hearing, GMN's counsel acknowledged that GMN was aware of its financial troubles long before the verification. Respondents should not be given incentive to request reviews and then withdraw their requests if verifications appear to be going poorly. This is one of the reasons why 19 CFR 353.22(a)(5) generally requires that review requests be withdrawn no later than 90 days after the date of publication of the initiation notice. Federal-Mogul's objection only indicates that other parties have an interest in the outcome of an administrative review, which supports the Department's decision not to terminate this proceeding.

16G. Programming

Comment 13: Torrington argues that RHP's the Department's preliminary SAS programs for RHP improperly assigned a zero margin to sales with a USP of less than zero. Torrington continues that it is possible to have a U.S. sale with a value of less than zero. Torrington asserts that the Department should calculate margins on all U.S. sales including those with a value less than zero.

RHP states that it has no objection to the Department adjusting the program so that sales with an adjusted price of less than zero are included.

Department's Position: Torrington misunderstood our program. The lines of the program which are quoted in its case brief do not improperly assign all sales with a negative USP a zero margin. Generally, margins were calculated for such sales as appropriate. However, for certain U.S. sales RHP provided no FMV information and, accordingly, we determined BIA dumping margins for such sales by applying the appropriate BIA rate to the USP of each of those sales. For these sales, negative margins would be generated by applying the BIA rate to a negative USP. Therefore, the lines of the program in question merely set to zero the margins for any U.S. sales to which a BIA rate should be applied but which have a negative USP

Comment 14: Torrington contends that while RHP's program should assign a BIA rate to RHP's U.S. sales of models that would be matched with HM sales by NSK Europe, it appears that there are errors in the treatment of NSK's sales which prevented the application of BIA to those U.S. sales. Torrington argues that the program did not properly classify these NSK sales in the RHP preliminary program.

RHP states that it attempted to find the alleged errors, but has been unable to do so. RHP argues that because it did not find any errors and Torrington has not identified specific errors, the Department should not change the treatment of NSK sales.

Department's Position: We agree with Torrington that there was a flaw in RHP's preliminary program. However, the flaw merely created duplicate listings of NSK Europe models and was not the reason that no RHP U.S. sales matched to HM sales by NSK Europe. Rather, no sales were matched because there were no comparable families of bearings, *i.e.*, similar merchandise, sold by NSK Europe. In response, we modified the program to match NSK Europe's sales with RHP's U.S. sales by model instead of by family. The fact that no NSK Europe models matched with RHP models further demonstrates that RHP and NSK did not sell comparable merchandise.

Comment 15: FAG UK/Barden alleges that the Department incorrectly identified domestic brokerage and handling expenses (DBROKHE) using the variable name for domestic presale inland freight (DPRSFRE).

Department's Position: We disagree with FAG UK/Barden. Our analysis of the firm's response, including its format sheets, leads us to conclude that FAG reported its brokerage and handling expenses in the field DPRSFRE. Therefore, we have deducted brokerage and handling expenses as DPRSFRE.

Comment 16: Torrington asserts that a clerical error occurs at line 990 in FAG UK's program where the margin is set to zero whenever USP is less than zero.

FAG UK argues that there is no clerical error at line 990 of the program, and that the setting of PCTMARG equal to zero where USP is less than zero, in any event, has no impact on the margin.

Department's Position: We disagree with Torrington that there is a clerical error. Without this line of the program, U.S. sales with dumping margins and negative U.S. prices would show a negative percentage margin. This programming eliminates this anomaly. The setting of the PCTMARG variable at line 990 has no effect on the calculation of the dumping margin.

Comment 17: Torrington states that, in PP transactions, the UNTCUSE variable (customs value) in the program for FAG-Germany is defined as UNITPRE—OCNFRE—MARNINE, and that UNITPRE was modified to include an amount representing VAT, to allow comparison with a VAT-inclusive FMV. Torrington argues that the VAT amount should be removed from UNTCUSE.

Department's Position: We disagree with Torrington that any change is necessary. This variable is not used for PP sales in either the margin calculation or in the calculation of assessment rates. The UNTCUSE variable is only used when calculating *ad valorem* assessment rates. However, purchase price sales are assessed on a per-unit, not *ad valorem*, basis.

16I. Revocation

Comment 18: Torrington asserts that the Department should deny SKF-France's request to revoke the antidumping duty orders spherical plain bearings (SPBs). Torrington notes that revocation is permissible only if the requesting company is unlikely to sell below FMV in the future. Torrington contends the circumstances indicate that this is doubtful, since SKF-France is part of a larger multinational organization which has preliminarily received dumping margins for SPBs in other countries.

SKF responds that Torrington has presented no legal basis on which to deny revocation. SKF argues that since neither the antidumping law nor the Department's regulations mandate a different standard for revocation for multinational corporations, Torrington's argument concerning SKF's multinational activity for purposes of revocation is irrelevant.

Department's Position: Under 19 CFR 353.25(a)(2)(i), the Department may revoke an order in part if it finds sales at not less than FMV for a period of at least three consecutive years. The results in this review, combined with the results in the two prior reviews, satisfies this requirement for SKF-France in the antidumping duty proceeding SPBs. Additionally, respondent has agreed, pursuant to 19 CFR 353.25(a)(2)(iii), to the immediate reinstatement of the order if circumstances develop indicating that they have resumed dumping the subject merchandise. We are satisfied that the respondents is not likely to sell the merchandise in the future at less than FMV, and we agree with respondents that the requirements for revocation have been met.

16J. No Sales During Period of Review

Comment 19: Kaydon, a U.S. producer of ball bearing products, urges the Department to reconsider its preliminary finding that Hoesch and Rollix had no U.S. sales of subject merchandise during the review period. Kaydon asserts that it has provided evidence to the Department which indicates that the respondents sell merchandise in the U.S. market which are properly characterized as bearings subject to the order rather than slewing rings. According to Kaydon, sales of these products, or substantially similar products, may have taken place during the POR but remain unreported due to