Korean government determines the drawback amount using its calculation of the amount of duty each importer paid on average. Hence, although respondents do not have to tie their imports to the exports in order to receive duty drawback from the Korean government, this average drawback approach does not satisfy the second prong of our duty drawback test. Although we verified that respondents received duty drawback under the simplified method, an adjustment to USP to determine the amount of dumping of a specific product might be distorted if that adjustment has not been calculated on a product-specific basis. Therefore, we have not adjusted USP for duty drawback where the respondents used the simplified method.

Comment 10: Ssang Yong asserts that the Department failed to adjust its USP for drawback it received using the individual drawback system. Ssang Yong further states that it received duty drawback under the individual method and the simplified method. Ssang Yong states that the Department verified its records for drawback and, citing the verification report, was satisfied that there were no discrepancies. Ssang Yong requests that the Department adjust USP for duty drawback in the cases where it was received under the individual drawback system.

Department's Position: We are satisfied that Ssang Yong's calculation of duty drawback under the individual method, as calculated during a portion of the POR, meets our test and have adjusted USP for duty drawback where appropriate.

Comment 11: Chun Kee asserts that the Department calculated the VAT tax twice on its home market sales by multiplying the net home market price (NETPRIH) by the VAT rate, and by multiplying the final foreign market value (FUPDOL), which the Department derives from NETPRIH, by the VAT rate later in the calculations. Chun Kee states that all positive and negative adjustments to the gross unit price must be multiplied by the VAT rate, but argues that the Department's calculations inflate the entire net price by applying the VAT rate twice.

The Committee responds, that, according to the Analysis Memorandum for Chun Kee, all positive and negative adjustments to the gross unit price must be multiplied by the VAT rate. The Committee further claims that first the Department performs the VAT adjustment with respect to negative adjustments and, later in the calculations, performs the adjustment with respect to the positive adjustments,

and, hence, there was no double-counting of the VAT rate.

Department's Position: We agree with Chun Kee that we made a ministerial error. However, for the final results we have made tax adjustments based on our new methodology. See comment eight above.

Comment 12: Chun Kee and Manho contend that, in a number of cases, they provided similar home market matches for U.S. sales, but the Department calculated constructed value to determine the dumping margin. They explain that this occurs in the model match portion of the Department's program. Respondents suggest that, because the Department's program retains only the first occurrence of each home market model that matches a U.S. sale, even though a home market model may be comparable to more than one U.S. model, subsequent U.S. sales cannot find a match and, therefore, the Department relied on constructed value. They recommend that one way to correct this would be to ensure that every U.S. sale which does not have an identical home market match, has a home market control number attached to the observation so that a merge of databases and information can occur when appropriate.

Department's Position: We agree with respondents and have ensured that, where appropriate, each U.S. sale is matched to a home market model.

Comment 13: Chun Kee claims that the Department inadvertently added home market packing to FMV instead of subtracting the expense. It claims that this had a very large impact on FMV and provides an example of the effect of this error.

The Committee argues that Chun Kee's explanation of the error is incorrect and that the Department's calculation of FMV is correct.

Department's Position: We agree with Chun Kee and have corrected this ministerial error. In our calculations for Chun Kee we inadvertently inserted a minus sign twice, which had the effect of adding packing instead of subtracting it. We have corrected this by deleting one of the minus signs.

Comment 14: Chun Kee claims that the Department failed to subtract home market inspection fees and rebates from the home market net price in its calculations.

Department's Position: We agree with Chun Kee and have corrected this ministerial error.

Comment 15: Chun Kee and Manho assert that major errors exist in the COP portion of the Department's calculations which affect the integrity of the COP test. Respondents request that the

Department correct these errors for the final results.

Department's Position: We agree with Chun Kee and Manho. We have corrected the error.

Comment 16: Chun Kee asserts that the Department neglected to apply the 90/60 day contemporaneity guideline for finding home market sales matches. It claims further that the Department's calculations relied only on home market sales in the same month as the U.S. sale, and, instead of examining the 90/60 window for home market sales, the Department relied on constructed value to determine FMV.

Department's Position: We agree with Chun Kee and have applied our 90/60 day contemporaneity guideline in our calculations for Chun Kee.

Comment 17: Chun Kee claims that the Department failed to incorporate the corrections which Chun Kee submitted in attachment 13 of its supplemental questionnaire response. Chun Kee requests that the Department reflect these corrections in the final results.

Department's Position: We agree with Chun Kee and have made these corrections.

Comment 18: Manho claims that the Department mistakenly added U.S. packing to the FMV, even though the calculations for constructed value contains U.S. packing costs. Respondent requests that the Department correct this double-counting error.

Department's Position: We agree with Manho and have corrected this ministerial error.

Comment 19: Manho claims that the Department incorrectly subtracted duty drawback from USP rather than adding it, as the statute requires. Manho requests that the Department correct this error.

Department's Position: We agree with Manho and have corrected this ministerial error.

Final Results of Review

We determine the following percentage weighted-average margins exist for the period September 30, 1992, through February 28, 1994:

Manufacturer/exporter	Margin (percent)
Atlantic & Pacific	1.51
Boo Kook Corporation	1.51
Chun Kee Steel & Wire Rope	
Co., Ltd	0.20
Chung Woo Rope Co., Ltd	0.14
Dae Heung Industrial Co	(¹)
Dae Kyung Metal	1.51
Dong-II Metal	1.51
Dong-II Steel Manufacturing	
Co., Ltd	1.51
Dong Young	1.51