

June 6, 2005

The Honorable Joseph A. Spetrini  
Acting Assistant Secretary for Import Administration  
U.S. Department of Commerce  
Central Records Unit, Room 1870  
Pennsylvania Avenue and 14<sup>th</sup> Street NW  
Washington, DC20230

**Re: Comments on Market Economy Inputs Practice in Antidumping  
Proceedings Involving Non-Market Economy Countries**

Dear Mr. Spetrini,

We, China Chamber of Commerce for Import & Export of Machinery and Electronic Products (CCCME), hereby submit these comments (including an original one and six copies) on USDOC's notice of Market Economy Inputs Practice in Antidumping Proceedings involving Non-Market Economy Countries published on May 26, 2005. Our comments are as followed:

We think USDOC's long-standing practice of using market economy import prices to value an entire input give the respondents an opportunity of fair treatment. It

is also proper to set up a threshold for the share of volume of a given input sourced from market economy suppliers to qualify as “meaningful” in order for the import price to be used to value all of the input. We think, if the import of input from market economy suppliers is representative, that is “meaningful”. To determine whether it is representative, 5% import of the total input value is enough. Because in an antidumping investigation, to determine whether the domestic sale is representative, the threshold of 5% is introduced.

Another important thing in market economy inputs practice we want to mention is the criteria to decide whether the input is sourced from market economy countries. For example, Korea is a market economy country in antidumping investigations, but when an enterprise in NME country sourced input from Korea, USDOC rejected to use the price due to general subsidies existed in Korea. In this way, surrogate prices were applied. We think, if there are really general subsidies existed and the import prices were biased, USDOC should adjust the import prices by subsidy duties. It is unfair and improper to neglect the import prices and use surrogate prices.

We sincerely hope USDOC will take our comments into consideration and change its unfair practice in the antidumping investigations in the future.

Sincerely yours,

Liu Mei Kun

Vice president, CCCME