letter of credit. In addition, exporters may establish pre-shipment credit lines under this program with limits contingent upon the value of exports. In prior administrative reviews of this order, this program was determined to be countervailable because receipt of the loans under this program is contingent upon export performance and the interest rates were preferential. (See, e.g., Final Results of Countervailing Duty Administrative Review: Certain Iron-Metal Castings From India (56 FR 41658; August 22, 1991) (1987 Indian Castings Final Results); Final Results of Countervailing Duty Administrative Review: Certain Iron-Metal Castings From India (56 FR 52515; October 21, 1991) (1988 Indian Castings Final Results); and Final Results of Countervailing Duty Administrative Review: Certain Iron-Metal Castings From India (56 FR 52521; October 21, 1991) (1989 Indian Castings Final Results).) There has been no new information or evidence of changed circumstances in this review to warrant reconsideration of this program's countervailability.

During the review period, there were two types of pre-shipment export financing arrangements. For pre-shipment loans with periods of 180 days or less, the interest rate was 7.5 percent per annum. For loans with periods exceeding 180 days, the interest rate was 9.5 percent per annum. In either case, a "penalty" interest rate of 15.5 percent was charged on an unpaid balance from the end of the loan period forward.

In the case of a short-term loan provided by a government, the Department will use as a benchmark the average interest rate for an alternative source of short-term financing in the country in question. In determining this benchmark, the Department will normally rely upon the predominant source of short-term financing in the country in question. (See Countervailing Duties; Notice of Proposed Rulemaking and Request for Public Comments, section 355.44(b)(3)(i) (Proposed Rules) (54 FR 23380; May 31, 1989).

The Government of India classifies the manufacturers and exporters subject to this review as small-scale industries. Since the interest rates on loans to small-scale industries were set by the Reserve Bank of India, we used the small-scale industry short-term interest rates published in the Reserve Bank of India periodicals "Report on Trend and Progress in India: 1989–90" and "Reserve Bank of India Bulletin October 1989 (Supplement)" to calculate a benchmark interest rate of 15.08 percent. Because the Reserve Bank of

India devised different interest rates for the latter months of the review period, this 15.08 percent benchmark is a weighted-average of the highest rate for small-scale industry loans between 200,000 and 2,500,000 rupees for the period January 1 through September 21, 1990, and the rate for small-scale industry loans over 50,000 rupees for the period September 22 through December 31, 1990. We compared this benchmark to the interest rate charged on pre-shipment loans and found that the interest rate charged under this program was lower than the benchmark. The use of this benchmark rate is consistent with prior reviews of this order. (See 1988 and 1989 Indian Castings Final Results).

During the review period, 12 of the 14 respondent companies made payments on pre-shipment export loans for shipments of subject castings to the United States. While all 12 of these companies provided specific loan information as requested in our questionnaires, the submission containing the pre-shipment loan information for Super Castings (India) Private Ltd. was untimely and therefore returned. (See the April 21, 1994 memorandum titled Removal of Information from the Administrative Record for the 1990 Administrative Review of the Countervailing Duty Order on Certain Iron-metal Castings from India, on file in the public file of the Central Records Unit, Room B-099.) To calculate the benefit from these loans to the other 11 companies, we compared the actual interest each company paid during the review period with the interest that would have been paid on these loans using the benchmark rate of 15.08 percent. The difference is the benefit. We divided the benefit by either total exports or total exports of subject merchandise to the United States, depending on how the pre-shipment financing was reported. That is, if a company was able to segregate preshipment loans applicable to subject merchandise exported to the United States, we divided the benefit derived from only those loans by total exports of subject merchandise to the United States. If a firm reported aggregate preshipment financing, we divided the benefit from all pre-shipment loans by total exports. For Super Castings (India) Private Ltd., we used the highest individual company benefit rate from this program as best information available. On this basis, we preliminarily determine the net subsidy from this program to be 1.11 percent ad valorem for all manufacturers and exporters in India of certain iron-metal

castings, except for those firms listed below which have significantly different aggregate benefits. The net subsidies for those firms are as follows:

Manufacturer/exporter	Net sub- sidy (per- cent)
Nandikeshwari Iron Foundary Overseas Iron Foundry Pvt. Ltd Sitaram Madhogarhia & Sons Pvt.	0.00 5.27
Ltd	0.41

2. Post-Shipment Export Financing

The Reserve Bank of India, through commercial banks, provides postshipment loans to exporters upon presentation of export documents. Postshipment financing also includes bank discounting of foreign customer receivables. As with pre-shipment financing, exporters may establish postshipment credit lines with their commercial banks. In general, postshipment loans are granted for a period of up to 180 days. In prior administrative reviews of this order, this program was determined to be countervailable because receipt of the loans under this program is contingent upon export performance and the interest rates were preferential. (See 1988 and 1989 Indian Castings Final Results.) There has been no new information or evidence of changed circumstances in this review to warrant reconsideration of this program's countervailability. The interest rate for post-shipment financing was 8.65 percent during the review period. For reasons stated above for pre-shipment financing, we are using 15.08 percent as our short-term interest rate benchmark.

During the review period, 12 of the 14 respondent companies made payments on post-shipment export loans for shipments of subject castings to the United States. Only 11 of those 12 companies, however, provided specific loan information as requested in our questionnaires. Super Castings (India) Private Ltd. stated in its response to our original questionnaire that its information about its post-shipment loans was forthcoming; despite another request for the information in our supplemental questionnaire, the company never submitted it. To calculate the benefit from these loans to the other 11 companies, we followed the same short-term loan methodology discussed above for pre-shipment financing. We divided the benefit by either total exports or exports of subject merchandise to the United States, depending on whether the company was able to segregate the post-shipment