






A-570-112
Circumvention
Circ. - Thailand
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DATE: September 25, 2023

MEMORANDUM TO: All Interested Parties

THROUGH: Irene Darzenta Tzafolias 
Director
AD/CVD Operations, Office VIII
Enforcement and Compliance

THROUGH: Rebecca Trainor 
Program Manager
AD/CVD Operations, Office VIII
Enforcement and Compliance

FROM: Brian Smith 
Senior International Trade Compliance Analyst
AD/CVD Operations, Office VIII
Enforcement and Compliance

RE: Certain Collated Steel Staples from the People's Republic of China: Circumvention Inquiry on the Antidumping and Countervailing Duty Orders

SUBJECT: Extension of Deadline for Issuing Final Determination in Circumvention Inquiry

On December 21, 2022, the Department of Commerce (Commerce) published the initiation of the above-referenced country-wide circumvention inquiry pursuant to section 781(b) of the Tariff Act of 1930, as amended (the Act).¹ On August 24, 2023, Commerce published its preliminary determination in this circumvention inquiry.²

Section 351.226(e)(2) of Commerce's regulations states that:

In accordance with section 781(f) of the Act, the Secretary shall, to the maximum extent practicable, issue a final determination under paragraph (g)(2) of this section no later than 300 days from the date

¹ See *Certain Collated Steel Staples from the People's Republic of China: Initiation of Circumvention Inquiries on the Antidumping Duty and Countervailing Duty Orders*, 87 FR 78047 (December 21, 2022)

² See *Antidumping and Countervailing Duty Orders on Certain Collated Steel Staples From the People's Republic of China: Preliminary Affirmative Determinations of Circumvention With Respect to the Kingdom of Thailand and the Socialist Republic of Vietnam*, 88 FR 57931 (August 24, 2023), [Approved](#)



of publication of the notice of initiation of a circumvention inquiry under paragraph (b) or (d) of this section. If the Secretary concludes that the inquiry is extraordinarily complicated and additional time is necessary to issue a final circumvention determination, then the Secretary may extend the 300-day deadline by no more than 65 days.

The issues in this inquiry are extraordinarily complicated, and Commerce needs additional time to analyze, consider, and respond to issues raised in the case and rebuttal briefs prior to issuing the final determination in this circumvention inquiry. Accordingly, and pursuant to 19 CFR 351.226(e)(2), we are extending the deadline for the final determination by 65 days, until **December 21, 2023**.