we have not deducted these expenses from INA's USP for these final results.

Comment 37: NTN and NTN-Germany contest the Department's rejection of NTN's claimed reduction to NTN's reported total U.S. indirect interest expenses for that portion of the total interest expenses attributable to cash deposits of estimated antidumping duties. NTN and NTN-Germany argue that the Department's failure to provide an explanation for its decision to deny their claimed reduction to U.S. interest expenses violated the Department's regulations by prohibiting NTN and NTN-Germany from effectively commenting on the methods that the Department used to calculate NTN's and NTN-Germany's preliminary dumping margins. NTN and NTN-Germany further argue that the Department's denial of this adjustment contravenes the Department's established practice of permitting this adjustment in previous reviews of the antidumping duty orders on both AFBs and tapered roller bearings. Citing Shikoku Chemicals Corp. v. United States, 795 F. Supp. 417 (CIT 1992), NTN and NTN-Germany assert that it has the right to rely on the Department's established practice in preparing its questionnaire responses. Accordingly, NTN and NTN-Germany conclude that the Department's failure to adhere to its regulations and its violation of judicial precedent in not allowing NTN and NTN-Germany to rely on established calculation methods require the Department to allow NTN's and NTN-Germany's claimed reduction to total U.S. interest expenses.

Torrington and Federal-Mogul support the Department's rejection of NTN and NTN-Germany's claim. Federal-Mogul contends that because the Department considers cash deposits of estimated antidumping duties to be provisional in nature, any interest expenses that NTN and NTN-Germany incurred on money borrowed to make cash deposits of estimated duties are also provisional in nature, and could ultimately be offset by interest received on refunded cash deposits. Torrington adds that interest expenses, including any incurred on financing cash deposits, are related to all NTN and NTN Germany's U.S. sales and, therefore, should be treated like other types of indirect selling expenses. Torrington further argues that even if NTN and NTN-Germany's claimed offsets were permissible, they failed to demonstrate that they actually incurred interest expenses on borrowing to finance cash deposits of estimated antidumping duties. Finally, Torrington and Federal-Mogul reject NTN and NTN-Germany's procedural arguments. Torrington states

that the Department always amends its calculation methods when existing methods are found to be inaccurate, while Federal-Mogul states that the Department has not denied NTN's and NTN-Germany's right to participate in the proceeding because they may still seek judicial review of the Department's final results. Accordingly, Torrington and Federal-Mogul conclude that the Department properly denied NTN's and NTN-Germany's claimed adjustment to U.S. indirect selling expenses for interest paid on borrowing to finance cash deposits of estimated antidumping duties.

Department's Position: We disagree with NTN and NTN-Germany. Cash deposits of estimated antidumping duties are provisional in nature, because they may be refunded, with interest, to respondents at some future date. Because the cash deposits are provisional in nature, so too are any interest expenses that respondents may incur on borrowing to finance cash deposits. To the extent that respondents receive refunds with interest on cash deposits, the interest that respondents receive on the refunded deposits will offset any interest expenses that respondents may have incurred in financing the cash deposits. Therefore, we did not allow NTN's and NTN Germany's claimed offsets to reported interest expenses in the United States to account for that portion of the interest expenses that respondents estimate to be related to payment of antidumping duties.

Further, we reject NTN's and NTN-Germany's arguments that we cannot deny their claimed adjustment because we deprived them of their right to participate in this proceeding. The Department has the authority to revise the methods that it uses to calculate dumping margins when it determines that existing methods yield inaccurate results. In addition, NTN and NTN-Germany had the opportunity to make affirmative arguments in support of their claimed offsets in the case briefs that they submitted subsequent to our issuance of the preliminary results of these reviews. Therefore, we are not constrained by prior practice to grant NTN's and NTN-Germany's claimed adjustment to U.S. interest expenses for interest incurred to finance cash deposits of antidumping duties, and have rejected the claim for these final results.

Comment 38: Torrington objects to NTN's claimed reductions to U.S. indirect selling expenses. According to Torrington, NTN has provided no evidence that the expenses that it has excluded from its reported U.S. indirect

selling expenses are not related to sales of subject merchandise. Accordingly, Torrington requests that the Department deny NTN's claimed reductions to U.S. indirect selling expenses for the final results.

In response to Torrington's arguments, NTN states that the Department has verified NTN's method of reporting these adjustments in previous reviews, and has accepted NTN's claimed adjustments in each of the previous reviews of AFBs. NTN further argues that the record supports its contention that the expenses in question are not related to sales of subject merchandise. Accordingly, NTN concludes that the Department should grant NTN's reported adjustments to U.S. indirect selling expenses for these final results.

Department's Position: We agree with NTN. The record contains no evidence to refute NTN's claims that NTN incurs the expenses in question almost exclusively for sales of non-subject merchandise, and that any such expenses that NTN may incur on sales of subject merchandise are insignificant. Therefore, we have permitted NTN to deduct these expenses from its total pool of U.S. indirect selling expenses for these final results.

Comment 39: NTN and NTN-Germany object to the Department's determination to re-allocate their reported U.S. selling expenses using their resale prices to the first unrelated customer. NTN and NTN-Germany argue that because the Department failed to articulate reasons for its rejection of their allocation method, the Department deprived them of the opportunity to comment on the Department's determination. NTN and NTN-Germany further argue that the Department violated judicial precedent by abandoning the method of allocating U.S. selling expenses that it used in the three previous reviews of AFBs. Moreover, NTN and NTN-Germany claim that there is no evidence that the Department's method of allocating U.S. selling expenses over resale prices is more accurate than NTN's and NTN-Germany's allocation of these expenses over transfer prices. Accordingly, NTN and NTN-Germany request that the Department use in its analysis NTN's and NTN-Germany's U.S. selling expenses as they reported them in their questionnaire responses for these final results.

In response, Torrington and Federal-Mogul state that transfer pricing is suspect because it is completely within the control of respondents and, therefore, subject to manipulation. Torrington further argues that the