## First Continental International (N.J.) Inc.

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November 1<sup>st</sup>, 2007

U.S. Department of Commerce C/O Mr. David Spooner, Assistant Secretary for Import Administration

Central Records Unit

Room 1870

14<sup>th</sup> Street and Constitution Avenue NW

Washington, D.C. 20230

Re: Antidumping Methodologies in Proceedings Involving Certain Non-Market Economies: Market-Oriented Enterprise: Request for Comment (Federal Register / Vo. 72, No. 206 / Thursday, October 25, 2007 / Notices)

To whom it may concern:

We believe that companies within China should be considered on an individual basis to determine if they fall under the mechanisms of a Non-Market Economy (NME) or a market oriented enterprise (MOE).

In truth there are two major changes in the Chinese economy that leave many of China's mills operating within the scope of a MOE:

- 1 The central government no longer controls the fiscal operations of the factories within China. Many of the factories are indeed independently operated but those mills that are not independent are now run by the local government. The local government must operate local enterprise profitably in order for the taxes to support the local community. If a factory is not profitable, it is shut down.
- 2 There is a growing trend within the drastically increasing independent enterprises within China to place their share-holds not only in the China's stock markets, but also in the stock markets of Hong Kong, Japan, and even America.

In conclusion, now many companies within China are already operating within a market economy because they are or will be shut down if they are not profitable.

Thank you for your consideration of our comments.

Sincerely.

General Manager

FCI (NJ) Inc.