

12 May 2017

(17-2656) Page: 1/12

Original: English

UNITED STATES – COUNTERVAILING MEASURES ON CERTAIN PIPE AND TUBE PRODUCTS FROM TURKEY

REQUEST FOR THE ESTABLISHMENT OF A PANEL BY TURKEY

The following communication, dated 11 May 2017, from the delegation of Turkey to the Chairperson of the Dispute Settlement Body, is circulated pursuant to Article 6.2 of the DSU.

My authorities have instructed me to request the establishment of a panel pursuant to Article 6 of the WTO *Understanding on Rules and Procedures Governing the Settlement of Disputes* ("DSU"), Article XXIII of the *General Agreement on Tariffs and Trade 1994* (GATT 1994), and Article 30 of the *Agreement on Subsidies and Countervailing Measures* (SCM Agreement) with respect to the preliminary and final countervailing duty measures imposed by the United States on Turkish imports of Certain Oil Country Tubular Goods ("OCTG"); Welded Line Pipe ("WLP"); Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes ("HWRP"); and Circular Welded Carbon Steel Pipes and Tubes ("CWP").

Background

- 1. On 8 March 2017, Turkey requested consultations with the Government of the United States pursuant to Articles 1 and 4 of the DSU, Article XXII:1 of the GATT 1994, and Article 30 of the SCM Agreement, with regard to the aforementioned preliminary and final countervailing duty measures imposed by the United States.
- 2. Consultations were held on 28 April 2017. Unfortunately, the consultations failed to settle the dispute. Therefore, Turkey respectfully requests, pursuant to Article 6 of the DSU and Article 30 of the SCM Agreement, that a Panel be established with the standard terms of reference as set out in Article 7.1 of the DSU with respect to the following matter:

Measures at Issue

- 3. The United States initiated a countervailing duty investigation of OCTG from Turkey (C-489-817) on 29 July 2013. The United States issued a negative preliminary countervailing duty determination on 23 December 2013, and an affirmative final countervailing duty determination on 18 July 2014. The United States issued an affirmative final injury determination in September 2014, and issued an order imposing final countervailing duty measures on 10 September 2014. A non-exhaustive list of the determinations, memoranda, etc. issued or relied upon by the United States on the record of this proceeding is attached in Annex 1. These measures continue to be in force.
- 4. The United States initiated a countervailing duty investigation of WLP from Turkey (C-489-823) on 13 November 2014. The United States issued an affirmative preliminary countervailing duty determination and imposed provisional countervailing duty measures on 20 March 2015. The United States issued an affirmative final countervailing duty determination on 13 October 2015, and an affirmative final injury determination in November 2015. The United States issued an order imposing final countervailing duty measures on 1 December 2015. A non-exhaustive list of the determinations, memoranda, etc. issued or relied upon by the United States on the record of this proceeding is attached in Annex 1. These measures continue to be in force.

- 5. The United States initiated a countervailing duty investigation of HWRP from Turkey (C-489-825) on 17 August 2015. The United States issued an affirmative preliminary countervailing duty determination and imposed provisional countervailing duty measures on 28 December 2015. The United States issued an affirmative final countervailing duty determination on 21 July 2016, and an affirmative final injury determination in September 2016. The United States issued an amended final countervailing duty determination and an order imposing final countervailing duty measures on 13 September 2016. A non-exhaustive list of the determinations, memoranda, etc. issued or relied upon by the United States on the record of this proceeding is attached in Annex 1. These measures continue to be in force.
- 6. The United States issued an order imposing countervailing duties on CWP from Turkey (C-489-502) on 7 March 1986. The United States has conducted several five-year "sunset" reviews of this order, most recently including the third five-year review of the order. The United States issued its final determination in the third five-year review of the order in 19 October 2011 and issued a continuation of the order on 17 July 2012. The United States has also conducted several administrative reviews of the order, initiating its administrative review for calendar year 2013 on 30 April 2014. The United States issued a final determination in this administrative review on 13 October 2015, and an amended final determination on 13 November 2015. A non-exhaustive list of the determinations, memoranda, etc. issued or relied upon by the United States on the record of this proceeding is attached in Annex 1. These measures continue to be in force.
- 7. This request covers the determination by the United States to initiate the identified countervailing duty proceedings, the conduct of those proceedings, any preliminary or final countervailing duty or injury determinations issued in those proceedings, and any definitive countervailing duties imposed as a result of those proceedings. This request also covers certain practices followed by the United States in the identified countervailing duty proceedings related to the cumulation of subsidized and non-subsidized imports in the assessment of injury and the rejection of in-country prices in the assessment of benefit. This request also covers any amendments, redeterminations, or other subsequent measures in connection with the measures cited herein.

Legal Basis of the Complaint

8. Turkey considers that the United States' determinations and the countervailing duty measures imposed in the aforementioned proceedings, and/or the specific practices on which such determinations and measures were based, are inconsistent with Articles 1, 2, 12, 14, and 15 of the SCM Agreement as follows:

(A) OCTG from Turkey (C-489-817)

In connection with the alleged Provision of Hot Rolled Steel for Less Than Adequate Remuneration:

1. Article 1.1(a)(1) of the SCM Agreement

- a. In determining that OYAK is a "public body," the U.S. Department of Commerce ("USDOC") failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. Instead, the USDOC determined that OYAK is a public body based on formal indicia of government ownership or control, with no consideration of whether OYAK in fact exercises or is vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that OYAK is a public body.
- b. In determining that Eregli Demir ve Celik Fabrikalari T.A.S. ("Erdemir") and its subsidiary, Iskenderun Iron & Steel Works Co. ("Isdemir"), are "public bodies," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. The USDOC's determination was improperly confined to formal indicia of government ownership or control, with no

consideration of whether Erdemir and its subsidiary Isdemir in fact exercise or are vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that Erdemir and its subsidiary Isdemir are public bodies.

2. Article 1.1(b) and 14(d) of the SCM Agreement

- a. The USDOC has a practice, in assessing whether a good is provided for less than adequate remuneration thereby conferring a benefit, of rejecting incountry prices as a benchmark based solely on evidence that the government owns or controls the majority or a substantial portion of the market for the good, with no consideration of whether in-country prices are distorted. Turkey considers that this USDOC practice is inconsistent with Article 14(d) of the SCM Agreement both "as such", as a practice, and as applied in this investigation.
- b. The USDOC failed to conduct a proper analysis of whether in-country prices for hot rolled steel are market determined, and therefore improperly rejected incountry prices as the benchmark for less than adequate remuneration under Article 14(d).
- c. The USDOC failed to establish that the provision of hot rolled steel by Erdemir and Isdemir conferred a benefit within the meaning of Article 1.1(b).

3. Article 12.7 of the SCM Agreement

- a. The USDOC failed to take due account of difficulties Borusan Istikbal Ticaret and Borusan Mannesmann Boru Sanayi (collectively "Borusan") experienced in gathering and reporting information requested by the USDOC.
- b. The USDOC drew adverse inferences in selecting among the facts available for the purpose of punishing Borusan for its alleged failure to cooperate.

4. Articles 2.1(c) and 2.4 of the SCM Agreement

- a. In finding specificity in terms of use by a limited number of industries or enterprises, the USDOC failed to identify, or substantiate based on positive evidence on the record, a "subsidy programme" related to the alleged provision of hot rolled steel for less than adequate remuneration.
- b. The USDOC failed to consider the extent of diversification of the Turkish economy or the length of time the alleged subsidy programme has been in operation.

In connection with the injury determination:

5. Article 15.3 of the SCM Agreement

- a. The U.S. International Trade Commission ("ITC") has a practice, in assessing material injury, of cumulating imports that are subject to countervailing duty investigations with imports that are subject only to antidumping duty investigations, *i.e.*, non-subsidized imports, from all countries with respect to which antidumping or countervailing duty petitions are filed on the same day. In investigations, the ITC considers this practice to be required under section 771(7)(G)(i) of the Tariff Act of 1930, if the subsidized and non-subsidized imports compete with each other and with the domestic like product in the U.S. market.
- b. Turkey considers that the ITC's practice of "cross-cumulating" subsidized and non-subsidized imports, with respect to which antidumping or countervailing duty petitions are filed on the same day, is inconsistent with Article 15.3 of the

SCM Agreement both "as such", as a practice, and as applied in this proceeding.

(B) WLP from Turkey (C-489-823)

In connection with the alleged Provision of Hot Rolled Steel for Less Than Adequate Remuneration:

1. Article 1.1(a)(1) of the SCM Agreement

- a. In determining that OYAK is a "public body," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. Instead, the USDOC determined that OYAK is a public body based on formal indicia of government ownership or control, with no consideration of whether OYAK in fact exercises or is vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that OYAK is a public body.
- b. In determining that Erdemir and its subsidiary Isdemir are "public bodies," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. The USDOC's determination was improperly confined to formal indicia of government ownership or control, with no consideration of whether Erdemir and its subsidiary Isdemir in fact exercise or are vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that Erdemir and its subsidiary Isdemir are public bodies.

2. Article 12.7 of the SCM Agreement

a. The USDOC drew adverse inferences in selecting among the facts available for the purpose of punishing Borusan for its alleged failure to cooperate.

3. Articles 2.1(c) and 2.4 of the SCM Agreement

- a. In finding specificity in terms of use by a limited number of industries or enterprises, the USDOC failed to identify, or substantiate based on positive evidence on the record, a "subsidy programme" related to the provision of hot rolled steel for less than adequate remuneration.
- b. The USDOC failed to consider the extent of diversification of the Turkish economy or the length of time the alleged subsidy programme has been in operation.

In connection with the injury determination:

4. Article 15.3 of the SCM Agreement

- a. The U.S. International Trade Commission ("ITC") has a practice, in assessing material injury, of cumulating imports that are subject to countervailing duty investigations with imports that are subject only to antidumping duty investigations, i.e., non-subsidized imports, from all countries with respect to which antidumping or countervailing duty petitions are filed on the same day. In investigations, the ITC considers this practice to be required under section 771(7)(G)(i) of the Tariff Act of 1930, if the subsidized and non-subsidized imports compete with each other and with the domestic like product in the U.S. market.
- b. Turkey considers that the ITC's practice of "cross-cumulating" subsidized and non-subsidized imports, with respect to which antidumping or countervailing

duty petitions are filed on the same day, is inconsistent with Article 15.3 of the SCM Agreement both "as such", as a practice, and as applied in this proceeding.

(C) HWRP from Turkey (C-489-825)

In connection with the alleged Provision of Hot Rolled Steel for Less Than Adequate Remuneration:

1. Article 1.1(a)(1) of the SCM Agreement

- a. In determining that OYAK is a "public body," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. Instead, the USDOC determined that OYAK is a public body based on formal indicia of government ownership or control, with no consideration of whether OYAK in fact exercises or is vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that OYAK is a public body.
- b. In determining that Erdemir and its subsidiary Isdemir are "public bodies," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. The USDOC's determination was improperly confined to formal indicia of government ownership or control, with no consideration of whether Erdemir and its subsidiary Isdemir in fact exercise or are vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that Erdemir and its subsidiary Isdemir are public bodies.

2. Articles 2.1(c) and 2.4 of the SCM Agreement

- a. In finding specificity in terms of use by a limited number of industries or enterprises, the USDOC failed to identify, or substantiate based on positive evidence on the record, a "subsidy programme" related to the provision of hot rolled steel for less than adequate remuneration.
- b. The USDOC failed to consider the extent of diversification of the Turkish economy or the length of time the alleged subsidy programme has been in operation.

In connection with "other subsidies" not previously reported to the USDOC:

3. Article 12.7 of the SCM Agreement

a. The USDOC drew adverse inferences in selecting among the facts available for the purpose of punishing MMZ Onur Boru Profil uretim Sanayi Ve Tic. A.S. ("MMZ") and Ozdemir Boru Profil Sanayi ve Tic. Ltd. Sti. ("Ozdemir") for their alleged failure to cooperate.

In connection with the injury determination:

4. Article 15.3 of the SCM Agreement

a. The U.S. International Trade Commission ("ITC") has a practice, in assessing material injury, of cumulating imports that are subject to countervailing duty investigations with imports that are subject only to antidumping duty investigations, *i.e.*, non-subsidized imports, from all countries with respect to which antidumping or countervailing duty petitions are filed on the same day. In investigations, the ITC considers this practice to be required under section 771(7)(G)(i) of the Tariff Act of 1930, if the subsidized and non-subsidized

imports compete with each other and with the domestic like product in the U.S. market.

b. Turkey considers that the ITC's practice of "cross-cumulating" subsidized and non-subsidized imports, with respect to which antidumping or countervailing duty petitions are filed on the same day, is inconsistent with Article 15.3 of the SCM Agreement both "as such", as a practice, and as applied in this proceeding.

(D) CWP from Turkey (C-489-502)

In connection with the alleged Provision of Hot Rolled Steel for Less Than Adequate Remuneration:

1. Article 1.1(a)(1) of the SCM Agreement

- a. In determining that OYAK is a "public body," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. Instead, the USDOC determined that OYAK is a public body based on formal indicia of government ownership or control, with no consideration of whether OYAK in fact exercises or is vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that OYAK is a public body.
- b. In determining that Erdemir and its subsidiary Isdemir are "public bodies," the USDOC failed to adhere to the appropriate legal standard under Article 1.1(a)(1) and follow the Appellate Body's guidance regarding the interpretation of that standard. The USDOC's determination was improperly confined to formal indicia of government ownership or control, with no consideration of whether Erdemir and its subsidiary Isdemir in fact exercise or are vested with governmental authority. The USDOC also failed to provide a reasoned and adequate explanation, based on the evidence on the record, for its finding that Erdemir and its subsidiary Isdemir are public bodies.

2. Articles 2.1(c) and 2.4 of the SCM Agreement

- a. In finding specificity in terms of use by a limited number of industries or enterprises, the USDOC failed to identify, or substantiate based on positive evidence on the record, a "subsidy programme" related to the provision of hot rolled steel for less than adequate remuneration.
- b. The USDOC failed to consider the extent of diversification of the Turkish economy or the length of time the alleged subsidy programme has been in operation.

In connection with the injury determination:

3. Article 15.3 of the SCM Agreement

a. The U.S. International Trade Commission ("ITC") has a practice, in assessing material injury, of cumulating imports that are subject to countervailing duty investigations with imports that are subject only to antidumping duty investigations, i.e., non-subsidized imports, from all countries with respect to which antidumping or countervailing duty petitions are filed on the same day. In five-year reviews, the ITC considers cumulation to be discretionary under section 1675a of the Tariff Act of 1930, but as a matter of practice the ITC cumulates subsidized and non-subsidized imports if the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and if subject imports are not likely to have no discernible adverse impact on the domestic industry.

- b. Turkey considers that the ITC's practice of "cross-cumulating" subsidized and non-subsidized imports, with respect to which five-year reviews of antidumping or countervailing duty orders are initiated on the same day, is inconsistent with Article 15.3 of the SCM Agreement both "as such", as a practice, and as applied in this proceeding.
- 9. To the extent that the United States' practices described above are inconsistent with Articles 1.1(a)(1), 1.1(b), 2.1(c), 12.7, 14(d) and 15.3 of the SCM Agreement, the United States is also in violation of its obligations under Article VI:3 of the GATT 1994 and Articles 10, 19.4, and 32.1 of the SCM Agreement.
- 10. Turkey considers that the measures at issue have a serious adverse effect on the export of subject merchandise from Turkey to the United States. Turkey further considers that the measures also cause nullification or impairment of benefits accruing to Turkey under the aforementioned covered agreements.
- 11. Turkey therefore respectfully requests that the Dispute Settlement Body establish a panel to examine this matter, with the standard terms of reference as set out in Article 7.1 of the DSU and asks that this request for the establishment of a Panel be placed on the agenda of the DSB meeting to be held on 22 May 2017.

Annex I

C-489-817: Certain Oil Country Tubular Goods from Turkey

- 1. Certain Oil Country Tubular Goods from India and Turkey: Initiation of Countervailing Duty Investigations, 78 FR 45502 (July 29, 2013).
- 2. Decision Memorandum for the Negative Preliminary Determination in the Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey (December 16, 2013).
- 3. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Preliminary Determination Calculation Memorandum for Borusan Mannesmann Boru Sanayi ve Ticaret A.S., Borusan Istikbal Ticaret, Borusan Mannesmann Boru Yatirim Holding A.S., and Borusan Holding A.S. (collectively, "Borusan") (December 16, 2013).
- 4. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Preliminary Determination Calculation Memorandum for Tosçelik Profil ve Sac Endustrisi A.S., Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (collectively, "Toscelik") (December 16, 2013).
- 5. Countervailing Duty Investigation of Certain Oil Country Tubular Goods (OCTG) from the Republic of Turkey (Turkey): Analysis of New Subsidy Allegations (December 17, 2013).
- 6. Certain Oil Country Tubular Goods from the Republic of Turkey: Preliminary Negative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Determination, 78 FR 77420 (December 23, 2013).
- 7. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Post-Preliminary Analysis Memorandum for Borusan Mannesmann Boru Sanayi ve Ticaret A.S. ("BMB"), Borusan Istikbal Ticaret ("Istikbal"), Borusan Mannesmann Boru Yatirim Holding A.S., and Borusan Holding A.S. (collectively, "Borusan") (April 18, 2014).
- 8. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Post-Preliminary Analysis Memorandum for Borusan Mannesmann Boru Sanayi ve Ticaret A.S. ("BMB"), Borusan Istikbal Ticaret ("Istikbal"), Borusan Mannesmann Boru Yatirim Holding A.S., and Borusan Holding A.S. (collectively, "Borusan"): Calculation Attachments (April 18, 2014).
- 9. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Post-Preliminary Analysis Memorandum for Tosçelik Profil ve Sac Endustrisi A.S. ("Toscelik Profil"), Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (collectively, "Toscelik") (April 18, 2014).
- 10. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Post-Preliminary Analysis Memorandum for Tosçelik Profil ve Sac Endustrisi A.S. ("Toscelik Profil"), Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (collectively, "Toscelik"): Calculation Attachments (April 18, 2014).
- 11. Countervailing Duty Investigation: Certain Oil Country Tubular Goods from the Republic of Turkey: Verification Report: Government of the Republic of Turkey (May 12, 2014).
- 12. Countervailing Duty Investigation: Certain Oil Country Tubular Goods from the Republic of Turkey: Verification Report: Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., Tosçelik Profil ve Sac Endustrisi A.S., and Tosyali Demir Celik San. A.S. (collectively, "Toscelik") (May 12, 2014).

- 13. Countervailing Duty Investigation: Certain Oil Country Tubular Goods from the Republic of Turkey: Verification Report: Borusan Mannesmann Boru Sanayi ve Ticaret A.S.,, Borusan Istikbal Ticaret, Borusan Mannesmann Boru Yatirim Holding A.S., and Borusan Holding A.S. (collectively, "Borusan") (May 15, 2014).
- 14. Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey (July 10, 2014).
- 15. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Final Determination Calculation Memorandum for Borusan Mannesmann Boru Sanayi ve Ticaret A.S., Borusan Istikbal Ticaret, Borusan Mannesmann Boru Yatirim Holding A.S., and Borusan Holding A.S. (collectively, "Borusan") (July 10, 2014).
- 16. Countervailing Duty Investigation of Certain Oil Country Tubular Goods from the Republic of Turkey: Final Determination Calculation Memorandum for Tosçelik Profil ve Sac Endustrisi A.S., Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (collectively, "Toscelik") (July 10, 2014).
- 17. Certain Oil Country Tubular Goods From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, 79 FR 41964 (July 18, 2014).
- 18. Certain Oil Country Tubular Goods from India, Korea, the Philippines, Taiwan, Thailand, Turkey, Ukraine, and Vietnam, Investigation Nos. 701-TA-499-500 and 731-TA-1215-1217 and 1219-1223 (Final), International Trade Commission Publication 4489 (September 2014).
- 19. Certain Oil Country Tubular Goods from India and the Republic of Turkey: Countervailing Duty Orders and Amended Affirmative Final Countervailing Duty Determination for India, 79 FR 53688 (September 10, 2014).
- 20. Office of Policy Memorandum, Section 129 Determination of the Countervailing Duty Investigation of Circular Welded Carbon Quality Steel Pipe; Light-Walled Rectangular Pipe and Tube; Laminated Woven Sacks; and Off-the-Road Tires from the People's Republic of China: An Analysis of Public Bodies in the People's Republic of China in Accordance with the WTO Appellate Body's Findings in WTO DS379 (May 18, 2012).
- 21. Draft Remand Redetermination Calculations for Borusan Mannesmann Boru Sanayi ve Ticaret A.S. and Borusan Istikbal Ticaret (collectively, Borusan) and Toscelik Profil ve Sac Endustrisi A.S. (Toscelik) (July 20, 2015).
- 22. Final Results of Remand Redetermination: Borusan Mannesmann Boru Sanayi Ve Ticaret A.S. and Borusan Istikbal Ticaret v. United States; Maverick Tube Corporation v. United States, Consol. Ct. No. 14-00229, 61 F. Supp. 3d 1306 and Slip Op. 15-59 (August 31, 2015).

C-489-823: Welded Line Pipe from Turkey

- 1. Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Initiation of Countervailing Duty Investigations, 79 FR 67419 (November 13, 2014).
- 2. Decision Memorandum for the Affirmative Preliminary Determination in the Countervailing Duty Investigation of Welded Line Pipe from the Republic of Turkey (March 16, 2015).
- 3. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Preliminary Determination Calculation Memorandum for Tosçelik Profil ve Sac Endustrisi A.S. (Toscelik Profil), Tosyali Dis Ticaret A.S. (Tosyali Dis), Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (Tosyali Demir) (collectively, Toscelik) (March 16, 2015).

- 4. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Preliminary Determination Calculation Memorandum for Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (BMB) and Borusan Istikbal Ticaret (Istikbal) (collectively, Borusan) (March 16, 2015).
- 5. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Recalculation of Percentage of Domestic Supply of Hot-Rolled Steel (HRS) Accounted for by Eregli Demir ve Celik Fabrikalari T.A.S. (Erdemir) and Iskenderun Iron & Steel Works Co. (Isdemir) (March 16, 2015).
- 6. Welded Line Pipe From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Determination, 80 FR 14943 (March 20, 2015).
- 7. Countervailing Duty Investigation of Welded Line Pipe from Turkey: Ministerial Error Allegations in the Preliminary Determination (April 10, 2015).
- 8. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Verification of Questionnaire Responses of Toscelik Profil ve Sac Endustrisi A.S. (June 9, 2015).
- 9. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Verification of Questionnaire Responses of the Government of Turkey (GOT) (June 18, 2015).
- 10. Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Welded Line Pipe from the Republic of Turkey (October 5, 2015).
- 11. Countervailing Duty Investigation: Welded Line Pipe from the Republic of Turkey: Final Determination Calculation Memorandum for Tosçelik Profil ve Sac Endustrisi A.S. (Toscelik Profil), Tosyali Dis Ticaret A.S., Tosyali Elektrik Enerjisi Toptan Satis Ith. Ihr. A.S., Tosyali Holding A.S., and Tosyali Demir Celik San. A.S. (collectively, Toscelik) (October 5, 2015).
- 12. Welded Line Pipe From the Republic of Turkey: Final Affirmative Countervailing Duty Determination, 80 FR 61371 (October 13, 2015).
- 13. Certain Welded Line Pipe from Korea and Turkey, Investigation Nos. 701-TA-525 and 731-TA-1260-1261 (Final), International Trade Commission Publication 4580 (November 2015).
- 14. Welded Line Pipe From the Republic of Turkey: Countervailing Duty Order, 80 FR 75054 (December 1, 2015).

C-489-825: Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Turkey

- 1. Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Initiation of Countervailing Duty Investigation, 80 FR 49207 (August 17, 2015).
- 2. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Preliminary Determination Calculations for Ozdemir Boru Profil San ve Tic. Ltd. Sti. (December 18, 2015).
- 3. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Preliminary Determination Calculations for MMZ Onur Boru Profil uretim San Ve Tic. A.S. (December 18, 2015).
- 4. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Decision Memorandum for the Preliminary Determination (December 18, 2015).

- 5. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Additional Information (December 21, 2015).
- 6. Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Determination, 80 FR 80749 (December 28, 2015).
- 7. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Ministerial Error Allegations on the Preliminary Determination (January 21, 2016).
- 8. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Verification of the Questionnaire Responses of MMZ Onur Boru Profil uretim San Ve Tic. A.S. (March 10, 2016).
- 9. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Verification of the Questionnaire Responses of Ozdemir Boru Profil San ve Tic. Ltd Sti. (March 10, 2016).
- 10. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Issues and Decision Memorandum for the Final Determination (July 14, 2016).
- 11. Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes From the Republic of Turkey: Final Affirmative Countervailing Duty Determination, 81 FR 47349 (July 21, 2016).
- 12. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Amended Final Determination Subsidy Rate for MMZ Onur Boru Profil uretim San Ve Tic. A.S. (August 19, 2016).
- 13. Countervailing Duty Investigation of Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from the Republic of Turkey: Ministerial Error Allegations in the Final Determination (August 19, 2016).
- 14. Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Korea, Mexico, and Turkey, Investigation Nos. 701-TA-539 and 731-TA-1280-1282 (Final), International Trade Commission Publication 4633 (September 2016).
- 15. Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes From the Republic of Turkey: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order, 81 FR 62874 (September 13, 2016).

C-489-502: Circular Welded Carbon Steel Pipes and Tubes from Turkey

- 1. Countervailing Duty Order; Certain Welded Carbon Steel Pipe and Tube Products from Turkey, 51 FR 7984 (March 7, 1986).
- 2. Welded Carbon Steel Pipe and Tube from Turkey: Final Results of Expedited Sunset Review of Countervailing Duty Order, 76 FR 64900 (October 19, 2011).
- 3. Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534 and 536 (Third Review), International Trade Commission Publication 4333 (June 2012).
- 4. Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, 77 FR 39736 (July 5, 2012).
- 5. Certain Circular Welded Carbon Steel Pipes and Tubes from India, Thailand, and Turkey; Certain Circular Welded Non-Alloy Steel Pipe from Brazil, Mexico, the Republic of Korea,

- and Taiwan; and Certain Circular Welded Carbon Steel Pipes and Tubes from Taiwan: Continuation of Antidumping and Countervailing Duty Orders, 77 FR 41967 (July 17, 2012).
- 6. Initiation of Antidumping and Countervailing Duty Administrative Reviews and Request for Revocation in Part, 79 FR 24398 (April 30, 2014).
- 7. Administrative Review of the Countervailing Duty Order on Welded Carbon Steel Pipes and Tubes from Turkey; 2013: New Subsidy Allegation Memorandum (November 6, 2014).
- 8. Countervailing Duty Administrative Review: Circular Welded Carbon Steel Pipes and Tubes from Turkey: Verification of Information Submitted by the Government of Turkey (March 31, 2015).
- 9. Countervailing Duty Administrative Review: Circular Welded Carbon Steel Pipes and Tubes from Turkey: Verification of the Questionnaire Responses submitted by Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (BMB), and Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, Borusan) (March 31, 2015).
- 10. Decision Memorandum for the Preliminary Results of Countervailing Duty (CVD) Administrative Review: Circular Welded Carbon Steel Pipes and Tubes from Turkey, POR 01/01/13-12/31/13 (March 31, 2015).
- 11. Administrative Review of Countervailing Duty Order on Certain Welded Carbon Steel Standard Steel Pipes and Tubes from Turkey: Preliminary Calculations for the Borusan Group, Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (BMB), and Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, Borusan) (March 31, 2015).
- 12. Circular Welded Carbon Steel Pipes and Tubes From Turkey: Preliminary Results of Countervailing Duty Administrative Review and Preliminary Intent To Rescind in Part; Calendar Year 2013, 80 FR 18809 (April 8, 2015).
- 13. Decision Memorandum for the Final Results of Countervailing Duty Administrative Review: Circular Welded Carbon Steel Pipes and Tubes from Turkey, POR 01/01/13-12/31/13 (October 5, 2015).
- 14. Administrative Review of Countervailing Duty Order on Certain Welded Carbon Steel Standard Steel Pipes and Tubes from Turkey: Final Calculations for the Borusan Group, Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (BMB), and Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies) (October 5, 2015).
- 15. Circular Welded Carbon Steel Pipes and Tubes From Turkey: Final Results of Countervailing Duty Administrative Review; Calendar Year 2013 and Rescission of Countervailing Duty Administrative Review, in Part, 80 FR 61361 (October 13, 2015).
- 16. Administrative Review of Countervailing Duty Order on Certain Welded Carbon Steel Standard Pipes and Tubes from Turkey: Amended Final Calculations for the Borusan Group, Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (BMB), and Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies) (November 5, 2015).
- 17. Certain Welded Carbon Steel Pipe and Tube from Turkey: Amended Final Results of Countervailing Duty Administrative Review, 2013: Final Results Ministerial Error Allegation (November 5, 2015).
- 18. Circular Welded Carbon Steel Pipes and Tubes from Turkey: Amended Final Results of Countervailing Duty Administrative Review, 2013, 80 FR 70186 (November 13, 2015).