

DATE: November 29, 2011

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Import Administration

FROM: Christian Marsh
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Lined Paper Products from India, Indonesia, and the People's Republic of China

SUMMARY

We have analyzed the substantive responses of the domestic interested party in the second sunset reviews of the antidumping duty orders covering lined paper products ("CLPP") from India, Indonesia, and the People's Republic of China ("the PRC").¹ We recommend that you approve the positions described in the "Discussion of the Issues" section of this memorandum. Below is a complete list of the issues in this sunset review for which we received substantive responses:

1. Likelihood of a continuation or recurrence of dumping
2. Magnitude of the margin likely to prevail

HISTORY OF THE ORDERS

The Department of Commerce ("Department") published its final affirmative determinations of sales at less than fair value with respect to imports of certain lined paper products in August and September 2006.² On September 28, 2006, the Department published the amended final

¹ No response was received from respondent interested parties.

² See Notice of Final Determination of Sales at Less Than Fair Value, and Negative Determination of Critical Circumstances: Certain Lined Paper Products from India, 71 FR 45012 (August 8, 2006) ("Indian Final"); Notice of Final Determination of Sales at Less Than Fair Value and Affirmative Final Determination of Critical

determination of sales at less than fair value with respect to the PRC and the antidumping duty orders on all three countries.³

In the final determination and order on CLPP from India, the Department determined dumping margins of 23.17 percent for Aero Exports and Navneet Publications (India) Ltd. (“Navneet”), and 3.91 percent for Kejriwal Paper Limited (“Kejriwal”) and all other Indian producers/exporters.⁴ The dumping margin for Kejriwal was amended to 3.06 percent as a result of litigation.⁵ The administrative review for the period April 17, 2006 through August 31, 2007, covered 19 respondents and resulted in dumping margins of 1.22 percent for Kejriwal and all non-selected respondents and 23.17 percent for Ria ImpEx Pvt. Ltd. (“Ria”).⁶ The administrative review covering the period September 1, 2007, through August 31, 2008, covered 25 respondents and resulted in dumping margins of 1.34 percent for Navneet and all non-selected respondents and 72.03 percent for Blue Bird (India) Limited (“Blue Bird”).⁷ The administrative review covering the period September 1, 2008, through August 31, 2009, covered 32 companies and resulted in de minimis dumping margins for Navneet and SuperImpex and a margin of 1.34 percent for all non-selected respondents.⁸ In addition to the completed reviews, the Department has issued the preliminary results of the September 1, 2009, through August 31, 2010, review finding above de minimis dumping margins for all 35 companies⁹ and initiated a review covering September 1, 2010, through August 31, 2011, and 57 companies.¹⁰

In the final determination and order on CLPP from Indonesia, the Department determined dumping margins of 118.63 percent for PT. Pabrik Tjiwi Kimia Tbk and 97.85 percent for all other Indonesian producers and exporters.¹¹ The Department has not conducted any administrative reviews of the order.

In the final determination and order on CLPP from the PRC, the Department determined dumping margins ranging from 76.70 to 94.91 percent for the two cooperating mandatory respondents (Watanabe Paper Products and Shanghai Lian Li (“Lian Li”), respectively), 78.38

Circumstances: Certain Lined Paper Products from Indonesia, 71 FR 47171 (August 16, 2006)(“Indonesia Final”); and Notice of Final Determination of Sales at Less Than Fair Value, and Affirmative Critical Circumstances, In Part: Certain Lined Paper Products From the People's Republic of China, 71 FR 53079 (September 8, 2006)(“PRC Final”).

³ See Notice of Amended Final Determination of Sales at Less Than Fair Value: Certain Lined Paper Products from the People's Republic of China; Notice of Antidumping Duty Orders: Certain Lined Paper Products from India, Indonesia and the People's Republic of China; and Notice of Countervailing Duty Orders: Certain Lined Paper Products from India and Indonesia, 71 FR 56949 (September 28, 2006)(“Amended Final and Orders”).

⁴ See Amended Final and Orders.

⁵ See Certain Lined Paper Products From India: Amended Final Determination of Sales at Less Than Fair Value, 76 FR 20954 (April 14, 2011).

⁶ See Certain Lined Paper Products from India: Notice of Final Results of the First Antidumping Duty Administrative Review, 74 FR 17149 (April 14, 2009).

⁷ See Certain Lined Paper Products from India: Notice of Final Results of Antidumping Duty Administrative Review, 75 FR 7563 (February 22, 2010).

⁸ See Certain Lined Paper Products From India: Notice of Final Results of Antidumping Duty Administrative Review and Partial Rescission of Antidumping Duty Administrative Review, 76 FR 10876 (February 28, 2011).

⁹ See Certain Lined Paper Products From India: Notice of Preliminary Results of Antidumping Duty Administrative Review, 76 FR 62343 (October 7, 2011).

¹⁰ See Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part, 76 FR 67133 (October 31, 2011).

¹¹ See Amended Final and Orders.

percent for the 48 separate rate respondents, and 258.21 percent for the PRC-wide entity.¹² The administrative review for the period April 17, 2006, through August 31, 2007, covered four respondents and resulted in dumping margins of 16.47 percent for Lian Li and for the non-selected respondents.¹³ The dumping margin for Lian Li was amended to 8.10 percent as a result of litigation.¹⁴ In the administrative review covering the period September 1, 2007, through August 31, 2008, the Department determined that Watanabe Paper Products was no longer entitled to a separate rate and was subject to the PRC-wide rate of 258.21 percent.¹⁵ In the administrative review covering the period September 1, 2008, through August 31, 2009, the Department again determined that Watanabe Paper Products was subject to the PRC-wide rate of 258.21 percent.¹⁶ In addition to the completed reviews, the Department rescinded the review covering the period September 1, 2009, through August 31, 2010,¹⁷ and initiated a review covering September 1, 2010, through August 31, 2011, and two companies.¹⁸

BACKGROUND

On August 1, 2011, the Department initiated sunset reviews of the AD orders on CLPP from India, Indonesia, and the PRC pursuant to section 751(c) of the Act. See Initiation of Five-Year (“Sunset”) Reviews, 76 FR 45778 (August 1, 2011). The Department received a notice of intent to participate in each of these reviews from the Association of American School Paper Suppliers (“AASPS”) and its individual members – MWV Consumer & Office Products (“MWV”), Norcom, Inc., and TopFlight, Inc. (collectively, “petitioners”), within the deadline specified in 19 CFR 351.218(d)(1)(i). The petitioners claimed interested party status for each of these reviews under section 771(9)(C) of the Act, as domestic producers of CLPP. On August 31, 2011, the Department received a complete substantive response from the petitioners for each of these reviews within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i). However, the Department did not receive a substantive response from any respondent interested party to either of these proceedings. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department conducted expedited reviews of these AD orders.

¹² See Amended Final and Orders.

¹³ See Certain Lined Paper Products from the People's Republic of China: Notice of Final Results of the Antidumping Duty Administrative Review, 74 FR 17160 (April 14, 2009), as amended by Notice of Amended Final Results of the Antidumping Duty Administrative Review of Certain Lined Paper Products from the People's Republic of China, 74 FR 68036 (December 22, 2009).

¹⁴ See Certain Lined Paper Products From the People's Republic of China: Notice of Court Decision Not in Harmony With Final Results of Administrative Review and Notice of Amended Final Results of Administrative Review Pursuant to Court Decision, 76 FR 53116 (August 25, 2011).

¹⁵ See Certain Lined Paper Products From the People's Republic of China: Notice of Final Results of the Second Administrative Review of the Antidumping Duty Order, 74 FR 63387 (December 3, 2009).

¹⁶ See Certain Lined Paper Products From the People's Republic of China: Notice of Final Results of the Antidumping Duty Administrative Review and Partial Rescission, 76 FR 23288 (April 26, 2011). Certain Lined Paper Products From India: Notice of Final Results of Antidumping Duty Administrative Review and Partial Rescission of Antidumping Duty Administrative Review, 76 FR 10876 (February 28, 2011).

¹⁷ See Certain Lined Paper Products From the People's Republic of China: Notice of Final Rescission of Antidumping Duty Administrative Review, 76 FR 57951 (September 19, 2011).

¹⁸ See Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part, 76 FR 67133 (October 31, 2011).

DISCUSSION OF THE ISSUES

In accordance with section 751(c)(1) of the Act, the Department is conducting sunset reviews to determine whether revocation of the antidumping duty orders would likely lead to continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and the period after, the issuance of the antidumping duty orders. In addition, section 752(c)(3) of the Act states that the Department shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the orders were revoked. Below we address the comments made by the domestic interested party.

1. Likelihood of Continuation or Recurrence of Dumping

AASPS asserts that, in determining whether revocation would lead to continuation or recurrence of dumping, the Department considers (1) the weighted-average dumping margins determined in the investigation and subsequent reviews, and (2) the volume of imports of the subject merchandise both before and after the issuance of the antidumping order. AASPS cites to the Policy Bulletin¹⁹ in asserting that the Department will normally determine that revocation of an antidumping duty order will likely lead to continuation or recurrence of dumping where dumping continued at any level above de minimis after issuance of an order; imports of the subject merchandise ceased after issuance of the order; or dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.

AASPS argues that revocation of the antidumping duty orders will likely lead to a continuation of dumping in the instant cases because (1) dumping has continued after the issuance of the orders at above de minimis levels for each of the three orders, and (2) import volumes declined significantly after the issuance of the orders covering Indonesia and the PRC. AASPS notes that imports from Indonesia have dropped from 39.3 million units in 2005 to 2.2 million units in 2010 and imports from the PRC have dropped from nearly 346 million units in 2005 to just over 24 million units in 2010.

In addition to the continued existence of above de minimis dumping margins for all producers and exporters from Indonesia and the PRC and for all but two Indian producers, AASPS asserts that other factors support a finding that revocation of the orders would likely result in the continuation and/or recurrence of dumping. AASPS asserts that the U.S. market is highly price-sensitive and that Indian, Indonesian, and Chinese producers continue to display significant interest in the U.S. market. In addition, AASPS argues that other factors include that some Indian producers are entirely export-focused, that Indonesian producers are increasing production capacity, that Chinese producers/exporters subject to administrative reviews have either failed to provide any information or have provided contradictory and unreliable data, and finally, that Chinese currency is significantly undervalued.

¹⁹ See Policies Regarding the Conduct of Five-year (“Sunset”) Reviews of Antidumping and Countervailing Duty Orders, 63 FR 18871(April 16, 1998) (“Policy Bulletin”) (quoting the SAA at 889).

Department's Position:

Drawing on the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the SAA, the House Report, H. Rep. No. 103-826, pt. 1 (1994), and the Senate Report, S. Rep. No. 103-412 (1994), the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping where (a) dumping continued at any level above de minimis after the issuance of the order, (b) imports of the subject merchandise ceased after the issuance of the order, or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.²⁰ In addition, pursuant to section 752(c)(1)(B) of the Act, the Department considers the quantity of imports of the subject merchandise for the period before and after the issuance of the order.

As noted above in the "History of the Orders" section, the Department has completed three administrative reviews of the order on CLPP from India and is in the process of conducting two additional reviews. Above de minimis rates were found in each of the reviews. In addition, above de minimis margins remain in effect for all but two Indian producers of CLPP. AASPS did not provide any statistics with respect to imports of CLPP from India.

The Department has not conducted any administrative reviews of the order on Indonesia. Therefore, the above de minimis margins from the original investigation remain in effect for all producers and exporters. As noted above, the statistics provided by AASPS demonstrate a significant decline in the volume of imports from Indonesia since the issuance of the order.

Finally, with respect to the order on CLPP from the PRC, the Department has completed four administrative reviews and is in the process of conducting one additional review. With the exception of the review that was rescinded based on lack of shipments, the Department has found above de minimis dumping margins in each review. Additionally, the statistics provided by AASPS show a significant decline in the volume of imports of subject merchandise since the issuance of the order.

Section 752(c)(2) of the Act provides that the Department shall consider "other factors" than those listed in section 752(c)(1) of the Act only if "good cause is shown." Additionally, under 19 CFR 351.218(e)(2)(iii), the Department will consider other factors under section 752(c)(2) of the Act only if it determines that good cause to consider such factors exists. We have concluded that no such "good cause" exists in this case, because the previously-calculated dumping margins and the volume of imports of subject merchandise since the imposition of the orders satisfy the statutory test for determining if the likelihood of the continuation of dumping would exist absent the existence of the orders. Therefore, we have not considered the other factors raised by AASPS.

Given that dumping continues at levels above de minimis with respect to all three orders and imports from Indonesia and the PRC have declined significantly, we determine that dumping is likely to continue or recur if these orders were revoked. Therefore, on the basis of information

²⁰ See SAA at 889-90, the House Report, H. Rep. No. 103-826, pt.1 at 63-64 (1994) reprinted at 1994 U.S.C.C.A.N. 3773, and the Senate Report, S. Rep. No. 103-412 (1994) at 52.

provided by AASPS, information on the record, and the lack of information provided by respondent parties, we find that revocation of the antidumping duty orders on CLPP from India, Indonesia, and the PRC would likely lead to a continuation or recurrence of dumping.

2. Magnitude of the Margins Likely to Prevail

AASPS notes that section 752(c)(3) of the Act requires the Department to determine the magnitude of the margins of dumping that likely would prevail if the Department revoked the antidumping orders. AASPS claims that the Department will normally select a margin from the investigation because it is the only calculated rate that reflects the behavior of exporters, without the discipline of an order or suspension agreement in place. Citing to the SAA and the Policy Bulletin, AASPS notes that where the dumping margin for a particular producer or exporter has increased since the original investigation, the Department may report the increased margin, even if it was based on adverse inferences.

AASPS asserts that, in applying these principals, the Department should report to the ITC that the following margins would be likely to prevail if the Department determines to revoke these orders:

India

- 3.06 percent for Kejriwal Exports
- 23.17 percent for Navneet Publications (India) Ltd., Aero Exports, and Ria ImpEx Pvt. Ltd.
- 72.03 percent for Blue Bird
- 3.91 percent for all other producers

Indonesia

- 118.63 percent for PT. Pabrik Kertas Tjiwi Kimia Tbk
- 97.85 percent for all other producers

PRC

- 94.91 percent for Shanghai Lian Li Paper Products Co., Ltd. through all suppliers named in the order
- 78.38 percent for all valid separate rate companies
- 258.21 percent for the Watanabe Groups and the PRC-wide entity

Department's Position:

Section 752(c)(3) of the Act provides that the Department will provide to the ITC the magnitude of the margin of dumping likely to prevail if the order were revoked. Citing to the SAA and the House Report, the Policy Bulletin provides that normally, the Department will provide the ITC

the company-specific margin from the investigation for each company.²¹ Further, for those companies not investigated specifically, or for companies that did not begin shipping until after an order was issued, the Department normally will provide a margin based on the “all-others” rate from the investigation.²² The Department’s preference for selecting a margin from the investigation is based on the fact that it is the only calculated rate on the record that reflects the behavior of manufacturers, producers, and exports without the discipline of an order or suspension agreement in place.²³ However, under certain circumstances, the Department may select a more recently calculated margin to report to the ITC.²⁴ The Department may use a rate from a more recent review where the dumping margin increased, as this rate may be more representative of a company’s behavior in the absence of an order (e.g., where a company increases dumping to maintain or increase market share with an order in place).²⁵ In determining whether a more recently calculated margin is probative of the behavior of an exporter were the order to be revoked, the Department considers company-specific exports and company-specific margins and, when available, a company’s share of imports.²⁶

With respect to CLPP from India, we do not agree with AASPS that we should report a rate for Blue Bird or Ria. Neither of these companies received a company-specific rate in the investigation. Therefore, consistent with the Policy Bulletin we will report to the ITC the company-specific dumping margins from the underlying investigation as those are the only calculated rates that reflect the behavior of the exporters without the discipline of the order.

We agree with AASPS that we should report the rates from the original investigation for CLPP from Indonesia,²⁷ because these are the only calculated rates that reflect the behavior of manufacturers, producers, and exporters without the discipline of an order in place. PT. Pabrik Kertas Tjiwi Kimia Tbk had a margin of 118.63 percent in the investigation of CLPP from Indonesia and a margin of 97.85 percent was found for all other producers/exporters.

We agree with AASPS that the margins from the investigation of CLPP from the PRC reflect the behavior of the producers and exporters without the discipline of the order, with the exception of Watanabe Paper Products. As discussed above in the “History of the Orders” section, in administrative reviews conducted after the issuance of the order on CLPP from the PRC, the Department twice determined that Watanabe Paper Products was not entitled to a separate rate

²¹ See Policy Bulletin at 18873.

²² See Policy Bulletin at 18873 and Certain Hot-Rolled Carbon Steel Flat Products from Argentina, the People’s Republic of China, India, Indonesia, Kazakhstan, Romania, South Africa, Taiwan, Thailand, and Ukraine; Final Results of Expedited Sunset Reviews of the Antidumping Duty Orders, 71 FR 70506 (December 5, 2006), and accompanying Issues and Decision Memorandum at Comment 2.

²³ Id.

²⁴ See also Final Results of Full Sunset Review: Aramid Fiber Formed of Poly Para-Phenylene Terephthalamide From the Netherlands, 65 FR 65294 (November 1, 2000), and accompanying Issues and Decision Memorandum at Comment 3.

²⁵ See SAA at 890-91; Policy Bulletin at section II.B.2; see, e.g., Chloropicrin From the People’s Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order, 74 FR 57450 (November 6, 2009).

²⁶ See Stainless Steel Bar from Germany; Preliminary Results of the Sunset Review of Antidumping Duty Order, 72 FR 29970 (May 30, 2007), and accompanying Issues and Decision Memorandum at Comment 2, as corrected in 72 FR 31660 (June 7, 2007) (unchanged in Stainless Steel Bar from Germany; Final Results of the Sunset Review of the Antidumping Duty Order, 72 FR 56985 (October 5, 2007)).

²⁷ See Indonesia Final Determination.

and was subject to the PRC-wide rate. Given that it is no longer subject to a separate rate, we determine that it is not appropriate to report a separate rate to the ITC for Watanabe Paper Products.

Because the investigation margins are the only calculated rates that reflect the behavior of these manufacturers, producers, and exporters without the discipline of an order in place, we agree that these margins best reflect the margins of dumping that would prevail if the order were revoked.

FINAL RESULTS OF REVIEWS

We determine that revocation of the orders on CLPP from India, Indonesia, and the PRC would likely lead to a continuation or recurrence of dumping at the following weighted-average percentage margins:

Country	Manufacturer/exporter	Margin (percent)
India	Aero Exports	23.17
	Kejriwal Paper Limited	3.91
	Navneet Publications (India) Ltd.	23.17
	All Others	3.91
Indonesia	PT. Pabrik Kertas Tjiwi Kimia Tbk	118.63
	All Others	97.85

PRC

Exporter	Producer	Margin (percent)
Shanghai Lian Li Paper Products Co., Ltd.	Shanghai Lian Li Paper Products Co., Ltd.	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Sentian Paper Products Co., Ltd	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Shanghai Miaopaofang Paper Products Co., Ltd	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Shanghai Pudong Wenbao Paper Products Co., Ltd.	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Changshu Changjiang Printing Co., Ltd.	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Shanghai Loutang Stationery Factory	94.91
Shanghai Lian Li Paper Products Co., Ltd.	Shanghai Beijia Paper Products Co., Ltd.	94.91
Ningbo Guangbo Imports and Exports Co. Ltd.	Ningbo Guangbo Plastic Products Manufacture Co., Ltd.	78.38
Yalong Paper Products (Kunshan) Co., Ltd.	Yalong Paper Products (Kunshan) Co., Ltd.	78.38
Suzhou Industrial Park Asia Pacific Paper Converting Co., Ltd.	Suzhou Industrial Park Asia Pacific Paper Converting Co., Ltd.	78.38
Sunshine International Group (HK) Ltd.	Dongguan Shipai Tonzex Electronics Plastic Stationery Factory	78.38
Sunshine International Group (HK) Ltd.	Dongguan Kwong Wo Stationery Co., Ltd.	78.38
Sunshine International Group (HK) Ltd.	Hua Lian Electronics Plastic Stationery Co., Ltd.	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Linqing YinXing Paper Co., Ltd.	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Jiaxing Seagull Paper Products Co., Ltd.	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Shenda Paper Product Factory	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Lianyi Paper Product Factory	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Changhang Paper Product Factory	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Tianlong Paper Product Factory	78.38
Suzhou Industrial Park You-You Trading Co., Ltd.	Rugao Paper Printer Co., Ltd.	78.38

Suzhou Industrial Park You-You Trading Co., Ltd.	Yinlong Paper Product Factory	78.38
You You Paper Products (Suzhou) Co., Ltd.	You You Paper Products (Suzhou) Co., Ltd.	78.38
Haijing Stationery (Shanghai) Co., Ltd.	Haijing Stationery (Shanghai) Co., Ltd.	78.38
Orient International Holding Shanghai Foreign Trade Co., Ltd.	Yalong Paper Products (Kunshan) Co., Ltd.	78.38
Orient International Holding Shanghai Foreign Trade Co., Ltd.	Shanghai Comwell Stationery Co., Ltd.	78.38
Orient International Holding Shanghai Foreign Trade Co., Ltd.	Yuezhou Paper Co., Ltd.	78.38
Orient International Holding Shanghai Foreign Trade Co., Ltd.	Changshu Guangming Stationery Co., Ltd.	78.38
Shanghai Foreign Trade Enterprise Co., Ltd.	Shanghai Xin Zhi Liang Culture Products Co., Ltd.;	78.38
Shanghai Foreign Trade Enterprise Co., Ltd.	Shangyu Zhongsheng Paper Products Co., Ltd.;	78.38
Shanghai Foreign Trade Enterprise Co., Ltd.	Shanghai Miaoxi Paper Products Factory;	78.38
Shanghai Foreign Trade Enterprise Co., Ltd.	Shanghai Xueya Stationery Co., Ltd.	78.38
Anhui Light Industries International Co., Ltd.	Shanghai Pudong Wenbao Paper Products Factory;	78.38
Anhui Light Industries International Co., Ltd.	Foshan City Wenhai Paper Factory	78.38
Fujian Hengda Group Co., Ltd.,	Fujian Hengda Group Co., Ltd.,	78.38
Changshu Changjiang Printing Co., Ltd.	Changshu Changjiang Paper Industry Co., Ltd.	78.38
Jiaxing Te Gao Te Paper Products Co., Ltd	Jiaxing Te Gao Te Paper Products Co., Ltd	78.38
Jiaxing Te Gao Te Paper Products Co., Ltd	Jiaxing Seagull Paper Products Co., Ltd.	78.38
Jiaxing Te Gao Te Paper Products Co., Ltd	Jiaxing Boshi Paper Products Co., Ltd.	78.38
Chinapack Ningbo Paper Products Co., Ltd.	Jiaxing Te Gao Te Paper Products Co., Ltd.	78.38
Linqing Silver Star Paper Products Co., Ltd.	Linqing Silver Star Paper Products Co., Ltd.	78.38
Wah Kin Stationery and Paper Product Limited	Shenzhen Baoan Waijing Development Company	78.38
Shanghai Pudong Wenbao Paper Products Factory	Shanghai Pudong Wenbao Paper Products Factory	78.38

Shanghai Pudong Wenbao Paper Products Factory	Linqing Glistar Paper Products Co., Ltd.	78.38
Shanghai Pudong Wenbao Paper Products Factory	Changshu Changjiang Printing Co., Ltd.	78.38
Shanghai Pudong Wenbao Paper Products Factory	Linqing Silver Star Paper Products Co., Ltd.	78.38
Paperline Limited	Shanghai Pudong Wenbao Paper Products Factory	78.38
Paperline Limited	Linqing Glistar Paper Products Co., Ltd.	78.38
Paperline Limited	Changshu Changjiang Printing Co., Ltd.	78.38
Paperline Limited	Linqing Silver Star Paper Products Co., Ltd.	78.38
Paperline Limited	Jiaxing Te Gao Te Paper Products Co., Ltd.	78.38
Paperline Limited	Yantai License Printing & Making Co., Ltd.	78.38
Yantai License Printing & Making Co., Ltd.	Yantai License Printing & Making Co., Ltd.	78.38
Paperline Limited	Anhui Jinhua Import & Export Co., Ltd.	78.38
Essential Industries Limited	Dongguan Yizhi Gao Paper Products Ltd.	78.38
MGA Entertainment (H.K.) Limited	Kon Dai (Far East) Packaging Co., Ltd.	78.38
MGA Entertainment (H.K.) Limited	Dong Guan Huang Giang Rong Da Printing Factory	78.38
MGA Entertainment (H.K.) Limited	Dong Guan Huang Giang Da Printing Co., Limited	78.38
Excel Sheen Limited	Dongguan Shipai Fuda Stationery Factory	78.38
Maxleaf Stationery Ltd.	Maxleaf Stationery Ltd.	78.38
PRC Entity*		258.21

*Including Atico, Planet International, the companies that did not respond to the Q&V questionnaire in the underlying investigation, and Watanabe Paper Products.

RECOMMENDATION

Based on our analysis of the substantive responses received, we recommend adopting the above positions. If this recommendation is accepted, we will publish the final results of these sunset reviews in the Federal Register, and notify the ITC of our determination.

AGREE _____

DISAGREE _____

Paul Piquado
Assistant Secretary
for Import Administration

Date