

A-570-095; C-570-096  
Circumvention and Scope Inquires: from Vietnam  
**Public Document**  
E&C/VII: GHC

December 20, 2023

TO: CERTAIN PRODUCERS, EXPORTERS, OR U.S. IMPORTERS OF ALUMINUM WIRE AND CABLE EXPORTED FROM VIETNAM

SUBJECT: Quantity and Value Questionnaire for Vietnamese Producers, Exporters, or U.S. Importers: Circumvention and Scope Inquires of the Antidumping and Countervailing Duty Orders of Aluminum Wire and Cable from the People's Republic of China

Dear Sir or Madam:

On October 19, 2023, the Department of Commerce (Commerce) self-initiated circumvention and scope inquiries of the antidumping (AD) and countervailing duty (CVD) orders on aluminum wire and cable (AWC) from the People's Republic of China (China).<sup>1</sup> Section 781(b)(1) of the Tariff Act of 1930, as amended (the Act), provides that Commerce may find circumvention of an AD or CVD order when merchandise of the same class or kind subject to the order is completed or assembled in a foreign country other than the country to which the order applies. Therefore, based on available information, Commerce determined, pursuant to section 781(b) of the Act and 19 CFR 351.225(b) and (h), that initiation of circumvention inquiries is warranted to determine whether certain imports of AWC, completed in Vietnam using certain AWC inputs manufactured in China, are circumventing the *Orders*.<sup>2</sup> Commerce also initiated scope inquiries pursuant to 19 CFR 351.225(b). The scope inquiry covers AWC of Chinese-origin that has undergone further processing in Vietnam before export to the United States as merchandise of Vietnamese origin.<sup>3</sup>

For a full discussion of the basis for our decision to initiate these circumvention and scope inquiries, *see* the Initiation Memorandum.<sup>4</sup> As explained in the Initiation Memorandum, the available information warrants initiating these circumvention and scope inquiries on a country-wide basis.

You are receiving this letter because information indicates that you produce, export, or import AWC produced in Vietnam.<sup>5</sup> In advance of the issuance of a substantive circumvention and scope

<sup>1</sup> See *Aluminum Wire and Cable from the People's Republic of China: Initiation of Scope and Circumvention Inquiries of the Antidumping Duty and Countervailing Duty Orders*, 88 FR 72041 (October 19, 2023) (*Initiation Notice*).

<sup>2</sup> See *Aluminum Wire and Cable from the People's Republic of China: Antidumping Duty and Countervailing Duty Orders*, 84 FR 70496 (December 23, 2019) (*AD and CVD Orders*) (collectively, the *Orders*).

<sup>3</sup> Including but not limited to stranding, insulating, cabling, armoring, jacketing, testing, packing, or any other processing that would not otherwise remove the merchandise from the scope of the *Orders* if performed in the country of manufacture.

<sup>4</sup> See Memorandum, "Aluminum Wire and Cable from the People's Republic of China: Initiation of Scope and Circumvention Inquiries on the Antidumping and Countervailing Duty Orders," dated October 11, 2023 (*Initiation Memorandum*).

<sup>5</sup> See Memorandum, "Public Information on Producers and/or Exporters of Aluminum Wire and Cable Located in Vietnam," dated concurrently with this memorandum; *see also* Memorandum, "Scope and Circumvention Inquires with



questionnaires, Commerce requests that you respond to the initial questions included in Attachment I to this letter. The definition of the merchandise covered by this inquiry, *i.e.*, AWC, is included in Attachment II.

General instructions for responding to this letter are contained in Attachment III. Receipt of this letter does not indicate that you (or your producer or exporter) have been, or will be, selected to receive further questionnaires. In addition, please be aware that your response to this letter may be subject to an on-site verification by Commerce officials. **Failure to provide accurate information or to cooperate to the best of your ability may result in Commerce resorting to the use of facts available and adverse inferences within the meaning of section 776 of the Tariff Act of 1930.**

**Your response to these questions should be submitted under the case numbers A-570-095 CIRC-AWC-Vietnam and A-570-095 SCO-AWC-Vietnam),** using Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (*i.e.*, ACCESS), no later than **January 3, 2024, at 5:00 pm Eastern Time.** All submissions to Commerce must be accompanied by a Certificate of Accuracy from company officials and, if represented by legal counsel or other representative, a Certificate of Accuracy from the representative. Additionally, all submissions to Commerce must be served on all parties on the public service list and as needed on the Administrative Protective Order service list. Both the public service list and the APO list may be found on ACCESS. Certificates of service and accuracy are included in Attachment IV.

In the unlikely event that you have received this questionnaire after the deadline to respond, you **MUST** contact the Commerce official identified in the questionnaire within five days of receipt of the questionnaire to receive further instructions and a revised deadline for submission of the required information. Failure to do so may result in the presumption that you failed to cooperate by not acting to the best of your ability to comply with the request for information and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

If you fail to respond or fail to provide the requested quantity and value information, please be aware that Commerce may find that you failed to cooperate by not acting to the best of your ability to comply with the request for information, and may use an inference that is adverse to your interests in selecting from the facts otherwise available, in accordance with section 776(b) of the Act.

For your convenience, Commerce has the following resources available online to assist you in complying with these electronic filing procedures:

ACCESS: Help Link

<https://access.trade.gov/help.aspx>

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Respect to the Antidumping and Countervailing Duty Orders on Aluminum Wire and Cable from the People's Republic of China: Customs and Border Protection Data," dated October 26, 2023; and Memorandum, "Scope and Circumvention Inquiries with Respect to the Antidumping and Countervailing Duty Orders on Aluminum Wire and Cable, from the People's Republic of China: Customs and Border Protection Data; Addendum to the Release of U.S. Customs and Border Protection Data," dated October 30, 2023.

ACCESS: External User Guide

[https://access.trade.gov/help/ACCESS\\_User\\_Guide.pdf](https://access.trade.gov/help/ACCESS_User_Guide.pdf)

ACCESS: Handbook on Electronic Filing Procedures

[https://access.trade.gov/help/Handbook\\_on\\_Electronic\\_Filing\\_Procedures.pdf](https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf)

*Federal Register notice: Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures*, 76 FR 39263 (July 6, 2011)

<http://www.gpo.gov/fdsys/pkg/FR-2011-07-06/pdf/2011-16352.pdf>

and *Enforcement and Compliance: Change of Electronic Filing System Name*, 79 FR 69046 (November 20, 2014) <http://www.gpo.gov/fdsys/pkg/FR-2014-11-20/pdf/2014-27530.pdf>

Please note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).<sup>6</sup>

If you have any questions or concerns, please contact Gene Calvert at (202) 482-3586 by email at [gene.calvert@trade.gov](mailto:gene.calvert@trade.gov).

Sincerely,



Mark Hoadley  
Program Manager  
AD/CVD Operations, Office VII  
Enforcement and Compliance

Attachments

cc: Public Service List

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<sup>6</sup> See *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings; Final Rule*, 88 FR 67069 (September 29, 2023).

**THE ENCLOSED QUESTIONNAIRE EXPLAINS THE STEPS FOR FILING YOUR RESPONSE.**

**PLEASE NOTE THAT WE ARE ASKING YOUR COMPANY TO SUBMIT YOUR RESPONSE TO THE ENCLOSED QUESTIONNAIRE UNDER THE CASE NUMBER FOR THE CIRCUMVENTION INQUIRY:**

**(A-570-095 CIRC-AWC-VIETNAM)**

**AND ALSO UNDER THE CASE NUMBER FOR THE SCOPE INQUIRY:**

**(A-570-095 SCO-AWC-VIETNAM)**

**Attachment I**

1. In the chart below, please provide the total quantity and total value of your shipments (if you are an exporter or producer) or imports (if you are an importer) of AWC during the period January 1, 2020, through September 30, 2023. Explain how you aggregated these data from your books and records.

Time Period	Total Shipments (or Imports) of AWC in Kilograms (kg)			
	All Markets		United States	
	Total Value (US\$)	Total Quantity (kg)	Total Value (US\$)	Total Quantity (kg)
January 1, 2020 – March 31, 2020				
April 1, 2020 – June 30, 2020				
July 1, 2020 – September 30, 2020				
October 1, 2020 – December 31, 2020				
January 1, 2021 – March 31, 2021				
April 1, 2021 – June 30, 2021				
July 1, 2021 – September 30, 2021				
October 1, 2021 – December 31, 2021				
January 1, 2022 – March 31, 2022				
April 1, 2022 – June 30, 2022				
July 1, 2022 – September 30, 2022				
October 1, 2022 – December 31, 2022				
January 1, 2023 – March 31, 2023				
April 1, 2023 – June 30, 2023				
July 1, 2023 – September 30, 2023				
<b>Total January 1, 2020 – September 30, 2023</b>				

2. Are you a Vietnamese producer, exporter, or U.S. importer of AWC produced in Vietnam?
3. If you are not a producer of AWC in Vietnam, identify your supplier(s) and the Vietnamese producer(s) of the AWC that you export from Vietnam. State whether you are affiliated with any:
  - a. producers of AWC in Vietnam;
  - b. exporters of AWC from Vietnam;
  - c. exporters of AWC to the United States; or
  - d. importers of AWC into the United States?

If yes, please identify those producers, exporters, or importers.

4. Identify the total quantity, in kilograms, of AWC purchased from each Vietnamese producer of AWC during the period January 1, 2020, through September 30, 2023.

Please respond to questions 5 and 6 (below) only if you are a producer or exporter. Importers need not respond to questions 5 and 6.

5. Do you produce AWC, either by yourself or through a tolling agreement with another party? Do you also sell AWC?
6. Report the total quantity of all merchandise purchased from all sources, and separately from the People's Republic of China purchased during the period January 1, 2020, through September 30, 2023, that was used to produce AWC that was then exported to the United States.

Please note that Commerce expects a response from each company in receipt of this questionnaire regardless of whether: (1) the company used the Chinese AWC inputs; and (2) regardless of whether the company exported AWC to the United States.

## ATTACHMENT II

### **Scope of the Antidumping and Countervailing Duty Orders on Aluminum Wire and Cable from the People's Republic of China**

The scope of these orders covers aluminum wire and cable, which is defined as an assembly of one or more electrical conductors made from 8000 Series Aluminum Alloys (defined in accordance with ASTM B800), Aluminum Alloy 1350 (defined in accordance with ASTM B230/B230M or B609/B609M), and/or Aluminum Alloy 6201 (defined in accordance with ASTM B398/B398M), provided that: (1) at least one of the electrical conductors is insulated; (2) each insulated electrical conductor has a voltage rating greater than 80 volts and not exceeding 1000 volts; and (3) at least one electrical conductor is stranded and has a size not less than 16.5 thousand circular mil (kcmil) and not greater than 1000 kcmil. The assembly may: (1) include a grounding or neutral conductor; (2) be clad with aluminum, steel, or other base metal; or (3) include a steel support center wire, one or more connectors, a tape shield, a jacket or other covering, and/or filler materials.

Most aluminum wire and cable products conform to National Electrical Code (NEC) types THHN, THWN, THWN-2, XHHW-2, USE, USE-2, RHH, RHW, or RHW-2, and also conform to Underwriters Laboratories (UL) standards UL-44, UL-83, UL-758, UL-854, UL-1063, UL1277, UL-1569, UL-1581, or UL-4703, but such conformity is not required for the merchandise to be included within the scope.

The scope of these orders specifically excludes aluminum wire and cable products in lengths less than six feet, whether or not included in equipment already assembled at the time of importation. The merchandise covered by the orders is currently classifiable under subheading 8544.49.9000 of the Harmonized Tariff Schedule of the United States (HTSUS). Products subject to the scope may also enter under HTSUS subheading 8544.42.9090. The HTSUS subheadings are provided for convenience and customs purposes. The written description of the scope of these orders is dispositive.

## ATTACHMENT III

### General Instructions

#### I. Instructions for Filing the Response

The following instructions apply to your response to this questionnaire and all other documents that you submit to Commerce during the course of this proceeding.

##### A. Due Date

1. All submissions must be made electronically using Commerce's ACCESS website at <https://access.trade.gov>, unless an exception applies. To determine if your response qualifies for manual filing, *see* "Manual Filing" section below. All laws, regulations, and other descriptive materials that supplement your responses should be submitted on the same date as the initial response.
2. The **business proprietary** response should be submitted on the day specified on the cover page of this questionnaire. The **public version** of the response may be filed one business day after the proprietary response.
3. An electronically filed document must be received successfully in its entirety by ACCESS by 5 p.m. Eastern Time (ET) on the due date, unless an earlier time is specified. Where applicable, a submitter must manually file a document between the hours of 8:30 a.m. and 5 p.m. ET on the due date, unless an earlier time is specified.

##### B. Format

1. You are required to state in the upper right-hand corner of your cover letter the following information in the following format:
  - a. on the first line, indicate the case number stated on the cover page to this questionnaire;
  - b. on the second line, indicate the total number of pages in the document including cover pages, appendices, and any unnumbered pages;
  - c. on the third line, indicate the specific segment of the proceeding, (*e.g.*, investigation, administrative review, scope inquiry, suspension agreement, *etc.*) and, if applicable, indicate the complete period of review (MM/DD/YY - MM/DD/YY);
  - d. on the fourth line, indicate Commerce office conducting the proceeding;
  - e. on the fifth and subsequent lines, indicate whether any portion of the document contains business proprietary information and, if so, list the page

numbers containing business proprietary information; and indicate the business proprietary/public status of the document and whether you agree or object to release of the submitted information under **administrative protective order** (APO) by stating one of the following:

- “Business Proprietary Document -- May Be Released Under APO,”
  - “Business Proprietary Document -- May Not Be Released Under APO,”
  - “Business Proprietary/APO Version-- May Be Released Under APO,” as applicable,
  - “Public Version,” or
  - “Public Document.”
2. Please include a “Re:” line on the cover letter of your response, or any other submissions you make during this proceeding. In the Re: line, briefly summarize the purpose of your submission, *e.g.*, “response to questionnaire,” “case brief.”
  3. Prepare your response in typed form and in English (*see* 19 CFR 351.303(d) and (e) for these and other formatting requirements). Include an original and translated version of all pertinent portions of non-English language documents that accompany your response, including financial statements.
  4. Repeat the question to which you are responding in your narrative submission and place your answer directly below it. Commerce will provide an electronic version of this questionnaire for your convenience.
  5. Please respond to each question. If a particular question does not apply, please state so and explain why in your response. Failure to do so could lead to the use of adverse inferences for that particular question.
  6. In each of your answers, please identify your source of information. Please include with your response copies of source documents necessary to understand your response. For additional information sources not included in your response, indicate the location where the documents or electronic data systems are maintained. If information is maintained at multiple locations, please list in an appendix to your response these locations along with notes indicating the information maintained at each location. This information is used by Commerce to prepare for **verification**.
  7. Include all worksheets, financial reports, and other requested documents as appendices to your response.
  8. Provide a table of attachments. Assign a number to each attachment and include a descriptive name for each attachment and its number in the table.
  9. All monetary amounts should be shown in the currency in which they were originally denominated, and in the currency in which they are registered in your accounts (if the two are different). Also, report the actual exchange rate used for a particular conversion. For all values adjusted for inflation, please provide the data in both

nominal and adjusted terms and explain how these values were adjusted.

Identify all units of measurement, currencies, and conversion factors used in your narrative response, worksheets, or other appendices.

10. It is your responsibility to contact the official in charge if subsequent to your filing there are events that affect your response (*e.g.*, changes in your cost accounting system are relevant to antidumping proceedings, and changes as a result of an audit are relevant to both antidumping and CVD proceedings).

C. Manual Filing

**\*\* On the date of this questionnaire, alternative arrangements for manual filing must be made. If you are unable to file your submission electronically in ACCESS such that alternative arrangements are needed, please contact an official in charge at least 72 hours before the due date. For data files larger than 50 MB, email the ACCESS Help Desk at [access@trade.gov](mailto:access@trade.gov) so that they may assist you in reducing the size of your file.\*\***

1. **All submissions must be filed electronically.** Only under the following four circumstances will Commerce accept a hardcopy response that is manually filed:
  - Documents exceeding 500 pages in length may be filed manually (in paper form) in the APO/Dockets Unit. This is referred to as a “bulky document.”
  - Data files greater than 50 MB must be filed manually on CD-ROM or DVD.
  - If the ACCESS system is unable to accept filings continuously or intermittently over the course of any period of time greater than one hour between 12:00 p.m. and 4:30 p.m. ET or for any duration of time between 4:31 p.m. and 5:00 p.m. ET, then a person may manually file the document in the APO/Dockets Unit. Commerce will provide notice of such technical failures on the ACCESS Help Desk line at 202-482-3150 and on the Enforcement and Compliance website, which is <https://www.trade.gov/us-antidumping-and-countervailing-duties>
  - Apart from the above, if you are unable to comply with the electronic filing requirement, as provided in 19 CFR 351.103(c) of Commerce’s regulations, and in accordance with section 782(c) of the Tariff Act of 1930, as amended (the Act), you must promptly notify the official in charge and submit a full

written explanation of the reasons you are unable to file the document electronically. You must also suggest alternative forms in which to submit the information. Commerce will consider the ability of a submitter and may modify the electronic filing requirement on a case-by-case basis.

2. All manually filed documents must be accompanied by a cover sheet generated in ACCESS. For manually filed bulky documents, separator sheets must also be generated and used.
3. If your response qualifies as a bulky document and you opt to file it manually, you must file two identical paper copies of the document. For all other authorized manual submissions, only one paper copy is required.
4. Manual submissions must be addressed and submitted to:

**Secretary of Commerce**  
**Attention: Enforcement and Compliance, AD/CVD Operations Office VII**  
APO/Dockets Unit, Room 18022  
**U.S. Department of Commerce**  
**1401 Constitution Avenue, N.W.**  
**Washington, D.C. 20230**

D. Certification

1. 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. Commerce cannot accept questionnaire responses that do not contain the certification statements. Forms for such certification are included as appendices to this questionnaire. You may photocopy this form and submit a completed copy with each of your submissions.
2. Provide the required **certificate of service** (included as an appendix) with each business proprietary document and public version submitted to Commerce.
3. Signed certifications of accuracy and certificates of service should be scanned and appended to the appropriate electronic documents filed in ACCESS.

E. Business Proprietary Information and Summarization of Business Proprietary Information

1. Request business proprietary treatment for information submitted that you do not wish to be made publicly available. As a general rule, Commerce places all correspondence and submissions received in the course of an antidumping or countervailing duty proceeding in a public reading file. However, information

deemed to be proprietary information will not be made available to the public. If you wish to make a request for proprietary treatment for particular information, refer to sections 351.304, 351.305, and 351.306 of Commerce's regulations. You must submit the request for proprietary treatment at the same time as the claimed business proprietary information is submitted to Commerce.

2. Utilize the "one-day lag rule" under section 351.303(c)(2) of Commerce's regulations if you wish an additional day to review the final bracketing of business proprietary information in a document and to prepare the required public version. The filing requirements under the one-day lag rule provide for a party to file only the business proprietary document within the applicable time limit (section 351.303(c)(2)(i)). By the close of business one business day after the date the business proprietary document is filed, the person must file the complete final business proprietary document (section 351.303(c)(2)(ii)). The final business proprietary document must be identical to the original document except for any bracketing corrections.
3. By the close of business one business day after the date the business proprietary document is filed (refer to the "one-day lag rule" in the preceding paragraph), submit the public version of your response (section 351.303(c)(2)(iii)). A public version must contain:
  - a. a non-proprietary (public) version of your response that is in sufficient detail to permit a reasonable understanding of the information submitted in confidence, and/or
  - b. an itemization of particular information that you believe you are unable to summarize. State the reasons why you cannot summarize each piece of information.

*Note: The summarization requirement does not apply solely to the narrative portion of your response. It applies equally to worksheets and other appendices to your response, and even to sales and cost databases submitted in antidumping proceedings. Generally, numerical data, such as that provided in sales and cost databases in antidumping proceedings, are adequately summarized only if grouped or presented in terms of indices or figures ranged within 10 percent of the actual figure. If a particular portion of data is voluminous, use ranged figures for at least one percent of the voluminous portion.*

*Responses, or portions thereof, that are not adequately summarized may be rejected from the record of this proceeding.*

4. Submit the statements required regarding limited release of business proprietary information under the provisions of an 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:

- a. a statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or
- b. 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. As discussed above, you must state in the upper right-hand corner of the cover letter accompanying your questionnaire response whether you agree or object to release of the submitted information under APO (*e.g.*, May Be Released Under APO or May Not Be Released Under APO). (*See* section 351.304 of Commerce’s regulations for specific instructions.<sup>7</sup>)

5. 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.
6. Provide to all parties whose representatives have been granted APO access and who are listed on Commerce’s most recent APO Service List, a complete copy of the submission – proprietary document and public version, except for that information which you do not agree to release under APO.<sup>8</sup> (APO service lists, as well as public service lists, are regularly updated and maintained as record documents in ACCESS at <https://access.trade.gov>. The current service lists and are also either attached to the cover letter of this questionnaire or will be provided by a subsequent letter from Commerce.) If you exclude information because you do not agree to release it under APO, you must submit the complete business proprietary version, wherein information in double brackets has been excluded. This version of the response must be marked “Business Proprietary/APO Version - May Be Released Under APO” on the cover page. For parties that do not have access to information under APO, please provide a public version only.

**Note:** *A chart summarizing AD/CVD document filing requirements can be found at <https://enforcement.trade.gov/filing/index.html>. ACCESS filing instructions are [https://access.trade.gov/help/Handbook\\_on\\_Electronic\\_Filing\\_Procedures.pdf](https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf). Detailed and*

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<sup>7</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.

<sup>8</sup> Please note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f). *See Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings; Final Rule*, 88 FR 67069 (September 29, 2023).

*supplemental information concerning APOs, including the APO Handbook, a complete set of APO regulations, and APO application forms and service lists, can be found at <http://enforcement.trade.gov/apo/index.html>.*

F. Government Confidential Information

Any government confidential information submitted to us should be clearly labeled, preferably with the national security classification mark of the responsible authority. The appropriate authority should also submit a statement explaining, in detail, why the information is confidential.

Please note that any company-specific information submitted by government authorities, for which the government is acting merely as a conduit, is not entitled to government confidential treatment; such information is covered by the business proprietary information guidelines outlined above.

G. Verification

All information submitted may be subject to verification. Failure to allow full and complete verification of any information may affect the consideration accorded to that or any other verified or non-verified item in the responses.

H. Extension Requests

Commerce must conduct this proceeding in accordance with statutory and regulatory deadlines. If you are unable to respond completely to every question in the attached questionnaire by the established deadline or are unable to provide all requested supporting documentation by the same date, you must notify the official in charge and submit a request for an extension of the deadline for all or part of the questionnaire response. If you require an extension for only part of your response, such a request should be submitted separately from the portion of your response filed under the current deadline. Statements included within a questionnaire response regarding a respondent's ongoing efforts to collect part of the requested information and promises to supply such missing information when available in the future do not substitute for a written extension request. Section 351.302(c) of Commerce's regulations requires that all extension requests be in writing and state the reasons for the request. Any extension granted in response to your request will be in writing; otherwise the original deadline will apply.

If Commerce does not receive either the requested information or a written extension request before 5:00 pm ET on the established deadline, we may conclude that you have decided not to cooperate in this proceeding. Commerce will not accept any requested information submitted after the deadline. As required by section 351.302(d) of our regulations, we will reject such submissions as untimely. Therefore, failure to properly request extensions for all or part of a questionnaire response may result in the application of partial or total facts available, pursuant to section 776(a) of the Act, which may include adverse inferences, pursuant to section 776(b) of the Act.

I. Separate Letter of Appearance Required

Pursuant to 19 CFR 351.103(d)(1), “with the exception of a petitioner filing a petition in an investigation, to be included on the public service list for a particular segment, each interested party must file a letter of appearance.” The letter of appearance must be filed separately from any other document (with the exception of an application for APO access) and must be accompanied by the certification(s) required under 19 CFR 351.303(g). If you have an ACCESS E-Filer account, you may also enter your appearance by logging into ACCESS at <https://access.trade.gov> and clicking on “Manage Entry of Appearance” and then “Create New Entry of Appearance.”

**SUBMISSION OF COMPUTER DATABASES AND SPREADSHEETS**

As stated above under “Manual Filing,” contact an official in charge if you are not able to file your databases and spreadsheets electronically in ACCESS. Email the ACCESS Help Desk at [access@trade.gov](mailto:access@trade.gov) for assistance in reducing the size of your files. If there are any questions, contact the official in charge.

A. Filing Instructions

Except as described above under the section “Manual Filing,” all database files, including Microsoft Excel spreadsheets that are less than 50 MB in size must be filed electronically using ACCESS. Instructions for using ACCESS can be found above and at <https://access.trade.gov>. Please refer to the Handbook on Electronic Filing Procedures in the “Help” section of the website.

Please label the electronic files that you upload in a manner indicating their specific contents. For example, ABC Subsidiary 1 March 15 Electricity Worksheet, rather than ABC March 15 QR – Excel 1.

For manual filings (when available), separately pack and label the electronic media containing the databases or spreadsheets (*see* section below for labeling and other instructions). Deliver the package to the address listed in the section “Manual Filing.” (Note that databases over 50 MB must be filed manually.)

B. Special Instructions for Manual Filing

For manual filings (when available), you may submit your databases or spreadsheets on either a CD or DVD. Compressed databases are acceptable, but decompression instructions and software must accompany any compressed data submission.

Clearly label the CD or DVD with the following information:

1. Case name, case number, and submission date
2. Name of respondent
3. Proceeding and time period (for example, INV-POI 1/2016-12/2016)

4. Name of official in charge
5. File formats and software used to create the databases or worksheets
6. File names, number of observations, and record lengths
7. ACCESS bar code number

C. Data Formatting Instructions

1. The database or spreadsheet must be readable by an IBM-compatible PC; the data must be encoded in ASCII format or, at your option, PC SAS, Access, dBase, or Excel formats.
2. Report numerical data in a numerical format that allows calculations (*e.g.*, 10, not 10 MT). Units should be reported in fields separate from numerical values.

APPENDIX IV

CERTIFICATIONS OF FACTUAL ACCURACY AND CERTIFICATE OF SERVICE

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CERTIFICATIONS OF FACTUAL ACCURACY

**§ 351.303 Filing, document identification, format, translation, service, and certification of documents.**

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(g) *Certifications.* Each submission containing factual information must include the following certification from the person identified in paragraph (g)(1) of this section and, in addition, if the person has legal counsel or another representative, the certification in paragraph (g)(2) of this section. The certifying party must maintain the original signed certification for a period of five years from the date of filing the submission to which the certification pertains. The original signed certification must be available for inspection by U.S. Department of Commerce officials. Copies of the certifications must be included in the submission filed at Commerce.

(1) For the person(s) officially responsible for presentation of the factual information:

(i) **COMPANY CERTIFICATION:\***

I, **(PRINTED NAME AND TITLE)**, currently employed by **(COMPANY NAME)**, certify that I prepared or otherwise supervised the preparation of the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN {}): {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}**. I certify that the public information and any business proprietary information of **(CERTIFIER'S COMPANY NAME)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\* For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, *e.g.*, “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

**(ii) GOVERNMENT CERTIFICATION:\*\***

I, **(PRINTED NAME AND TITLE)**, currently employed by the government of **(COUNTRY)**, certify that I prepared or otherwise supervised the preparation of the attached submission of **(IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE)** pursuant to the **(INSERT ONE OF THE FOLLOWING OPTIONS IN {} : {THE (ANTIDUMPING OR COUNTERVAILING) DUTY INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)})**. I certify that the public information and any business proprietary information of the government of **(COUNTRY)** contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\*\* For multiple person certifications, all persons should be listed in the first sentence of the certification and all persons should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, *e.g.*, “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

(2) For the legal counsel or other representative:

**REPRESENTATIVE CERTIFICATION:\*\*\***

I, (PRINTED NAME), with (LAW FIRM or OTHER FIRM), (INSERT ONE OF THE FOLLOWING OPTIONS IN {}): {COUNSEL TO} or {REPRESENTATIVE OF}) (COMPANY NAME, OR GOVERNMENT OF COUNTRY, OR NAME OF ANOTHER PARTY), certify that I have read the attached submission of (IDENTIFY THE SPECIFIC SUBMISSION BY TITLE) due on (DATE) OR filed on (DATE) pursuant to the (INSERT ONE OF THE FOLLOWING OPTIONS IN {}): {THE (ANTIDUMPING OR COUNTERVAILING DUTY) INVESTIGATION OF (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (DATES OF PERIOD OF REVIEW) (ADMINISTRATIVE OR NEW SHIPPER) REVIEW UNDER THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)} or {THE (SUNSET REVIEW OR CHANGED CIRCUMSTANCE REVIEW OR SCOPE RULING OR CIRCUMVENTION INQUIRY) OF THE (ANTIDUMPING OR COUNTERVAILING) DUTY ORDER ON (PRODUCT) FROM (COUNTRY) (CASE NUMBER)}}. In my capacity as (INSERT ONE OF THE FOLLOWING OPTIONS IN {}): {COUNSEL} or {ADVISER, PREPARER, OR REVIEWER}) of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\*\*\* For multiple representative certifications, all representatives and their firms should be listed in the first sentence of the certification and all representatives should sign and date the certification. In addition, singular pronouns and possessive adjectives should be changed accordingly, e.g., “I” should be changed to “we” and “my knowledge” should be changed to “our knowledge.”

**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)