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October 2, 2002

The Honorable Donald L. Evans
Secretary
U.S. Department of Commerce
14th Street and Constitution Avenue
Washington, DC 20230

Re: Case No. A-552-801

Dear Mr. Secretary:

These comments are respectfully submitted in response to the Commerce Department's August 9, 2002 request for public comments on the Catfish Farmers of America's allegation that Vietnam should be treated as a non-market economy for purposes of antidumping calculations in the pending case on certain frozen fish fillets from Vietnam. We understand that the Department's decision in this matter may have a broad-reaching impact, affecting not merely the calculations made in this case but in future cases as well. We also understand that this decision has potentially broader implications, evidenced by the wide-ranging attention that the recent decision on Russia's market status received.

As you may know, the **US-ASEAN Business Council** is the voice of the American private sector in the 10-country ASEAN market. With over two decades of building strategic alliances and working relationships with ASEAN regional organizations as well as with government and private sector leaders in each country, the Council has helped improve the business environment for American companies and expand the U.S. competitive position in the region. ASEAN has been and continues to be an area of regional growth and change. Moves toward regional economic integration through ASEAN Free Trade Area (AFTA) and related initiatives focus on economic reform, deregulation, liberalization, and modernization in key sectors. The US-ASEAN Business Council is dedicated to effectively strengthening bilateral and US-ASEAN relations through strong economic and commercial ties. Our objectives are to:

- Promote trade, investment and technology cooperation
- Remove all barriers to the expansion of commercial relationships
- Promote U.S. competitiveness in ASEAN through strong private sector participation in business-governmental partnerships.

Vietnam is a member of ASEAN and has committed, under the AFTA, to reform its economy in order to integrate itself not only into the ASEAN economic network, but the entire world economy. We view the progress made in recent years under the AFTA, IMF protocols, and -- perhaps most importantly for the Department's purposes -- the US-Vietnam Bilateral Trade Agreement, as a demonstration that the "Communist" label attached to Vietnam has very

little to do with economic reality. Rather, the reforms adopted in recent years are transforming Vietnam into a vibrant market economy. We are not saying that Vietnam has achieved all that it could, but we certainly believe that it is well on its way.

Given the broad effect this decision will have, we think a decision to treat Vietnam as a non-market economy will do unnecessary harm to the relationship between the United States and Vietnam. Such a decision would seem to convey the message that Vietnam is not doing enough to reform its economy, even though it is fully abiding by the reform schedule it committed to with the other ASEAN nations, the IMF, and the United States.

We urge the Department to sent the right message and treat Vietnam as a market economy.

Respectfully submitted,

Ernest Z. Bower
President
US-ASEAN Business Council

cc: The Honorable Jon Huntsman, Jr., USTR
The Honorable James Kelly, U.S. Department of State
The Honorable Ray Burghardt, U.S. Embassy, Hanoi
Ms. Karen Brooks, National Security Council