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November 19, 2026

MEMORANDUM TO: Kasey O'Connor
Deputy General Counsel,
performing the non-exclusive functions and duties
of the Assistant Secretary for Enforcement and Compliance

FROM: Scot Fullerton
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Preliminary Decision Memorandum in the Circumvention Inquiry of the Antidumping and Countervailing Duty Orders on Certain Corrosion-Resistant Steel Products from the Socialist Republic of Vietnam

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I. SUMMARY

The U.S. Department of Commerce (Commerce) preliminarily determines that imports of certain corrosion-resistant steel products (CORE) completed in Indonesia using cold-rolled steel (CRS) manufactured in the Socialist Republic of Vietnam (Vietnam) are not circumventing the antidumping duty (AD) and countervailing duty (CVD) orders on CORE from Vietnam.[1] The period of inquiry (POI) is January 1, 2025, through December 31, 2025.

II. BACKGROUND

On February 2, 2026, Commerce received an allegation from Steel Dynamics Inc. and Nucor Corporation (collectively, the domestic interested parties) alleging that certain imports of CORE exported from Indonesia are circumventing the *Orders*.[2] On February 13 and 23, 2026, Commerce requested additional information from the domestic interested parties regarding their

[1] *See Corrosion-Resistant Steel Products from Brazil and Mexico: Amended Final Antidumping Duty Determination; Corrosion-Resistant Steel Products from Australia, Brazil, Canada, Mexico, the Netherlands, South Africa, Taiwan, the Republic of Türkiye, the United Arab Emirates, and the Socialist Republic of Vietnam: Antidumping Duty Orders*, 90 FR 59494 (December 19, 2025); *see also Certain Corrosion-Resistant Steel Products from Brazil, Canada, Mexico and the Socialist Republic of Vietnam: Countervailing Duty Orders*, 90 FR 59488 (December 19, 2025) (collectively, *Orders*).

[2] *See* Domestic Interested Parties' Letter, "Request for Circumvention Inquiry (Indonesia)," dated January 30, 2026 (Circumvention Allegation). The request was filed after 5:00 pm Eastern Time on Friday, January 30, 2026 and therefore is considered to be filed on the next business day, Monday, February 2, 2026.

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circumvention request.[3] On February 19 and 26, 2026, the domestic interested parties responded to our requests for information.[4] On March 25, 2026, Commerce initiated a circumvention inquiry, pursuant to section 781(b) of the Tariff Act of 1930, as amended (the Act), to determine whether imports of CORE completed in Indonesia using CRS manufactured in Vietnam are circumventing the *Orders* on a country-wide basis.[5]

In the *Initiation Notice*, Commerce stated that it would conduct this circumvention inquiry on a country-wide basis and that Commerce intended to use U.S. Customs and Border Protection (CBP) entry data for the purpose of selecting mandatory respondents.[6] Accordingly, on March 26, 2026, Commerce released the CBP data for entries of CORE from Indonesia for the POI to all interested parties under an administrative protective order and requested comments regarding the data and the selection of respondents in this inquiry.[7] On April 2, 2026, Commerce received comments submitted by the domestic interested parties and a U.S. importer, JFE Shoji America LLC (JFE Shoji America), regarding the CBP data and respondent selection.[8]

On April 9, 2026, Commerce issued quantity and value (Q&V) questionnaires to the three Indonesian companies that account for the largest volume of entries identified in the CBP data: PT. AM/NS Indonesia (AMNS), PT. Sunrise Steel (Sunrise), and PT. Tata Metal Lestari (TML).[9] Between April 22 and 23, 2026, Commerce received timely filed responses from all three companies that were served the Q&V questionnaire, in addition to one voluntary response from PT Aluminium Extrusion Indonesia (PT Alex Indo).[10] In their responses to Commerce's Q&V questionnaire, all four companies reported that they did not export CORE produced in Indonesia using Vietnamese-origin CRS to the United States during the POI.[11]

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[3] *See* Commerce's Letter, "Indonesia Circumvention Inquiry Request Supplemental Questionnaire," dated February 13, 2026; *see also* Commerce's Letter, "Indonesia Circumvention Inquiry Request Second Supplemental Questionnaire," dated February 23, 2026.

[4] *See* Domestic Interested Parties' Letter, "Response to Indonesia Circumvention Inquiry Request Supplemental Questionnaire," dated February 19, 2026; *see also* Domestic Interested Parties' Letter, "Response to Indonesia Circumvention Inquiry Request Second Supplemental Questionnaire," dated February 26, 2026.

[5] *See Certain Corrosion-Resistant Steel Products from the Socialist Republic of Vietnam: Initiation of Circumvention Inquiry on the Antidumping and Countervailing Duty Orders*, 91 FR 14530 (March 25, 2026) (*Initiation Notice*), and accompanying Initiation Checklist, "Certain Corrosion-Resistant Steel Products from the Socialist Republic of Vietnam," dated March 19, 2026 (Initiation Checklist).

[6] *See Initiation Notice*, 91 FR at 14530.

[7] *See* Memorandum, "Release of U.S. Customs and Border Protection Entry Data," dated March 26, 2026 (CBP Data Memorandum).

[8] *See* Domestic Interested Parties' Letter, "Comments on Respondent Selection," dated April 2, 2026; *see also* JFE Shoji America's Letter, "JFE Shoji America's Comments on CBP Data and Respondent Selection," dated April 2, 2026.

[9] *See* Commerce's Letters, "Quantity and Value Questionnaire for Indonesian Producers or Exporters," dated April 9, 2026; *see also* Memorandum, "Issuance of Quantity and Value Questionnaire," dated April 9, 2026.

[10] *See* AMNS' Letter, "PT. AM/NS INDONESIA Response to Quantity and Value Questionnaire," dated April 22, 2026 (AMNS Q&V Response); *see also* Sunrise's Letter, "PT Sunrise Steel Response to Quantity and Value Questionnaire," dated April 23, 2026 (Sunrise Q&V Response); TML's Letter, "PT Tata Metal Lestari Response to Quantity and Value Questionnaire for Indonesian Producers or Exporters," dated April 23, 2026 (TML Q&V Response); and PT Alex Indo's Letter, "PT Aluminum Extrusion Indonesia's Quantity and Value Questionnaire Response," dated April 23, 2026 (PT Alex Indo Q&V Response).

[11] *See* AMNS Q&V Response at 8; *see also* Sunrise Q&V Response at 9; TML Q&V Response at 1 and 3; and PT Alex Indo Q&V Response at 6-7.

On May 19, 2026, Commerce received comments submitted by the domestic interested parties regarding responses to the Q&V questionnaire,[12] and on May 26, 2026, Commerce received rebuttal comments submitted by TML and Sunrise.[13]

On June 25, 2026, Commerce issued a Q&V supplemental questionnaire to all four companies that responded to the initial Q&V questionnaire.[14] Between July 17 and 20, 2026, Commerce received timely filed responses to the Q&V supplemental questionnaire from each company.[15] On July 28, 2026, Commerce extended the deadline to issue its preliminary circumvention determination by 60 days.[16] On August 10, 2026, Commerce received timely filed comments submitted by the domestic interested parties regarding responses to the supplemental Q&V questionnaire.[17]

On August 13, 2026, Commerce issued second Q&V supplemental questionnaires to AMNS, Sunrise, and TML.[18] On August 28 and 31, 2026, Commerce received timely filed responses to the second Q&V supplemental questionnaires from all three companies.[19] On September 21, 2026, Commerce received comments submitted by the domestic interested parties regarding responses to the second supplemental Q&V questionnaires.[20]

On October 9, 2026, Commerce extended the deadline to issue its preliminary circumvention determination by an additional 30 days, until November 20, 2026.[21] On October 20, 2026, Commerce issued third Q&V supplemental questionnaires to AMNS, Sunrise, and TML.[22] From

[12] *See* Domestic Interested Parties' Letter, "Comments on Quantity and Value Questionnaire Responses and Selection of Mandatory Respondents," dated May 19, 2026.
[13] *See* TML's Letter, "PT Tata Metal Lestari's Response Comments to the Domestic Interested Parties' Submission Regarding Quantity and Value Questionnaire Responses and Selection of Mandatory Respondents," dated May 26, 2026; *see also* Sunrise's Letter, "PT Sunrise Steel Response Comments to the Domestic Interested Parties' Submission Regarding Quantity and Value Questionnaire Responses and Selection of Mandatory Respondents," dated May 30, 2026.
[14] *See* Commerce's Letters, "Quantity and Value Supplemental Questionnaire," dated June 25, 2026.
[15] *See* AMNS' Letter, "Quantity and Value Supplemental Questionnaire Response of PT. AM/NS INDONESIA," dated July 20, 2026 (AMNS First SQR); *see also* Sunrise's Letter, "PT Sunrise Steel Response to Quantity and Value Supplemental Questionnaire," dated July 20, 2026 (Sunrise First SQR); TML's Letter, "PT Tata Metal Lestari Response to Quantity and Value Supplemental Questionnaire," dated July 20, 2026 (TML First SQR); and PT Alex Indo's Letter, "PT Aluminium Extrusion Indonesia's Quantity &Value Supplemental Questionnaire Response," dated July 20, 2026 (PT Alex Indo SQR).
[16] *See* Memorandum, "Extension of Deadline for the Preliminary Determination in the Circumvention Inquiry," dated July 28, 2026.
[17] *See* Domestic Interested Parties' Letter, "Comments on Supplemental Quantity and Value Questionnaires and Selection of Mandatory Respondents," dated July 11, 2026.
[18] *See* Commerce's Letters, "Second Quantity and Value Supplemental Questionnaire," dated August 13, 2026.
[19] *See* AMNS' Letter, "Second Quantity and Value Supplemental Questionnaire Response of AMNS," dated August 31, 2026 (AMNS Second SQR); *see also* Sunrise's Letter, "PT Sunrise Steel Response to Second Quantity and Value Supplemental Questionnaire," dated August 28, 2026 (Sunrise Second SQR); and TML's Letter, "PT Tata Metal Lestari's Response to Second Quantity and Value Supplemental Questionnaire for Indonesian Producers or Exporters," dated August 31, 2026 (TML Second SQR).
[20] *See* Domestic Interested Parties' Letter, "Comments on Second Supplemental Quantity and Value Questionnaire Responses," dated September 21, 2026.
[21] *See* Memorandum, "Extension of Deadline for the Preliminary Determination in the Circumvention Inquiry," dated October 9, 2026.
[22] *See* Commerce's Letters, "Third Quantity and Value Supplemental Questionnaire," dated October 20, 2026.

October 26 to 30, 2026, Commerce received timely filed responses to the third Q&V supplemental questionnaires from all three companies.[23] On November 12, 2026, the domestic interested parties submitted comments for consideration in advance of the preliminary determination.[24]

Responses to Commerce's supplemental questionnaires affirm and further substantiate each company's initial claim that it did not export CORE produced in Indonesia using Vietnamese-origin CRS to the United States during the POI. Accordingly, Commerce selected no Indonesian producer for individual examination in this circumvention inquiry.

III. SCOPE OF THE *ORDERS*

The products covered by these *Orders* are certain flat-rolled steel products, either clad, plated, or coated with corrosion-resistant metals such as zinc, aluminum, or zinc-, aluminum-, nickel- or iron-based alloys, whether or not corrugated or painted, varnished, laminated, or coated with plastics or other non-metallic substances in addition to the metallic coating. The products covered include coils that have a width of 12.7 mm or greater, regardless of form of coil (*e.g.*, in successively superimposed layers, spirally oscillating, *etc.*). The products covered also include products not in coils (*e.g.*, in straight lengths) of a thickness less than 4.75 mm and a width that is 12.7 mm or greater and that measures at least 10 times the thickness. The products covered also include products not in coils (*e.g.*, in straight lengths) of a thickness of 4.75 mm or more and a width exceeding 150 mm and measuring at least twice the thickness. The products described above may be rectangular, square, circular, or other shape and include products of either rectangular or non-rectangular cross-section where such cross-section is achieved subsequent to the rolling process, *i.e.*, products which have been "worked after rolling" (*e.g.*, products which have been beveled or rounded at the edges).

For purposes of the width and thickness requirements referenced above:

(1) Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above, and

(2) Where the width and thickness vary for a specific product (*e.g.*, the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, *etc*.), the measurement at its greatest width or thickness applies.

Steel products included in the scope of these *Orders* are products in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

[23] *See* Sunrise's Letter, "PT Sunrise Steel Response to Third Quantity and Value Supplemental Questionnaire," dated October 26, 2026; *see also* AMNS' Letter, "Third Quantity and Value Supplemental Questionnaire Response of AMNS," dated October 29, 2026; and TML's Letter, "PT Tata Metal Lestari's Response to Third Quantity and Value Supplemental Questionnaire for Indonesian Producers or Exporters," dated October 30, 2026.
[24] *See* Domestic Interested Parties' Letter, "Pre-Preliminary Comments," dated November 12, 2026.

Subject merchandise also includes corrosion-resistant steel that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching and/or slitting or any other processing that would not otherwise remove the merchandise from the scope of the *Orders* if performed in the country of manufacture of the in-scope corrosion-resistant steel.

All products that meet the written physical description are within the scope of these *Orders* unless specifically excluded. The following products are outside of and/or specifically excluded from the scope of these *Orders*:

- Flat-rolled steel products either plated or coated with tin, lead, chromium, chromium oxides, both tin and lead ("terne plate") or both chromium and chromium oxides ("tin free steel"), whether or not painted, varnished or coated with plastics or other non-metallic substances in addition to the metallic coating;

- Clad products in straight lengths of 4.7625 mm or more in composite thickness and of a width which exceeds 150 mm and measures at least twice the thickness;

- Certain clad stainless flat-rolled products, which are three-layered corrosion-resistant carbon steel flat-rolled products less than 4.75 mm in composite thickness that consist of a carbon steel flat-rolled product clad on both sides with stainless steel in a 20%-60%- 20% ratio; and

Also excluded from the scope of the antidumping duty order on corrosion-resistant steel from Taiwan are any products covered by the existing antidumping duty order on corrosion-resistant steel from Taiwan. *See Certain Corrosion-Resistant Steel Products from India, Italy, the People's Republic of China, the Republic of Korea and Taiwan: Amended Final Affirmative Antidumping Determination for India and Taiwan, and Antidumping Duty Orders*, 81 FR 48390 (July 25, 2016); *Corrosion-Resistant Steel Products from Taiwan: Notice of Third Amended Final Determination of Sales at Less Than Fair Value Pursuant to Court Decision and Partial Exclusion from Antidumping Duty Order*, 88 FR 58245 (August 25, 2023).

Also excluded from the scope of the antidumping duty order on corrosion-resistant steel from the United Arab Emirates and the antidumping duty and countervailing duty orders on corrosion-resistant steel from the Socialist Republic of Vietnam are any products covered by the existing antidumping and countervailing duty orders on corrosion-resistant steel from the People's Republic of China and the Republic of Korea and the antidumping duty order on corrosion-resistant steel from Taiwan. *See Certain Corrosion-Resistant Steel Products from India, Italy, the People's Republic of China, the Republic of Korea and Taiwan: Amended Final Affirmative Antidumping Determination for India and Taiwan, and Antidumping Duty Orders,* 81 FR 48390 (July 25, 2016); *see also Certain Corrosion-Resistant Steel Products from India, Italy, Republic of Korea and the People's Republic of China: Countervailing Duty Order*, 81 FR 48387 (July 25, 2016). This exclusion does not apply to imports of corrosion-resistant steel that are entered, or withdrawn from warehouse, for consumption in the United States for which the relevant importer and exporter certifications have been completed and maintained and all other applicable certification requirements have been met such that the entry is entered into the United States as

not subject to the antidumping and countervailing duty orders on corrosion-resistant steel from the People's Republic of China, the antidumping and countervailing duty orders on corrosion-resistant steel from the Republic of Korea, or the antidumping duty order on corrosion-resistant steel from Taiwan.

The products subject to the *Orders* are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers: 7210.30.0030, 7210.30.0060, 7210.41.0000, 7210.49.0030, 7210.49.0040, 7210.49.0045, 7210.49.0091, 7210.49.0095, 7210.61.0000, 7210.69.0000, 7210.70.6030, 7210.70.6060, 7210.70.6090, 7210.90.6000, 7210.90.9000, 7212.20.0000, 7212.30.1030, 7212.30.1090, 7212.30.3000, 7212.30.5000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7212.60.0000, 7225.91.0000, 7225.92.0000, 7226.99.0110, and 7226.99.0130.

The products subject to the *Orders* may also enter under the following HTSUS item numbers: 7210.90.1000, 7215.90.1000, 7215.90.3000, 7215.90.5000, 7217.20.1500, 7217.30.1530, 7217.30.1560, 7217.90.1000, 7217.90.5030, 7217.90.5060, 7217.90.5090, 7225.99.0090, 7226.99.0180, 7228.60.6000, 7228.60.8000, and 7229.90.1000.

The HTSUS subheadings above are provided for convenience and customs purposes only. The written description of the scope of the *Orders* is dispositive.

IV. MERCHANDISE SUBJECT TO THE CIRCUMVENTION INQUIRY

The circumvention inquiry covers CORE completed in Indonesia using Vietnamese-origin CRS that is subsequently exported from Indonesia and imported into the United States.[25]

V. PERIOD OF CIRCUMVENTION INQUIRY

The POI is January 1, 2025, through December 31, 2025.

VI. STATUTORY AND REGULATORY FRAMEWORK FOR CIRCUMVENTION INQUIRY

Circumvention inquiries are conducted pursuant to section 781 of the Act and 19 CFR 351.226.[26] With respect to merchandise assembled or completed in a third country, section 781(b) of the Act provides that Commerce may find circumvention of the AD and CVD orders when merchandise of the same class or kind subject to the orders is assembled or completed in a foreign country other than the country to which the order applies. Section 781(b)(1) of the Act provides that Commerce, after taking into account any advice provided by the U.S. International Trade Commission (ITC) under section 781(e) of the Act, may include imports of merchandise assembled or completed in a third country within the scope of an order at any time an order is in effect if:

[25] *See Initiation Notice*, 91 FR at 14530.

[26] The legislative history to section 781(b) of the Act indicates that Congress intended Commerce to make determinations regarding circumvention on a case-by-case basis, in recognition that the facts of individual cases and the nature of specific industries are widely variable. *See* S. Rep. No. 103-412 (1994) at 81-82.

(A) the merchandise imported in the United States is of the same class or kind as any merchandise produced in a foreign country that is the subject of an AD and/or CVD order;

(B) before importation into the United States, such imported merchandise is completed or assembled in another foreign country from merchandise which (i) is subject to such order, or (ii) is produced in the foreign country with respect to which such order applies;

(C) the process of assembly or completion in the foreign country is minor or insignificant;

(D) the value of the merchandise produced in the foreign country to which the AD and/or CVD order applies is a significant portion of the total value of the merchandise exported to the United States; and

(E) Commerce determines that action is appropriate to prevent evasion of an order.

In determining whether the process of assembly or completion in a third country is minor or insignificant under section 781(b)(1)(C) of the Act, section 781(b)(2) of the Act directs Commerce to consider:

(A) the level of investment in the foreign country;

(B) the level of research and development (R&D) in the foreign country;

(C) the nature of the production process in the foreign country;

(D) the extent of production facilities in the foreign country; and

(E) whether the value of processing performed in the foreign country represents a small proportion of the value of the merchandise imported into the United States.

No single factor under section 781(b)(2) of the Act, by itself, controls Commerce's determination of whether the process of assembly or completion in a third country is minor or insignificant.[27] Accordingly, it is Commerce's practice to evaluate each of the five factors as they exist in the third country, depending on the totality of the circumstances of the particular circumvention inquiry.[28]

[27] *See* Statement of Administrative Action accompanying the Uruguay Rounds Agreements Act, H.R. Doc. No. 103-316 (1994) (SAA) at 893.

[28] *See Hydrofluorocarbon Blends from the People's Republic of China: Final Negative Scope Ruling on Gujarat Fluorochemicals Ltd.'s R-410A Blend; Affirmative Final Determination of Circumvention of the Antidumping Duty Order by Indian Blends Containing CCC Components*, 85 FR 61930 (October 1, 2020) (*HFC Blends from China*), and accompanying Issues and Decision Memorandum at 20.

Furthermore, in determining whether action is appropriate to prevent evasion of an order pursuant to section 781(b)(1)(E) of the Act, section 781(b)(3) of the Act sets forth additional factors to consider.[29] Specifically, Commerce shall take into account such factors as:

(A) the pattern of trade, including sourcing patterns;

(B) whether the manufacturer or exporter of the merchandise is affiliated with the person who, in the third country, uses the merchandise to complete or assemble the merchandise which is subsequently imported into the United States; and

(C) whether imports of the merchandise into the third country have increased after the initiation of the investigation that resulted in the issuance of such order.

No single factor under section 781(b)(3) of the Act, by itself, controls Commerce's determination of whether action is appropriate to prevent evasion of the order, or whether other evidence that would address whether action is appropriate. Accordingly, it is Commerce's practice to evaluate the record evidence, depending on the totality of the circumstances of the particular circumvention inquiry.

VII. ANALYSIS OF STATUTORY CRITERIA FOR THE CIRCUMVENTION INQUIRY

Section 781(b) of the Act directs Commerce to consider the criteria described above to determine whether merchandise completed or assembled in a third country is circumventing an order. We analyze the statutory factors below.

(A) Whether the Merchandise Imported into the United States is of the Same Class or Kind as Merchandise that is Subject to the *Orders*

Information on the record of this inquiry establishes that CORE imported into the United States from Indonesia meets the physical description of the merchandise described in the scope of the *Orders*. As discussed in the Initiation Checklist, CORE exported from Indonesia has entered the United States under the same Harmonized Tariff Schedule of the United States (HTSUS) subheadings as the HTSUS subheadings that are listed in the scope of the *Orders*.[30] The HTSUS subheadings identified in the scope of the *Orders* are generally exclusive to subject merchandise.[31] Additionally, the majority of U.S. purchasers surveyed in the U.S. International Trade Commission's investigations of CORE, reported that CORE produced in the United States, the trading partners subject to the investigations (*i.e.*, China, India, Italy, Korea, and Taiwan), and non-subject countries were comparable in terms of industry quality standards, product consistency, and product range.[32] Furthermore, record evidence provided in response to requests

[29] *See* SAA at 894.
[30] *See* Initiation Checklist at 5; *see also* Circumvention Allegation at 8.
[31] *See* Circumvention Allegation at 8 and Exhibit 6; *see also* Circumvention Request Supplement at Exhibit 4.
[32] *See* Circumvention Allegation at Exhibit 3 (citing *Certain Corrosion-Resistant Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278, (Final), USITC Pub. 4620 (July 2016), at II-27-29).

for information in this inquiry confirms that firms produce CORE in Indonesia and subsequently export CORE to the United States.[33]

This evidence supports a finding that CORE exported to the United States from Indonesia is of the same class or kind as merchandise that is subject to the *Orders* in accordance with section 781(b)(l)(A) of the Act.

(B) Whether, Before Importation into the United States, Such Merchandise Is Completed or Assembled in a Third Country from Merchandise that Is Subject to the *Orders* or Produced in the Foreign Country that Is Subject to the *Orders*

There is no information on the record of this inquiry that establishes the merchandise imported into the United States that is of the same class or kind as merchandise that is subject to the *Orders* is completed from merchandise that is produced in the foreign country that is subject to the *Orders* (*i.e.*, Vietnam). As noted above, we received Q&V responses (including supplemental responses) from four Indonesian companies, AMNS, Sunrise, TML, and PT Alex Indo, which each reported that they did not export CORE produced in Indonesia using Vietnamese-origin CRS to the United States during the POI, and that there is no record information that contradicts the accuracy of these claims.[34] Thus, there is no evidence that CORE exported from Indonesia and imported into the United States during the POI was completed or assembled in Indonesia from CRS produced in Vietnam.

The above evidence does not support a preliminary finding that CORE exported to the United States from Indonesia was completed in Indonesia from Vietnamese-origin CRS substrate in accordance with section 781(b)(1)(B) of the Act. Furthermore, because Commerce preliminarily finds that the requirements of section 781(b)(1)(B) of the Act have not been met, an analysis of the statutory criteria relating to completion or assembly (*i.e.*, whether the process of assembly or completion in Indonesia is minor or insignificant,[35] and the value of the merchandise as a proportion of the total value of exported to the United States),[36] *i.e.*, sections 781(b)(1)(C) and (D) of the Act, respectively, is moot. Furthermore, because the requirement for finding circumvention concerning completion or assembly contained in section 781(b)(1)(B) of the Act is not satisfied, an analysis of whether action is appropriate to prevent evasion of the *Orders*,[37] *i.e.*, section 781(b)(1)(E) of the Act, likewise is moot. If evidence arises that AMNS, Sunrise, TML and/or PT

[33] *See* AMNS Q&V Response at 5; *see also* Sunrise Q&V Response at 8; TML Q&V Response at 1; and PT Alex Indo Q&V Response at 6.
[34] *See* AMNS Q&V Response; *see also* Sunrise Q&V Response; TML Q&V Response; PT Alex Indo Q&V Response; AMNS First SQR; Sunrise First SQR; TML First SQR; PT Alex Indo SQR; AMNS Second SQR; Sunrise Second SQR; TML Second SQR; AMNS Third SQR; Sunrise Third SQR; and TML Third SQR.
[35] *See* sections 781(b)(1)(C) and 781(b)(2)(A)-(E) of the Act.
[36] *See* section 781(b)(1)(D) of the Act.
[37] *See* section 781(b)(1)(E) of the Act.

Alex Indo are exporting CORE produced in Indonesia using Vietnamese-origin CRS substrate, Commerce may reevaluate the determination herein.

VIII. VERIFICATION

As provided by 19 CFR 351.226(f)(3) and 19 CFR 351.307, Commerce intends to verify information relied upon in making its determination.

IX. RECOMMENDATION

We recommend preliminarily finding that, pursuant to 781(b) of the Act, imports of CORE completed in Indonesia using CRS manufactured in Vietnam are not circumventing the *Orders* on a country-wide basis.

☒	☐
Agree	Disagree

X Kasey O'Connor

Signed by: KASEY O'CONNOR
Kasey O'Connor
Deputy General Counsel,
performing the non-exclusive functions and duties
of the Assistant Secretary for Enforcement and Compliance