

TAK for the period August 1, 2019, through July 31, 2020:

Exporter/producer	Weighted-average dumping margin (percent)
Toray Advanced Materials Korea, Inc	3.00

Assessment Rates

Commerce has determined, and U.S. Customs and Border Protection (CBP) shall assess, antidumping duties on all appropriate entries in accordance with section 751(a)(2)(C) of the Act and 19 CFR 351.212(b).

Pursuant to 19 CFR 351.212(b)(1), where the respondent reported the entered value of their U.S. sales, we calculated importer-specific *ad valorem* duty assessment rates based on the ratio of the total amount of dumping calculated for the examined sales to the total entered value of the sales for which entered value was reported. Where the respondent did not report entered value, we calculated the entered value in order to calculate the assessment rate. Where either the respondent's weighted-average dumping margin is zero or *de minimis* within the meaning of 19 CFR 351.106(c)(1), or an importer-specific rate is zero or *de minimis*, we will instruct CBP to liquidate the appropriate entries without regard to antidumping duties.

The final results of this review shall be the basis for the assessment of antidumping duties on entries of merchandise covered by the final results of this review and for future deposits of estimated duties, where applicable.⁴

Commerce's "automatic assessment" will apply to entries of subject merchandise during the POR produced by TAK for which it did not know that the merchandise it sold to an intermediary (*e.g.*, a reseller, trading company, or exporter) was destined for the United States. In such instances, we will instruct CBP to liquidate unreviewed entries at the all-others rate if there is no rate for the intermediate company(ies) involved in the transaction.⁵ The all-others rate is 16.27 percent.⁶

Commerce intends to issue assessment instructions to CBP no earlier than 35 days after the date of

publication of the final results of this review in the **Federal Register**. If a timely summons is filed at the U.S. Court of International Trade, the assessment instructions will direct CBP not to liquidate relevant entries until the time for parties to file a request for a statutory injunction has expired (*i.e.*, within 90 days of publication).

Cash Deposit Requirements

The following cash deposit requirements will be effective for all shipments of subject merchandise entered, or withdrawn from warehouse, for consumption on or after the publication date of the final results of this administrative review, as provided by section 751(a)(2)(C) of the Act: (1) The cash deposit rate for TAK will be the rate shown above; (2) for previously reviewed or investigated companies not participating in this review, the cash deposit rate will continue to be the company-specific rate published for the most recently-completed segment; (3) if the exporter is not a firm covered in this review, a previous review, or the original less-than-fair value (LTFV) investigation, but the manufacturer is, the cash deposit rate will be the rate established for the most recent segment for the manufacturer of the merchandise; and (4) the cash deposit rate for all other manufacturers or exporters will continue to be 16.27 percent, the all-others rate made effective by the LTFV investigation.⁷ These deposit requirements, when imposed, shall remain in effect until further notice.

Notification to Importers

This notice serves as a final reminder to importers of their responsibility under 19 CFR 351.402(f)(2) to file a certificate regarding the reimbursement of antidumping duties prior to liquidation of the relevant entries during this review period. Failure to comply with this requirement could result in Commerce's presumption that reimbursement of antidumping duties occurred and the subsequent assessment of double antidumping duties.

Administrative Protective Order

This notice serves as the only reminder to parties subject to administrative protective order (APO) of their responsibility concerning the disposition of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3), which continues to govern business proprietary information in this segment of the proceeding. Timely written

notification of return/destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and the terms of an APO is a sanctionable violation.

Notification to Interested Parties

This notice is issued and published in accordance with sections 751(a)(1) and 777(i) of the Act.

Dated: August 24, 2021.

Christian Marsh,

Acting Assistant Secretary for Enforcement and Compliance.

[FR Doc. 2021-18595 Filed 8-27-21; 8:45 am]

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DEPARTMENT OF COMMERCE

International Trade Administration

[C-570-980]

Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, From the People's Republic of China: Final Results and Partial Rescission of Countervailing Duty Administrative Review; 2018

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: The Department of Commerce (Commerce) determines that countervailable subsidies are being provided to producers/exporters of crystalline silicon photovoltaic cells, whether or not assembled into modules (solar cells), from the People's Republic of China (China) during the period of review (POR) January 1, 2018, through December 31, 2018. Commerce is also rescinding this review with respect to forty companies that had no reviewable entries during the POR.

DATES: Applicable August 30, 2021.

FOR FURTHER INFORMATION CONTACT: Robert Copyak or Lingjun Wang, AD/CVD Operations, Office VII, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone (202) 482-3642, or (202) 482-2316, respectively.

SUPPLEMENTARY INFORMATION:

Background

On April 23, 2021, Commerce published the *Preliminary Results* of this administrative review and invited comments from interested parties.¹ On

¹ See *Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, from the*
Continued

⁴ See section 751(a)(2)(C) of the Act.

⁵ For a full discussion of this practice, see *Antidumping and Countervailing Duty Proceedings: Assessment of Antidumping Duties*, 68 FR 23954 (May 6, 2003).

⁶ See *Low Melt Polyester Staple Fiber from the Republic of Korea and Taiwan: Antidumping Duty Orders*, 83 FR 40752, 40753 (August 16, 2018).

⁷ *Id.*

May 24, 2021, we received timely case briefs and letters in lieu of case briefs from the following interested parties: (1) Jinko Solar Co., Ltd., Jinko Solar Import and Export Co., Ltd., Jinko Solar International Limited, Zhejiang Jinko Solar Co., Ltd., and Longi Solar Technology Co. Ltd. (f/k/a LERRI Solar Technology Co., Ltd.);² (2) the Government of China (GOC);³ (4) Wuxi Tianran Photovoltaic Co., Ltd. (Tianran);⁴ (5) Shanghai BYD Co., Ltd. and BYD (Shangluo) Industrial Co., Ltd. (collectively, BYD);⁵ and (6) Shanghai JA Solar Technology Co., Ltd., JA Solar Technology Yangzhou Co., Ltd., and JingAo Solar Co., Ltd. (collectively, JA Solar).⁶ On June 1, 2021, we received a timely rebuttal brief from a domestic interested party, the American Alliance for Solar Manufacturing.⁷

Scope of the Order

The products covered by the order are solar cells from China. A full description of the scope of the order is contained in the Issues and Decision Memorandum.⁸

Analysis of Comments Received

All issues raised in the interested parties' briefs are addressed in the

People's Republic of China: Preliminary Results of Countervailing Duty Administrative Review and Rescission of Review, in Part, 2018, 86 FR 21691 (April 23, 2021) (Preliminary Results), and accompanying Preliminary Decision Memorandum (PDM).

² See GDLSK's Letter, "GDLSK Respondents Letter Brief: 2018 Administrative Review of the Countervailing Duty Order on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, from the People's Republic of China (C-570-980)," dated May 24, 2021.

³ See GOC's Letter, "Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules from the People's Republic of China—Case Brief," dated May 24, 2021.

⁴ See Tianran's Letter, "Countervailing Duty Administrative Review of Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China: Case Brief Wuxi Tianran Photovoltaic Co., Ltd.," dated May 24, 2021.

⁵ See BYD's Letter, "Crystalline Silicon Photovoltaic Cells, Whether Or Not Assembled Into Modules, from the People's Republic of China (2018 Review); See also BYD Letter in Lieu of Case Brief," dated May 24, 2021.

⁶ See JA Solar's Letter, "Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules from the People's Republic of China: Letter in Lieu of Case Brief," dated May 24, 2021.

⁷ See Alliance's Letter, "Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules from the People's Republic of China: Rebuttal Brief," dated June 1, 2021.

⁸ See Memorandum, "Issues and Decision Memorandum for the Final Results and Partial Rescission of the Administrative Review of the Countervailing Duty Order on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China; 2018," dated concurrently with, and hereby adopted by, this notice (Issues and Decision Memorandum).

Issues and Decision Memorandum. A list of the issues raised by interested parties and to which Commerce responded in the Issues and Decision Memorandum is provided in Appendix I to this notice. The Issues and Decision Memorandum is a public document and is on file electronically via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). ACCESS is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Issues and Decision Memorandum can be accessed directly at <http://enforcement.trade.gov/frn/>.

Changes Since the Preliminary Results

Based on comments in the case and rebuttal briefs and record evidence, Commerce made certain changes from the *Preliminary Results* with regard to the calculation of Tianran's program rates for the Provision of Electricity for Less than Adequate Remuneration (LTAR) program and the Provision of Solar Glass for LTAR program. As a result of these changes to Tianran's program rates, the final AFA rate also changed. These changes are explained in the Issues and Decision Memorandum.

Methodology

Commerce conducted this administrative review in accordance with section 751(a)(1)(A) of the Tariff Act of 1930, as amended (the Act). For each subsidy program found to be countervailable, Commerce finds that there is a subsidy, *i.e.*, a financial contribution from a government or public entity that gives rise to a benefit to the recipient, and that the subsidy is specific.⁹ For a full description of the methodology underlying all of Commerce's conclusions, including any determination that relied upon the use of adverse facts available pursuant to section 776(a) and (b) of the Act, see the Issues and Decision Memorandum.

Partial Rescission of Administrative Review

It is Commerce's practice to rescind an administrative review of a countervailing duty order, pursuant to 19 CFR 351.213(d)(3), when there are no reviewable entries of subject merchandise during the POR for which liquidation is suspended.¹⁰ Normally,

⁹ See sections 771(5)(B) and (D) of the Act regarding financial contribution; section 771(5)(E) of the Act regarding benefit; and section 771(5A) of the Act regarding specificity.

¹⁰ See, *e.g.*, *Lightweight Thermal Paper from the People's Republic of China: Notice of Rescission of Countervailing Duty Administrative Review, 2015,*

upon completion of an administrative review, the suspended entries are liquidated at the countervailing duty assessment rate calculated for the review period.¹¹ Therefore, for an administrative review of a company to be conducted, there must be a reviewable, suspended entry that Commerce can instruct U.S. Customs and Border Protection (CBP) to liquidate at the calculated countervailing duty assessment rate calculated for the review period.¹²

We continue to find that fifteen companies had no shipments of the subject merchandise, and that twenty-five companies subject to this review did not have reviewable entries of subject merchandise for which liquidation is suspended. Because there is no evidence on the record to indicate that these companies had entries, exports, or sales of subject merchandise during the POR, we are rescinding this review with respect to these companies consistent with 19 CFR 351.213(d)(3). See Appendix III for a complete list of these companies.

Companies Not Selected for Individual Review

The statute and Commerce's regulations do not address the establishment of a rate to be applied to companies not selected for examination when Commerce limits its examination in an administrative review pursuant to section 777A(c)(2) of the Act. Generally, Commerce looks to section 705(c)(5) of the Act, which provides instructions for determining the all-others rate in an investigation, for guidance when calculating the rate for companies which were not selected for individual examination in an administrative review. Under section 705(c)(5)(A) of the Act, the all-others rate is normally "an amount equal to the weighted average of the countervailable subsidy rates established for exporters and producers individually investigated, excluding any zero or *de minimis* countervailable subsidy rates, and any rates determined entirely {on the basis of facts available}."

In these final results, the only rate that is not zero, *de minimis*, or based entirely on facts otherwise available is the rate calculated for Tianran. Consequently, as discussed above, the rate calculated for Tianran is also assigned as the rate for all other

82 FR 14349 (March 20, 2017); and *Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Rescission of Countervailing Duty Administrative Review, 2017, 84 FR 14650 (April 11, 2019).*

¹¹ See 19 CFR 351.212(b)(2).

¹² See 19 CFR 351.213(d)(3).

producers and exporters subject to this review but not selected for individual examination (*i.e.*, non-selected companies). See Appendix II for a complete list of these companies.

Final Results of Administrative Review

In accordance with 19 CFR 351.221(b)(5), Commerce calculated a countervailable subsidy rate for the mandatory company respondent Tianran. Further, pursuant to 19 CFR 351.525(c), we cumulated the benefits from subsidies received by Tianran and DaSol Solar Energy Science & Technology Co., Ltd. (DaSol), an unaffiliated producer of subject merchandise exported by Tianran to the United States.¹³ We continue to (1) determine the countervailable subsidy rate for Solarchina based entirely on adverse facts available according to section 776 of the Act; (2) assign an individual estimated subsidy rate based on adverse facts available to Taichang, Tianran's other unaffiliated supplier of subject merchandise, according to section 776 of the Act; (3) assign the rate calculated for Tianran to the non-selected companies.

Commerce determines the net countervailable subsidy rates for the period January 1, 2018, through December 31, 2018, are as follows:

Company	Subsidy rate (percent <i>ad valorem</i>)
Jiawei Solarchina Co., Ltd	525.58
Wuxi Tianran Photovoltaic Co., Ltd	14 19.28
Wuxi Taichang Electronics Co., Ltd ¹⁵	525.58
Non-Selected Companies ¹⁶	19.28

Disclosure

Commerce will disclose to the parties in this proceeding the calculations performed for these final results within five days of the date of publication of this notice in the **Federal Register**.¹⁷

¹³ For a more detailed discussion, see *Preliminary Results PDM*.

¹⁴ This rate applies to subject merchandise exported by Tianran and produced by companies other than Taichang.

¹⁵ Commerce preliminarily finds the following companies to be cross-owned with Taichang: China Machinery Engineering Wuxi Co., Ltd (CMEW); and China Machinery Engineering Corporation (CMEC).

¹⁶ See Appendix II of this notice for a list of all companies that remain under review but were not selected for individual examination, and to whom Commerce has assigned the non-selected company rate.

¹⁷ See 19 CFR 351.224(b).

Assessment Rates

Pursuant to section 751(a)(2)(C) of the Act and 19 CFR 351.212(b), Commerce shall determine, and CBP shall assess, countervailing duties on all appropriate entries of subject merchandise in accordance with the final results of this review.

Commerce intends to issue assessment instructions to CBP no earlier than 35 days after the date of publication of the final results of this review in the **Federal Register**. If a timely summons is filed at the U.S. Court of International Trade, the assessment instructions will direct CBP not to liquidate relevant entries until the time for parties to file a request for a statutory injunction has expired (*i.e.*, within 90 days of publication).

Cash Deposit Instructions

In accordance with section 751(a)(1) of the Act, Commerce intends to instruct CBP to collect cash deposits of estimated countervailing duties in the amounts shown for each of the respective companies listed above. For all non-reviewed firms, CBP will continue to collect cash deposits of estimated countervailing duties at the all-others rate or the most recent company-specific rate applicable to the company, as appropriate. These cash deposits, when imposed, shall remain in effect until further notice.

Administrative Protective Order

This notice also serves as a reminder to parties subject to administrative protective order (APO) of their responsibility concerning the destruction of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Timely written notification of the return or destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and terms of an APO is a sanctionable violation.

Notification to Interested Parties

Commerce is issuing and publishing these results in accordance with sections 751(a)(1) and 777(i)(1) of the Act.

Dated: August 23, 2021.

Christian Marsh,

Acting Assistant Secretary for Enforcement and Compliance.

Appendix I

List of Topics Discussed in the Issues and Decision Memorandum

- I. Summary
- II. Background
- III. List of Comments from Interested Parties

- IV. Scope of the Order
- V. Rescission of the Administrative Review, in Part
- VI. Rate for Non-Selected Companies Under Review
- VII. Use of Facts Available and Application of Adverse Inferences
- VIII. Changes Since the Preliminary Results
- IX. Subsidies Valuation Information
- X. Analysis of Programs
- XI. Analysis of Comments
 - Comment 1: Whether Commerce Should Apply AFA to the Export Buyer's Credit Program
 - Comment 2: Whether Input Producers of Solar Glass and Aluminum Extrusions are Authorities
 - Comment 3: Whether the Provision of Electricity for LTAR Program is Countervailable
 - Comment 4: Whether "Other Subsidies" are Countervailable
 - Comment 5: Whether Certain Benchmarks for Electricity Should Be Corrected
 - Comment 6: Whether the Per-Kilogram Quantities Should be Used for DaSol's Solar Glass for LTAR Calculations
- XII. Recommendation

Appendix II

Non-Selected Companies Under Review

1. Anji DaSol Solar Energy Science & Technology Co., Ltd.
2. Canadian Solar International Limited
3. JA Solar Technology Yangzhou Co., Ltd.
4. Jiawei Solarchina (Shenzhen) Co., Ltd.
5. JingAo Solar Co., Ltd.
6. Jinko Solar Co., Ltd.
7. Jinko Solar Import and Export Co., Ltd.
8. Ningbo Qixin Solar Electrical Appliance Co., Ltd.
9. Risen Energy Co., Ltd.
10. Shanghai BYD Co., Ltd.
11. Shanghai JA Solar Technology Co., Ltd.
12. Shenzhen Sungold Solar Co., Ltd.
13. Shenzhen Topray Solar Co., Ltd.
14. Taizhou BD Trade Co., Ltd.
15. Wuxi Suntech Power Co., Ltd.
16. Yingli Energy (China) Co., Ltd.

Appendix III

Rescind the Review, In Part

No-Shipments:

1. Chint Solar (Zhejiang) Co., Ltd.
2. Changzhou Trina Solar Yabang Energy Co., Ltd.
3. Hubei Trina Solar Energy Co., Ltd.
4. Trina Solar Energy Co., Ltd., (formerly, Changzhou Trina Solar Energy Co., Ltd.)
5. Trina Solar (Changzhou) Science and Technology Co., Ltd.
6. Turpan Trina Solar Energy Co., Ltd.
7. Yancheng Trina Solar Energy Technology Co., Ltd.
8. Baoding Jiasheng Photovoltaic Technology Co., Ltd.
9. Baoding Tianwei Yingli New Energy Resources Co., Ltd.
10. Hainan Yingli New Energy Resources Co., Ltd.
11. Hengshui Yingli New Energy Resources Co., Ltd.
12. Lixian Yingli New Energy Resources Co., Ltd.
13. Shenzhen Yingli New Energy Resources

- Co., Ltd.
14. Tianjin Yingli New Energy Resources Co., Ltd.
 15. Yingli Green Energy International Trading Company Limited
- No-Reviewable Entries:*
16. BYD (Shangluo) Industrial Co., Ltd.
 17. Canadian Solar Manufacturing (Changshu) Inc.
 18. Canadian Solar Manufacturing (Luoyang) Inc.
 19. De-Tech Trading Limited HK
 20. Dongguan Sunworth Solar Energy Co., Ltd.
 21. Eoply New Energy Technology Co., Ltd.
 22. ERA Solar Co., Ltd.
 23. ET Solar Energy Limited
 24. Hangzhou Sunny Energy Science and Technology Co., Ltd.
 25. Hengdian Group DMEGC Magnetics Co., Ltd.
 26. Jiangsu High Hope Int'l Group
 27. Jinko Solar International Limited
 28. LERRI Solar Technology Co., Ltd.
 29. Light Way Green New Energy Co., Ltd.
 30. Luoyang Suntech Power Co., Ltd.
 31. Ningbo ETDZ Holdings, Ltd.
 32. Sumec Hardware & Tools Co., Ltd.
 33. Sunpreme Solar Technology (Jiaxing) Co., Ltd.
 34. Systemes Versilis, Inc.
 35. tenKsolar (Shanghai) Co., Ltd.
 36. Tianneng Yingli New Energy Resources Co., Ltd.
 37. Toenergy Technology Hangzhou Co., Ltd.
 38. Zhejiang ERA Solar Technology Co., Ltd.
 39. Zhejiang Jinko Solar Co., Ltd.
 40. Zhejiang Sunflower Light Energy Science & Technology Limited Liability Company

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DEPARTMENT OF COMMERCE

International Trade Administration

[C-122-858]

Certain Softwood Lumber Products From Canada: Notice of Court Decision Not in Harmony With the Final Results of Countervailing Duty Expedited Review; Notice of Rescission of Final Results of Expedited Review; Notice of Amended Cash Deposit Rates

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: On August 18, 2021, the U.S. Court of International Trade (CIT) issued its final judgment in *Committee Overseeing Action for Lumber International Trade Investigations or Negotiations, et al. v. United States, et al.*, Consol. Court No. 19-00122, sustaining the Department of Commerce's (Commerce) remand results pertaining to the expedited review of the countervailing duty (CVD) order on certain softwood lumber products (softwood lumber) from Canada covering the period January 1, 2015, through December 31, 2015. Commerce is notifying the public that the CIT's final judgment is not in harmony with Commerce's final results of the expedited review, and that Commerce is rescinding the final results; reinstating the CVD order for Les Produits Forestiers D&G Ltée (D&G), Marcel Lauzon Inc. (MLI), North American Forest Products Ltd. (NAFB) (located in New Brunswick), Roland Boulanger & Cie Ltée (Roland), and Scierie Alexandre Lemay & Fils Inc. (Lemay) (including their cross-owned affiliates); and reassigning the cash deposit rate for the companies covered by the *Final Results of Expedited Review*.

DATES: Applicable August 28, 2021.

FOR FURTHER INFORMATION CONTACT: Kristen Johnson, AD/CVD Operations, Office III, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-4793.

SUPPLEMENTARY INFORMATION:

Background

On January 3, 2018, Commerce published the CVD order on softwood lumber from Canada.¹ On July 5, 2019, Commerce published its *Final Results of Expedited Review* for the CVD Order.²

¹ See *Certain Softwood Lumber Products from Canada: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order*, 83 FR 347 (January 3, 2018) (*CVD Order*).

² See *Certain Softwood Lumber Products from Canada: Final Results of Countervailing Duty Expedited Review*, 84 FR 32121 (July 5, 2019) (*Final Results of Expedited Review*), and accompanying Issues and Decision Memorandum (IDM).

In the *Final Results of Expedited Review*, Commerce stated that it promulgated 19 CFR 351.214(k), its regulations for conducting CVD expedited reviews, pursuant to section 103(a) of the Uruguay Round of Agreements Act (URAA), which made several amendments to the antidumping and CVD provisions of the Tariff Act of 1930, as amended (the Act).³ Specifically, Commerce explained that Article 19.3 of the World Trade Organization Agreement on Subsidies and Countervailing Measures (SCM Agreement) expressly provides for expedited reviews of non-investigated exporters or producers in CVD proceedings and that the Statement of Administrative Action (SAA) states that "Article 19.3 of the Subsidies Agreement provides that any exporter whose exports are subject to a CVD order, but which was not actually investigated for reasons other than a refusal to cooperate, shall be entitled to an expedited review to establish an individual CVD rate for that exporter."⁴ Although the URAA did not implement a specific provision for the conduct of CVD expedited reviews in the Act, Commerce concluded that it had the authority to promulgate the CVD expedited review regulations at 19 CFR 351.214(k) pursuant to section 103(a) of the URAA, which provides that "appropriate officers of the United States Government may issue such regulations, as may be necessary to ensure that any provision of this Act, or amendment made by this Act, . . . is appropriately implemented"⁵

³ See *Final Results of Expedited Review* IDM at 19 (citing URAA, Pub. L. 103-465, 108 Stat. 4809 (1994)).

⁴ *Id.* at 18 (citing SAA H.R. Doc. 103-316, Vol. I at 870 (1994), reprinted at 1994 U.S.C.C.A.N. 4040, 4199, at 941. Section 102(d) of the URAA states that the SAA "shall be regarded as an authoritative expression by the United States concerning the interpretation and application of the Uruguay Round Agreements and this Act in any judicial proceeding in which a question arises concerning such interpretation or application").

⁵ See *Final Results of Expedited Review* IDM at 19 (citing section 103(a) of the URAA).