

**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**



Sayı : 35649853-TİM.KİB.GSK.TEŞVİK.2024/854-2318

Giresun, 17/07/2024

Konu : ABD / Fren Kampanaları Anti-Damping ve Sübvansiyon Soruşturmaları

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2024 /432**

İlgi: 28/06/2024 tarih 394 sayılı sirkülerimiz.

Sayın üyemiz,

Amerika Birleşik Devletleri'nde (ABD) yerli üreticiler tarafından ülkemizin yanı sıra Çin Halk Cumhuriyeti (ÇHC) menşeli, fren kampanası ürünleri (Brake Drums) ithalatına karşı anti-damping ve sübvansiyon soruşturması açılması için ABD Ticaret Bakanlığı (DoC) ve ABD Uluslararası Ticaret Komisyonu'na (USITC) başvuruda bulunulmuş ve USITC tarafından zarara ilişkin bir ön soruşturma başlatıldığı ilgede kayıtlı sirkülerimiz ile duyurulmuştur.

Bu defa; T.C. Ticaret Bakanlığı İthalat Genel Müdürlüğünden alınan 12/07/2024 tarih 98748881 sayılı yazıda;

DoC Uluslararası Ticaret İdaresince (ITA) tarafından anti-damping ve sübvansiyon soruşturmalarının açıldığına ilişkin Ek 1 ve Ek 2'de yer alan bildirimler ITA tarafından ACCESS'te (ABD Ticaret Departmanı Çevrimiçi Belge Portalı'nda) 11 Temmuz 2024 tarihinde yayımlandığı, anılan bildirimlerin incelenmesinden de görüleceği üzere ITA tarafından açılan mezkur soruşturmaların ABD Gümrük Tarife Cetveli'ne göre 8708.30.50.20 gümrük tarife pozisyonu altında yer alan ürünlere yönelik açıldığı, bununla birlikte ilgili ürünlerin bir montajın parçası olarak girildiğinde 8708.30.50.90 gümrük tarife pozisyonu altında sınıflandırılabilirliği, ayrıca 8716.90.50.60 gümrük tarife pozisyonu altına da girebileceği, mezkur soruşturmalarda gümrük tarife pozisyonlarının kolaylık sağlaması ve gümrük amaçları için verilmiş olsa da, bu soruşturmalar kapsamındaki ürünlerin yazılı tanımının belirleyici olacağı anlaşılmaktadır. Bununla birlikte, anti-damping soruşturmasının döneminin 1 Nisan 2023- 31 Mart 2024, sübvansiyon soruşturmasının döneminin ise 1 Ocak 2023-31 Aralık 2023 olduğu belirtilmekte olup, ITA, ihracatçı firma sayısının fazla olması durumunda soruşturma kapsamında yer alacak firmaları seçme yoluna gidebilmekte olup, söz konusu seçme işlemini, miktar ve değer soru formu (Quantity and Value Questionnaire) aracılığıyla yapabilmektedir. Bu çerçevede, 11 Temmuz 2024 tarihinde ACCESS'te yayımlanan ve ITA tarafından belirlenen firmalara e-posta yoluyla iletilmiş olduğu anlaşılan bahse konu soru formları ekte (Ek3 ve Ek 4) yer almaktadır. Soru formlarının

Karadeniz İhracatçı Birlikleri Genel Sekreterliği
Atatürk Bulvarı No:19/E PK.51 28200 GİRESUN
Telefon: 0.454.2162426 (PBX)
Faks: 0.454.2164842-2168890
e-posta: kib@kib.org.tr Kep: kib@hs01.kep.tr
Web : www.kib.org.tr

Sahin KURUL tarafından 5070 sayılı kanun gereğince güvenli elektronik imza ile imzalanmıştır.

Ayrıntılı bilgi için: Şahin KURUL – Şube Müdürü



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.TEŞVİK.2024/854-2318

Giresun, 17/07/2024

Konu : ABD / Fren Kampanaları Anti-Damping ve Sübvansiyon Soruşturmaları

incelenmesinden, mezkûr formların 24 Temmuz 2024 tarihine kadar cevaplanması gerektiği, formların iletildiği firmaların cevaplamaması halinde söz konusu firmaların iş birliği yapmadığı varsayımına yol açabileceği, ve eldeki veriler (facts otherwise available) arasından seçim yaparken firmaların çıkarlarına aykırı bir çıkarımda bulunabileceği belirtilmekte ve ilaveten, söz konusu açılış bildirimlerinde, e-posta yoluyla anılan soru formları taraflarına iletilmemiş olan firmalar, <https://www.trade.gov/ec-adcvd-case-announcements> adresinden ilgili soru formlarına erişim sağlayabilecek olup, cevaplarını ACCESS üzerinden gönderebileceği, öte yandan, ITA tarafından mezkûr sübvansiyon soruşturması kapsamında firmalarımıza gönderilecek soru formunun yanı sıra Bakanlığımıza da verilen sübvansiyonlar hakkında bilgi talep edilen bir hükümet soru formu gönderilecek olup, soruşturma süresince firmalarımız ve Bakanlığımız arasında koordineli olarak çalışılması büyük önem arz ettiği belirtilmektedir.

Diğer taraftan, firmalarımızın Türkiye İhracatçılar Meclisi tarafından düzenlenen “Ticaret Politikası Önlemleri Soruşturmaları ve Genelleştirilmiş Tercihler Sistemi Uygulamaları Kapsamında Firmalarca Alınacak Avukatlık ve/veya Danışmanlık Hizmeti Harcamalarının Desteklenmesine İlişkin Uygulama Usul ve Esasları”nı incelemesinde fayda mütalaa edildiği ifade edilmektedir.

Bilgilerinize sunarız.

e-imzalıdır
Şahin KURUL
Genel Sekreter a.
Şube Müdürü

Ekler:

- 1- ITA Damping Soruşturması Açılış Bildirimi-Unpublished
- 2- ITA Telafi Edici Vergi Soruşturması Açılış Bildirimi-Unpublished
- 3- Miktar ve Değer Soru Formu- AD
- 4- Miktar ve Değer Soru Formu- TEV

BILLING CODE: 3510-DS-P

DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-174, A-489-853]

Certain Brake Drums from the People's Republic of China and the Republic of Türkiye:
Initiation of Less-Than-Fair-Value Investigations

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

DATES: Applicable July 10, 2024.

FOR FURTHER INFORMATION CONTACT: Samuel Frost (the People's Republic of China
(China)) at (202) 482-8180 and Eric Hawkins (the Republic of Türkiye (Türkiye)) at (202) 482-
1988, AD/CVD Operations, Enforcement and Compliance, International Trade Administration,
U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230.

SUPPLEMENTARY INFORMATION:

The Petitions

On June 20, 2024, the U.S. Department of Commerce (Commerce) received antidumping
duty (AD) petitions concerning imports of certain brake drums (brake drums) from China and
Türkiye filed in proper form on behalf of Webb Wheel Products, Inc. (the petitioner), a U.S.
producer of brake drums.¹ The Petitions were accompanied by countervailing duty (CVD)
petitions concerning imports of brake drums from China and Türkiye.²

¹ See Petitioner's Letter, "Petitions for the Imposition of Antidumping and Countervailing Duties," dated June 20,
2024 (the Petitions).

² *Id.*

Between June 24 and July 5, 2024, Commerce requested supplemental information pertaining to certain aspects of the Petitions in supplemental questionnaires.³ The petitioner responded to Commerce's supplemental questionnaires between June 28 and July 8, 2024.⁴

In accordance with section 732(b) of the Tariff Act of 1930, as amended (the Act), the petitioner alleges that imports of brake drums from China and Türkiye are being, or are likely to be, sold in the United States at less than fair value (LTFV) within the meaning of section 731 of the Act, and that imports of such products are materially injuring, or threatening material injury to, the brake drums industry in the United States. Consistent with section 732(b)(1) of the Act, the Petitions were accompanied by information reasonably available to the petitioner supporting its allegations.

Commerce finds that the petitioner filed the Petitions on behalf of the domestic industry, because the petitioner is an interested party, as defined in section 771(9)(C) of the Act. Commerce also finds that the petitioner demonstrated sufficient industry support for the initiation of the requested LTFV investigations.⁵

Periods of Investigation

Because the Petitions were filed on June 20, 2024, pursuant to 19 CFR 351.204(b)(1), the period of investigation (POI) for the LTFV investigation from Türkiye is April 1, 2023, through March 31, 2024. Because China is a non-market economy (NME) country, pursuant to 19 CFR

³ See Commerce's Letters, "Supplemental Questions," dated June 24, 2024 (General Issues Questionnaire), Country-Specific Supplemental Questionnaires: China Supplemental and Türkiye Supplemental, dated June 24, 2024, and "Supplemental Questions," dated July 5, 2024; see also Memoranda, "Phone Call with Counsel to the Petitioner," dated July 2, 2024 (July 2 Memorandum).

⁴ See Petitioner's Letters, "Supplemental Questionnaire Response, Volume I," dated June 28, 2024 (First General Issues Supplement); Country-Specific AD Supplemental Responses, dated Jun 28, 2024; "Supplemental Questionnaire Response, Volume I," dated July 5, 2024 (Second General Issues Supplement); "Supplemental Questionnaire Response," dated July 5, 2024; and "Supplemental Questionnaire Response, Volume I," dated July 8, 2024 (Third General Issues Supplement).

⁵ See section on "Determination of Industry Support for the Petitions," *infra*.

351.204(b)(1), the POI for the LTFV investigation from China is October 1, 2023, through March 31, 2024.

Scope of the Investigations

The products covered by these investigations are brake drums from China and Türkiye. For a full description of the scope of these investigations, *see* the appendix to this notice.

Comments on the Scope of the Investigations

Between June 24 and July 2, 2024, Commerce requested information and clarification from the petitioner regarding the proposed scope to ensure that the scope language in the Petitions is an accurate reflection of the products for which the domestic industry is seeking relief.⁶ Between June 28 and July 5, 2024, the petitioner provided clarifications and revised the scope.⁷ The description of merchandise covered by these investigations, as described in the appendix to this notice, reflects these clarifications.

As discussed in the *Preamble* to Commerce's regulations, we are setting aside a period for interested parties to raise issues regarding product coverage (*i.e.*, scope).⁸ Commerce will consider all scope comments received from interested parties and, if necessary, will consult with interested parties prior to the issuance of the preliminary determinations. If scope comments include factual information,⁹ all such factual information should be limited to public information. To facilitate preparation of its questionnaires, Commerce requests that scope comments be submitted by 5:00 p.m. Eastern Time (ET) on July 30, 2024, which is 20 calendar days from the signature date of this notice.¹⁰ Any rebuttal comments, which may include factual information,

⁶ See First General Issues Questionnaire; *see also* July 2 Memorandum.

⁷ See First General Issues Supplement at 1-2 and Exhibit I-S1-3; *see also* Second General Issues Supplement at 1-2.

⁸ See *Antidumping Duties; Countervailing Duties, Final Rule*, 62 FR 27296, 27323 (May 19, 1997) (*Preamble*); *see also* 19 CFR 351.312.

⁹ See 19 CFR 351.102(b)(21) (defining "factual information").

¹⁰ See 19 CFR 351.303(b)(1).

and should also be limited to public information, must be filed by 5:00 p.m. ET on August 9, 2024, which is 10 calendar days from the initial comment deadline.

Commerce requests that any factual information that parties consider relevant to the scope of these investigations be submitted during that period. However, if a party subsequently finds that additional factual information pertaining to the scope of the investigations may be relevant, the party must contact Commerce and request permission to submit the additional information. All scope comments must be filed simultaneously on the records of the concurrent LTFV and CVD investigations.

Filing Requirements

All submissions to Commerce must be filed electronically via Enforcement and Compliance's Antidumping Duty and Countervailing Duty Centralized Electronic Service System (ACCESS), unless an exception applies.¹¹ An electronically filed document must be received successfully in its entirety by the time and date it is due.

Comments on Product Characteristics

Commerce is providing interested parties an opportunity to comment on the appropriate physical characteristics of brake drums to be reported in response to Commerce's AD questionnaires. This information will be used to identify the key physical characteristics of the subject merchandise in order to report the relevant factors of production (FOP) or cost of production (COP) accurately, as well as to develop appropriate product comparison criteria.

¹¹ See *Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures*, 76 FR 39263 (July 6, 2011); see also *Enforcement and Compliance: Change of Electronic Filing System Name*, 79 FR 69046 (November 20, 2014) for details of Commerce's electronic filing requirements, effective August 5, 2011. Information on using ACCESS can be found at <https://access.trade.gov/help.aspx> and a handbook can be found at https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf.

Interested parties may provide any information or comments that they feel are relevant to the development of an accurate list of physical characteristics. Specifically, they may provide comments as to which characteristics are appropriate to use as: (1) general product characteristics; and (2) product comparison criteria. We note that it is not always appropriate to use all product characteristics as product comparison criteria. We base product comparison criteria on meaningful commercial differences among products. In other words, although there may be some physical product characteristics utilized by manufacturers to describe brake drums, it may be that only a select few product characteristics take into account commercially meaningful physical characteristics. In addition, interested parties may comment on the order in which the physical characteristics should be used in matching products. Generally, Commerce attempts to list the most important physical characteristics first and the least important characteristics last.

In order to consider the suggestions of interested parties in developing and issuing the AD questionnaires, all product characteristics comments must be filed by 5:00 p.m. ET on July 30, 2024, which is 20 calendar days from the signature date of this notice.¹² Any rebuttal comments must be filed by 5:00 p.m. ET on August 9, 2024, which is 10 calendar days from the initial comment deadline. All comments and submissions to Commerce must be filed electronically using ACCESS, as explained above, on the record of each of the LTFV investigations.

Determination of Industry Support for the Petitions

Section 732(b)(1) of the Act requires that a petition be filed on behalf of the domestic industry. Section 732(c)(4)(A) of the Act provides that a petition meets this requirement if the

¹² See 19 CFR 351.303(b)(1).

domestic producers or workers who support the petition account for: (i) at least 25 percent of the total production of the domestic like product; and (ii) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition. Moreover, section 732(c)(4)(D) of the Act provides that, if the petition does not establish support of domestic producers or workers accounting for more than 50 percent of the total production of the domestic like product, Commerce shall: (i) poll the industry or rely on other information in order to determine if there is support for the petition, as required by subparagraph (A); or (ii) determine industry support using a statistically valid sampling method to poll the “industry.”

Section 771(4)(A) of the Act defines the “industry” as the producers as a whole of a domestic like product. Thus, to determine whether a petition has the requisite industry support, the statute directs Commerce to look to producers and workers who produce the domestic like product. The U.S. International Trade Commission (ITC), which is responsible for determining whether “the domestic industry” has been injured, must also determine what constitutes a domestic like product in order to define the industry. While both Commerce and the ITC must apply the same statutory definition regarding the domestic like product,¹³ they do so for different purposes and pursuant to a separate and distinct authority. In addition, Commerce’s determination is subject to limitations of time and information. Although this may result in different definitions of the like product, such differences do not render the decision of either agency contrary to law.¹⁴

¹³ See section 771(10) of the Act.

¹⁴ See *USEC, Inc. v. United States*, 132 F. Supp. 2d 1, 8 (CIT 2001) (citing *Algoma Steel Corp., Ltd. v. United States*, 688 F. Supp. 639, 644 (CIT 1988), *aff’d Algoma Steel Corp., Ltd. v. United States*, 865 F.2d 240 (Fed. Cir. 1989)).

Section 771(10) of the Act defines the domestic like product as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this title.” Thus, the reference point from which the domestic like product analysis begins is “the article subject to an investigation” (*i.e.*, the class or kind of merchandise to be investigated, which normally will be the scope as defined in the petitions).

With regard to the domestic like product, the petitioner does not offer a definition of the domestic like product distinct from the scope of the investigations.¹⁵ Based on our analysis of the information submitted on the record, we have determined that brake drums, as defined in the scope, constitute a single domestic like product, and we have analyzed industry support in terms of that domestic like product.¹⁶

In determining whether the petitioner has standing under section 732(c)(4)(A) of the Act, we considered the industry support data contained in the Petitions with reference to the domestic like product as defined in the “Scope of the Investigations,” in the appendix to this notice. To establish industry support, the petitioner provided its production of the domestic like product in 2023.¹⁷ The petitioner estimated the 2023 production of the domestic like product for the only other known producer of brake drums in the United States.¹⁸ The petitioner compared its production to the estimated total 2023 production of the domestic like product for the entire

¹⁵ See Petitions at Volume I (pages I-9 through I-13 and Exhibits I-2 through I-4 and I-7); *see also* First General Issues Supplement at 4-7 and Exhibits I-SI-5 through I-SI-7); and Third General Issues Supplement at 1-3.

¹⁶ For a discussion of the domestic like product analysis as applied to these cases and information regarding industry support, *see* Checklists, “Certain Brake Drums from the People’s Republic of China and the Republic of Türkiye,” dated concurrently with, and hereby adopted by, this notice (Country-Specific AD Initiation Checklists), at Attachment II, Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People’s Republic of China and the Republic of Türkiye (Attachment II). These checklists are on file electronically via ACCESS.

¹⁷ See Petitions at Volume I (pages I-2 and I-3 and Exhibit I-1); *see also* First General Issues Supplement at 2-3 and Exhibit I-SI-2.

¹⁸ See Petitions at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-3 and Exhibits I-SI-1 and I-SI-2.

domestic industry.¹⁹ We relied on data provided by the petitioner for purposes of measuring industry support.²⁰

Our review of the data provided in the Petitions, the First General Issues Supplement, the Third General Issues Supplement, and other information readily available to Commerce indicates that the petitioner has established industry support for the Petitions.²¹ First, the Petitions established support from domestic producers (or workers) accounting for more than 50 percent of the total production of the domestic like product and, as such, Commerce is not required to take further action in order to evaluate industry support (*e.g.*, polling).²² Second, the domestic producers (or workers) have met the statutory criteria for industry support under section 732(c)(4)(A)(i) of the Act because the domestic producers (or workers) who support the Petitions account for at least 25 percent of the total production of the domestic like product.²³ Finally, the domestic producers (or workers) have met the statutory criteria for industry support under section 732(c)(4)(A)(ii) of the Act because the domestic producers (or workers) who support the Petitions account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the Petitions.²⁴ Accordingly, Commerce determines that the Petitions were filed on behalf of the domestic industry within the meaning of section 732(b)(1) of the Act.²⁵

¹⁹ See Petitions at Volume I (pages I-2 and I-3 and Exhibit I-1); *see also* First General Issues Supplement at 3 and Exhibit I-S1-2.

²⁰ See Petition at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-4 and Exhibits I-S1-1, I-S1-2, and I-S4; and Third General Issues Supplement at 1-3. For further discussion, *see* Attachment II of the Country-Specific AD Initiation Checklists.

²¹ See Attachment II of the Country-Specific AD Initiation Checklists.

²² *Id.*; *see also* section 732(c)(4)(D) of the Act.

²³ See Attachment II of the Country-Specific AD Initiation Checklists.

²⁴ *Id.*

²⁵ *Id.*

Allegations and Evidence of Material Injury and Causation

The petitioner alleges that the U.S. industry producing the domestic like product is being materially injured, or is threatened with material injury, by reason of the imports of the subject merchandise sold at LTFV. In addition, the petitioner argues that subject imports from China and Türkiye individually exceed the negligibility threshold provided for under section 771(24)(A) of the Act.²⁶

The petitioner contends that the industry's injured condition is illustrated by the significant and increasing volume of subject imports; decreased market share; underselling and price depression and/or suppression; lost sales and revenues; decline in capacity utilization, production, and U.S. sales quantity; decline in production-related workers; and decline in operating margins.²⁷ We assessed the allegations and supporting evidence regarding material injury, threat of material injury, causation, as well as negligibility, and we have determined that these allegations are properly supported by adequate evidence, and meet the statutory requirements for initiation.²⁸

Allegations of Sales at LTFV

The following is a description of the allegations of sales at LTFV upon which Commerce based its decision to initiate an LTFV investigation of imports of brake drums from China and Türkiye. The sources of data for the deductions and adjustments relating to U.S. price and normal value (NV) are discussed in greater detail in the Country-Specific AD Initiation Checklists.

²⁶ See Petitions at Volume I (pages I-13 and I-14 and Exhibit I-8).

²⁷ *Id.* at I-13 through I-36 and Exhibits I-7 through I-25; see also First General Issues Supplement at 7 and Exhibits I-S1-8 and I-S1-9.

²⁸ See Country-Specific AD Initiation Checklists at Attachment III, Analysis of Allegations and Evidence of Material Injury and Causation for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People's Republic of China and the Republic of Türkiye.

U.S. Price

For China and Türkiye, the petitioner based export price (EP) on pricing information for brake drums produced in and exported from the respective countries and sold, or offered for sale, in the United States.²⁹ For each country, the petitioner made certain adjustments to U.S. price to calculate a net ex-factory U.S. price, where applicable.³⁰

Normal Value³¹

For Türkiye, the petitioner based NV on a home market price obtained for brake drums produced in and sold, or offered for sale, in Türkiye during the applicable time period.³² The petitioner made certain adjustments to the home market price to calculate a net ex-factory home market price, where applicable.³³

Commerce considers China to be an NME country.³⁴ In accordance with section 771(18)(C)(i) of the Act, any determination that a foreign country is an NME country shall remain in effect until revoked by Commerce. Therefore, we continue to treat China as an NME country for purposes of the initiation of the China LTFV investigation. Accordingly, we base NV on FOPs valued in a surrogate market economy country in accordance with section 773(c) of the Act.

²⁹ See Country-Specific AD Initiation Checklists.

³⁰ *Id.*

³¹ In accordance with section 773(b)(2) of the Act, for the Türkiye investigation, Commerce will request information necessary to calculate the constructed value (CV) and COP to determine whether there are reasonable grounds to believe or suspect that sales of the foreign like product have been made at prices that represent less than the COP of the product.

³² See Türkiye AD Initiation Checklist.

³³ *Id.*

³⁴ See, e.g., *Certain Freight Rail Couplers and Parts Thereof from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances*, 88 FR 15372 (March 13, 2023), and accompanying Preliminary Decision Memorandum at 5, unchanged in *Certain Freight Rail Couplers and Parts Thereof from the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances*, 88 FR 34485 (May 30, 2023).

The petitioner claims that Malaysia is an appropriate surrogate country for China because it is a market economy that is at a level of economic development comparable to that of China and is a significant producer of comparable merchandise.³⁵ The petitioner provided publicly available information from Malaysia to value all FOPs except labor.³⁶ Consistent with Commerce's recent practice in cases involving Malaysia as a surrogate country,³⁷ to value labor, the petitioner provided labor statistics from another surrogate country, Romania.³⁸ Based on the information provided by the petitioner, we believe it is appropriate to use Malaysia as a surrogate country for China to value all FOPs except labor and to value labor using labor statistics from Romania for initiation purposes.

Interested parties will have the opportunity to submit comments regarding surrogate country selection and, pursuant to 19 CFR 351.301(c)(3)(i), will be provided an opportunity to submit publicly available information to value FOPs within 30 days before the scheduled date of the preliminary determination.

Factors of Production

Because information regarding the volume of inputs consumed by Chinese producers/exporters was not reasonably available, the petitioner used its own product-specific consumption rates as a surrogate to value Chinese manufacturers' FOPs.³⁹ Additionally, the

³⁵ See China AD Initiation Checklist.

³⁶ *Id.*

³⁷ See, e.g., *Certain Collated Steel Staples from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; and Final Determination of No Shipments; 2021-2022*, 88 FR 85242 (December 7, 2023), and accompanying Issues and Decision Memorandum (IDM) at Comment 2; and *Light-Walled Rectangular Pipe and Tube from the People's Republic of China: Final Results of Antidumping Duty Administrative Review*, 88 FR 15671 (March 14, 2023), and accompanying IDM at Comment 2.

³⁸ See China AD Initiation Checklist.

³⁹ *Id.*

petitioner calculated factory overhead, selling, general, and administrative expenses, and profit based on the experience of a Malaysian producer of comparable merchandise.⁴⁰

Fair Value Comparisons

Based on the data provided by the petitioner, there is reason to believe that imports of brake drums from China and Türkiye are being, or are likely to be, sold in the United States at LTFV. Based on comparisons of EP to NV in accordance with sections 772 and 773 of the Act, the estimated dumping margins for the countries covered by this initiation are as follows: (1) China – 160.79 percent *ad valorem* and (2) Türkiye – 149.29 percent *ad valorem*.⁴¹

Initiation of LTFV Investigations

Based upon the examination of the Petitions and supplemental questionnaire responses, we find that they meet the requirements of section 732 of the Act. Therefore, we are initiating LTFV investigations to determine whether imports of brake drums from China and Türkiye are being, or are likely to be, sold in the United States at LTFV. In accordance with section 733(b)(1)(A) of the Act and 19 CFR 351.205(b)(1), unless postponed, we will make our preliminary determinations no later than 140 days after the date of these initiations.

Respondent Selection

Türkiye

In the Petition, the petitioner named 19 companies in Türkiye as producers and/or exporters of brake drums.⁴² In the event Commerce determines that the number of companies is large, and it cannot individually examine each company based upon Commerce's resources, where appropriate, Commerce intends to select mandatory respondents based on quantity and

⁴⁰ *Id.*

⁴¹ See Country-Specific AD Initiation Checklists.

⁴² See Petitions at Volume I (page I-7 and Exhibit I-5).

value (Q&V) questionnaires issued to potential respondents. Following standard practice in AD investigations involving market economy countries, Commerce would normally select respondents based on U.S. Customs and Border Protection (CBP) entry data for imports under the appropriate Harmonized Tariff Schedule of the United States (HTSUS) subheadings listed in the scope of the investigations. However, for these investigations, the main HTSUS subheading under which the subject merchandise would enter (8708.30.5020) is a basket category under which non-subject merchandise may also enter. Therefore, we cannot rely on CBP entry data in selecting respondents. Notwithstanding the decision to rely on Q&V questionnaires for respondent selection, due to the number of producers and/or exporters identified in the Petitions, Commerce has determined to limit the number of Q&V questionnaires that it will issue to producers and/or exporters based on CBP data for brake drums from Türkiye during the POI under the appropriate HTSUS subheading listed in the “Scope of the Investigations,” in the appendix. Accordingly, for Türkiye, Commerce will send Q&V questionnaires to the largest producers and/or exporters that are identified in the CBP entry data for which there is complete address information on the record.⁴³

Commerce will post the Q&V questionnaires along with filing instructions on Commerce’s website at <https://www.trade.gov/ec-adcvd-case-announcements>. Exporters/producers of brake drums from Türkiye that do not receive Q&V questionnaires by mail may still submit a response to the Q&V questionnaire and can obtain a copy of the Q&V questionnaire from Commerce’s website noted above. Responses to the Q&V questionnaire must be submitted by the relevant exporters/producers no later than 5:00 p.m. ET on July 24, 2024, which is two weeks from the signature date of this notice. All Q&V responses must be

⁴³ See Memorandum, “Release of U.S. Customs and Border Protection Entry Data,” dated July 8, 2024.

filed electronically via ACCESS. An electronically filed document must be received successfully, in its entirety, by ACCESS no later than 5:00 p.m. ET on the deadline noted above.

Interested parties must submit applications for disclosure under administrative protective order (APO) in accordance with 19 CFR 351.305(b). Instructions for filings such applications may be found on Commerce's website at <https://www.trade.gov/administrative-protective-orders>.

China

In the Petitions, the petitioner named 54 companies in China as producers and/or exporters of brake drums.⁴⁴ Our standard practice for respondent selection in AD investigations involving NME countries is to select respondents based on Q&V questionnaires in cases where Commerce has determined that the number of companies is large, and it cannot individually examine each company based upon its resources. Therefore, considering the number of producers and/or exporters identified in the Petitions, Commerce will solicit Q&V information that can serve as a basis for selecting exporters for individual examination in the event that Commerce determines that the number is large and decides to limit the number of respondents individually examined pursuant to section 777A(c)(2) of the Act. Because there are 54 Chinese producers and/or exporters identified in the Petitions, Commerce has determined that it will issue Q&V questionnaires to the largest producers and/or exporters that are identified in the CBP entry data for which there is complete address information on the record.⁴⁵

Commerce will post the Q&V questionnaires along with filing instructions on Commerce's website at <https://www.trade.gov/ec-adcvd-case-announcements>. Producers/exporters of brake drums from China that do not receive Q&V questionnaires may still submit a response to the Q&V questionnaire and can obtain a copy of the Q&V

⁴⁴ See Petitions at Volume I (page I-7 and Exhibit I-5).

⁴⁵ See Memorandum, "Release of U.S. Customs and Border Protection Entry Data," dated July 8, 2024.

questionnaire from Commerce's website noted above. Responses to the Q&V questionnaire must be submitted by the relevant Chinese producers/exporters no later than 5:00 p.m. ET on July 24, 2024, which is two weeks from the signature date of this notice. All Q&V questionnaire responses must be filed electronically via ACCESS. An electronically filed document must be received successfully, in its entirety, by ACCESS no later than 5:00 p.m. ET on the deadline noted above.

Interested parties must submit applications for disclosure under APO in accordance with 19 CFR 351.305(b). As stated above, instructions for filing such applications may be found on Commerce's website at <https://www.trade.gov/administrative-protective-orders>.

Separate Rates

In order to obtain separate rate status in an NME investigation, exporters and producers must submit a separate rate application. The specific requirements for submitting a separate rate application in an NME investigation are outlined in detail in the application itself, which is available on Commerce's website at <https://access.trade.gov/Resources/nme/nme-sep-rate.html>. The separate rate application will be due 30 days after publication of this initiation notice. Exporters and producers must file a timely separate rate application if they want to be considered for individual examination. Exporters and producers who submit a separate rate application and have been selected as mandatory respondents will be eligible for consideration for separate rate status only if they respond to all parts of Commerce's AD questionnaire as mandatory respondents. Commerce requires that companies from China submit a response both to the Q&V questionnaire and to the separate rate application by the respective deadlines to receive consideration for separate rate status. Companies not filing a timely Q&V questionnaire response will not receive separate rate consideration.

Use of Combination Rates

Commerce will calculate combination rates for certain respondents that are eligible for a separate rate in an NME investigation. The Separate Rates and Combination Rates Bulletin states:

{w}hile continuing the practice of assigning separate rates only to exporters, all separate rates that {Commerce} will now assign in its NME investigation will be specific to those producers that supplied the exporter during the period of investigation. Note, however, that one rate is calculated for the exporter and all of the producers which supplied subject merchandise to it during the period of investigation. This practice applies both to mandatory respondents receiving an individually calculated separate rate as well as the pool of non-investigated firms receiving the {weighted average} of the individually calculated rates. This practice is referred to as the application of “combination rates” because such rates apply to specific combinations of exporters and one or more producers. The cash-deposit rate assigned to an exporter will apply only to merchandise both exported by the firm in question *and* produced by a firm that supplied the exporter during the period of investigation.⁴⁶

Distribution of Copies of the Petitions

In accordance with section 732(b)(3)(A) of the Act and 19 CFR 351.202(f), copies of the public version of the Petitions have been provided to the Governments of China and Türkiye via ACCESS. To the extent practicable, we will attempt to provide a copy of the public version of the Petitions to each exporter named in the Petitions, as provided under 19 CFR 351.203(c)(2).

ITC Notification

Commerce will notify the ITC of our initiation, as required by section 732(d) of the Act.

Preliminary Determinations by the ITC

The ITC will preliminarily determine, within 45 days after the date on which the Petitions were filed, whether there is a reasonable indication that imports of brake drums from China

⁴⁶ See Enforcement and Compliance’s Policy Bulletin No. 05.1, regarding, “Separate-Rates Practice and Application of Combination Rates in Antidumping Investigation Involving NME Countries,” (April 5, 2005), at 6 (emphasis added), available on Commerce’s website at <https://access.trade.gov/Resources/policy/bull05-1.pdf>.

and/or Türkiye are materially injuring, or threatening material injury to, a U.S. industry.⁴⁷ A negative ITC determination for any country will result in the investigation being terminated with respect to that country.⁴⁸ Otherwise, these LTFV investigations will proceed according to statutory and regulatory time limits.

Submission of Factual Information

Factual information is defined in 19 CFR 351.102(b)(21) as: (i) evidence submitted in response to questionnaires; (ii) evidence submitted in support of allegations; (iii) publicly available information to value factors under 19 CFR 351.408(c) or to measure the adequacy of remuneration under 19 CFR 351.511(a)(2); (iv) evidence placed on the record by Commerce; and (v) evidence other than factual information described in (i)-(iv). Section 351.301(b) of Commerce's regulations requires any party, when submitting factual information, to specify under which subsection of 19 CFR 351.102(b)(21) the information is being submitted⁴⁹ and, if the information is submitted to rebut, clarify, or correct factual information already on the record, to provide an explanation identifying the information already on the record that the factual information seeks to rebut, clarify, or correct.⁵⁰ Time limits for the submission of factual information are addressed in 19 CFR 351.301, which provides specific time limits based on the type of factual information being submitted. Interested parties should review the regulations prior to submitting factual information in this investigation.

Particular Market Situation Allegation

Section 773(e) of the Act addresses the concept of particular market situation (PMS) for purposes of CV, stating that "if a particular market situation exists such that the cost of materials

⁴⁷ See section 733(a) of the Act.

⁴⁸ *Id.*

⁴⁹ See 19 CFR 351.301(b).

⁵⁰ See 19 CFR 351.301(b)(2).

and fabrication or other processing of any kind does not accurately reflect the cost of production in the ordinary course of trade, the administering authority may use another calculation methodology under this subtitle or any other calculation methodology.” When an interested party submits a PMS allegation pursuant to section 773(e) of the Act (*i.e.*, a cost-based PMS allegation), the submission must be filed in accordance with the requirements of 19 CFR 351.416(b), and Commerce will respond to such a submission consistent with 19 CFR 351.301(c)(2)(v). If Commerce finds that a cost-based PMS exists under section 773(e) of the Act, then it will modify its dumping calculations appropriately.

Neither section 773(e) of the Act, nor 19 CFR 351.301(c)(2)(v), sets a deadline for the submission of cost-based PMS allegations and supporting factual information. However, in order to administer section 773(e) of the Act, Commerce must receive PMS allegations and supporting factual information with enough time to consider the submission. Thus, should an interested party wish to submit a cost-based PMS allegation and supporting new factual information pursuant to section 773(e) of the Act, it must do so no later than 20 days after submission of a respondent’s initial section D questionnaire response.

We note that a PMS allegation filed pursuant to sections 773(a)(1)(B)(ii)(III) or 773(a)(1)(C)(iii) of the Act (*i.e.*, a sales-based PMS allegation) must be filed within 10 days of submission of a respondent’s initial section B questionnaire response, in accordance with 19 CFR 351.301(c)(2)(i) and 19 CFR 351.404(c)(2).

Extensions of Time Limits

Parties may request an extension of time limits before the expiration of a time limit established under 19 CFR 351.301, or as otherwise specified by Commerce. In general, an extension request will be considered untimely if it is filed after the expiration of the time limit

established under 19 CFR 351.301, or as otherwise specified by Commerce.⁵¹ For submissions that are due from multiple parties simultaneously, an extension request will be considered untimely if it is filed after 10:00 a.m. ET on the due date. Under certain circumstances, Commerce may elect to specify a different time limit by which extension requests will be considered untimely for submissions which are due from multiple parties simultaneously. In such a case, we will inform parties in a letter or memorandum of the deadline (including a specified time) by which extension requests must be filed to be considered timely. An extension request must be made in a separate, standalone submission; under limited circumstances we will grant untimely filed requests for the extension of time limits, where we determine, based on 19 CFR 351.302, that extraordinary circumstances exist. Parties should review Commerce's regulations concerning the extension of time limits and the *Time Limits Final Rule* prior to submitting factual information in these investigations.⁵²

Certification Requirements

Any party submitting factual information in an AD or CVD proceeding must certify to the accuracy and completeness of that information.⁵³ Parties must use the certification formats provided in 19 CFR 351.303(g).⁵⁴ Commerce intends to reject factual submissions if the submitting party does not comply with the applicable certification requirements.

Notification to Interested Parties

Interested parties must submit applications for disclosure under APO in accordance with 19 CFR 351.305. Parties wishing to participate in this investigation should ensure that they meet

⁵¹ See 19 CFR 351.301; see also *Extension of Time Limits; Final Rule*, 78 FR 57790 (September 20, 2013) (*Time Limits Final Rule*), available at <https://www.gpo.gov/fdsys/pkg/FR-2013-09-20/html/2013-22853.htm>.

⁵² See 19 CFR 351.302; see also, e.g., *Time Limits Final Rule*.

⁵³ See section 782(b) of the Act.

⁵⁴ See *Certification of Factual Information to Import Administration During Antidumping and Countervailing Duty Proceedings*, 78 FR 42678 (July 17, 2013) (*Final Rule*). Additional information regarding the *Final Rule* is available at <https://access.trade.gov/Resources/filing/index.html>.

the requirements of 19 CFR 351.103(d) (*e.g.*, by filing the required letter of appearance). Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).⁵⁵

This notice is issued and published pursuant to sections 732(c)(2) and 777(i) of the Act, and 19 CFR 351.203(c).

Dated: July 10, 2024.

/S/ Abdelali Elouaradia

Abdelali Elouaradia,
Deputy Assistant Secretary
for Enforcement and Compliance

⁵⁵ See *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069 (September 29, 2023).

Appendix

Scope of the Investigations

The merchandise covered by these investigations is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. Specifically excluded is merchandise covered by the scope of the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China. *See Certain Chassis and Subassemblies Thereof from the People's Republic of China: Antidumping Duty Order*, 86 FR 36093 (July 8, 2021) and *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 FR 24844 (May 10, 2021).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight.

The merchandise covered by these investigations is classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheading 8708.30.5020. The merchandise covered by these investigations may be classifiable under HTSUS subheading 8708.30.5090 when entered as part of an assembly. Subject merchandise may also enter under HTSUS subheading 8716.90.5060. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise covered by these investigations is dispositive.

BILLING CODE: 3510-DS-P

DEPARTMENT OF COMMERCE

International Trade Administration

[C-570-175, C-489-854]

Certain Brake Drums from the People's Republic of China and the Republic of Türkiye:
Initiation of Countervailing Duty Investigations

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

DATES: Applicable July 10, 2024.

FOR FURTHER INFORMATION CONTACT: Nathan James (the People's Republic of China
(China)), and Kyle Clahane (Republic of Türkiye (Türkiye)), AD/CVD Operations, Offices V
and III, Enforcement and Compliance, International Trade Administration, U.S. Department of
Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-
5305, and (202) 482-5449, respectively.

SUPPLEMENTARY INFORMATION:

The Petitions

On June 20, 2024, the U.S. Department of Commerce (Commerce) received
countervailing duty (CVD) petitions concerning imports of certain brake drums (brake drums),
from China and Türkiye filed in proper form on behalf of Webb Wheel Products, Inc. (the
petitioner), a U.S. producer of brake drums.¹ The CVD petitions were accompanied by
antidumping duty (AD) petitions concerning imports of brake drums from China and Türkiye.²

¹ See Petitioner's Letters, "Antidumping and Countervailing Duty Petitions on Behalf of Webb Wheel Products
Inc.," dated June 20, 2024 (Petitions).

² See, generally, Petitions.

Between June 24 and July 5, 2024, Commerce requested supplemental information pertaining to certain aspects of the Petitions.³ Between June 28 and July 8, 2024, the petitioner filed timely responses to these requests for additional information.⁴

In accordance with section 702(b)(1) of the Tariff Act of 1930, as amended (the Act), the petitioner alleges that the Government of China (GOC) and the Government of Türkiye (GOT) (collectively, Governments) are providing countervailable subsidies, within the meaning of sections 701 and 771(5) of the Act, to producers of brake drums from China and Türkiye, and that such imports are materially injuring, or threatening material injury to, the domestic industry producing brake drums in the United States. Consistent with section 702(b)(1) of the Act and 19 CFR 351.202(b), for those alleged programs on which we are initiating CVD investigations, the Petitions were accompanied by information reasonably available to the petitioner supporting its allegations.

Commerce finds that the petitioner filed the Petitions on behalf of the domestic industry because the petitioner is an interested party as defined in section 771(9)(C) of the Act.

Commerce also finds that the petitioner demonstrated sufficient industry support with respect to the initiation of the requested CVD investigations.⁵

³ See Commerce's Letters, "Supplemental Questionnaire," dated June 24, 2024 (General Issues Questionnaire); "Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from the Republic of Türkiye: Supplemental Questions," dated June 24, 2024; "Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from China: Supplemental Questions," dated June 25, 2024; and "Supplemental Questions," dated July 5, 2024; *see also* Memoranda, "Phone Call with Counsel to the Petitioner," dated July 2, 2024 (July 2, 2024, Memorandum).

⁴ See Petitioner's Letters, "Supplemental Questionnaire Response, Volume I," dated June 28, 2024 (General Issues Supplement); "Certain Brake Drums from Türkiye: Supplemental Questionnaire Response, Volume V," dated July 1, 2024; "Certain Brake Drums from the People's Republic of China: Supplemental Questionnaire Response," dated July 2, 2024; "Supplemental Questionnaire Response, Volume I," dated July 5, 2024 (Second General Issues Supplement); and "Supplemental Questionnaire Response, Volume I," dated July 8, 2024 (Industry Support Supplement).

⁵ See section on "Determination of Industry Support for the Petitions," *infra*.

Periods of Investigation

Because the Petitions were filed on June 20, 2024, the periods of investigation for the China and Türkiye CVD investigations are January 1, 2023, through December 31, 2023.⁶

Scope of the Investigations

The products covered by these investigations are brake drums from China and Türkiye. For a full description of the scope of these investigations, *see* the appendix to this notice.

Comments on the Scope of the Investigations

Between June 24 and July 2, 2024, Commerce requested information and clarification from the petitioner regarding the proposed scope to ensure that the scope language in the Petitions is an accurate reflection of the products for which the domestic industry is seeking relief.⁷ Between June 28 and July 5, 2024, the petitioner provided clarifications and revised the scope.⁸ The description of merchandise covered by these investigations, as shown in the appendix to this notice, reflects these clarifications.

As discussed in the *Preamble* to Commerce's regulations, we are setting aside a period for interested parties to raise issues regarding product coverage (*i.e.*, scope).⁹ Commerce will consider all comments received from interested parties and, if necessary, will consult with interested parties prior to the issuance of the preliminary determinations. If scope comments include factual information, all such factual information should be limited to public information.¹⁰ To facilitate preparation of its questionnaires, Commerce requests that scope comments be submitted by 5:00 p.m. Eastern Time (ET) on July 30, 2024, which is 20 calendar

⁶ See 19 CFR 351.204(b)(2).

⁷ See General Issues Questionnaire; *see also* July 2 Memorandum.

⁸ See First General Issues Supplement at 1-2 and Exhibit I-S1-3; and Second General Issues Supplement at 1-2.

⁹ See *Antidumping Duties; Countervailing Duties; Final Rule*, 62 FR 27296, 27323 (May 19, 1997) (*Preamble*).

¹⁰ See 19 CFR 351.102(b)(21) (defining "factual information").

days from the signature date of this notice.¹¹ Any rebuttal comments, which may include factual information, must be filed by 5:00 p.m. ET on August 9, 2024, which is 10 calendar days from the initial comment deadline.

Commerce requests that any factual information that parties consider relevant to the scope of the investigations be submitted during that time period. However, if a party subsequently finds that additional factual information pertaining to the scope of the investigations may be relevant, the party must contact Commerce and request permission to submit the additional information. All scope comments must be filed simultaneously on the records of the concurrent AD and CVD investigations.

Filing Requirements

All submissions to Commerce must be filed electronically via Enforcement and Compliance's Antidumping Duty and Countervailing Duty Centralized Electronic Service System (ACCESS), unless an exception applies.¹² An electronically filed document must be received successfully in its entirety by the time and date it is due.

Consultations

Pursuant to sections 702(b)(4)(A)(i) and (ii) of the Act, Commerce notified the Governments of the receipt of the Petitions and provided an opportunity for consultations with

¹¹ See 19 CFR 351.303(b)(1).

¹² See *Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures*, 76 FR 39263 (July 6, 2011); see also *Enforcement and Compliance; Change of Electronic Filing System Name*, 79 FR 69046 (November 20, 2014), for details of Commerce's electronic filing requirements, effective August 5, 2011. Information on using ACCESS can be found at <https://access.trade.gov/help.aspx> and a handbook can be found at https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf.

respect to the Petitions.¹³ Commerce held consultations with the GOT on July 9, 2024.¹⁴ The GOC filed consultation remarks in lieu of consultations on July 8, 2024.¹⁵

Determination of Industry Support for the Petitions

Section 702(b)(1) of the Act requires that a petition be filed on behalf of the domestic industry. Section 702(c)(4)(A) of the Act provides that a petition meets this requirement if the domestic producers or workers who support the petition account for: (i) at least 25 percent of the total production of the domestic like product; and (ii) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition. Moreover, section 702(c)(4)(D) of the Act provides that, if the petition does not establish support of domestic producers or workers accounting for more than 50 percent of the total production of the domestic like product, Commerce shall: (i) poll the industry or rely on other information in order to determine if there is support for the petition, as required by subparagraph (A); or (ii) determine industry support using a statistically valid sampling method to poll the “industry.”

Section 771(4)(A) of the Act defines the “industry” as the producers as a whole of a domestic like product. Thus, to determine whether a petition has the requisite industry support, the statute directs Commerce to look to producers and workers who produce the domestic like product. The U.S. International Trade Commission (ITC), which is responsible for determining whether “the domestic industry” has been injured, must also determine what constitutes a domestic like product in order to define the industry. While both Commerce and the ITC apply

¹³ See Commerce’s Letters, “Petition for the Imposition of Countervailing Duties on Imports of Certain Brake Drums from China: Invitation for Consultations,” dated June 25, 2024; and “Countervailing Duty Petition on Certain Brake Drums from the Republic of Türkiye,” dated June 20, 2024.

¹⁴ See Memorandum, “Consultation with Officials from Government of Türkiye,” dated July 9, 2024.

¹⁵ See GOC’s Letter, “Comments on Countervailing Duty Petition on Certain Brake Drums from the People’s Republic of China (C-570-175),” dated July 8, 2024.

the same statutory definition regarding the domestic like product,¹⁶ they do so for different purposes and pursuant to a separate and distinct authority. In addition, Commerce's determination is subject to limitations of time and information. Although this may result in different definitions of the like product, such differences do not render the decision of either agency contrary to law.¹⁷

Section 771(10) of the Act defines the domestic like product as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this title." Thus, the reference point from which the domestic like product analysis begins is "the article subject to an investigation" (*i.e.*, the class or kind of merchandise to be investigated, which normally will be the scope as defined in the petition).

With regard to the domestic like product, the petitioner does not offer a definition of the domestic like product distinct from the scope of the investigations.¹⁸ Based on our analysis of the information submitted on the record, we have determined that brake drums, as defined in the scope, constitute a single domestic like product, and we have analyzed industry support in terms of that domestic like product.¹⁹

In determining whether the petitioner has standing under section 702(c)(4)(A) of the Act, we considered the industry support data contained in the Petitions with reference to the domestic

¹⁶ See section 771(10) of the Act.

¹⁷ See *USEC, Inc. v. United States*, 132 F. Supp. 2d 1, 8 (CIT 2001) (citing *Algoma Steel Corp., Ltd. v. United States*, 688 F. Supp. 639, 644 (CIT 1988), *aff'd Algoma Steel Corp., Ltd. v. United States*, 865 F.2d 240 (Fed. Cir. 1989)).

¹⁸ See Petitions at Volume I (pages I-9 through I-13 and Exhibits I-2 through I-4 and I-7); see also First General Issues Supplement at 4-7 and Exhibits I-SI-5 through I-SI-7); and Industry Support Supplement at 1.

¹⁹ For a discussion of the domestic like product analysis as applied to these cases and information regarding industry support, see Checklists, "Countervailing Duty Investigation Initiation Checklists: Certain Brake Drums from the People's Republic of China and the Republic of Türkiye," dated concurrently with, and hereby adopted by, this notice (Country-Specific CVD Initiation Checklists), at Attachment II, Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People's Republic of China and the Republic of Türkiye (Attachment II). These checklists are on file electronically via ACCESS.

like product as defined in the “Scope of the Investigations,” in the appendix to this notice. The petitioner estimated the 2023 production of the domestic like product for the only other known producer of brake drums in the United States.²⁰ The petitioner compared its production to the estimated total 2023 production of the domestic like product for the entire domestic industry.²¹ We relied on data provided by the petitioner for purposes of measuring industry support.²²

Our review of the data provided in the Petitions, the First General Issues Supplement, the Industry Support Supplement, and other information readily available to Commerce indicates that the petitioner has established industry support for the Petitions.²³ First, the Petitions established support from domestic producers (or workers) accounting for more than 50 percent of the total production of the domestic like product and, as such, Commerce is not required to take further action to evaluate industry support (*e.g.*, polling).²⁴ Second, the domestic producers (or workers) have met the statutory criteria for industry support under section 702(c)(4)(A)(i) of the Act because the domestic producers (or workers) who support the Petitions account for at least 25 percent of the total production of the domestic like product.²⁵ Finally, the domestic producers (or workers) have met the statutory criteria for industry support under section 702(c)(4)(A)(ii) of the Act because the domestic producers (or workers) who support the Petitions account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the Petitions.²⁶

²⁰ See Petitions at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-3 and Exhibits I-S1-1 and I-S1-2.

²¹ See Petitions at Volume I (pages I-2 and I-3 and Exhibit I-1); *see also* First General Issues Supplement at 3 and Exhibit I-S1-2.

²² See Petition at Volume I (pages I-2 and I-3 and Exhibits I-1 and I-7); *see also* First General Issues Supplement at 2-4 and Exhibits I-S1-1, I-S1-2, and I-S4; and Industry Support Supplement at 1-3. For further discussion, *see* Attachment II of the Country-Specific CVD Initiation Checklists.

²³ See Attachment II of the Country-Specific CVD Initiation Checklists.

²⁴ *Id.*; *see also* section 702(c)(4)(D) of the Act.

²⁵ See Attachment II of the Country-Specific CVD Initiation Checklists.

²⁶ *Id.*

Accordingly, Commerce determines that the Petitions were filed on behalf of the domestic industry within the meaning of section 702(b)(1) of the Act.²⁷

Injury Test

Because China and Türkiye are “Subsidies Agreement Countries” within the meaning of section 701(b) of the Act, section 701(a)(2) of the Act applies to these investigations.

Accordingly, the ITC must determine whether imports of the subject merchandise from China and/or Türkiye materially injure, or threaten material injury to, a U.S. industry.

Allegations and Evidence of Material Injury and Causation

The petitioner alleges that imports of the subject merchandise are benefiting from countervailable subsidies and that such imports are causing, or threaten to cause, material injury to the U.S. industry producing the domestic like product. In addition, the petitioner alleges that subject imports from China and Türkiye individually exceed the negligibility threshold provided for under section 771(24)(A) of the Act.²⁸

The petitioner contends that the industry’s injured condition is illustrated by the significant and increasing volume of subject imports; decreased market share; underselling and price depression and/or suppression; lost sales and revenues; decline in capacity utilization, production, and U.S. sales quantity; decline in production-related workers; and decline in operating margins.²⁹ We assessed the allegations and supporting evidence regarding material injury, threat of material injury, causation, cumulation, as well as negligibility, and we have

²⁷ *Id.*

²⁸ See Petitions at Volume I (pages I-13 and I-14 and Exhibit I-8).

²⁹ *Id.* at I-13 through I-36 and Exhibits I-7 through I-25; see also First General Issues Supplement at 7 and Exhibits I-S1-8 and I-S1-9.

determined that these allegations are properly supported by adequate evidence and meet the statutory requirements for initiation.³⁰

Initiation of CVD Investigations

Based upon our examination of the Petitions and supplemental responses, we find that they meet the requirements of section 702 of the Act. Therefore, we are initiating CVD investigations to determine whether imports of brake drums from China and Türkiye benefit from countervailable subsidies conferred by the GOC and the GOT, respectively. In accordance with section 703(b)(1) of the Act and 19 CFR 351.205(b)(1), unless postponed, we will make our preliminary determinations no later than 65 days after the date of these initiations.

China

Based on our review of the Petitions, we find that there is sufficient information to initiate a CVD investigation on 17 of the 18 programs alleged by the petitioner. For a full discussion of the basis of our initiation decision for each program, *see* the China CVD Initiation Checklist. A public version of the initiation checklist for this investigation is available on ACCESS.

Türkiye

Based on our review of the Petitions, we find that there is sufficient information to initiate a CVD investigation on 44 of the 47 of the programs alleged by the petitioner. For a full discussion of the basis of our initiation decision for each program, *see* the Türkiye CVD Initiation Checklist. A public version of the initiation checklist for this investigation is available on ACCESS.

³⁰ *See* Country-Specific CVD Initiation Checklists at Attachment III, Analysis of Allegations and Evidence of Material Injury and Causation for the Antidumping and Countervailing Duty Petitions Covering Certain Brake Drums from the People's Republic of China and the Republic of Türkiye.

Respondent Selection

In the Petitions, the petitioner identified 54 companies in China, and 19 companies in Türkiye, as producers or exporters of brake drums.³¹ Commerce intends to follow its standard practice in CVD investigations and calculate company-specific subsidy rates in these investigations.

In the event that Commerce determines that the number of companies is large and it cannot individually examine each company based on Commerce's resources, Commerce normally selects mandatory respondents in CVD investigations using U.S. Customs and Border Protection (CBP) entry data for U.S. imports under the appropriate Harmonized Tariff Schedule of the United States (HTSUS) subheading(s) listed in the "Scope of the Investigations" in the appendix. However, for these investigations, the main HTSUS subheading under which the subject merchandise would enter (8708.30.5020) is a basket category under which non-subject merchandise may also enter. Therefore, we cannot rely on CBP entry data in selecting respondents. Notwithstanding the decision to rely on Q&V questionnaires for respondent selection, due to the number of producers and/or exporters identified in the Petitions, Commerce has determined to limit the number of Q&V questionnaires that it will issue to producers and/or exporters based on CBP data for brake drums from China and Türkiye during the POI under the appropriate HTSUS subheading listed in the "Scope of the Investigations," in the appendix. Accordingly, for China and Türkiye, Commerce will send Q&V questionnaires to the largest producers and/or exporters that are identified in the CBP entry data for which there is complete address information on the record.

³¹ See Petitions at Volume I (Exhibit I-5).

Commerce will also post the Q&V questionnaires along with filing instructions on Commerce's website at <https://www.trade.gov/ec-adcvd-case-announcements>.

Exporters/producers of brake drums from China and Türkiye that do not receive Q&V questionnaires may still submit a response to the Q&V questionnaire and can obtain a copy of the Q&V questionnaire from Commerce's website. Responses to the Q&V questionnaire must be submitted by the relevant producers/exporters no later than 5:00 p.m. on July 24, 2024, which is two weeks from the signature date of this notice. An electronically filed document must be received successfully, in its entirety, by ACCESS no later than 5:00 p.m. ET on the deadline noted above. Commerce intends to finalize its decision regarding respondent selection within 20 days of publication of this notice.

Distribution of Copies of the Petitions

In accordance with section 702(b)(4)(A) of the Act and 19 CFR 351.202(f), a copy of the public version of the Petitions has been provided to the GOC and GOT via ACCESS. To the extent practicable, we will attempt to provide a copy of the public version of the Petitions to each exporter named in the Petitions, as provided under 19 CFR 351.203(c)(2).

ITC Notification

Commerce will notify the ITC of its initiation, as required by section 702(d) of the Act.

Preliminary Determinations by the ITC

The ITC will preliminarily determine, within 45 days after the date on which the Petitions were filed, whether there is a reasonable indication that imports of brake drums from China and/or Türkiye are materially injuring, or threatening material injury to, a U.S. industry.³² A negative ITC determination for any country will result in the investigation being terminated with

³² See section 703(a)(1) of the Act.

respect to that country.³³ Otherwise, these CVD investigations will proceed according to statutory and regulatory time limits.

Submission of Factual Information

Factual information is defined in 19 CFR 351.102(b)(21) as: (i) evidence submitted in response to questionnaires; (ii) evidence submitted in support of allegations; (iii) publicly available information to value factors of production under 19 CFR 351.408(c) or to measure the adequacy of remuneration under 19 CFR 351.511(a)(2); (iv) evidence placed on the record by Commerce; and (v) evidence other than factual information described in (i)-(iv). Section 351.301(b) of Commerce's regulations requires any party, when submitting factual information, to specify under which subsection of 19 CFR 351.102(b)(21) the information is being submitted³⁴ and, if the information is submitted to rebut, clarify, or correct factual information already on the record, to provide an explanation identifying the information already on the record that the factual information seeks to rebut, clarify, or correct.³⁵ Time limits for the submission of factual information are addressed in 19 CFR 351.301, which provides specific time limits based on the type of factual information being submitted. Interested parties should review the regulations prior to submitting factual information in these investigations.

Extensions of Time Limits

Parties may request an extension of time limits before the expiration of a time limit established under 19 CFR 351.301, or as otherwise specified by Commerce. In general, an extension request will be considered untimely if it is filed after the expiration of the time limit established under 19 CFR 351.301, or as otherwise specified by Commerce.³⁶ For submissions

³³ *Id.*

³⁴ *See* 19 CFR 351.301(b).

³⁵ *See* 19 CFR 351.301(b)(2).

³⁶ *See* 19 CFR 351.302.

that are due from multiple parties simultaneously, an extension request will be considered untimely if it is filed after 10:00 a.m. ET on the due date. Under certain circumstances, Commerce may elect to specify a different time limit by which extension requests will be considered untimely for submissions which are due from multiple parties simultaneously. In such a case, we will inform parties in a letter or memorandum of the deadline (including a specified time) by which extension requests must be filed to be considered timely. An extension request must be made in a separate, standalone submission; under limited circumstances we will grant untimely filed requests for the extension of time limits, where we determine, based on 19 CFR 351.302, that extraordinary circumstances exist. Parties should review Commerce's regulations concerning the extension of time limits and the *Time Limits Final Rule* prior to submitting factual information in these investigations.³⁷

Certification Requirements

Any party submitting factual information in an AD or CVD proceeding must certify to the accuracy and completeness of that information.³⁸ Parties must use the certification formats provided in 19 CFR 351.303(g).³⁹ Commerce intends to reject factual submissions if the submitting party does not comply with the applicable certification requirements.

Notification to Interested Parties

Interested parties must submit applications for disclosure under APO in accordance with 19 CFR 351.305. Parties wishing to participate in these investigations should ensure that they meet the requirements of 19 CFR 351.103(d) (e.g., by filing the required letters of appearance).

³⁷ See 19 CFR 351.301; see also *Extension of Time Limits; Final Rule*, 78 FR 57790 (September 20, 2013) (*Time Limits Final Rule*), available at <https://www.gpo.gov/fdsys/pkg/FR-2013-09-20/html/2013-22853.htm>.

³⁸ See section 782(b) of the Act.

³⁹ See *Certification of Factual Information to Import Administration During Antidumping and Countervailing Duty Proceedings*, 78 FR 42678 (July 17, 2013) (*Final Rule*); see also frequently asked questions regarding the *Final Rule*, available at https://enforcement.trade.gov/tlei/notices/factual_info_final_rule_FAQ_07172013.pdf.

Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).⁴⁰

This notice is issued and published pursuant to sections 702 and 777(i) of the Act, and 19 CFR 351.203(c).

Dated: July 10, 2024.

/s/ Abdelali Elouaradia

Abdelali Elouaradia,
Deputy Assistant Secretary
for Enforcement and Compliance

⁴⁰ See *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069 (September 29, 2023).

Appendix

Scope of the Investigations

The merchandise covered by these investigations is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. Specifically excluded is merchandise covered by the scope of the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China. *See Certain Chassis and Subassemblies Thereof from the People's Republic of China: Antidumping Duty Order*, 86 FR 36093 (July 8, 2021) and *Certain Chassis and Subassemblies Thereof from the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 FR 24844 (May 10, 2021).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight.

The merchandise covered by these investigations is classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheading 8708.30.5020. The merchandise covered by these investigations may be classifiable under HTSUS subheading 8708.30.5090 when entered as part of an assembly. Subject merchandise may also enter under HTSUS subheading 8716.90.5060. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise covered by these investigations is dispositive.

Barcode: 4594512-01 A-489-853-INV



UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176 DECEMBER 14, 2019

EO 14176



INTERNATIONAL
TRADE
ADMINISTRATION

Filed By: Eric Hawkins, Filed Date: 7/11/24 1:17 PM, Submission Status: Approved

5070 sayılı kanun gereğince güvenli elektronik imza ile imzalanmıştır. ID:8AE26DC962394C8AE26D. Bu kod ile <http://evrak.kb.org.tr/> adresinden doğrulayabilirsiniz.

Barcode:4594512-01 A-489-853 INV - Investigation -

[illegible]

E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0
14	26	26	14	16	16	1F	18	20	26	1C

[illegible][illegible][illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	5
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	---

[illegible][illegible]

Barcode:4594512-01 A-489-853 INV - Investigation -

E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0
14	26	26	14	16	18	1F	18	20	26	10	C

E0 E0E0E0E0 E0E0E0E0E0 E0E0E0E0E0E0E0E0E0E0E0
252F83B31 8A328B491 19A413136B93203B5A3A

[illegible][illegible][illegible][illegible]

94853
1000000

94856
1000000

E0E0E8E0E0E0
31H24B824005

Eq. (1)

EO EO
0905

E0E0
0A05

Ε0Ε0
ΩΕΩΕ

E0	E0
17	65

0000

0905

94856
104046

948530
1000000

[illegible]

50	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

E0E0E0E0	E0E0E0E0E0E0
99363744	992915432088

9	5
12H	04B

E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	E0	
18	18	24	26	10	9	10	6	14	26	18	21	19	25	18	24	28	10	6	18

[illegible]

00000000 00 0000 0000000000000000 0000000000000000
00000000 00 0000 0000000000000000 0000000000000000

[illegible]

E0E0E0	E0E0E0	E0E0E0	E0E0
000000	302000	302000	3200

[illegible]

```

00000000 0000 0000 00000000 0000 00000000 0000 0000000000000000
429029101 3098 48532 830389C44 88834 8028398824101

```

```

E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0 E0
00 5 42 40 80 80 32 04 22 80 30 30 30 24 20 40 20 80 20 40 80 01

```

E0	E0	E0	E0E0E0E0E0E0E0E0
21	98	15	32952E393EC39

E0	E0E0	E0	E0E0E0	E0E0E0	E0E0E0E0
20	2E2E	32	2E3E3E	2E3E3E	3E2E4E4E

```
EE0E0E0E8E0 E0 E0EE0E0E0E0E0  
02242F39E0 2B 329A0B0C3E01
```

E0	E0	E0	E0E0E0E0E0E0E0E0
21	98	15	92952E9993C99

E0	E0E0	E0	E0E0E0	E0E0E0E0E0E0E0E0
20	2E2E	32	2E3E3E	2E3E3E3E3E3E3E3E

[illegible][illegible]



UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

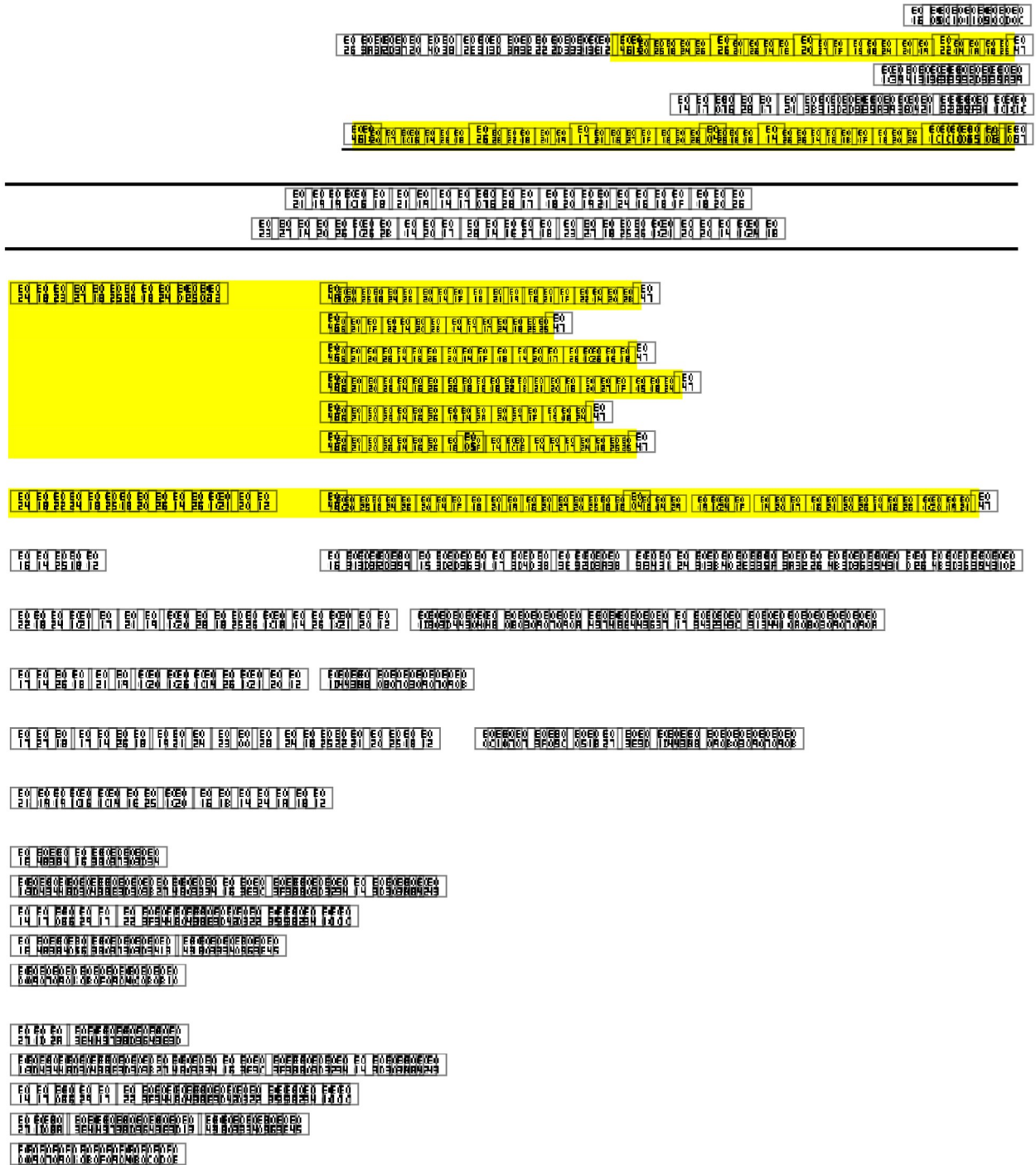
EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00

EO 14176 DECLASS AUTHORITY
16 SEP 2010 10:00:00



INTERNATIONAL
TRADE
ADMINISTRATION

5070 sayılı kanun gereğince güvenli elektronik imza ile imzalanmıştır. ID:8AE26DC962394C8AE26D. Bu kod ile <http://evrak.kib.org.tr/> adresinden doğrulayabilirsiniz.



E	DE	DE	DE	DE	0
1	0	0	0	0	0

[illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible]

E E E E E
I I I I I

[illegible][illegible]

14-00000 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 10

