

**From:** [Samuel Vastano](#)  
**To:** [Boyland, David](#)  
**Subject:** RE: U.S. ITC Investigations (Third Review): Inv. Nos: 701-TA-350 and 731-TA-616 and 618 (Corrosion-Resistant Carbon Steel Flat Products from Germany and Korea)  
**Date:** Friday, September 14, 2012 12:51:08 PM

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I cannot give you more on the inter-co profit –loss elimination without an extensive amount of time and effort. Sorry about that. As for price paid it is Market price only.

Sam

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**From:** David.Boyland@usitc.gov [mailto:David.Boyland@usitc.gov]  
**Sent:** Friday, September 14, 2012 11:23 AM  
**To:** Samuel Vastano  
**Subject:** RE: U.S. ITC Investigations (Third Review): Inv. Nos: 701-TA-350 and 731-TA-616 and 618 (Corrosion-Resistant Carbon Steel Flat Products from Germany and Korea)

Good morning Sam,

I appreciate the follow-up information provided to date and understand that removing the profit or (loss) component from the transferred input would not necessarily be an easy exercise and is normally only an issue at the NLMK PA LLC level. Could you consider and comment on the extent to which this adjustment can be reasonably made; i.e., eliminating the profit or (loss)) from the transferred input. If you determine that a meaningful adjustment can be made and included in corresponding CORE financial results, that would be ideal. Additionally, please indicate what valuation methodology was used by the related party to determine the price paid by your company with respect to the transferred coil; e.g., does transfer price reflect market price, cost, cost plus or some other value?

Thank you again for your time.

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**From:** Samuel Vastano [mailto:svastano@us.nlmk.com]  
**Sent:** Wednesday, August 29, 2012 3:38 PM  
**To:** Boyland, David  
**Subject:** RE: U.S. ITC Investigations (Third Review): Inv. Nos: 701-TA-350 and 731-TA-616 and 618 (Corrosion-Resistant Carbon Steel Flat Products from Germany and Korea)

David,

Reading your questions. Sharon Coating LLC only purchases from NLMK PA LLC and not the other way around. There would not be any inter –co profit that could be reported on the Sharon Coating LLC books. That profit would only be eliminated on the NLMK PA LLC's books.

Sam

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**From:** [David.Boyland@usitc.gov](#) [mailto:David.Boyland@usitc.gov]  
**Sent:** Wednesday, August 29, 2012 2:34 PM  
**To:** Samuel Vastano

**Subject:** U.S. ITC Investigations (Third Review): Inv. Nos: 701-TA-350 and 731-TA-616 and 618  
(Corrosion-Resistant Carbon Steel Flat Products from Germany and Korea)

Good afternoon Mr. Vastano,

Thank you for the follow-up information submitted in response to my previous questions. The attached Word document contains several additional follow-up questions primarily related to the financial section of the U.S. producer questionnaire. As indicated in the attachment and given the report deadlines in this case, I respectfully request that responses be submitted no later than COB September 7, 2012. Please contact me if any of my questions require clarification. Thank you for your attention to this matter.

Regards,

David Boyland, CPA  
Financial Analysis and Accounting Division  
Office of Investigations International Trade Commission  
Phone: 202-708-4725 Fax: 202-205-3205