

estimated margin for the subject country to be sufficient for purposes of initiation. *See Initiation Checklist*, at page 3. Should the need arise to use any of this information in our preliminary or final determination for purposes of facts available under section 776 of the Act, we may re-examine the information and revise the margin calculation, if appropriate.

Export Price

To calculate export price (EP), the petitioner provided: (1) a direct price quotation of a mesh-top T-leg unit, with pad and cover, from a major Chinese producer and exporter of ironing tables to the United States; and, (2) a bid offer from an unknown competing vendor. The price quotation provided by the petitioner for the subject merchandise was determined to be sufficient for initiation purposes. Since the petitioner was unable to document who the supplier was, we did not consider the bid offer as a basis for EP. Should the need arise to use any of this information as facts available under section 776 of Tariff Act of 1930 (the Act) in our preliminary or final determinations, we may reexamine the information and revise the margin calculations, if appropriate. *See Petition*, at page 17.

The ironing table model referenced in the price quotation represents the single dominant design that pervades the U.S. market. *See Initiation Checklist*, at page 6. Given the terms of sale applicable to the price quotation, the petitioner made no adjustments to EP because the reliance upon the sale price offered by the seller reflects a conservative approach.

Normal Value

The petitioner asserted that the PRC is an NME country and no determination to the contrary has yet been made by the Department. In previous investigations, the Department determined that the PRC is an NME. *See, e.g., Final Determination on Ferrovandium from the People's Republic of China*, 67 FR 71137 (November 29, 2002); *Final Determination on Cold-Rolled Carbon Steel Flat Products from the People's Republic of China*, 67 FR 62107 (October 3, 2002). In accordance with section 771(18)(C)(i) of the Act, the presumption of NME status remains in effect until revoked by the Department. The presumption of NME status for the PRC has not been revoked by the Department and, therefore, remains in effect for purposes of the initiation of this investigation. Because the PRC's status as an NME remains in effect, the petitioner determined the dumping

margin using a factors of production (FOP) analysis.

For the normal value (NV) calculation, the petitioner based the FOP analysis, with respect to raw materials, labor, and energy, as defined by section 772(c)(3) of the Act, on its knowledge and experience of the ironing board industry and ironing board production process, and, where applicable, on a physical examination of a Chinese mesh-top T-leg ironing table. The petitioner also added to the FOP values an amount for factory overhead, selling, general, and administrative expenses, and profit, as well as an amount for packing.

Pursuant to section 773(c) of the Act, the petitioner asserted that India is the most appropriate surrogate country for the PRC, claiming that India is: (1) at a level of development comparable to the PRC in terms of per capita gross national income (GNI), which is the current World Bank term for what was previously termed "Gross National Product" (GNP); and, (2) a significant producer of comparable merchandise. The petitioner further notes that India has often been the primary surrogate country for PRC cases. *See, e.g., Notice of Preliminary Determination of Sales at Less Than Fair Value: Saccharin From the People's Republic of China*, 67 FR 79049, 79054 (December 27, 2002). Furthermore, the petitioner has been able to obtain all of the necessary data to value the factors of ironing table production in India. Based on the information provided by the petitioner, we believe that the petitioner's use of India as a surrogate country is appropriate for purposes of initiating this investigation. *See Initiation Checklist*, at page 7.

The petitioner identified and quantified the material inputs (*e.g.*, cold-rolled flat-rolled steel, washers, cloth, etc.) based on its knowledge and experience, as well as its physical examination of a Chinese mesh-top T-leg ironing table. The petitioner valued these material inputs based on Indian import statistics for the period of July 2002 through December 2002, as published by the *World Trade Atlas* subscription service, which, in turn, obtains data from the Indian Ministry of Commerce and Industry, Director General, Commercial Intelligence & Statistics. Because some of these values are from a period preceding the POI, the petitioner adjusted for inflation the values to reflect the POI levels, where appropriate, using the Indian Wholesale Price Index (WPI) (compiled by the Indian ministry of Commerce and Industry, Office of the Economic

Advisor). *See Initiation Checklist*, at page 6.

Based on its knowledge of Chinese ironing-table producing equipment, the petitioner was able to quantify the amount of electricity consumed. The petitioner valued electricity based on the Indian publication *Electricity for Industry*, for the fourth quarter 2001, as maintained by the International Energy Agency on its website (http://www.iea.org/statist/keyworld2002/key2002/p_0505.htm). That value was then adjusted for inflation on the basis of the Indian monthly WPI for Electricity for Industry. *See Initiation Checklist*, at page 7.

To determine the quantity of natural gas used in the heat curing finishing process, the petitioner relied on its own knowledge and experience. To value natural gas, the petitioner used a value derived from the Indian company Gail (India) Ltd., for May through September 2002. *See Initiation Checklist*, at page 7.

The petitioner valued labor by applying the Department's regression-based wage rate for the PRC, in accordance with section 351.408(c)(3) of the Department's regulations, to the corresponding yield rates for each process.

For manufacturing overhead, selling, general, and administrative expenses, and profit, the petitioner relied upon the publicly available financial data of Godrej & Boyce Manufacturing Company Ltd. (Godrej). The Department recently relied upon this data in another antidumping investigation. *See Notice of Final Determination of Sales at Less Than Fair Value: Folding Metal Tables and Chairs from the People's Republic of China*, 67 FR 20090 (April 24, 2002). Godrej is an Indian producer of metal furniture, including folding metal tables that is sufficiently similar to metal-top ironing tables in terms of materials and production processes to be considered comparable merchandise. *See Initiation Checklist*, at page 8.

Based on the information provided by the petitioner, we believe that the surrogate values represent information reasonably available to the petitioner and are acceptable for purposes of initiating this investigation. *See Initiation Checklist*, at page 8.

Fair Value Comparisons

Based on the data provided by the petitioner, there is reason to believe that imports of ironing tables from the PRC are being, or are likely to be, sold at LTFV.

Based on a comparison of EP to NV, the petitioner calculated an estimated dumping margin of **59.32** percent. A summary of the margin calculation is