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MEMORANDUM TO: The File

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SUBJECT: Administrative Review of Certain Hardwood Plywood Products
 from the People's Republic of China: Final Analysis
 Memorandum for Linyi Chengen Import and Export Co., Ltd.

I. FINAL RESULTS MARGIN STATISTICS

Total U.S. Quantity Sold:	[] cubic meters (M3)
Total Value U.S. Sales:	[\$[] U.S. dollars (USD)
Total Amount of Dumping:	[\$[] USD
Weighted Average Margin:	14.95 percent

II. BACKGROUND

The Department of Commerce (Commerce) is conducting an administrative review of the antidumping duty order on certain hardwood plywood products from the People's Republic of China in accordance with section 751(a) of the Tariff Act of 1930, as amended (the Act).¹ This review covers one producer/exporter of subject merchandise, Linyi Chengen Import and Export Co., Ltd. (Chengen). The period of review (POR) is June 23, 2017, through December 31, 2018.²

In the final results margin calculation, Commerce continued to use Chengen's most recently submitted U.S. sales database and factors of production database.

¹ See *Initiation of Antidumping and Countervailing Duty Administrative Reviews*, 84 FR 12200 (April 1, 2019) (*Initiation Notice*); see also *Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order*, 83 FR 504 (January 4, 2018) (*Order*).

² See *Initiation Notice*, 84 FR at 12200.



We used the following databases in the margin calculation:

U.S. Sales Database chengenus03 (barcode 3912885-04)
 FOP Database: chengenfop02 (barcode 3917340-02)
 Exchange Rates: Malaysia

See Attachment 1 for SAS Margin Program, Log, and Results and Attachment 2 for Common Macros and Exchange Rates.

III. CHANGES SINCE THE *PRELIMINARY RESULTS*

We received comments from interested parties on the *Preliminary Results*.³ Based on a review of the record and comments received from interested parties, Commerce made changes to the *Preliminary Results*. First, we adjusted the calculation of the surrogate financial ratios. Second, we revised the surrogate value for formaldehyde, and finally, we changed the surrogate value for labor. For a discussion of the issues raised by interested parties in this proceeding and the changes noted above, see Issues and Decision Memorandum.⁴ See also the Final SV Memo.⁵

IV. RESULTS OF DIFFERENTIAL PRICING ANALYSIS

In order to determine whether Chengen's sales of subject merchandise were made at less than normal value (NV), Commerce compared the export price EP to the NV by using a differential pricing analysis of Chengen's U.S. sales in the *Preliminary Results* of this review.⁶ The results for the differential pricing analysis for the final results are as follows:

Value of Passing Sales	Value of All Sales	U.S. Sales Passing the Cohen's <i>d</i> Test by Value
\$[]	\$[]	82.10%

The weighted-average dumping margins calculated using the three methodologies are shown below:

³ See *Certain Hardwood Plywood Products from the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review and Rescission of Review, In Part 2017-2018*, 85 FR 7270 (February 7, 2020) (*Preliminary Results*), and accompanying Preliminary Decision Memorandum (PDM).

⁴ See Memorandum, "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).

⁵ See Memorandum, "Administrative Review of Certain Hardwood Plywood Products from the People's Republic of China: Final Surrogate Value Memorandum," dated November 23, 2020 (Final SV Memo).

⁶ For further details on the differential pricing analysis, see *Preliminary Results* PDM at "Determination of Comparison Method."

Comparison Method		
A-to-A Method for All U.S. Sales	A-to-T Method for U.S. Sales Which Pass the Cohen's <i>d</i> Test; A-to-A Method for Sales Which Do Not Pass	A-to-T Method for All U.S. Sales
14.95%	15.37%	15.56%

Based on the results of the differential pricing analysis, Commerce preliminarily finds that 82.10 percent of the value of U.S. sales pass the Cohen's *d* test, and confirms the existence of a pattern of prices that differ significantly among purchasers, regions, or time periods. However, Commerce determines that there is no meaningful difference between the weighted-average dumping margin calculated using the average-to-average method and the weighted-average dumping margin calculated using an alternative comparison method based on applying the average-to-transaction method to all U.S. sales. Thus, for these final results, Commerce is applying the average-to-average method to all U.S. sales to calculate the weighted-average dumping margin for Chengen.

List of Attachments

1. SAS Margin Program, Log, and Results (BPI)
2. Common Macros, and Exchange Rates (Public)

ATTACHMENT 1

SAS Margin Program, Log, and Results
Contains Business Proprietary Information
Not Capable of Public Summary
Located in Accompanying Electronic Files

ATTACHMENT 2

Common Macros and Exchange Rates
Public Information
Located in Accompanying Electronic Files