



A-570-910, C-570-911, A-583-814  
Vietnam Imports  
A-580-809, A-583-008, A-533-502  
Vietnam HRS  
A-570-914, A-580-859, A-583-803  
LWRPT Completed in Vietnam  
Circumvention Inquiries  
Public Document  
E&C/OVI: DSM

July 1, 2022

**MEMORANDUM FOR:** The File

**THROUGH:** Dana S. Mermelstein *DSM*  
Director  
AD/CVD Operations Office VI

Robert Bolling *RB*  
Acting Director  
AD/CVD Operations Office IV

**Re:** Circumvention Inquiries on Circular and Rectangular Pipe and Tube Products from China, India, Korea, and Taiwan

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## I. Background

On May 17, 2022, the U.S. Department of Commerce (Commerce) received requests to conduct circumvention inquiries on eight antidumping duty orders and one countervailing duty order on various circular and rectangular pipe products from the People's Republic of China, the Republic of Korea, India, and Taiwan. The requests to conduct the inquiries were filed by Atlas Tube Inc., Bull Moose Tube Company, Maruichi American Corporation, Searing Industries, Nucor Tubular Products Inc., Vest Inc., Wheatland Tube Company, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC.

On June 13, 2022, we extended the deadline for reaching a decision regarding whether to initiate the inquiries by 15 days, pursuant to 19 CFR 351. 226(d)(1).<sup>1</sup> The deadline for initiation is currently July 1, 2022.

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<sup>1</sup> See e.g., Memorandum, "Light-Walled Rectangular Pipe and Tube from the People's Republic of China (A-570-914 and C-570-915): Extension of Time to Determine Whether to Initiate Circumvention Inquiry," dated June 13, 2022.



On June 22, 2022, with regard to each antidumping and countervailing duty order covered by the inquiry requests, we issued a request for additional information to the Domestic Interested Parties (DIPs).<sup>2</sup> The DIPs filed the information requested on June 28, 2022.<sup>3</sup>

This memorandum clarifies that Commerce requested additional information from the DIPs because we found that the requests to conduct circumvention inquiries were insufficient for purposes of initiation in accordance with 19 CFR 351.226(d)(1)(i). As such, we further clarify that we deem the requests rejected on June 22, 2022. We will evaluate the initial requests of May 17, 2022, together with the supplementary information provided by the DIPs on June 28, 2022, for purposes of initiation, and, in this instance, we will consider that the initial requests and the supplementary information together constitute the applications for the circumvention inquiries under 19 CFR 351.226(c). Therefore, based on the deadline we established to provide supplemental information, we consider the inquiry request to have been filed on June 28, 2022, and this is the date from which the initiation deadline is determined; accordingly, Commerce expects to reach a decision regarding whether to initiate these circumvention inquiries by July 28, 2022, unless extended.

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<sup>2</sup> See e.g., Commerce Letter, “Circumvention Inquiry of Light-Walled Rectangular Pipe and Tube from the People’s Republic of China (A-570-914, C-570-915): Supplemental Questionnaire,” dated June 22, 2022.

<sup>3</sup> See, e.g., DIPs’ Letter, “Light-Walled Rectangular Pipe and Tube from the People’s Republic of China – Circumvention Inquiry Supplemental Questionnaire Response,” dated June 28, 2022.