 (February 25, 2009). Further, as determined in the scope ruling memorandum “Wooden Bedroom Furniture from the People's Republic of China: Scope Ruling on a White Toy Box,” dated July 6, 2009, the dimensional ranges used to identify the toy boxes that are excluded from the wooden bedroom furniture order apply to the box itself rather than the lid.

wooden footboards for beds, wooden side rails for beds, and wooden canopies for beds may also be entered under subheading 9403.50.9040 of the HTSUS as “parts of wood” and framed glass mirrors may also be entered under subheading 7009.92.5000 of the HTSUS as “glass mirrors . . . framed.” This order covers all WBF meeting the above description, regardless of tariff classification. Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the scope of this proceeding is dispositive.

**ATTACHMENT III**  
**GENERAL INSTRUCTIONS**

Instructions for Filing the Response

The following instructions apply to all documents you submit to the Department during the course of this proceeding.

1. Send your response to the following address:

Secretary of Commerce  
Attention: Import Administration  
APO/Dockets Unit  
Room 1870  
U.S. Department of Commerce  
14<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20230

2. **Proprietary versions** of the response should be submitted on the day specified in the cover letter. The **public version** of the response may be filed one business day after the proprietary version.
3. File the original and six copies of the proprietary version. However, if you file an electronic copy of the proprietary version in Microsoft Word, you need file only the original version and four copies. In case of any difference between the narrative response and the content of the electronic media, the narrative response is the controlling version. For either alternative, only one copy of sample printouts and electronic media containing sales files and cost files need be submitted.

File the original and four copies of the public version of your narrative response and attachments, including sample printouts.

4. 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. The Department cannot accept responses to the letter that do not contain the certification statements. A form for such certification is included in this Appendix. You may photocopy this form and submit a completed copy with each of your submissions.
5. Provide the required **certificate of service** with each proprietary version, APO version, and public version submitted to the Department.
6. Request **proprietary treatment** for information submitted that you do not wish to be made publicly available. As a general rule, the Department places all correspondence and submissions received in the course of an antidumping proceeding in a public reading file. However, information deemed to be **proprietary information** will not be made available to the public.<sup>1</sup> If you wish to make a request for proprietary treatment for

---

<sup>1</sup> Supplier names will not be considered proprietary information in situations where the Department has excluded the

particular information, refer to sections 351.304 and 351.304(a)(2) of the Department's **regulations**. Submit the request for proprietary treatment no later than one business day following the submission of the proprietary version of your response to the letter accompanied by:

- (1) a non-proprietary (public) version of your response that is in sufficient detail to permit a reasonable understanding of the information submitted in confidence,<sup>2</sup> and/or
- (2) an itemization of particular information that you believe you are unable to summarize. State the reasons why you cannot summarize each piece of information.

Responses, or portions thereof, that are not adequately summarized may be returned to you and not used.

7. Submit the statements required regarding limited release of proprietary information under the provisions of an **administrative protective order** (“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:

- (1) a statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or
- (2) 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. You must state in the upper right-hand corner of the cover letter accompanying your response whether you agree or object to release of the submitted information under APO. (See section 351.303 of our regulations for specific instructions.)<sup>3</sup>

8. 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.

---

exporter from the antidumping duty order. Exclusions of non-producing exporters will be granted only to exporter/supplier combinations.

<sup>2</sup> Generally, numerical data are adequately summarized if grouped or presented in terms of indices or figures ranged within ten percent of the actual figure. If a particular portion of the data is voluminous, use ranged figures for at least one percent of the voluminous portion.

<sup>3</sup> 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.

9. Provide to all parties whose representatives have been granted an APO (see <http://ia.ita.doc.gov/apo/index.html>) a complete copy of the submission, proprietary and public versions, except for that information which you do not agree to release under APO. If you exclude information because you do not agree to release it under APO, submit with your response to the Department a certificate of service and a copy of the APO version of the document containing the information that you agree may be released under APO. For parties that do not have access to information under APO, please provide a public version only.
10. Prepare your response in typed form and in English. Repeat the question to which you are responding in your narrative submission and place your answer directly below it.

**COMPANY OFFICIAL CERTIFICATION**

I, \_\_\_\_\_, currently employed  
(name and title)

by \_\_\_\_\_, certify that (1) I have  
(Interested Party)

read the attached submission, and (2) the information contained in

this submission is, to the best of my knowledge, complete and

accurate.

\_\_\_\_\_  
(signature of certifying official)

**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)

**ATTACHMENT IV**