

calculate surrogate values for JMC's factors of production (FOP). In addition, we corrected the surrogate value for adhesive tape in the worksheet used for SLK's packing, and the surrogate value for steel shavings in the worksheet used for one of SLK's suppliers.

Comment 2: Indirect Labor Calculation for an SLK Supplier

SLK argues that the Department incorrectly recalculated indirect labor hours in the galvanizing workshop of one of its suppliers by allocating them to the total weight of galvanized fittings produced in the galvanizing workshop. SLK states that both black and galvanized fittings are cleaned in the galvanizing workshop, and argues that the indirect labor hours should be divided by the weight of both types of fittings.

The petitioners argue that the selection of the basis over which to allocate indirect labor is not ministerial, but instead methodological, and urge the Department to deny SLK's request to revise the calculation.

Department's Position:

We agree with SLK that the omission of the weight of the black fittings cleaned in the galvanizing workshop was a ministerial error. The error resulted from SLK's formatting of a worksheet, in which only the galvanized fittings are shown under the heading "Galvanizing and Cleaning." As it was not an intentional choice of methodology, but resulted from an error in copying, we have made the requested correction. For a more detailed discussion, see the memorandum to Richard O. Weible from Helen M. Kramer entitled "Allegations of Ministerial Errors; Final Determination in the Antidumping Duty Investigation of Certain Malleable Iron Pipe Fittings from the People's Republic of China (A-570-881)," dated November xx, 2003 ("Ministerial Errors Memorandum").

Comment 3: Application of Surrogate Freight in Facts Available Scrap Input Valuation

SLK claims that the Department applied a freight factor to recycled scrap in the final determination, contrary to its stated position, because it applied the surrogate value for freight in its facts available steel scrap calculation. SLK argues that the Department applied a factor of 56.83% for recycled scrap as facts available, and applied the surrogate value for freight equally to scrap and recycled scrap.

The petitioners rebut SLK, arguing that the alleged error involves a methodological decision regarding the application of facts available, and is not a ministerial error. The petitioners also argue that SLK's claim is not factually correct, because the Department applied the 56.83 percent facts available factor to **purchased** scrap and pig iron, and not to recycled inputs, as noted in the final determination analysis memorandum for SLK. See Memorandum to the File from Helen Kramer, Case Analyst, entitled "Antidumping Duty Investigation of Certain Malleable Iron Pipe Fittings from the People's Republic of China; Final Determination Analysis for LDR/SLK," (October 20, 2003) at 3. The petitioners conclude that the Department therefore properly applied the freight factor to the full cost of metallic inputs, which includes the cost of freight.

Department's Position:

We agree with the petitioners that the Department's methodology of applying facts available is not a ministerial error within the meaning of 19 CFR 351.224(f) because the Department's decision to apply a surrogate freight value was intentional. We also agree with the petitioners that SLK's claim is not factually correct. We used a combination of petitioners' and two respondents' data to calculate the

percentage by which purchased steel scrap and pig iron inputs should be increased to account for all metallic inputs. This calculation did not include freight. Inasmuch as we are applying facts available to purchased scrap steel which incurs freight expenses, and we did not use the respondents' data on recycled scrap, we do not agree with SLK that we applied surrogate freight to recycled scrap contrary to our stated intention.

Ministerial Error Allegations from the Petitioners

Comments 1 and 2: Deductions from U.S. Price

The petitioners argue that the Department made ministerial errors in the calculation of SLK's net U.S. price by not deducting the variable "OTHDIS1" added after the preliminary determination for an additional discount, and the variable "INLFPWU," representing the cost of trucking the subject merchandise from the Chicago rail station to LDR's warehouse for certain sales.

SLK did not comment on this issue.

Department's Position:

We agree with the petitioners that these were ministerial errors. The omission of these variables from the adjustments to U.S. price was not a methodological decision, but rather errors in copying. For this amended final determination, we have therefore recalculated net U.S. price by deducting these variables from the gross price. See Ministerial Errors Memorandum at 4.

Amended Final Determination

In accordance with 19 CFR 351.224(e), we are amending the final determination of the antidumping duty investigation of MPF from the PRC to correct these ministerial errors. The revised final weighted-average dumping margins are as follows:

Exporter/manufacturer	Original weighted-average margin (Percent)	Revised weighted-average margin (Percent)
Jinan Meide Casting Co., Ltd	11.35	11.31
Beijing Sai Lin Ke Hardware Co. Ltd.	14.32	15.92
Langfang Pannext Pipe Fitting Co., Ltd.	7.35	7.35
Chengde Malleable Iron General Factory	10.96	11.18
SCE Co., Ltd.	10.96	11.18
PRC-Wide	111.36	111.36

Continuation of Suspension of Liquidation

In accordance with section 735(c)(1)(B)(ii) of the Act, we are directing the Bureau of Customs and

Border Protection (CBP) to continue to suspend liquidation of all imports of MPF from the PRC. CBP shall require a cash deposit or the posting of a bond equal to the weighted-average amount by which the normal value exceeds the

export price, as indicated in the chart above. These suspension of liquidation instructions will remain in effect until further notice.