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Proprietary Document
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MEMORANDUM TO: The File

FROM: Kabir Archuletta ^{KJA}
Program Manager, Office V
Enforcement & Compliance

RE: Certain Hardwood Plywood Products from the People’s Republic of
China: Business Proprietary Memorandum for the Final Results

This memorandum identifies the business proprietary information omitted from the Issues and Decision Memorandum for these final results of review.¹

Note 1: The petitioner² provided [], but did not provide any corroborating data supporting the claims made in the [].³ In addition, a discussion regarding the [

[].⁴ This statement would appear to support Chengen’s yield conversion rates and indicates that, for some Chinese producers, the yield loss is even less than Chengen’s reported loss.

Note 2: Because Chengen’s reported factors of production (FOPs) are based on actual veneer consumption levels, the amount of veneers remaining in inventory should not have an impact on the accuracy of the reported FOPs. In addition, although Chengen calculated a period of investigation (POI)-wide log-to-veneer conversion rate, the record also contains monthly data that demonstrate [], despite fluctuations in [] levels.⁵ For example, this table of Chengen’s monthly core veneer conversion rates details the variation in Chengen’s conversion rates during the POI:

¹ See Memorandum, “Issues and Decision Memorandum for the Final Results of the Antidumping Duty Administrative Review of Certain Hardwood Plywood Products from the People’s Republic of China; 2017-2018,” dated November 23, 2020 (Issues and Decision Memorandum).

² The petitioner is the Coalition for Fair Trade in Hardwood Plywood.

³ See Petitioner’s Letter, “Placing Information from the Investigation on the Record of this Administrative Review,” dated September 24, 2019, (Petitioner’s Record Submission) at Exhibit 2.3 (Petitioner’s Pre-prelim SV Comments), at Exhibit 4.

⁴ *Id.*

⁵ See Petitioner’s Record Submission at Exhibit 3.2 (LTFV Verification Report) at Verification Exhibit 36.



[

].⁶
Accordingly, we do not find that any [] between Chengen’s veneer production and its plywood production should impact the accuracy of its reported FOPs. Moreover, given that the period of review for this administrative review is 18 months, the impact of any fluctuation in conversions rates would be mitigated over the extended period.

⁶ *Id.*