

Assessment Rates

Upon completion of the final results, Commerce shall determine and U.S. Customs and Border Protection (CBP) shall assess antidumping duties on all appropriate entries. If Yücel's weighted-average dumping margin is above *de minimis* in the final results of this review, we will calculate an importer-specific assessment rate on the basis of the ratio of the total amount of antidumping duties calculated for each importer's examined sales and the total entered value of the sales in accordance with 19 CFR 351.212(b)(1). If Yücel's weighted-average dumping margin is zero or *de minimis* in the final results of review, we will instruct CBP not to assess duties on any of its entries in accordance with the *Final Modification for Reviews*.⁷

For entries of subject merchandise during the POR produced by Yücel for which it did not know its merchandise was destined for the United States, we will instruct CBP to liquidate unreviewed entries at the all-others rate if there is no rate for the intermediate company(ies) involved in the transaction.

For the companies which were not selected for individual examination, Çayirova Boru San A.Ş., HG Tubulars Canada Ltd., and Yücelboru İhracat, İthalat, we will instruct CBP to apply the rates listed above to all entries of subject merchandise produced and/or exported by these firms.

We intend to issue liquidation instructions to CBP 15 days after publication of the final results of this review.

Cash Deposit Requirements

The following deposit requirements will be effective upon publication of the notice of final results of administrative review for all shipments of OCTG from Turkey entered, or withdrawn from warehouse, for consumption on or after the date of publication as provided by section 751(a)(2) of the Act: (1) The cash deposit rate for companies subject to this review will be the rates established in the final results of the review; (2) for merchandise exported by producers or exporters not covered in this review but covered in a prior segment of the proceeding, the cash deposit rate will continue to be the company-specific rate published for the most recent period; (3) if the exporter is not a firm covered in

this review, a prior review, or the original investigation but the producer is, the cash deposit rate will be the rate established for the most recent period for the producer of the merchandise; (4) the cash deposit rate for all other producers or exporters will continue to be 35.86 percent,⁸ the all-others rate established in the less-than-fair-value investigation, adjusted for the export-subsidy rate established in the companion countervailing duty investigation. These cash deposit requirements, when imposed, shall remain in effect until further notice.

Notification to Importers

This notice serves as a preliminary reminder to importers of their responsibility under 19 CFR 351.402(f)(2) to file a certificate regarding the reimbursement of antidumping duties prior to liquidation of the relevant entries during this review period. Failure to comply with this requirement could result in the Secretary's presumption that reimbursement of antidumping duties occurred and the subsequent assessment of double antidumping duties.

We are issuing and publishing these results in accordance with sections 751(a)(1) and 777(i)(1) of the Act and 19 CFR 351.221.

Dated: June 5, 2018.

Gary Taverman,

Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations, performing the non-exclusive functions and duties of the Assistant Secretary for Enforcement and Compliance.

Appendix

List of Topics Discussed in the Preliminary Decision Memorandum

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⁸ See *Certain Oil Country Tubular Goods from India, the Republic of Korea, Taiwan, the Republic of Turkey, and the Socialist Republic of Vietnam: Antidumping Duty Orders; and Certain Oil Country Tubular Goods from the Socialist Republic of Vietnam: Amended Final Determination of Sales at Less Than Fair Value*, 79 FR 53691, 53693 (September 10, 2014).

- B. Level of Trade
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IX. Recommendation

[FR Doc. 2018-12479 Filed 6-8-18; 8:45 am]

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DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-064]

Stainless Steel Flanges From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value

AGENCY: Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce.

SUMMARY: The U.S. Department of Commerce (Commerce) determines that stainless steel flanges from the People's Republic of China (China) are being, or are likely to be, sold in the United States at less than fair value (LTFV). The period of investigation (POI) is January 1, 2017, through June 30, 2017. The final dumping margins of sales at LTFV are listed below in the "Final Determination" section of this notice.

DATES: Applicable June 11, 2018.

FOR FURTHER INFORMATION CONTACT: Ian Hamilton or Kabir Archuletta, AD/CVD Operations, Office V, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-4798 or (202) 482-2593, respectively.

SUPPLEMENTARY INFORMATION:

Background

This final determination is made in accordance with section 735(a) of the Tariff Act of 1930, as amended (the Act). On March 28, 2018, Commerce published the preliminary affirmative determination of sales at LTFV in the investigation of stainless steel flanges from China.¹ We invited interested parties to comment on the *Preliminary Determination*. We received no comments from interested parties.

¹ See *Stainless Steel Flanges from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 13244 (March 28, 2018) (*Preliminary Determination*), and accompanying Preliminary Decision Memorandum.

⁷ See *Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Proceedings: Final Modification*, 77 FR 8101, 8102 (February 14, 2012) (*Final Modification for Reviews*).

Scope of the Investigation

The products covered by this investigation are stainless steel flanges from China. For a complete description of the scope of this investigation, see the Appendix to this notice.

Analysis of Comments Received

As noted above, we received no comments in response to the *Preliminary Determination*. For the purposes of the final determination, Commerce has made no changes to the *Preliminary Determination*.

Use of Adverse Facts Available

We continue to find that the mandatory respondent in this investigation, Shanxi Guanjiaying Flange Forging Group Co., Ltd (GJY), withheld requested information, significantly impeded this investigation, and did not cooperate to the best of its ability to comply with Commerce’s request for information in failing to submit a complete and reliable sales reconciliation, as detailed in the *Preliminary Determination* and accompanying Preliminary Decision Memorandum.² Accordingly, we continue to determine it appropriate to apply facts otherwise available, with an adverse inference, in accordance with sections 776(a)–(b) of the Act.³ As AFA, we have continued to apply the highest dumping margin contained in the Petition, 257.11 percent, as explained in the *Preliminary Determination* and accompanying Preliminary Decision Memorandum.⁴

In accordance with the *Preliminary Determination*, we continue to grant GJY

a separate rate because evidence on the record supports an absence of *de jure* and *de facto* government control.⁵ Hydro-Fluids Controls Limited (HFC), Songhai Flange Manufacturing Co., Ltd (Songhai), and Dongtai QB Stainless Steel Co., Ltd (Dongtai), were also selected as mandatory respondents, but withdrew from participation in this investigation and did not respond to requests for information.⁶ Thus, we continue to find that HFC, Songhai, and Dongtai did not demonstrate that they are eligible for a separate rate and are part of the China-wide entity. We also continue to find that, in addition to the mandatory respondents that did not respond to our requests for information, Commerce did not receive timely responses to its Quantity and Value (Q&V) questionnaire from numerous Chinese exporters and/or producers of the merchandise under consideration that were named in the Petition and to whom Commerce issued Q&V questionnaires.⁷ Because these companies, which comprise part of the China-wide entity, failed to submit the requested Q&V information, we determine that the China-wide entity did not cooperate to the best of its ability. Therefore, for this final determination, Commerce continues to find that the China-wide entity failed to provide necessary information, withheld information requested by Commerce, failed to provide information in a timely manner, and significantly impeded this proceeding by not submitting the requested information. As a result, Commerce continues to find that use of facts available, with an adverse inference, is

warranted in determining the rate of the China-wide entity, pursuant to sections 776(a)(1), (a)(2)(A)–(C), and 776(b) of the Act.⁸

China-Wide Rate

In selecting the AFA rate for the China-wide entity, Commerce’s practice is to select a rate that is sufficiently adverse to ensure that the uncooperative party does not obtain a more favorable result by failing to cooperate than if it had fully cooperated. Specifically, it is Commerce’s practice to select, as an AFA rate, the higher of: (a) the highest dumping margin alleged in the petition; or, (b) the highest calculated dumping margin of any respondent in the investigation. As AFA, Commerce has assigned to the China-wide entity the rate of 257.11 percent, which is the highest dumping margin alleged in the Petition.

Combination Rates

In the *Initiation Notice*, Commerce stated that it would calculate producer/exporter combination rates for the respondents that are eligible for a separate rate in this investigation.⁹ Because Commerce continues to use facts otherwise available with an adverse inference in determining the rate for the only respondent that demonstrated eligibility for a separate rate in this investigation, GJY, Commerce did not calculate producer/exporter combination rates for that company.

Final Determination

The final weighted-average dumping margins are as follows:

Exporter/producer	Weighted-average dumping margins (percent)
Shanxi Guanjiaying Flange Forging Group Co., Ltd	257.11
China-wide Entity	257.11

² See *Preliminary Determination*, 83 FR at 13244; see also Preliminary Decision Memorandum at 8–10.

³ Preliminary Decision Memorandum at 10–15.

⁴ See *Stainless Steel Flanges from India and the People’s Republic of China: Initiation of Less-Than-Fair-Value Investigations*, 82 FR 42649 (September 11, 2017); see also Petitioners’ Letter, “Stainless Steel Flanges from the People’s Republic of China and India: Petitions for the Imposition of Antidumping and Countervailing Duties,” dated August 16, 2017 (Petition); Preliminary Decision Memorandum at 13–15.

⁵ See Policy Bulletin 05.1, Separate-Rates Practice and Application of Combination Rates in Antidumping Investigations involving Non-Market

Economy Countries, dated April 5, 2005, available at <http://enforcement.trade.gov/policy/bull05-1.pdf>.

⁶ See HFC’s Letter, “Certain Stainless Steel Flanges from the People’s Republic of China: Withdrawal from Active Participation by Hydro-Fluid Controls Limited,” dated October 12, 2017; Songhai’s Letter, “Certain Stainless Steel Flanges from the People’s Republic of China: Withdrawal from Active Participation by Songhai Flange Manufacturing Co. Ltd.,” dated October 13, 2017; Dongtai’s Letter, “Certain Stainless Steel Flanges from the People’s Republic of China: Withdrawal from Active Participation by Dongtai QB Stainless Steel Co., Ltd.,” dated November 28, 2017.

⁷ See Preliminary Decision Memorandum at 10; see also Petition; Memorandum, “Quantity and

Value Questionnaires Delivery Confirmation,” dated September 20, 2017.

⁸ See, e.g., *Notice of Preliminary Determination of Sales at Less Than Fair Value, Affirmative Preliminary Determination of Critical Circumstances and Postponement of Final Determination: Certain Frozen Fish Fillets from the Socialist Republic of Vietnam*, 68 FR 4986, 4991–92 (January 31, 2003); unchanged in *Notice of Final Determination of Sales at Less Than Fair Value and Affirmative Critical Circumstances: Certain Frozen Fish Fillets from the Socialist Republic of Vietnam*, 68 FR 37116 (June 23, 2003).

⁹ See *Stainless Steel Flanges from India and the People’s Republic of China: Initiation of Less-Than-Fair-Value Investigations*, 82 FR 42649, 42653 (September 11, 2017) (*Initiation Notice*).

Disclosure

Normally, Commerce discloses to interested parties the calculations performed in connection with a final determination within five days of its public announcement or, if there is no public announcement, within five days of the date of publication of this notice in accordance with 19 CFR 351.224(b). However, because Commerce applied adverse facts available to the individually examined company participating in this investigation, in accordance with section 776 of the Act, and the applied adverse facts available rate is based solely on the Petition, there are no calculations to disclose.

Continuation of Suspension of Liquidation

In accordance with section 735(c)(1)(B) of the Act, Commerce will instruct U.S. Customs and Border Protection (CBP) to continue to suspend liquidation of all appropriate entries of stainless steel flanges from China, as described in the Appendix to this notice, which were entered, or withdrawn from warehouse, for consumption on or after March 28, 2018, the date of publication in the **Federal Register** of the affirmative *Preliminary Determination*.

Further, pursuant to section 735(c)(1)(B)(ii) of the Act, Commerce will also instruct CBP to collect a cash deposit as follows: (1) The rate for the exporters listed in the chart above will be the rate we have determined in this final determination; (2) for all Chinese exporters of subject merchandise which have not received their own rate, the cash-deposit rate will be the China-wide rate; and (3) for all non-Chinese exporters of subject merchandise which have not received their own rate, the cash-deposit rate will be the rate applicable to the Chinese exporter/producer combination that supplied that non-Chinese exporter. These suspension-of-liquidation instructions will remain in effect until further notice. Because there has been no demonstration that an adjustment for domestic subsidies is warranted, Commerce has not made any such adjustment to the rate assigned to GJY or the China-wide entity. Additionally, Commerce is making no adjustments for export subsidies to the antidumping cash deposit rate in this investigation because we have made no findings in the companion countervailing duty investigation that any of the programs are export subsidies.¹⁰

¹⁰ See *Countervailing Duty Investigation of Stainless Steel Flanges from the People's Republic of China: Final Affirmative Determination*, 83 FR

International Trade Commission Notification

In accordance with section 735(d) of the Act, we will notify the U.S. International Trade Commission (ITC) of the final affirmative determination of sales at LTFV. Because the final determination in this proceeding is affirmative, in accordance with section 735(b)(2) of the Act, the ITC will make its final determination as to whether the domestic industry in the United States is materially injured, or threatened with material injury, by reason of imports of stainless steel flanges from China no later than 45 days after this final determination. If the ITC determines that material injury, or threat of material injury, does not exist, the proceeding will be terminated and all cash deposits will be refunded. If the ITC determines that such injury does exist, Commerce will issue an antidumping duty order directing CBP to assess, upon further instruction by Commerce, antidumping duties on all imports of the merchandise under consideration entered, or withdrawn from warehouse, for consumption on or after the effective date of the suspension of liquidation.

Notification Regarding Administrative Protective Orders

This notice serves as a reminder to parties subject to an administrative protective order (APO) of their responsibility concerning the disposition of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Timely notification of the return or destruction of APO materials, or conversion to judicial protective order, is hereby requested. Failure to comply with the regulations and the terms of an APO is a sanctionable violation.

Notification to Interested Parties

This determination is issued and published in accordance with sections 735(d) and 777(i)(1) of the Act, and 19 CFR 351.210(c).

15790 (April 12, 2018); see also, e.g., *Circular Welded Carbon-Quality Steel Pipe from Pakistan: Affirmative Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination and Extension of Provisional Measures*, 81 FR 36867 (June 8, 2016) and accompanying Preliminary Decision Memorandum at 13.

Dated: June 4, 2018.

Gary Taverman,

Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations, performing the non-exclusive functions and duties of the Assistant Secretary for Enforcement and Compliance.

Appendix

Scope of the Investigation

The products covered by this investigation are certain forged stainless steel flanges, whether unfinished, semi-finished, or finished (certain forged stainless steel flanges). Certain forged stainless steel flanges are generally manufactured to, but not limited to, the material specification of ASTM/ASME A/SA182 or comparable domestic or foreign specifications. Certain forged stainless steel flanges are made in various grades such as, but not limited to, 304, 304L, 316, and 316L (or combinations thereof). The term "stainless steel" used in this scope refers to an alloy steel containing, by actual weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements.

Unfinished stainless steel flanges possess the approximate shape of finished stainless steel flanges and have not yet been machined to final specification after the initial forging or like operations. These machining processes may include, but are not limited to, boring, facing, spot facing, drilling, tapering, threading, beveling, heating, or compressing. Semi-finished stainless steel flanges are unfinished stainless steel flanges that have undergone some machining processes.

The scope includes six general types of flanges. They are: (1) Weld neck, generally used in butt-weld line connection; (2) threaded, generally used for threaded line connections; (3) slip-on, generally used to slide over pipe; (4) lap joint, generally used with stub-ends/butt-weld line connections; (5) socket weld, generally used to fit pipe into a machine recession; and (6) blind, generally used to seal off a line. The sizes and descriptions of the flanges within the scope include all pressure classes of ASME B16.5 and range from one-half inch to twenty-four inches nominal pipe size. Specifically excluded from the scope of this investigation are cast stainless steel flanges. Cast stainless steel flanges generally are manufactured to specification ASTM A351.

The country of origin for certain forged stainless steel flanges, whether unfinished, semi-finished, or finished is the country where the flange was forged. Subject merchandise includes stainless steel flanges as defined above that have been further processed in a third country. The processing includes, but is not limited to, boring, facing, spot facing, drilling, tapering, threading, beveling, heating, or compressing, and/or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the stainless steel flanges.

Merchandise subject to the investigation is typically imported under headings 7307.21.1000 and 7307.21.5000 of the Harmonized Tariff Schedule of the United States (HTSUS). While HTSUS subheadings

and ASTM specifications are provided for convenience and customs purposes, the written description of the scope is dispositive.

[FR Doc. 2018-12482 Filed 6-8-18; 8:45 am]

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DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-058, A-428-845, A-533-873, A-475-838, A-580-892, A-441-801]

Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland: Antidumping Duty Orders; and Amended Final Determinations of Sales at Less Than Fair Value for the People's Republic of China and Switzerland

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: Based on affirmative final determinations by the Department of Commerce (Commerce) and the International Trade Commission (the ITC), Commerce is issuing antidumping duty orders on certain cold-drawn mechanical tubing of carbon and alloy steel (cold-drawn mechanical tubing) from the People's Republic of China (China), the Federal Republic of Germany (Germany), India, Italy, the Republic of Korea (Korea), and Switzerland. In addition, Commerce is amending its final determination of sales at less than fair value (LTFV) for China and Switzerland as a result of ministerial errors.

DATES: Applicable June 11, 2018.

FOR FURTHER INFORMATION CONTACT: Paul Stolz at (202) 482-4474 or Keith Haynes at (202) 482-5139 (China), Frances Veith at (202) 482-4295 (Germany), Susan Pulongbarit at (202) 482-4031 or Omar Qureshi at (202) 482-5307 (India), Carrie Bethea at (202) 482-1491 (Italy), Annathea Cook at (202) 482-0250 (Korea), and Laurel LaCivita at (202) 482-4243 (Switzerland), AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230.

SUPPLEMENTARY INFORMATION:

Background

In accordance with sections 735(a), 735(d), and 777(i)(1) of the Tariff Act of 1930, as amended (the Act), and 19 CFR 351.210(c), Commerce published its affirmative final determinations in the LTFV investigations of cold-drawn

mechanical tubing from China, Germany, India, Italy, Korea, and Switzerland on April 16, 2018.¹ In addition, Commerce made affirmative determinations of critical circumstances with respect to China and Italy, in part, and with respect to Korea, pursuant to section 735(a)(3) of the Act, and 19 CFR 351.206.²

Commerce received numerous ministerial error allegations and comments in the various investigations. A ministerial error is defined as an error in addition, subtraction, or other arithmetic function, clerical error resulting from inaccurate copying, duplication, or the like, and any other similar type of unintentional error which the Secretary considers ministerial.³

On April 17, 2018, Goodluck India Limited (Goodluck) alleged that Commerce made a ministerial error in the *India Final*.⁴ However, we find that the alleged error is methodological, rather than ministerial, in nature.⁵

On April 23, 2018, the petitioners⁶ alleged that Commerce made certain

¹ See *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China: Affirmative Final Determination of Sales at Less-Than-Fair Value and Final Determination of Critical Circumstances, in Part*, 83 FR 16322 (April 16, 2018) (*China Final*); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Federal Republic of Germany: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 16326 (April 16, 2018) (*Germany Final*); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India: Final Affirmative Determination of Sales at Less Than Fair Value*, 83 FR 16296 (April 16, 2018) (*India Final*); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Italy: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 83 FR 16289 (April 16, 2018) (*Italy Final*); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value, Final Affirmative Determination of Critical Circumstances*, 83 FR 16319 (April 16, 2018) (*Korea Final*); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Switzerland: Final Determination of Sales at Less Than Fair Value*, 83 FR 16293 (April 16, 2018) (*Switzerland Final*).

² See *China Final*, 83 FR at 16322; *Italy Final*, 83 FR at 16290; and *Korea Final*, 83 FR at 16320.

³ See section 735(e) of the Act and 19 CFR 351.224(f).

⁴ See Goodluck's letter, "Goodluck's Final Determination Ministerial Error Comments: Antidumping Duty Investigation on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India (A-533-873)," dated April 17, 2018 (Goodluck's Allegation).

⁵ See Memorandum, "Antidumping Duty Investigation of Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India: Ministerial Error Allegation Memorandum," dated May 16, 2018.

⁶ ArcelorMittal Tubular Products, Michigan Seamless Tube, LLC, Plymouth Tube Co. USA, PTC Alliance Corp., Webco Industries, Inc., and Zekelman Industries, Inc. (collectively, the petitioners).

ministerial errors in the *Germany Final* with respect to Benteler Steel/Tube GmbH (Benteler), Salzgitter Mannesmann Line Pipe GmbH (Salzgitter Line Pipe) and Salzgitter Mannesmann Precision GmbH (Salzgitter Precision).⁷ On April 30, 2018, Benteler submitted rebuttal comments to the petitioners' allegation.⁸ Neither Salzgitter Line Pipe nor Salzgitter Precision submitted rebuttal comments. However, we find that the alleged errors regarding our *Final Determination* with respect to Benteler's margin calculation and our treatment of Salzgitter Line Pipe, Salzgitter Precision, or any other Salzgitter company are methodological, rather than ministerial, in nature.⁹

On April 23, 2018, Benteler Rothrist AG (Benteler Rothrist) alleged that Commerce made certain ministerial errors in the *Switzerland Final*.¹⁰ On April 30, 2018, the petitioners submitted rebuttal comments to Benteler Rothrist's allegation.¹¹ See the "Amendment to Switzerland Final" section below for further information.

On April 24, 2018, the petitioners alleged that Commerce made certain ministerial errors in the *China Final* with respect to Zhangjiagang Huacheng Import & Export Co., Ltd. (Huacheng).¹² On April 30, 2018, Huacheng submitted rebuttal comments to the petitioners' allegation.¹³ See the "Amendment to

⁷ See the petitioners' letter, "Cold-Drawn Mechanical Tubing from Germany—Petitioners' Ministerial Error Allegations Regarding BENTELER Steel/Tube GmbH," dated April 23, 2018 (Petitioners' Allegation regarding Benteler); the petitioners' letter, "Cold-Drawn Mechanical Tubing from Germany—Petitioners' Ministerial Error Allegations Regarding Salzgitter Mannesmann Line Pipe GmbH and Salzgitter Mannesmann Precision GmbH," dated April 23, 2018 (Petitioners' Allegation regarding Salzgitter).

⁸ See Benteler's letter, "Antidumping Duty Investigation of Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Germany: Reply to Ministerial Error Comments for the Final Determination," dated April 30, 2018 (Benteler's Rebuttal Comments).

⁹ See Memorandum, "Less-Than-Fair-Value Investigation of Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the Federal Republic of Germany: Ministerial Error Allegation Memorandum," dated June 6, 2018.

¹⁰ See Benteler Rothrist's letter, "Antidumping Duty Investigation of Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from Switzerland: Ministerial Error Comments for the Final Determination," dated April 23, 2018 (Benteler Rothrist's Allegation).

¹¹ See the petitioners' letter, "Cold-Drawn Mechanical Tubing from Switzerland—Petitioners' Response to Benteler Rothrist's Ministerial Error Allegation," dated April 30, 2018 (Petitioners' Rebuttal Comments to Benteler Rothrist).

¹² See the petitioners' letter, "Cold-Drawn Mechanical Tubing from China—Petitioners' Ministerial Error Allegations," dated April 24, 2018 (Petitioners' China Allegation).

¹³ See Huacheng's letter, "Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from