

States Price" and "Foreign Market Value" sections of this notice.

In accordance with past practice and consistent with our decision in the preliminary determination, we considered Brazil's economy to be hyperinflationary during the POI. Pursuant to our methodology concerning such an economy, we made contemporaneous sales comparisons based on the month of the U.S. sale.

In accordance with 19 CFR 353.58, we made comparisons at the same level of trade. For those U.S. sales where there were no comparable sales at the same level of trade in the home market, we used home market sales at a different level of trade as the basis of our less than fair value comparisons. Based on our analysis of Mannesmann's questionnaire response, we have accepted its claim that MSA's sales from its factory to unrelated customers and its sales through its related distributor MCSA represent two distinct levels of trade. However, because we could not determine that the difference in level of trade affects price comparability, we made no adjustment to FMV. See Comment 5 of the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

We also made adjustments for differences-in-merchandise (difmer), where possible, in accordance with 19 CFR 353.57. At verification, we found that respondent's reported variable cost of manufacture data included cost differences not attributable to physical differences in the merchandise. Therefore, we modified the submitted cost data where we had information on the record to eliminate cost differences unrelated to physical differences.

For those products for which difmer cost modification was not possible and those U.S. sales with no comparable home market products and no cost data, we based our analysis, pursuant to section 776(C) of the Act, on the best information available (BIA). As BIA, we used a calculated margin that is sufficiently adverse to fulfill the statutory purpose of the BIA rule. See June 12, 1995, *Final Determination Concurrence Memorandum*. See also DOC Position to Comment 2 of the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

#### United States Price

We calculated USP according to the methodology described in our preliminary determination, with the following exceptions:

1. We corrected certain clerical errors found at verification, including: (a) The reported product codes for four

products; (b) the reported sales date and end-finish for one transaction; (c) the level of trade reported for one customer; and (d) the reported U.S. duty charges for certain transactions.

2. We revised the reported ocean freight, U.S. brokerage, and U.S. inland freight amounts for certain transactions to reflect actual expenses.

3. We recalculated credit expenses using respondent's revised U.S. shipment dates submitted in the March 9, 1995, response. These dates reflect the approximate date on which the merchandise left the factory.

4. We made a deduction for foreign inland freight charges that were previously not reported in respondent's sales listing.

5. We made a deduction for bank fees paid by MSA for entering into foreign exchange contracts, which had not been reported in respondent's sales listing. See Comment 8 of the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

#### Foreign Market Value

As stated in the preliminary determination, we determined that respondent's home market was viable with respect to sales of seamless pipe during the POI to serve as the basis for FMV.

Based on the results of the Department's related party sales test as set forth in Appendix II of the *Final Determination of Sales at Less Than Fair Value: Certain Cold-Rolled Carbon Steel Flat Products from Argentina*, 58 FR 37062 (July 9, 1993), we excluded respondent's related party sales from our analysis, and used only those sales made to unrelated parties.

We calculated FMV according to the methodology described in our preliminary determination with the following exceptions:

1. Where we had verified transaction-specific data on the record, we excluded from our analysis those home market sales that were found to have been returned, and incorrectly included in respondent's sales listing.

2. For both MSA's and MCSA's sales, we revised the reported insurance charges, where appropriate, based on the applicable, verified insurance percentage rates prevailing during the POI.

3. We corrected clerical errors made with respect to the reported interest revenue amounts for two transactions.

4. For MSA's sales, we reduced the reported inland freight charges by the amount by which they exceeded the actual amounts charged by MSA's freight supplier.

5. With respect to MCSA's sales, we corrected the surface treatment codes for those products reported incorrectly as corrosion-resistant.

6. We made no adjustment for inflation value in addition to an adjustment for the reported, verified credit expenses which included an inflation factor. See Comment 4 in the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

7. Because the reported U.S. and home market packing expenses did not verify, we used BIA for these expenses. As BIA for home market packing expenses, we used the lowest domestic packing expense noted on the record. As BIA for U.S. packing expenses, we used the highest export packing expense noted on the record. See Comment 6 in the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

8. Where possible, we made difmer adjustments based on the submitted cost data, modified to eliminate cost differences unrelated to physical differences between the merchandise being compared. See Comment 2 in the "Company-specific Issues" sub-section of the "Interested Party Comments" section of this notice.

#### Currency Conversion

No certified rates of exchange, as furnished by the Federal Reserve Bank of New York, were available for the POI. In place of the official certified rates, we used the daily official exchange rates for the Brazilian currency, as well as the UFIR<sup>5</sup> index, published by the Central Bank of Brazil which were provided by respondent in its February 28, 1995, response and verified by the Department.

#### Verification

As provided in section 776(b) of the Act, we verified information provided by Mannesmann by using standard verification procedures, including the examination of relevant sales and financial records, and selection of original source documentation containing relevant information.

#### Interested Party Comments

##### General Issues

##### Comment 1

Mannesmann argues that petitioner lacks standing to seek the imposition of antidumping duties on products that it does not produce. According to Mannesmann, petitioner has admitted

<sup>5</sup> The UFIR is an inflationary neutral currency unit.