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December 30, 2002

The Honorable Donald Evans
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
14th Street and Constitution Ave., N.W.
Washington, D.C. 20230

NORTH AMERICA
LOS ANGELES, NEW YORK, PALO ALTO,
SAN FRANCISCO, WASHINGTON

EUROPE
ANTWERP, BERLIN, BRUSSELS, FRANKFURT,
GHENT, LONDON, MILAN, MOSCOW, MUNICH,
PARIS, ROME, ST. PETERSBURG, STOCKHOLM

ASIA/PACIFIC
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ASSOCIATED OFFICES
BUDAPEST, MEXICO CITY, PRAGUE, SHANGHAI

RECEIVED
DEPT. OF COMMERCE
ITA
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DEC 30 2002

Case No.: A-485-805
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Administrative Review
February 4, 2000 - July 31, 2001

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PUBLIC DOCUMENT

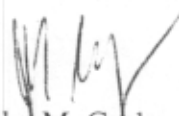
RE: Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe from Romania -- Inquiry Into the Status of Romania As a Non-Market Economy Country Under the U.S. Antidumping And Countervailing Duty Laws

Dear Mr. Secretary:

On behalf of S.C. Silcotub S.A., we hereby submit letters in support of Romania's transition to market economy status. These letters rebut the allegations made by domestic industry parties in their submissions of November 8, 2002.

Please do not hesitate to contact us if you have any questions concerning this request.

Respectfully Submitted,


John M. Gurley

CERTIFICATE OF SERVICE

**Certain Small Diameter Carbon and Alloy Seamless Standard, Line and Pressure Pipe
from Romania**

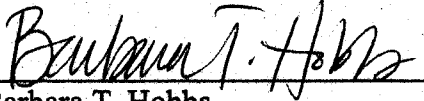
A-485-805

**The undersigned hereby certifies that on this 30th day of December, 2002, copies
of the following were delivered by hand on the following parties:**

**Robert E. Lighthizer
John J. Mangan
Skadden, Arps, Slate, Meagher & Flom, LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111**

**Valerie A. Slater
Akin, Gump, Strauss, Hauer, & Feld LLP
1333 New Hampshire Ave, N.W, Suite 400
Washington, D.C. 20036**

**Alan Wolff
Thomas Howell
Dewey Ballantine LLP
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006**


Barbara T. Hobbs



Washington

STEPHEN M. JOHNSON
Senior Executive Vice President &
Chief Business Development Officer

The Honorable Donald L. Evans
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
U.S. Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

Date: December 20, 2002
Ref: Case No. A-485-805

Re: Support for Revocation of Romania's Non-Market Economy Status

Dear Secretary Evans:

Washington Group International is a global engineering and construction company comprised of the legacy companies, Morrison Knudsen, Westinghouse Government Services and Raytheon Engineers and Constructors. Our more than 30,000 employees do work in 43 states and 35 countries. Of strategic interest to our company are our corporate operations in Ploiesti, Romania where we employ more than 200 engineers and support staff and from which we serve clients in the United States, Europe and the Middle East. We have conducted operations from Ploiesti for nearly five (5) years. In short, Romania has become an excellent venue from which to do business.

We write you in support of the Romanian government's request for revocation of the current "Non-market economy" status.

From the vantage point of our corporate interests, Romania, since its liberation, has been transformed into a growing, vibrant market with many attractive attributes. These include an excellent geographic location with proximity to major centers of commerce. The government is making a concerted effort to provide necessary infrastructure. Most importantly, we have found that Romania boasts a highly educated and motivated workforce eager to compete in today's global market economy.

We believe you are also aware of the following additional factors which support Romania's request:

- The national currency (ROL) is characterized by full convertibility on all current account transactions. We may freely repatriate our profits and dividends in foreign currency.
- Wage rates are determined by free bargaining between labor and management.

DA KC/2459/14.12.02



Nr.	1287
Data	13.12.2002

AM/4667/13.12.02.

Astra Vagoane Arad S.A.
 Calea A.Vaicu 41-43
 Romania, 2900 Arad
 Tel +40 (0)2 57 231 255
 Fax +40 (0)2 57 202 115

Se An Cirliza
Albu

Date: December 11, 2002

Se St. Ad. Lupta
Lupta
NRC

Se St. Ad. Lupta
11.12.2002

The Honorable Donald L. Evans
 Secretary of Commerce
 Attn: Import Administration
 Central Records Unit, Room 1870
 US Department of Commerce
 14th Street and Constitution Avenue, NW
 Washington, DC 20230

Re: Request for Revocation of Romanian's Non-Market Economy Status

Dear Mr. Evans:

Our company is in its 3.5 years of activity in Romania.
 We provide a wide range of services; our main activity is rail car manufacture.
 Many foreign companies have established themselves in Romania over the last 13 years.
 Since 2001, when the new Government is in place, the foreign investments have risen sharply. Romania has managed to accelerate the process of attracting foreign investors, at the same time lowering inflation and boosting economic growth.
 Romania with its excellent geographical location, in proximity of developing markets, with a developing infrastructure, low operating and living costs, and educated workforce is a good base for foreign companies to expand their business in the region.

Economic growth, accelerated reforms, and business achievements in Romania have created a stable basis for a market economy:

- The national currency (ROL) is characterized by full convertibility on all current account transactions.
- Wage rates are determined by bargaining between labor and management.
- Foreign investment is fully permitted and encouraged in Romania. Significant investments enjoy substantial incentives, tax breaks and a streamlined administrative process.
- Romania is committed in finalizing the privatization of remaining state-owned enterprises as its economy is based on the right to private ownership.
- Companies themselves decide on the allocation of resources and prices according to the situation in the market.

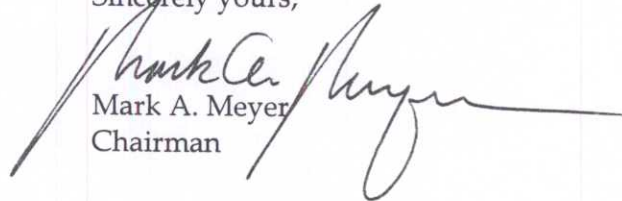
With this in mind, we believe that the last few years have transformed Romania into a market economy and therefore support their request to be awarded the Market Economy Status under U.S. anti-dumping and countervailing laws.

Sincerely,

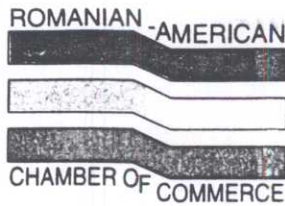
Donald Crook
 General Director
 Donald Crook

We wish to reiterate our complete support for Romania's request for market economy status. Indeed, we think that the granting of such a status would help strengthen Romania's dedication to complete more rapidly its privatization process and eliminate all remnants of state ownership of economic units.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Mark A. Meyer". The signature is written in black ink and is positioned to the right of the typed name and title.

Mark A. Meyer
Chairman



5530 Wisconsin Avenue, Suite 1110, Chevy Chase, MD 20815

Tel: (301) 656-9022 • Fax: (301) 656-9008

Chairman's Office: 40 Wall Street, New York, NY 10005

Tel: (212) 471-8453 • Fax: (212) 344-3333

December 19, 2002

The Honorable Donald Evans
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
14th Street and Constitution Ave., N.W.
Washington, D.C. 20230

Case No.: A-485-805

Total Pages: 2

PUBLIC DOCUMENT

**RE: Certain Small Diameter Carbon and Alloy Seamless Standard, Line
and Pressure Pipe from Romania**

Dear Mr. Secretary:

On behalf of the Board of Directors of the Romanian-American Chamber of Commerce ("RACC"), I hereby write in support of Romania's request for market economy status.

The RACC is the largest bilateral trade and investment organization in the United States representing Romanian and U.S. companies. The RACC has a significant background in all aspects of Romanian-American bilateral issues and is cognizant of both the strengths and the weaknesses of the Romanian economy. As members of your department familiar with its activities will attest, the RACC has consistently supported efforts to develop legislative stability and transparency, fight corruption, and create a business environment conducive to foreign investment in Romania. Indeed, the RACC has only recently publicly urged the Government of Romania to fairly and rapidly settle several unfortunate disputes with American companies, of which we believe you are already aware. It is important to note, however, that these troubled situations are not indicative of the norm for foreign investors in Romania.

While the Romanian economy is not perfect, the Romanian Government has made strides in advancing market economy principles to a level at which it is simply not accurate to state that Romania lacks a market economy. In point of fact, Romania enjoys a robust market economy that has emerged from a previously wholly controlled state directed economy.

We have reviewed the submissions filed by both the U.S. Steel industry and the Ad Hoc Committee of Nitrogen Producers. Neither of these submissions is accurate. Rather, they paint a biased picture that does not recognize the significant strides made in the Romanian economy.

To the extent that our organization can provide the Department of Commerce with additional information, we would be happy to do so.

Procter & Gamble

JANE FAWCETT-HOOVER
Vice President
National Government Relations

December 19, 2002
Ref. Case No. A-485-805

The Honorable Donald L. Evans
Secretary of Commerce
U.S. Department of Commerce
Import Administration
Central Records Unit, Room 1870
14th Street and Constitution Avenue, NW
Washington, DC 20230

Re: Status of Romania as a Non-Market Economy

Dear Mr. Secretary:

The Department has requested comments on whether Romania's status as a non-market economy under the antidumping and countervailing duty laws should be revoked (67FR 57388). We submit the following comments, but offer them independent of the administrative review of "Certain Small Diameter Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Romania," Case No. A-485-805, a matter in which we have no opinion.

Procter & Gamble (P&G) manufactures and markets nearly 300 brands of consumer products in more than 160 countries. We established business in Romania in 1994, and have sustaining manufacturing and marketing operations there.

It is our view that Romania is making substantial progress toward a free market economy. Reforms implemented beginning in 1999 and continuing under the government that took office in December 2000 have especially improved the business climate for foreign investors. Romania is committed to further economic reform, evidenced by plan for accession to the European Union (E.U.).

Considering the Department's six criteria for "market economy" status in light of our experience as a foreign investor, we would support Romania's classification as a market economy. Currency convertibility, labor markets, treatment of foreign investors, and the extent of government intervention in markets are in line with the practices of other E.U. accession candidates (such as Poland, Slovakia, and the Czech Republic) for which the Department has revoked non-market economy status. Finally, we would observe that the E.U. already considers Romania a market economy under its antidumping and countervailing duty laws.

Respectfully submitted,


Jane Fawcett-Hoover

PRICEWATERHOUSECOOPERS

Since 2001, when the new Government took office, foreign investments have improved. Romania managed to accelerate the process of attracting foreign investors, whilst at the same time lowering inflation and boosting economic growth.

Romania with its excellent geographical location, close to some big markets, with a developing infrastructure, low operating and living costs and highly educated labor force is a valid base for foreign companies wishing to expand their business in the region.

Economic growth, the accelerated reforms and business achievements in Romania have created a stable basis for a market economy:

- The national currency (ROL) is characterized by full convertibility on all current account transactions. We may freely repatriate our profits and dividends in foreign currency.
- Wage rates are determined by free bargaining between labor and management
- Foreign investment is fully permitted and encouraged in Romania. Significant investments enjoy substantial incentives, tax breaks, and a streamlined administrative process.
- Romania is committed to finalizing the privatization of remaining state-owned enterprises as its economy is based on the allocation of resources and prices according to the situation in the market.

In view of the above, I strongly believe that the last couple of years has transformed Romania into a market economy and support its request of achieving Market Economy Status under US antidumping and countervailing laws.

Yours sincerely,

Jean-Pierre Vigroux
Country Senior Partner
PricewaterhouseCoopers Romania

PricewaterhouseCoopers
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1-5 Costache Negri Street
Bucharest 5, Romania
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Facsimile +40 (21) 202 8600

To The Honorable Donald L. Evans
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
US Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

Date: 06 December 2002
Ref: Case No. A-485-805

Re: Request for Revocation of Romania's Non-Market Economy Status

Dear Mr. Evans,

I am writing to you as I was surprised to find my name and a quote from a supposed interview I gave in May 2002 on a website of US Department of Commerce. My surprise was caused by the fact that the quote contained negative comments on Romania's business environment, with special reference to foreign investment.

I feel the need to make a few clarifications about this:

- I gave no interview in May 2002, the so called quote being a journalistic interpretation of a speech I made at the 2002 EBRD Business Forum in Bucharest on 19 May.
- My words were taken out of context, giving place to the denaturation and misinterpretation of my message that was, in substance, a clear appeal for foreign investment in Romania.
- Unfortunately, this quote was used, together with other comments of personalities in Romanian public life e.g. Prime Minister Adrian Nastase, ex Prime Minister and current leader of the National Liberal Party Teodor Stolojan, CEO of Raiffeisen Bank Steven van Groningen, and former President of Romania Emil Constantinescu, as supporting arguments for not according Market Economy Status to Romania.

PricewaterhouseCoopers is in its 11th year of activity in Romania - former Coopers & Lybrand entered the Romanian market in 1991 and Price Waterhouse in 1993. We provide a wide range of services such as audit and business advisory, domestic taxation and general business advice, corporate finance & recovery, to a wide array of clients, including local state owned and private enterprises, central government bodies, and leading international corporations.

Many foreign companies have established themselves in Romania over the last 13 years.



HARRIS CORPORATION

BRUCE ALLAN
President

Broadcast Communications Division
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phone 1-513-459-3400
main 1-513-459-3400
fax 1-513-459-3991
e-mail: bellan@harrk.com

www.harris.com

December 13, 2002

Honorable Donald L. Evans
Secretary
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

RE: Request for Revocation of Romania's Non-Market Economy Status

Dear Secretary Evans:

I am writing to communicate support for the request by the Romanian Government to have its status as a non-market economy revoked. Harris Corporation has provided a range of products and services to Romania in recent years, including microwave, point-to-point radios; tactical radios; and, most recently, broadcast transmission equipment to assist the Government modernize Radiocomunicatii S.A., its state-owned radio network. Our business dealings in Romania illustrate the degree to which the new government has accelerated the pace and breadth of economic reforms in an effort to introduce market-based economic practices.

The results of these efforts appear to be favorable. The pace of foreign investment has increased at the same time that inflation has slowed and overall economic growth has improved. The Romanian Government's leadership team is becoming as significant an asset toward economic growth as the country's excellent geographic location, developing infrastructure, low operating and living costs and highly educated labor force.

It is also worth noting that the new Romanian Government has instituted reforms that form the foundation for future progress. These include:

- Full convertibility of the national currency on all current account transactions. This allows full repatriation of profits and dividends.
- Foreign investment is permitted and welcomed. The Romanian Government encourages investment through a series of incentives that are based sound free-market principles.
- Privatization of remaining state-owned enterprises is proceeding. This action is perhaps that clearest indication to date that Romania has embraced the fundamental concept of private ownership as a necessary condition to economic growth.

It appears that Romania is in the midst of a serious and determined effort to transform its economy to one based on sound free-market practices. To that end, I encourage favorable consideration of Romania's request for removal of its non-market status.

Sincerely,

Bruce Allan
President, Harris Broadcast Communications Division



ISPAT SIDEX S.A.

The Honourable Donald L. Evans
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
US Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

Date: 12/12/2002
Ref: Case No. A-485-805

Re: Request for Revocation of Romania's Non-Market Economy Status

Dear Mr. Evans:

Post-privatisation, our company is in its second year of activity in Romania. We produced mild steel flat products viz. hot-rolled coils, hot-rolled plates, cold-rolled coils, hot dip galvanised coils, pipes & billets, which we sell in the domestic and export markets.

Many foreign companies have established themselves in Romania over the last 13 years. Since 2001, when the new Government is in place, the foreign investments have risen sharply. Romania managed to accelerate the process of attracting foreign investors, lowering at the same time the inflation and boosting the economic growth. Romania with its excellent geographical location, in the proximity of some big markets, with a developing infrastructure, low operating and living costs and highly educated labour force is a proper base for the foreign companies to expand their businesses in the region.

The economic growth, the accelerated reforms and business achievements in Romania have created a stable basis for a market economy:

- The national currency (ROL) is characterized by full convertibility on all current account transactions. We may freely repatriate our profits and dividends in foreign currency.
- Wage rates are determined by free bargaining between labour and management.
- Foreign investment is fully permitted and encouraged in Romania. Significant investments enjoy substantial incentives, tax breaks and a streamlined administrative process.
- Romania is committed in finalizing the privatisation of remaining state-owned enterprises as its economy is based on the right to private ownership.
- Companies themselves decide on the allocation of resources and prices according to the situation in the market.

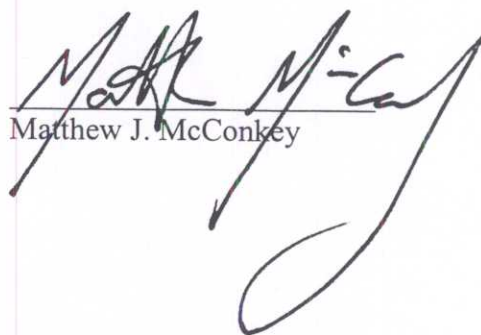
Having in view the above mentioned, we strongly believe that the last couple of years had transformed Romania into a market economy and support its request to achieving the Market Economy Status under US antidumping and countervailing laws.

Yours Sincerely,
For Ispat Sidex S.A.


Satyakam Basu
Director – Sales & Marketing

CERTIFICATION

I, Matthew J. McConkey, counsel to S.C. Silcotub S.A., certify that: (1) I have read the attached submission, and (2) based on the information made available to me, have no reason to believe that this submission contains any material misrepresentations or omissions of fact.

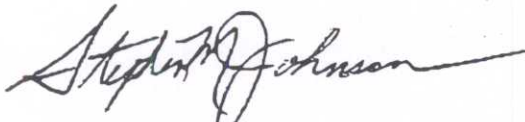


Matthew J. McConkey

- Foreign investment is fully permitted and encouraged in Romania. Significant investments enjoy substantial incentives, tax breaks and a streamlined administrative process.
- Romania is committed to finalizing the privatization of remaining state-owned enterprises as its economy is based on the right to private ownership.
- Companies themselves decide on the allocation of resources and prices according to the situation in the market.

In sum, designation of Romania as a market economy and revocation of the prior non-market economy status represents a mutually beneficial means of recognizing the remarkable progress and exciting potential for the future of Romania and its people.

Thank you for your time and consideration.



Stephen M. Johnson
Chief Business Development Officer
Office of the Chairman

cc: Cynthia Stinger
Washington Government Affairs