



A-552-855
Investigation
Public Version
E&C/TRCI: BL

April 14, 2026

Stephen J. Orava
King & Spalding LLP
1700 Pennsylvania Avenue NW
Washington, DC 20006

Re: Petition for the Imposition of Antidumping Duties on Imports of Polytetramethylene Ether Glycol from the Socialist Republic of Vietnam: Supplemental Questions

Dear Mr. Orava:

This letter concerns your April 8, 2026, petition (Petition) filed with the U.S. Department of Commerce (Commerce) on behalf of your client, BASF Corporation, for the imposition of antidumping duties on imports of polytetramethylene ether glycol (PTMEG) from the Socialist Republic of Vietnam (Vietnam). We have reviewed the Petition and have identified certain issues that require clarification, as specified in the attachment to this letter.

Your response to these questions is due to Commerce no later than **5:00 pm Eastern Time on Monday, April 20, 2026.**

We remind you that with certain, limited exceptions, all submissions for all proceedings must be filed electronically using Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). An electronically filed document must be received successfully in its entirety by Commerce's electronic records system, ACCESS, by the time and date identified above. Commerce has recently modified certain of its requirements for serving documents containing business proprietary information.¹ For your convenience, Commerce has the following resources available online to assist you in complying with these electronic filing procedures:

ACCESS: Help Link
<https://access.trade.gov/help.aspx>

ACCESS: External User Guide
https://access.trade.gov/help/ACCESS_User_Guide.pdf

ACCESS: Handbook on Electronic Filing Procedures
https://access.trade.gov/help/Handbook_on_Electronic_Filing_Procedures.pdf

¹ See *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069 (September 29, 2023).



Federal Register notice: Antidumping and Countervailing Duty Proceedings: Electronic Filing Procedures; Administrative Protective Order Procedures, 76 FR 39263 (July 6, 2011) <http://www.gpo.gov/fdsys/pkg/FR-2011-07-06/pdf/2011-16352.pdf>. and *Enforcement and Compliance: Change of Electronic Filing System Name*, 79 FR 69046 (November 20, 2014) <http://www.gpo.gov/fdsys/pkg/FR-2014-11-20/pdf/2014-27530.pdf>

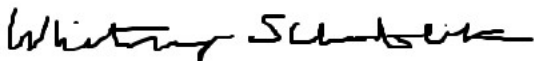
Parties are hereby reminded that the formats for the certifications provided at the end of the *Final Rule* should be used for company/government officials as well as their representatives. See *Certification of Factual Information To Import Administration During Antidumping and Countervailing Duty Proceedings*, 78 FR 42678 (July 17, 2013) (*Final Rule*); see also the frequently asked questions regarding the *Final Rule*, available at the following: http://enforcement.trade.gov/tlei/notices/factual_info_final_rule_FAQ_07172013.pdf. Commerce intends to reject factual submissions if the submitting party does not comply with applicable revised certification requirements.

All submissions of business proprietary information that do not contain a statement permitting their release under an Administrative Protective Order (APO), as required by section 777(b)(1)(B)(ii) of the Tariff Act of 1930, as amended, 19 CFR 351.304(b)(1) and 19 CFR 351.303(d)(2)(v) will be rejected at the time of filing. Please place this statement in the upper right-hand corner of your cover letter. If you object to the release of certain information under APO, you must state in full your reasons for objecting.

Please note that, in accordance with 19 CFR 351.303(c)(1), the one-day lag rule does not apply to pre-initiation submissions, including amendments to the Petition.

If you have any questions, please contact Whitney Schablik at (202) 482-2539 or Yun Liang at (202) 482-3108.

Sincerely,



Whitney Schablik
Director
Trade Remedy Counseling and Initiations
Enforcement and Compliance

PTMEG from Vietnam

Vietnam AD Questionnaire

In your response, please replicate each question and then provide your answer. All questions refer to Volume V of your April 8, 2026, Petition.

U.S. Price

1. We note that you provided a table of the U.S. Census data obtained through Datamyne for your transaction-specific average unit values (AUVs) calculation in Exhibit V-5a. Please provide the underlying monthly and port-specific official import statistics for all months of the proposed period of investigation (POI) (*i.e.*, October 1, 2025 through March 31, 2026) for which data are available from a source other than Datamyne (*i.e.*, U.S. International Trade Commission's Dataweb) and provide documentation (*e.g.*, website printout) to support the transaction-specific AUVs you use as the basis for U.S. price in Exhibit V-7.
2. It appears that the "Shipper Declared" in four of your matched shipments are [] and [] in Exhibit V-5d. Please explain how you determined that these companies produced PTMEG in Vietnam. If they are producers, please revise your list of foreign exporters in Exhibit I-14 of Volume I of the Petition to include these companies. If they are trading companies and you cannot determine whether the subject merchandise was produced in Vietnam, please do not rely on these shipments for your transaction-specific AUVs.
3. Please recalculate foreign inland freight and foreign brokerage and handling using only the cost to export, rather than averaging the costs to export and import, and revise your U.S. price calculations.
4. Please provide supporting documentation (*i.e.*, company address printout, Google maps distances, *etc.*) for the foreign inland freight distances from [] to the port of [], [] to the port of [] and [] to the port of [] used to calculate the foreign inland freight expenses in Exhibit V-6.

Normal Value

5. On page 5, you stated "{t}o estimate input usage in Vietnam, Petitioner relies on its own production experience in the United States, adjusting for known differences for costs in Vietnam." Please explain what adjustments were made.
6. With respect to the declaration in Exhibit V-8:
 - a. We note that the declarant explains [] in paragraph four. Please explain how the []

] is relevant for the dumping calculations for Vietnam, when the products that are used in U.S. prices are for [].

- b. In paragraph 5, you state that the producers in China, South Korea, Taiwan, and Vietnam either produce or purchase BDO to produce THF, or alternatively, may also purchase THF. Page 57 of Exhibit V-2 states that “Hyosung Vietnam started domestic PTMEG production in 2016, using BDO imported mainly from Taiwan and the Netherlands.” However, we note that you calculated the constructed value for Vietnam using the cost model based on the assumption that the Vietnamese producer produces BDO and THF to produce PTMEG (*i.e.*, integrated producer). Please explain the apparent discrepancy, amend the declaration and revise the cost model to account for the difference.
7. In Exhibit V-11A, please inflate the Indonesia labor rates using the Indonesian Producer Price Index (PPI) rather than the Wholesale Price Index, to the extent PPI is reasonably available.
 8. It appears that Exhibit V-15 contains two different exchange-rate sources for Indonesia. Exhibit V-15A(i) provides the Indonesian Rupiah (IDR) to U.S. Dollar (USD) rates for October 1, 2025 through January 2, 2026 and Exhibit V-15A(ii) provides the “Jisdor” exchange rates for January 2, 2026 through March 31, 2026.
 - a. Please explain why it is appropriate to average Jisdor, a weighted average of interbank spot transactions, with a different exchange rate metric, the market IDR rate to calculate the POI-average currency exchange rate.
 - b. Please provide the source and supporting documentation for the Jisdor exchange rate in Exhibit V-15A(ii).
 - c. Please provide the exchange rates for the entire POI (*i.e.*, October 1, 2025 through March 31, 2026) using one source and one metric (*i.e.*, either all IDR or all Jisdor to USD) and revise any currency conversions using the POI-average exchange rate.
 9. Please provide documentation to support the natural gas rates for El Salvador, Indonesia, and Jordan provided in Exhibit V-12.
 10. Please provide supporting documentation (*i.e.*, website printout) to clearly demonstrate the natural gas rates for small, medium, large, and extra large firms, as it is unclear from the supporting documentation in Exhibit V-14 how the petitioner derived the electricity rates during Q4 2025 and Q1 2026. Please provide the supporting documentation for natural gas rates for the entirety of the POI (*i.e.*, April 1, 2025 to March 31, 2026) to the extent reasonably available.
 11. We note that you selected PT Pertamina Persero (Pertamina) to calculate the financial ratios for Indonesia. Please address the following:

- a. Please describe your attempts to obtain financial statements of a producer of identical merchandise in Indonesia and identify the companies you considered, but that you found were not profitable or did not have publicly available statements.
 - b. On page 3, you state “Indonesia has a significant petrochemical industry and at least one significant manufacturer of comparable merchandise.” Please identify the companies you considered as producers of comparable merchandise, and document (with supporting information) your specific attempts to obtain financial statements of a producer of comparable merchandise in Indonesia.
 - c. Please identify other products that may be broadly considered comparable to PTMEG and briefly explain why they should be considered comparable.
 - d. We note that the financial statements of Pertamina in Exhibit V-16 are for the financial year ending December 31, 2024. Please provide financial statements that are contemporaneous with the POI, to the extent reasonably available to you. If you are unable to obtain more recent financial statements, please explain your efforts to obtain them.
 - e. Provide any new financial statements that you find as part of your response and provide alternative or revised calculations based on these financial statements.
12. We note that you used the Indonesian company Pertamina’s financial statements to calculate the financial ratios for El Salvador and Jordan. Please address the following:
- a. Please describe your attempts to obtain financial statements of a producer of identical merchandise in a country economically comparable to Vietnam and identify the companies you considered, but that you found were not profitable or did not have publicly available statements.
 - b. On page 8, you state “Petitioner was unable to identify publicly available financial statements for producers of comparable merchandise in these countries.” Please document (with supporting information) your specific attempts to obtain financial statements of a producer of comparable merchandise in El Salvador and Jordan and explain what products you considered comparable to PTMEG and why.
 - c. Please identify other products that may be broadly considered comparable to PTMEG and briefly explain why they should be considered comparable.
 - d. Provide any new financial statements that you find as part of your response to the questions above and provide alternative or revised calculations based on these financial statements.

Margin Calculations

13. After addressing the questions above, please provide any necessary revised calculations, including margin calculations. Margin calculations should be rounded to the nearest hundredth decimal (*e.g.*, 50.01 percent) and stated for the public record.