

April 5, 2006

The Honorable David Spooner
Assistant Secretary for Import Administration
U.S. Department of Commerce
ATTN: Weighted Average Dumping Margin
Central Records Unit, Room 1870
Pennsylvania Avenue and 14th Street, NW
Washington, DC 20230

Dear Assistant Secretary Spooner:

On March 6, 2006, the U.S. Department of Commerce (the "Department") requested comments on the use of "zeroing" in calculating duty margins in antidumping investigations. The Cold Finished Steel Bar Institute ("CFSBI") submits these comments in response to the Department's request.

The CFSBI is a trade association representing approximately 55 percent of the North American cold finished steel bar industry. The CFSBI's overall mission is to promote and encourage beneficial and useful growth and development of the cold finished steel bar industry and to foster, among the public, the government, and major user groups, an awareness and recognition of matters and conditions of importance to or affecting the industry.

As the Department stated in its notice seeking comments, it usually makes comparisons in antidumping investigations between average export prices and average normal values and does not offset any dumping that is found with the results of comparisons for which the average export price exceeds the average normal value. A recent WTO dispute settlement report found that the United States' application of this methodology was inconsistent with its WTO obligations. The Department expressed its intention, in response to this report, to "abandon" the use of average-to-average comparisons without such offsets. Zeroing, and whatever alternative approach(s) the Department may adopt, is an issue that will have a major impact in many future antidumping investigations and, therefore, is of critical importance to any company or group of companies that may be a petitioner or respondent in such cases.

The CFSBI is a member of the Committee to Support United States Trade Laws ("CUSTL"), which will be submitting separate comments to the Department on zeroing. The CFSBI supports the views of the CUSTL on this important issue and hereby adopts its comments in full.

If there are any questions or comments regarding this submission, please contact the undersigned on behalf of the CFSBI. Thank you.

Respectfully submitted,

David Gillespie
Chairman, Government Relations Committee