considered "similar" for purposes of the weight criterion. We also invited the interested parties to suggest an alternative methodology and explain why their proposed methodology would be more reasonable than our proposed 20 percent weight range.

We proposed the 20 percent weight range for two reasons. First, we wanted to define the phrase "greatly disparate," and the only way to do so with any kind of predictability was to assign a specific value to the term. Second, we used a 20 percent range rather than any other percentage range because the Department uses a 20 percent range in similar circumstances when applying its difmer test. As discussed above, the function of the weight criterion in these reviews is similar to that of the difmer test, and ensures that we do not make unreasonable comparisons.

We disagree with the respondent's claim that the Department's 20 percent weight range treats differences in weight erratically. By applying the weight criterion as a range, we are simply setting an outside parameter for acceptable weight differences. Within that range, the Department applied the remaining criteria to find the most similar matches. If there was more than one potential home market match after applying the remaining criteria, the Department chose the home market model that was closest in weight to the U.S. model. Applying weight as a specific percentage range, and then choosing the model that is closest in weight if there is more than one potential match after applying the remaining criteria, makes the criterion's operation predictable, not erratic.

The Department would be treating differences in weight erratically if it were to apply the weight criterion only to choose the home market model that is "closest" in weight to the U.S. model, because in some cases the potential home market comparisons may be very close in weight to the U.S. model, and in other cases the potential home market comparisons may all be far from the weight of the U.S. model. Simply choosing the home market model that is "closest" in weight, without also setting an outside limit for acceptable weight differences, would thus treat differences in weight differently in analogous circumstances. The respondent's proposed solution of making weight the fifth criterion or using it only to "break ties" would not avoid this problem. Moreover, each of the respondent's proposed alternative methodologies would, like the Department's preliminary methodology, effectively nullify any remaining matching criteria.

We also disagree with the respondent's contention that a 20 percent range is too narrow. As discussed above, we solicited comments from the parties on our proposed methodology. If the respondent believed that a 20 percent range was too narrow, it had an opportunity to suggest a broader range and explain why that broader range would have been more appropriate than the Department's proposal. While the respondent suggests the range should have been "much" broader than 20 percent, it declined our invitation to quantify what that range should be.

Moreover, after asserting that the range should have been much broader than 20 percent, the respondent then asserted that any percentage "cutoff" would be inappropriate. While the respondent seems to believe that there is no point at which the differences in weight between the home market and U.S. models would be so great as to make comparisons ipso facto unreasonable, we disagree. If the Department were to accept the respondent's argument, we would be required to make ad hoc determinations of what constitutes a "great disparity" in weight each time we made a comparison. This would frustrate our intent to ensure greater predictability in our application of the weight criterion.

We also disagree with the respondent's argument that the Department has previously determined that a range approach would be inappropriate for comparing crankshafts. In the original investigation, we simply declined to group crankshafts according to size because crankshafts are not sold in specific sizes. Our methodology in this review does not create "groups" of U.S. and home market models; it merely establishes boundaries for comparing individual U.S. models to all potential

home market comparisons

Finally, we disagree with the respondent's assertion that our methodology is inconsistent with the Act and our prior determinations. First, the respondent claims that there are no compelling reasons to change our methodology from the preliminary determination, because there were no "unreasonable" matches in this review. As noted above, however, the methodology we applied in the preliminary results was flawed in several respects. Thus, the matches may not be those that are truly most similar when all of the criteria are considered. It would undermine our attempts to make our matching hierarchy more accurate and predictable if we were to continue applying that methodology in

this review, only to change the methodology in a future review when the flaws manifested themselves in unreasonable matches.

Second, the respondent claims there is no evidence that our preliminary methodology was unpredictable, and that a 20 percent range will not increase predictability. We disagree. Our preliminary methodology, while 'predictable,'' was flawed; applying the weight criterion as a range will increase predictability without invalidating the remaining matching criteria.

Third, the respondent argues that applying the weight criterion as a 20 percent range will require the use of CV for certain models. However, as discussed below in Comment 3, the goal in establishing a model match methodology is not simply to yield the greatest number of matches, the goal is to identify matches of "similar" products. We have determined that products are not similar if the difference between the U.S. and home market weights are more than 20 percent; in such situations, resort to CV would be appropriate.

Finally, the respondent's argument that our methodology will permit the use of more than one home market comparison for a single U.S. model is incorrect. As discussed above, if there were two or more potential home market matches after applying each of the Department's matching criteria, we chose the model that was closest in weight to the U.S. model because that model was, objectively speaking, "most" similar to the U.S. model.

Comment 2: Excluding Certain Models from Use in Matching

The petitioner contends that the Department should have excluded, as potential matches, all home market crankshaft models that appeared to have been sold at prices below their COP. The petitioner argues that the Department has the information necessary for initiating a COP investigation in accordance with section 773(b) of the Act and should have done so. Furthermore, the petitioner argues that if the Department is applying the 90/60 rule and difmer test in order to limit the pool of possible home market comparisons, then the Department should also take into account whether models are sold at or above their costs of production.

The respondent contends that the Department should not disregard any sales of home market models when selecting its matches because no authority cited by the petitioner supports disregarding them in this case. The respondent maintains that: 1) the