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To: U.S. Department of Commerce

10/5/2002

In reference to A451-801

Please find and consider the following arguments in regard to a correction of your records for Lithuania to that of a free-market economy.

1. As vice president of Viskase Corporation, formerly division of Union Carbide Corporation, I have conducted business in Lithuania between 1993-1997 and have encountered no instance where the NME status would apply.

To the contrary, in regarding new product development, with firms like FASA which produced packaging machinery and later PAKMA* in the town of Mariampole, Lithuania, I observed entrepreneurship beyond that of many other market-economy countries. There has been no government interference and joint ventures was encouraged.

We had exhibits at the Agro-Balt Expo in Vilnius, Lithuania and encouragement from all sectors to form Joint ventures. We joined the Lithuanian Packaging Association and established distribution of our products without excessive tariffs or any non-tariff import restrictions. We set the price of our food packaging material products and let the market decide their demand. Our competitors there at the time were U.S. firm -W.R.Grace Company (Cyovac Div.) and Visko of Finland. All enjoyed the same free market privileges.

2. At the end of my career, I served as Corporate Director of Strategic Research and traveled worldwide to search for outsourcing opportunities. I have since then taken early retirement to serve as a volunteer for the International Executive Service Corps (IESC) and to teach International Business Management at Lake Forest Graduate School of Management, Lake Forest, IL and National-Louis University (brief Bio. is attached). Comparing with other nations of my experience, UK, Canada, France, Mexico, Germany, etc.-- I look at the NME classification of Lithuania as an inadvertent error to be corrected as soon as possible.

For example:

- i) The convertibility of currency is a foregone fact – one simply has to go to a bank or currency exchange – spot exchange is available as anywhere else in Europe.
- ii) Wage rates and other factors of administrating authority that affect international free trade are as open as any of the West European countries. In this I refer to administrative policies as, for example defined, by Charles W. L. Hill, “Global Trade and Investment Environment” (p.178) *International Business*, McGraw-Hill, Boston, 2003.
- iii) As another example, the *Lithuanian Junior Achievement* program, which by the way is called “*Lietuvos Junior Achievement*” is a very well developed and successful program that last year has won the 1st place award sponsored by Hewlett Packard. The program is active throughout the country practicing and teaching the principals of free-market economy.

Sincerely,

D. Tijunelis

*PAKMA, AB, E. Budrevicius, Managing Director