



UNITED STATES DEPARTMENT OF COMMERCE  
International Trade Administration  
Washington, D.C. 20230

A-570-502

Scope Review

Public Document

IA/NME 8: KGH

**PUBLIC FILE**

JAN 18 2007

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By Certified Mail, Return Receipt Requested

To All Interested Parties:

The Department of Commerce ("the Department") has received a request from A.Y. McDonald Mfg. Co. ("AYM") for a scope ruling on whether cast iron bases and cast iron upper bodies it imports for assembling its meter boxes are covered by the antidumping duty order on iron construction castings from the People's Republic of China ("PRC"). See *Antidumping Duty Order: Iron Construction Castings from the People's Republic of China*, 51 FR 17222 (May 9, 1986).

In accordance with 19 CFR 351.225(k)(1), and with the antidumping duty order in effect for this merchandise, the Department has determined that cast iron bases and cast iron upper bodies, when imported independently, do not fall within the scope of the order because the order does not contain language to include parts or components of meter boxes.

Enclosed is a memorandum containing the Department's analysis. We will notify U.S. Customs and Border Protection of this decision. If you have any questions, please contact Charles Riggle at (202) 482-0650 or Katharine Huang at (202) 482-1271.

Sincerely,

Wendy Frankel

Director

AD/CVD Operations, Office 8

Enclosure

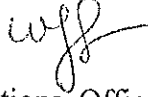




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MEMORANDUM FOR: Stephen J. Claeys  
Deputy Assistant Secretary  
for Import Administration

FROM: Wendy Frankel   
Director  
AD/CVD Operations, Office 8

SUBJECT: Scope Ruling on the Antidumping Duty Order on Iron  
Construction Castings from the People's Republic of China:  
Request by A.Y. McDonald Mfg. Co.

### Summary

On July 7, 2006, A.Y. McDonald Mfg. Co. ("AYM") requested that the Department of Commerce ("the Department") issue a ruling that certain cast iron bases and cast iron upper bodies for meter boxes that AYM imports from the People's Republic of China ("PRC") are not covered by the antidumping duty order on iron construction castings from the PRC because the scope does not extend to parts of meter boxes. *See Antidumping Duty Order: Iron Construction Castings from the People's Republic of China*, 51 FR 17222 (May 9, 1986). In accordance with 19 CFR 351.225(d) and 351.225(k)(1), we recommend that the Department determine that AYM's imports of cast iron bases and cast iron upper bodies for meter boxes classified under Harmonized Tariff Schedule of the United States ("HTSUS") subheading 7325.10.0035 and described in its July 7, 2006, submission are outside the scope of the antidumping duty order on iron construction castings from the PRC.

### Background

On July 7, 2006, AYM submitted a scope inquiry requesting that its cast iron bases and cast iron upper bodies for meter boxes, individual pieces which cannot be assembled into a complete meter box, be considered outside the scope of the order. AYM argued that, based on the physical description of these products, they are not included in the limited list of products covered by the scope set forth by the Department, nor in the product description set forth in the petition or the International Trade Commission's ("ITC") final determination.



On August 14, 2006, the Municipal Castings Fair Trade Council ("the Council") and its individual members<sup>1</sup> submitted comments on AYM's July 7, 2006, scope ruling request. The Council requested the Department to determine that cast iron bases and cast iron upper bodies that AYM imports from the PRC are within the scope of the order.

On August 21, 2006, the Department extended the time period for issuing a scope ruling or initiating a formal scope inquiry by 30 days, until September 20, 2006. On September 18, 2006, AYM submitted a response to the Council's comments. On September 19, 2006, the Department extended the time period for issuing a scope ruling or initiating a formal scope inquiry by an additional 30 days, until October 20, 2006. On October 20, 2006, the Department extended by an additional 45 days, until December 4, 2006. Finally, on December 4, 2006, the Department again extended by 45 days, until January 18, 2007, the time period for issuing a scope ruling or initiating a formal scope inquiry.

### **Scope of the Order**

The merchandise covered by the antidumping duty order consists of certain iron construction castings from the PRC, limited to manhole covers, rings, and frames, catch basin grates and frames, clean-out covers and frames used for drainage or access purposes for public utility, water and sanitary systems, classifiable as heavy castings under HTSUS item number 7325.10.0010; and to valve, service, and meter boxes which are placed below ground to encase water, gas, or other valves, or water and gas meters, classifiable as light castings under HTSUS item number 7325.10.0050. The HTSUS item numbers are provided for convenience and customs purposes only. The written description remains dispositive.<sup>2</sup>

### **Argument**

As an initial matter, AYM notes that on September 7, 2005, the Department found that cast iron bases, bodies, and lids for meter boxes, which together essentially make up a meter box, imported together by AYM, were covered by the scope of the order. AYM argues that it has never imported cast iron lids for meter boxes and, consequently, does not import all three basic components of a meter box. Given that it will import, at most, two of the three essential components that make up a subject meter box, AYM contends that its importation of cast iron bases and upper bodies are outside the scope of the order.

AYM describes its products as cast iron bases and cast iron upper bodies used in the assembly and manufacture of longboxes and yokeboxes (meter boxes). According to AYM, these items

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<sup>1</sup> The individual members include Bingham & Taylor, Deeter Foundry Inc., East Jordan Iron Works, Inc., LeBaron Foundry, Inc., Municipal Castings, Inc., Neenah Foundry, Company, Tyler Pipe Company, and U.S. Foundry & Manufacturing Co., domestic producers of the like product.

<sup>2</sup> See *Antidumping Duty Order: Iron Construction Castings from the People's Republic of China*, 51 FR 17222 (May 9, 1986); see also *Certain Iron Construction Castings From The People's Republic of China; Five-year ("Sunset") Review of Antidumping Duty Order; Final Results*, 70 FR 24511 (May 10, 2005).

are typically assembled with other domestic components into a meter box and sold as a set. AYM explains that its meter boxes are used below ground to encase a water meter. AYM asserts that its yokeboxes typically consist of six main components plus the hardware necessary to assemble the components; while a longbox includes the same components plus one or two additional components. AYM states that, generally, the base, upper body and lid are made from cast iron, but that often the upper body portion may be made from plastic. AYM reiterates that it imports only cast iron bases and cast iron upper bodies from the PRC, and that all other components, including the cast iron lid, are sourced domestically.

AYM states that its cast iron bases and cast iron upper bodies are properly classifiable under HTSUS subheading 7325.10.0035 as "Other cast articles of iron or steel; Of nonmalleable cast iron; Meter boxes." AYM maintains that its cast iron bases do not fall within the scope of the order. In support of its assertion, AYM states that the Department set forth the scope of products included in the antidumping duty order as follows:<sup>3</sup>

certain iron construction castings, limited to manhole covers, rings and frames, catch basins, grates and frames, cleanout covers and frames used for drainage or access purposes for public utility, water and sanitary systems, classifiable as heavy castings under item number 657.0950 of the Tariff Schedules of the United States, Annotated (TSUSA), and to valve, service and meter boxes which are placed below ground to encase water, gas, or other valves, or water or gas meters, classifiable as light castings under item number 657.0990 of the TSUSA. These articles must be of cast iron, not alloyed, and not malleable.

AYM explains that, more recently, the Department set forth the scope of this case as follows:<sup>4</sup>

This order covers certain iron construction castings, limited to manhole covers, rings and frames, catch basins, grates and frames, cleanout covers and frames used for drainage or access purposes for public utility, water and sanitary systems, and to valve, service and meter boxes which are placed below ground to encase water, gas, or other valves, or water or gas meters. The articles must be of cast iron, not alloyed, and not malleable. Until January 1, 1989, iron construction castings were classified under item number 657.0950 and 657.0990 of the TSUSA. This merchandise is currently classified under Harmonized Tariff System (HTS) items 7325.10.00.00 and 7325.10.00.50. The HTS and TSUSA item numbers

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<sup>3</sup> See *Antidumping Duty Order: Iron Construction Castings from the People's Republic of China (the PRC)*, 51 FR 17222 (May 9, 1986), in Exhibit 4 of AYM's scope request.

<sup>4</sup> See *Iron Construction Castings from the People's Republic of China; Amended Final Results of Antidumping Duty Administrative Reviews in Accordance with Court Decision*, 67 FR 57211 (September 9, 2002), in Exhibit 5 of AYM's scope request.

are provided for convenience and Customs purposes. The written description remains dispositive of the scope of the order.

In addition, AYM notes the language contained in the petition and in the ITC's final determination describing the products subject to the investigation. The petition set forth the product description as follows:<sup>5</sup>

Iron construction castings include two categories of products, both of cast iron, produced by two different foundry methods. The first group, so-called "heavy construction castings," include manhole covers, rings, and frames, catch basin grates and frames, and cleanout covers and frames, all of which are heavy-walled castings produced by the sand cast method. All these articles are usually manufactured in sets consisting of a cover and frame, and sometimes accessory parts such as increaser or adapter rings. These articles are used for drainage or access purposes in public utility, water, and sanitary systems. Manhole covers and frames constitute the bulk of both domestic production and imports of heavy construction castings.

The second group of articles, the so-called "light construction castings," can be produced by any of three processes, and include valve, service, and meter boxes. These products are also manufactured in sets, usually containing 3 pieces - a base, a straight midsection, and cover. These products are placed below ground to encase water, gas, or other valves, or water or gas meters. Although they can be manufactured in a range of dimensions, they are usually much lighter and smaller than manhole covers and other construction castings, and are more standardized in dimension nationwide.

According to AYM, the product description set forth in the ITC's final determination explained:<sup>6</sup>

The iron construction castings covered by these investigations are manhole covers, rings, and frames; catch basin grates and frames, cleanout covers and frames; and valve service and meter boxes. These articles are cast from iron that is not alloyed and not malleable; a material commonly known as gray iron.

Iron construction castings are divided into two categories: "heavy" castings, which usually have walls of one (1) inch or greater thickness, and "light" castings, which typically have 1/4-inch -thick walls. The heavy construction

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<sup>5</sup> See Petition Seeking Relief Under Section 731 of the Tariff Act of 1930, as Amended, on Imports of Iron Construction Castings from the People's Republic of China, Vol. I dated May 13, 1985, at 5-6 in Exhibit 6 of AYM's scope request.

<sup>6</sup> See *Iron Construction Castings from Brazil, India, and the People's Republic of China*, USITC Pub. 1838 (April 1986), in Exhibit 7 of AYM's scope request.

castings consist of manhole covers, rings and frames; catch basin grates and frames; and cleanout covers and frames. These products are used for drainage or access purposes in utility, water, and sanitary systems. Manhole sets, consisting of cover and a frame, and sometimes accessory parts such as rings, constitute the bulk of both domestic production and imports of heavy construction castings. Such castings generally range in weight from 270 to 1,000 pounds and are produced by the sand-cast method.

The light castings consist of valve, service, and meter boxes. These products are used to encase the underground valves and meters of water, gas, or other utilities, and to provide access to this equipment for periodic adjustment or reading. Light castings are also manufactured in sets, usually containing three pieces – a base, a top, and a cover with lettering and/or a pattern. Light castings generally range in weight from 10 to 120 pounds and are produced in the United States by the sand-cast, shell mold, or permanent mold process.

AYM notes that pursuant to 19 CFR 351.225(d) and (k)(1), in making a scope determination the Department must first consider the descriptions of the merchandise contained in the petition, the initial investigation and the determinations of the Department. If the Department determines that these descriptions of the merchandise are not dispositive, the Department will consider additional factors set forth at 19 CFR 351.225(k)(2). In placing the foregoing documents before the Department for purposes of this scope determination, AYM states that the Department has previously found that the descriptions of the product contained in the petition, the final determinations of the Department (including prior scope determinations) and the ITC, the initial investigation and the antidumping order are dispositive.<sup>7</sup> According to AYM, the same documents provide dispositive proof that the cast iron bases and upper bodies subject to AYM's scope request are not covered by the scope of this antidumping duty order.

AYM argues that the importation of a part of a product that is covered by an antidumping duty order does not necessarily constitute the importation of a finished product for antidumping purposes. AYM maintains that this issue was discussed specifically in *Helmac Products Corp. v. Roth (Plastics) Corp.*, 814 F.Supp.581, at 587 (D. Mich. 1993) ("*Helmac*"), where the District Court, E.D. Michigan, Southern Division, considering *Mitsubishi Electric Group v. U.S.*, 898 F.2d 1577 (Fed. Cir. 1990), and *NTN Bearing Corp. Of America v. U.S.*, 802 F.Supp. 448 (Ct. Int'l Trade 1992), developed a two-part test which looks at whether a foreign company's American operations: 1) added significant value to the product, and 2) did not serve exclusively to avoid application of antidumping laws. Applying that test to its own situation, AYM contends that its cast iron bases and upper bodies cannot be considered as the importation of a finished product subject to this antidumping duty order.

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<sup>7</sup> See Memorandum from Barbara E. Tillman to Joseph A. Spetrini Re: Scope Ruling on the Antidumping Order on Iron Construction Castings from the People's Republic of China -- Request by Frank J. Martin Company, dated October 17, 2003 ("Martin Scope Ruling"), in Exhibit 9 of AYM's scope request.

First, AYM states that cast iron meter boxes fall within the scope of the order, and if its longboxes and yokeboxes were imported as finished goods, they would “theoretically” fall within the scope. However, AYM claims that its imported cast iron bases and upper bodies do not constitute complete meter boxes, but are merely parts of meter boxes that will be assembled in the United States, at which point, AYM argues, it adds significant value to the imported castings. For instance, AYM claims that the imported bases and bodies comprise 20 - 33 percent of the value of a complete meter box. Furthermore, AYM states that the majority of its assembled meter boxes use a plastic upper body, in which case the imported bases make up 14 - 20 percent of the value of a complete meter box.

Second, AYM claims that because a majority of the meter box parts – by content and value – are sourced domestically, it makes economic sense to import its cast iron bases and upper bodies individually, whereby they can be sold independently or as part of an assembled set. AYM maintains that it abandoned its sole import of cast iron lids due to a country-of-origin marking violation, and has since sourced all of its cast iron lids domestically for reasons unrelated to the antidumping order.

Additionally, AYM contends that, based on the same reasoning used by the Department in the Martin Scope Ruling, the Department should find that its imported cast iron parts of meter boxes do not fall within the scope of the order. AYM states that in the Martin Scope Ruling the Department found that the descriptions of the product contained in the petition, the final determinations of the Department (including prior scope determinations) and the ITC, the initial investigation, and the antidumping order are dispositive. Also, AYM states that although the merchandise at issue here is “slightly different,” the Department addressed the issue of whether parts of articles covered by this antidumping order were also within the scope of the order. AYM states that the Department ultimately held that imported cast iron parts of a valve box were not within the scope of this antidumping order if, as imported, they did not make up complete articles.

The Council argues that AYM’s imported components that are assembled into meter boxes in the United States cannot be excluded from the order merely because the components are imported independently. According to the Council, the products covered by this order include “valve, service and meter boxes which are placed below ground to encase water, gas, or other valves, or water or gas meters, classifiable as light castings.” The Council maintains that the bases and upper bodies are cast iron components of a meter box, and the meter box is used below ground to encase a water meter. Therefore, the Council argues that AYM’s imports of these products fit precisely within the scope language of the order.

The Council first states its “strenuous disagreement” with the Department’s determination in the Martin Scope Ruling. Next, the Council urges the Department not to consider the Martin Scope Ruling as precedent in this proceeding for two reasons. First, the Council submits that scope determinations are inherently factual determinations, and the facts differ between the Martin Scope Ruling and AYM’s request and, even if upon reconsideration of the Martin Scope Ruling the Department found no fault in that decision, the Martin Scope Ruling does not apply to these *sui generis* facts.

Second, the Council maintains that the Department's analysis in the Martin Scope Ruling was wrong because the Department did not recognize that the petition language did not require valve, service, and meter boxes to be imported in their entirety and with all components in the same shipment for them to be covered by the order, and the Department did not take into account that the importation of components, as opposed to a completed valve box, is easy to do and would render the antidumping duty order meaningless.

The Council also argues that AYM cannot meet the *Helmac* two-part test to have its imported components excluded from the order. The Council contends that AYM's claim that it has not imported lids due to its inability to obtain lids from a foreign supplier that can properly produce a lid with the required country-of-origin marking does not withstand the most elementary scrutiny. The Council suggests that AYM's claim is particularly suspect considering the "savings on duties that AYM hopes to achieve with this tactic."

Furthermore, the Council argues that in selling a meter box as described in the scope of the order, AYM does not add significant value to the imported meter box components. The Council adds that AYM provided no support for its claims regarding the value of the imported components as a percentage of the value of completed meter boxes. In fact, the Council maintains that, where AYM argues that the foreign content is between 20 - 33 percent of the entire value of its meter boxes, based on domestic producers' data, the value of the base and upper body to the entire meter box would be between 50 and 60 percent if AYM were to obtain those components from a U.S. – rather than Chinese – supplier. Moreover, the Council contends that AYM's estimates of its U.S.-added value are also extremely overstated based on industry practice that all meter box component parts are manufactured independently from each other and would be "assembled" eventually at a job site, and any "assembly" performed by AYM would be rudimentary and only related to shipping to a distributor or installer at a job site.

In response, AYM argues that the scope of the order does not extend to parts of valve, service or meter boxes, and that the Department has repeatedly confirmed that individual components that, when assembled, do not constitute a complete valve, service or meter box, are excluded from the order.<sup>8</sup>

Likewise, AYM claims that it imports, at most, two meter box components which, at the time of importation, cannot be assembled to make up a complete valve, service or meter box. According to AYM, it imports cast iron bases and upper bodies independently from other components based on customers' specifications.<sup>9</sup> Thus, based on customer specifications, AYM maintains that its

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<sup>8</sup> AYM cites to Memorandum from Edward Yang, Division Director, Office of Antidumping Compliance to John Durant, Director, Commercial Rulings Division, Headquarters, U.S. Customs Service, Re: Scope Inquiry on Certain Iron Construction Castings from Brazil, Canada, the People's Republic of China, and India, dated June 15, 1992 ("1992 Scope Memo") (attached as Exhibit A of AYM's September 18, 2006, submission), and the Martin Scope Ruling.

<sup>9</sup> AYM explains that its decision to domestically source all of its cast iron lids are based on such things as customer requirements for specialized cast markings, because AYM claims that it can coordinate locally the proper



decision to import one or two of the total six or seven components is analogous to the Department's finding in the Martin Scope Ruling. AYM also reiterates its argument that, in meeting the two-part test established in *Helmac*, its imported cast iron bases and upper bodies are not covered by the scope of the order.

### **Applicable Regulations**

The regulations governing the Department's antidumping scope determinations can be found at 19 CFR 351.225. On matters concerning the scope of an order, the Department's initial basis for determining whether a product is included within the scope of an order is the descriptions of the product contained in the petition, the initial investigation, and the determinations of the Secretary (including prior scope determinations) and the ITC. *See* 19 CFR 351.225 (d) and 351.225 (k)(1). Such scope determinations may take place with or without a formal inquiry. *See* 19 CFR 351.225(d) and 351.225(e). If the Department determines that these descriptions are dispositive of the matter, it will issue a final scope ruling as to whether or not the merchandise is covered by the order. *See* 19 CFR 351.225(d).

Conversely, when the descriptions of the merchandise are not dispositive, the Department will consider the following additional criteria set forth at 19 CFR 351.225(k)(2): i) the physical characteristics of the product; ii) the expectations of the ultimate purchasers; iii) the ultimate use of the product; iv) the channels of trade in which the product is sold; and v) the manner in which the product is advertised and displayed. These factors are known commonly as the *Diversified Products*<sup>10</sup> criteria. The determination as to which analytical framework is most appropriate in any given scope inquiry is made on a case-by-case basis after consideration of all record evidence before the Department.

Documents from earlier segments of this proceeding that were considered for this analysis were placed on the record of this ruling by the Department. Documents that were not presented to the Department or placed by it on the record do not constitute part of the administrative record for this scope ruling.

### **Analysis**

The Department has evaluated AYM's request in accordance with 19 CFR 351.225(k)(1), taking into account the descriptions of the merchandise contained in the petition, the initial investigation, and determinations of the Department (including prior scope determinations) and the ITC.

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markings of these items. In addition, AYM states that customers are increasingly requesting plastic lids for longboxes and yokeboxes. *See Scope Ruling Request for A.Y. McDonald Mfg. Co. -- Cast Iron Bases: Iron Construction Castings from the People's Republic of China*, dated September 18, 2006, at 7.

<sup>10</sup> *Diversified Product Corp. v. United States*, 6 CIT 155, 572 F. Supp. 883 (1983).

AYM argues that the scope of the order does not extend to parts of valve, service or meter boxes, and, therefore, that its imports of cast iron bases and cast iron upper bodies for meter boxes are not covered by the scope of the order. As AYM points out, the petition described the relevant merchandise as “the so-called ‘light construction castings,’ {which} can be produced by any of three processes, and include valve, service, and meter boxes. These products are also manufactured in sets, usually containing 3 pieces - a base, a straight midsection, and cover.” In its final injury determination the ITC explained that “light castings consist of valve, service, and meter boxes. . . . Light castings are also manufactured in sets, usually containing three pieces – a base, a top, and a cover with lettering and/or a pattern.”

In addition, the scope language explains that “{t}his order covers certain iron construction castings, limited to . . . valve, service and meter boxes which are placed below ground to encase water, gas, or other valves, or water or gas meters” (see **Scope of the Order** section, above).

We find that the language from the petition and from the ITC’s final injury determination describe the subject light castings as being manufactured in sets, and while valve, service and meter boxes need not be “completed” in order to be subject to the order, they must be “complete.” Indeed, the scope language states that the merchandise covered by the order is “limited to . . . valve, service, and meter boxes” and contains no language to include parts or components of valve, service and meter boxes. We are not persuaded by the Council’s arguments that the petition language did not require valve, service, and meter boxes to be imported in their entirety for them to be covered by the order, or that the importation of meter box components that do not constitute a complete meter box would render the order meaningless.

Additional evidence also supports the Department’s conclusion that AYM’s imports of cast iron bases and cast iron upper bodies for meter boxes are not covered by the scope of the order. Pursuant to 19 CFR 351.225(k)(1), we have considered prior scope determinations where the Department also found that the scope of the order did not include parts or components of valve, service or meter boxes. Specifically, the Department previously stated: “With respect to the light castings the order only covers valve, service and meter boxes not the individual components of such boxes.”<sup>11</sup>

More recently, in the Martin Scope Ruling, the Department stated that under its interpretation of the petition language, the valve, service or meter boxes subject to the scope of the order “can be sold either as one complete box or as a set that comprises all of the individual parts or

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<sup>11</sup> See 1992 Scope Memo, where the Department ruled that certain cast iron rings produced by CNI Manufacturers (“CNI”) were not within the scope of the antidumping duty order on certain iron construction castings from the PRC. The memo stated that the rings at issue “are further assembled with a cover and skirt to make a containment box” for use with underground gasoline storage tanks. See *Memorandum from Edward Yang to John Durant entitled, “Scope Inquiry on Certain Iron Construction Castings from Brazil, Canada, the People’s Republic of China, and India,”* dated June 15, 1992, at 1. In the memo, the Department stated that, “although the CNI rings are light weight, the scope of the light castings covers completed sets not the individual components.” *Id.* at 1.

components necessary to complete a box.”<sup>12</sup> The Department also explained that “the petition would not include a set of individual pieces that could not be assembled into a valve, service or meter box.”<sup>13</sup>


In the instant case, AYM imports two components of meter boxes that do not comprise a complete meter box. The petition and the ITC’s final injury determination described the subject boxes as usually containing three pieces, a base, an upper body and a lid, or cover. Regardless of the actual number of parts or components needed to complete a box, we find that AYM’s imports of cast iron bases and cast iron upper bodies alone are insufficient to constitute a box and, therefore, do not fall within the scope of the order. We further find that including individual parts or components within the scope of the order when not imported together such that they could be assembled into a complete valve, service or meter box, would impermissibly expand the scope of the order.

Finally, while both AYM and the Council discussed *Helmac*, we have not addressed *Helmac*. We find it is not relevant to the instant case because we have made this scope ruling based on the application and the descriptions of the product contained in the petition, the initial investigation, and the determinations of the Department (including prior scope determinations) and the ITC. See 19 CFR 351.225 (d) and 351.225 (k)(1).

### Recommendation

We recommend that pursuant to 19 CFR 351.225(d) of the regulations, the Department determine that the iron cast bases and iron cast upper bodies imported by AYM from the PRC without the remaining components to make up a valve, service or meter box, are outside the scope of the antidumping duty order on iron construction castings from the PRC.

Agree                       Disagree

  
\_\_\_\_\_  
Stephen J. Claeys  
Deputy Assistant Secretary  
for Import Administration

1/18/07  
\_\_\_\_\_  
Date

<sup>12</sup> See Martin Scope Ruling at 7, where the Department determined that the Martin Company’s imports of two components used to assemble its eight-component Roadway Valve Box did not fall within the scope of the order because two components cannot be considered a valve, service or meter box by themselves.

<sup>13</sup> *Id.*