

contemporaneous home market sales of alloy 1080 or alloy 1070.

*Department's Position:* In the model matches for our preliminary results of review, because all of the sales we analyzed were in the same form and because the width criterion was irrelevant in this review, for each U.S. sheet sale, we first searched for a contemporaneous home market sheet sale of merchandise identical to each U.S. product based on an identical alloy and an identical gauge. If we found no match of identical merchandise, we then searched for a contemporaneous home market sale of merchandise that was most similar to the U.S. product based on an identical alloy but a different gauge. If we were still unable to find a match, we then searched for a contemporaneous home market sale based on a different alloy but an identical gauge. At this stage in the model matching we determined that the two home market alloys that were most similar to the U.S. 1085 alloy were the home market 1080 and 1070 alloys. As a result, for those U.S. sales of the 1085 alloy for which we were unable to find a contemporaneous home market match based on an identical alloy and gauge, or a contemporaneous home market match based on an identical alloy but a different gauge, we then searched for a contemporaneous home market sale of the 1080 alloy and of the same gauge. If at this point we were still unable to match the U.S. 1085 sale to a contemporaneous home market sale, we searched for a contemporaneous home market sale of the 1070 alloy and the same gauge.

Based on comments from both the respondent and the petitioners and our reexamination of the respondent's arguments against including home market 1090 alloy sales in our analysis, we determined that for these final results, when we were unable to match a U.S. 1085 alloy sale to a home market sheet sale of identical merchandise, to a home market sheet sale of an identical alloy but a different gauge, or a home market sheet sale of the 1080 alloy and the same gauge, we would search for a contemporaneous home market sheet sale of the 1090 rather than the 1070 alloy.

Our decision to alter our model-match program and to replace home market 1070 sales with home market 1090 alloy sales is based on the following reasons. First, due to the fact that all of OAB's U.S. sales were of brass sheet over 15 inches in width, we used only home market sales of sheet over 15 inches in width for our analysis and based the computer program portion of the model match on only the alloy and gauge

criteria. Of these two criteria, we determined that alloy was the most important criterion upon which to base our determination of home market such or similar merchandise. We also determined that when selecting the two home market alloys most similar to the U.S. 1085 and 1090 alloys, the only two U.S. alloys for which sufficient such or similar matches were not available, we would base our choice on similarity of alloy compositions. In our preliminary results we determined that, due to their similarity in copper content, the home market 1085 and 1080 alloys were the two most similar alloys to the U.S. 1090 alloy. Likewise, we determined that the two home market alloys most similar to the U.S. 1085 alloy were the 1080 and 1070 alloys. However, because we agree with petitioners that the home market 1090 alloy is closer in copper content to the U.S. 1085 alloy than is the home market 1070 alloy, we have determined for these final results that the ranking of home market 1090 alloy sales over home market 1070 alloy sales is more appropriate.

Furthermore, we disagree with the respondent's argument in its questionnaire response and its preliminary results comments that because OAB's home market 1090 alloy sales entailed only a few, small quantity sales of expensive, unique merchandise to only a limited number of customers, these sales are not in the ordinary course of trade and are inappropriate for price-to-price comparisons. After examining OAB's home market sales of sheet over 15 inches in width, we discovered that OAB's sales of other alloys at certain gauges were made in even smaller quantities and constituted even fewer transactions than OAB's 1090 alloy home market sales. In addition, we also discovered that OAB's weighted-average home market prices of other alloys were similar to the weighted-average home market price for OAB's 1090 sales, and one home market alloy was sold at a weighted-average price that even exceeded that of the 1090 alloy. As a result, we have determined that not only is there no evidence on the record that OAB's home market 1090 alloy sales were outside the ordinary course of trade, but that the evidence on the record refutes OAB's original claims that its home market sales of the 1090 alloy were smaller in quantity, less frequent, and more expensive. Therefore, because we have determined that OAB's home market 1090 alloy sales should not be excluded from such or similar merchandise comparisons, and because it would be neither distortive nor unreasonable to

use the 1090 alloy, we have changed our model matches for U.S. 1085 alloy sales and have relied on 1080 and 1090 alloy sales as similar comparisons where home market 1085 sales are not available for comparison.

#### Clerical and Programming Errors

*Comment 7:* OAB states that because the Department has determined for this review that OAB paid commissions in the U.S. market but not in the home market, the Department should grant OAB a commission offset and deduct from FMV home market indirect selling expenses up to the amount of the U.S. commission. OAB contends that while the Department correctly applied the offset to certain sales, it did not apply the offset to an overwhelming number of sales. As a result, OAB requests that the Department re-examine its preliminary calculations and correct this error.

*Department's Position:* We agree with the respondent. Because we inadvertently omitted certain programming language in a portion of our preliminary results computer program, a majority of the values OAB reported for its home market indirect selling expense variable were not retained in our calculation of FMV. As a result, when we applied the commission offset, we used missing values rather than actual home market indirect selling expense values. For these final results we added programming language which prevents the creation of missing values and ensures that the commission offset is properly applied to all appropriate sales.

#### Final Results of Review

As a result of our analysis of the comments received, we determine that the following margin exists for OAB for the period March 1, 1991, through February 29, 1992:

Manufacturer/exporter	Percent margin
Outokumpu Copper Rolled Products AB (OAB) .....	8.60

The Department shall determine, and the Customs Service shall assess, antidumping duties on all appropriate entries. Individual differences between the USP and FMV may vary from the percentage stated above. The Department will issue appraisal instructions directly to the Customs Service.

Furthermore, the following deposit requirements will be effective for all shipments of subject merchandise entered, or withdrawn from warehouse, for consumption on or after the