

Randol, Inc.
2320 Kaliste Saloom Road
Lafayette, LA 70508

July 13, 2005

Mr. Joseph A. Spetrini
Acting Assistant Secretary for Import Administration
U.S. Department of Commerce
Central Records Unit, Room 1870
14th and Constitution Avenue NW
Washington, D.C. 20230

RE: Timing of Assessment Instructions for Antidumping Duty Orders Involving Non-Market Economy Countries, Especially China

Dear Mr. Spetrini:

Randol, Inc. strongly urges the Department of Commerce promptly to resume issuing assessment instructions at the rate in effect on the date of entry for all entries except those entries from the specific entities for which a review was requested and initiated. This action would reinstate the process for freshwater crawfish tail meat from China in effect for the past several years.

The Department of Commerce instructions are essential to assuring timely compliance with the law, the Continued Dumping and Subsidy Offset Act of 2000 (CDSOA). This law provides for distribution of assessed duties to affected domestic producers for qualified expenditures which include health care benefits for employees paid for by employers, pension benefits and funds needed to maintain production in the face of illegal dumping. The timing of the continued dumping and subsidy offset already has a built-in delay and puts Louisiana crawfish processors at an even greater disadvantage if there is additional unwarranted delay.

If liquidation instructions are delayed further, CPA members, including Randol, Inc., will be harmed

A failure to promptly resume auto liquidation will further harm the economic interests of Southwest Louisiana, its small business crawfish processors, and the farmers involved in harvesting crawfish. These Louisiana interests already are short at least \$50 million (part of the \$285 million in as yet uncollected antidumping duties). The U.S. taxpayer also is a loser...to the tune of about \$250 million. In FY2004 Customs collected only \$8 million (5%) of the \$170 million antidumping duties due from China. To assure that even minimal FY2005 funds are available for distribution this calendar year, prompt instructions must be issued to Customs. If these instructions are not issued soon after the July 15 deadline for the filing of these comments, it is unlikely that the U.S. Bureau of Customs and Border Protection (Customs) will be motivated to act to make the September 30 deadline for transfer of FY2005 funds.

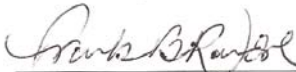
Leadership required by the Department of Commerce

We expect the U.S. government, acting through the Department of Commerce and Customs, aggressively to implement the law. In the case of freshwater crawfish tail meat, the Chinese have made a mockery of U.S. law and have been able to game the system. For dumping duties, the rate of collection for China is two thirds the rate of other countries. For crawfish the collection rate is an unacceptable 10 times lower.

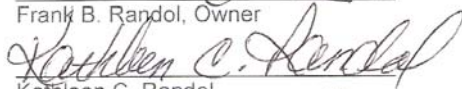
Until the recent suspension of its liquidation practice for unchallenged cases, the Department of Commerce had shown important leadership on the Chinese crawfish dumping issue. Further delay by Commerce will amplify the negative effect of the Customs failure to collect the antidumping duties from the Chinese.

Respectfully submitted,

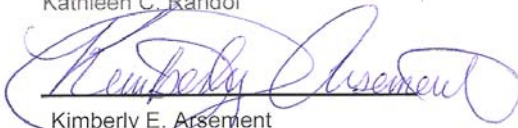
The undersigned owner and employees of Randol, Inc.



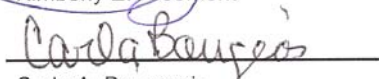
Frank B. Randol, Owner



Kathleen C. Randol



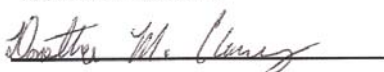
Kimberly E. Arsement



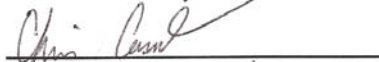
Carla A. Bourgeois



Richard J. Celestine



Donetha M. Clary



Chris Corral



Todd J. Courville



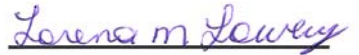
Russell P. Randol



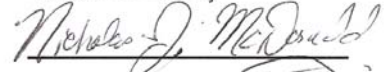
Harold LeBlanc



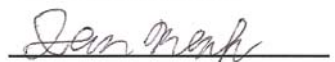
Karla K. LeBlanc



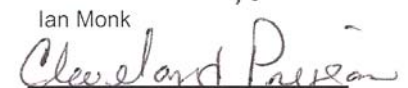
Lorena M. Lowery



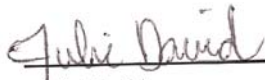
Nicholas J. McDonald



Ian Monk



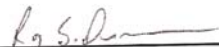
Cleveland Prejean



Julie David



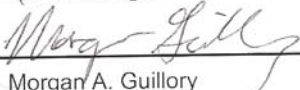
Charles Domingue



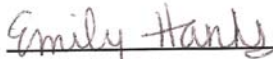
Ray S. Donovan



Jenna Granger

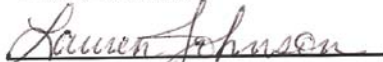


Morgan A. Guillory

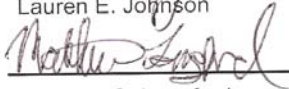


Emily N. Hanks

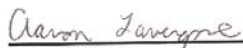
Nina K. Hasenstein



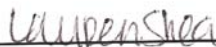
Lauren E. Johnson



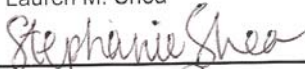
Matthew G. Langford



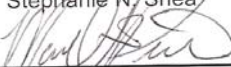
Aaron V. Lavergne



Lauren M. Shea

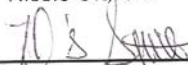


Stephanie N. Shea

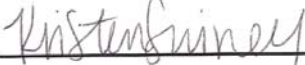


Marcel S. Pierre

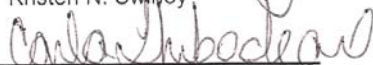
Nicole Stevens



Doris Y. Stewart



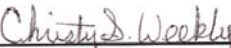
Kristen N. Swiney



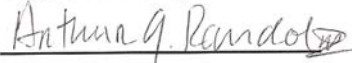
Carla Thibodeaux



Brandon C. Thibodeaux



Christy S. Weekly



Arthur G. Randol III