

(6) What actions will strengthen partnerships in effective development of SSA and STM services?

*B. STM, SSA, and Orbital Debris Mitigation Best Practices*

The President made clear that, alone, the SSA/STM open architecture data repository will not sufficiently protect U.S. national and commercial interests in space; minimum safety standards and best practices must be adopted in the United States and globally to utilize SSA/STM data to mitigate risk of collision and address the growing orbital debris issue threatening current and future space operation. The President directed the Department to lead a global effort to develop minimum safety standards and best practices that promote safe and responsible behavior in space.<sup>15</sup> Already, the Department is considering national and international activities, such as those under development in the International Organization for Standardization (ISO) and the Consultative Committee for Space Data Systems (CCSDS).

To develop these space traffic standards and best practices, the Department seeks information on:

(1) In the context of enhanced SSA/STM data, what best practices, technical guidelines, minimum safety standards, behavioral norms, and orbital deconfliction protocols should be adopted by the United States? Of these, are there any that should only be adopted in the United States if they are also adopted globally? If globally, what is the appropriate forum for such adoption?

(2) What pre-launch and on-orbit collision avoidance support services or technologies exist that will mitigate risk of collision, and improve situational awareness, and how should they be incorporated into best practices?

(3) What U.S. actions might incentivize global adherence to SSA/STM standards and compliance with space treaty obligations?

(4) What research methods for tracking whether international commercial entities are implementing such standards and best practices will assist in facilitating global adoption of a standards set of SSA/STM best practices?

*C. Appropriate SSA/STM-Related Regulations To Spur U.S. Space Commerce*

In coalescing his SSA/STM directives into specific agency actions, the President required the Secretaries of Defense, Commerce, and

Transportation, in coordination with the Secretary of State, the NASA Administrator, and the Director of National Intelligence, to regularly evaluate emerging trends in space missions and recommend revisions, as appropriate and necessary, to existing SSA and STM policies and regulations.<sup>16</sup>

The Department is actively engaged internally and in coordination with other agencies to assess how existing regulations related to STA/SSM and orbital debris mitigation are working and what changes are needed to implement the President's Space Policy Directives. To further inform Department regarding the policies or regulations needed to protect Federal and commercial space interests and enable significant growth in U.S. space commerce investment, the Department seeks information on:

(1) What existing policies and regulations, across agencies, positively and negatively enhance SSA/STM use and related orbital debris mitigation?<sup>17</sup>

(2) How do such existing policies and regulations encourage U.S. and allied space commerce investment, and how should they be revised?

(3) What emerging trends in space missions and proposed commercial spaceflight activity, including spacecraft safety standards, protection requirements, satellite tracking standards, and satellite control standards, impact existing and future SSA and STM policies and regulations? How should these trends drive revision to those policies and regulations?

(4) How can the proper regulatory environment drive a space activity insurance market that encourages investment?

(5) What, if anything, should the Federal government do to encourage insurance parameters for space activities that will encourage responsible space activities and make the U.S. the flag of choice for leading space innovators?

(6) Are there any other policies or regulations that the Department should consider in the context of SSA, STM, and orbital debris mitigation in order to promote the United States as the flag of choice for space commerce?

(7) What specific capabilities and technologies could commercial entities provide to characterize the small, millimeter-sized orbital debris population to improve the orbital debris impact risk assessments to support the

development and implementation of cost-effective protective measures for the safe operations of future space missions?

**III. Request for Public Comment and Ex Parte Communications**

The Department invites public comment on any and all issues identified in this Notice. Any non-public oral presentation to the Department regarding the substance of this Notice will be considered an ex parte presentation, and the substance of the meeting will be placed on the public record and become part of this docket. No later than two (2) business days after an oral presentation or meeting, an interested party must submit a memorandum to OSC summarizing the substance of the communication and attaching any documents presented in the meeting. The Department reserves the right to supplement the memorandum with additional information as necessary, or to request that the party making the filing do so, if the Department believes that important information was omitted or characterized incorrectly. Any written presentation provided in support of the oral communication or meeting will also be placed on the public record and become part of this docket. Such ex parte communications must be submitted to this docket as provided in the ADDRESSES section above and clearly labeled as an ex parte presentation. Federal entities are not subject to these procedures.

**Kevin O'Connell,**

*Director, Office of Space Commerce, U.S. Department of Commerce.*

[FR Doc. 2019-07169 Filed 4-8-19; 11:15 am]

**BILLING CODE P**

**DEPARTMENT OF COMMERCE**

**International Trade Administration**

[C-552-824]

**Laminated Woven Sacks From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination**

**AGENCY:** Enforcement and Compliance, International Trade Administration, Department of Commerce.

**SUMMARY:** The Department of Commerce (Commerce) determines that countervailable subsidies are being provided to producers and exporters of laminated woven sacks (LWS) from the Socialist Republic of Vietnam (Vietnam) during the period of investigation (POI),

<sup>15</sup> See id. at 28970.

<sup>16</sup> See id. at 28976.

<sup>17</sup> To the extent commenters discuss any existing or proposed regulations of another agency, the Department will provide those comments to the agency referenced.

January 1, 2017, through December 31, 2017.

**DATES:** Applicable April 11, 2019.

**FOR FURTHER INFORMATION CONTACT:** Thomas Martin or Ariela Garvett, AD/CVD Operations, Office IV, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-3936 or (202) 482-3609, respectively.

**SUPPLEMENTARY INFORMATION:**

**Background**

This final determination is made in accordance with section 705 of the Tariff Act of 1930, as amended (the Act). Commerce published the Preliminary Determination on August 13, 2018.<sup>1</sup> In the Preliminary Determination, Commerce aligned the final countervailing duty (CVD) determination with the final determination in the companion antidumping duty (AD) investigation, in accordance with section 705(a)(1) of the Tariff Act of 1930 (the Act) and 19 CFR 351.210(b)(4). Commerce exercised its discretion to toll all deadlines affected by the partial federal government closure from December 22, 2018, through the resumption of operations on January 29, 2019.<sup>2</sup> If the new deadline falls on a non-business day, in accordance with Commerce's practice, the deadline will become the next business day. Accordingly, the revised deadline for the final determination is now April 4, 2019.

For a complete description of the events that followed the Preliminary Determination, see the Issues and Decision Memorandum.<sup>3</sup> A list of topics discussed in the Issues and Decision Memorandum is included as Appendix II to this notice. The Issues and Decision Memorandum is a public document and is on file electronically via Enforcement

<sup>1</sup> See *Laminated Woven Sacks from the Socialist Republic of Vietnam: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 83 FR 39983 (August 13, 2018) (*Preliminary Determination*).

<sup>2</sup> See Memorandum to the Record from Gary Taverman, Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations, performing the non-exclusive functions and duties of the Assistant Secretary for Enforcement and Compliance, "Deadlines Affected by the Partial Shutdown of the Federal Government," dated January 28, 2019. All deadlines in this segment of the proceeding have been extended by 40 days.

<sup>3</sup> See Memorandum, "Issues and Decision Memorandum for the Final Affirmative Determination of the Countervailing Duty Investigation of Laminated Woven Sacks from the Socialist Republic of Vietnam," dated concurrently with, and hereby adopted by, this notice (Issues and Decision Memorandum).

and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). ACCESS is available to registered users at <http://access.trade.gov>, and is available to all parties in the Central Records Unit, room B8024 of the main Department of Commerce building. In addition, a complete version of the Issues and Decisions Memorandum can be accessed directly at <http://enforcement.trade.gov/frn/>. The signed and electronic versions of the Issues and Decision Memorandum are identical in content.

**Scope of the Investigation**

The products covered by this investigation are laminated woven sacks from Vietnam. For a full description of the scope of this investigation, see the "Scope of the Investigation," at Appendix I.

**Scope Comments**

During the course of this investigation and the concurrent AD investigation of LWS from Vietnam, Commerce received scope comments from interested parties. Commerce issued a Preliminary Scope Decision Memorandum to address these comments.<sup>4</sup> In response to Commerce's invitation to comment on its preliminary scope determination, Commerce received scope comments from Halsted Corporation (Halsted),<sup>5</sup> and rebuttal comments from the petitioners.<sup>6</sup> However, Commerce rejected Halsted's scope comments because they contained untimely filed new factual information.<sup>7</sup> Because Halsted's scope comments have been removed from the record of these investigations and Halsted did not file a redacted version of its scope comments within the deadline allotted by

<sup>4</sup> See Memorandum, "Antidumping and Countervailing Duty Investigations of Laminated Woven Sacks from the Socialist Republic of Vietnam: Preliminary Scope Determination," dated October 3, 2018 (Preliminary Scope Decision Memorandum).

<sup>5</sup> See Letter from Halstead, "Antidumping and Countervailing Duty Investigations of Laminated Woven Sacks from the Socialist Republic of Vietnam: Rejection of Untimely Filed Factual Information," dated December 12, 2018 (rejecting Halsted Corporation's November 13, 2018 scope brief).

<sup>6</sup> See Letter from Petitioners, "Investigation of Laminated Woven Sacks from the Socialist Republic of Vietnam: Petitioners' Rebuttal Scope Brief," dated November 19, 2018.

<sup>7</sup> See Letter from Commerce, "Antidumping and Countervailing Duty Investigations of Laminated Woven Sacks from the Socialist Republic of Vietnam: Rejection of Untimely Filed Factual Information," dated December 12, 2018; see also Letter from Halstead, "Antidumping and Countervailing Duty Investigations of Laminated Woven Sacks from the Socialist Republic of Vietnam: Request for Withdrawal of Scope Comments," dated February 8, 2019.

Commerce, Halsted's comments have not been considered in these investigations.<sup>8</sup> Furthermore, because the petitioners' rebuttal comments respond to Halsted's comments, which have been removed from the record of these investigations, Commerce has not considered the petitioners' comments. Therefore, Commerce has made no changes to the scope of these investigations since the *Preliminary Determination*.

**Analysis of Subsidy Programs and Comments Received**

The subsidy programs under investigation and the issues raised in the case briefs by parties in this investigation are discussed in the Issues and Decision Memorandum. A list of the issues that parties raised, and to which we responded in the Issues and Decision Memorandum, is attached to this notice at Appendix II.

**Methodology**

Commerce conducted this investigation in accordance with section 701 of the Act. For each of the subsidy programs found countervailable, Commerce determines that there is a subsidy, *i.e.*, a financial contribution by an "authority" that gives rise to a benefit to the recipient, and that the subsidy is specific.<sup>9</sup> For a full description of the methodology underlying our final determination, see the Issues and Decision Memorandum.

In making these findings, Commerce, in part, selected from among the facts otherwise available and, because it determined that one or more interested parties did not act to the best of their ability to respond to Commerce's requests for information, Commerce used an adverse inference where appropriate in selecting from among the facts otherwise available.<sup>10</sup> For further information, see "Use of Facts Otherwise Available and Adverse Inferences" in the Issues and Decision Memorandum.

**Changes Since the Preliminary Determination**

Based on our review and analysis of the comments received from the interested parties and our findings at verification, we made certain changes to the respondents' subsidy rate calculations. For a discussion of these changes, see the Issues and Decision Memorandum.

<sup>8</sup> *Id.*

<sup>9</sup> See sections 771(5)(B) and (D) of the Act regarding financial contribution; section 771(5)(E) of the Act regarding benefit; and section 771(5A) of the Act regarding specificity.

<sup>10</sup> See sections 776(a), (b), and 782(d) of the Act.

### Final Determination

In accordance with section 705(c)(1)(B)(i)(I) of the Act, we calculated a rate for Duong Vinh Hoa Packaging Company Limited (DVH Packaging), a producer/exporter of subject merchandise selected for individual examination in this investigation. With regard to Xinsheng Plastic Industry Co. Ltd. (Xinsheng), for the reasons described in the Issues and Decision Memorandum, Commerce assigned a rate based entirely on adverse facts available pursuant to section 776 of the Act.

Section 705(c)(5)(A) of the Act provides that in the final determination, Commerce shall determine an estimated all-others rate for companies not individually examined. This rate shall be an amount equal to the weighted average of the estimated subsidy rates established for those companies individually examined, excluding any zero and *de minimis* rates and any rates based entirely under section 776 of the Act. DVH Packaging is the only respondent for which Commerce calculated an estimated weighted-average dumping margin that is not zero, *de minimis*, or based entirely on facts otherwise available. Therefore, for purposes of determining the “all-others” rate, and pursuant to section 705(c)(5)(A) of the Act, we are using the subsidy rate calculated for DVH Packaging.

Commerce determines the countervailable subsidy rates to be:

Company	Subsidy rate (percent)
Duong Vinh Hoa Packaging Company Limited .....	3.02
Xinsheng Plastic Industry Co. Ltd .....	198.87
All-Others .....	3.02

### Disclosure

We intend to disclose the calculations performed to parties in this proceeding, for this final determination, within five days of the date of publication of our final determination, in accordance with 19 CFR 351.224(b).

### Continuation of Suspension of Liquidation

As a result of our affirmative Preliminary Determination and pursuant to sections 703(d)(1)(B) and (d)(2) of the Act, we instructed U.S. Customs and Border Protection (CBP) to suspend liquidation of any entries of merchandise under consideration from Vietnam that were entered, or withdrawn from warehouse, for

consumption on or after August 13, 2018, which is the publication date in the **Federal Register** of the Preliminary Determination. In accordance with section 703(d) of the Act, we issued instructions to CBP to discontinue the suspension of liquidation for CVD purposes for subject merchandise entered, or withdrawn from warehouse, on or after December 11, 2018, but to continue the suspension of liquidation of all entries from August 13, 2018, through December 10, 2018.

### International Trade Commission Notification

In accordance with section 705(d) of the Act, we will notify the ITC of the final affirmative determination of countervailable subsidies are being provided to producers and exporters of LWS from Vietnam. Because Commerce’s final determination is affirmative, in accordance with section 705(b) of the Act, the ITC will make its final determination as to whether the domestic industry in the United States is materially injured, or threatened with material injury, by reason of imports, or sales (or the likelihood of sales) for importation of LWS from Vietnam no later than 45 days after this final determination. If the ITC determines that such injury does not exist, this proceeding will be terminated and all cash deposits will be refunded or canceled. If the ITC determines that such injury does exist, Commerce will issue a countervailing duty order directing CBP to assess, upon further instruction by Commerce, countervailing duties on all imports of the subject merchandise entered, or withdrawn from warehouse, for consumption on or after the effective date of the suspension of liquidation, as discussed above in the “Continuation of Suspension of Liquidation” section.

### Notification Regarding Administrative Protective Orders

This notice will serve as the only reminder to parties subject to an APO of their responsibility concerning the destruction of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Timely written notification of the return/ destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and terms of an APO is a violation which is subject to sanction.

### Notification to Interested Parties

This determination is issued and published pursuant to sections 705(d)

and 777(i) of the Act and 19 CFR 351.210(c).

Dated: April 4, 2019.

### Gary Taverman,

*Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations, performing the non-exclusive functions and duties of the Assistant Secretary for Enforcement and Compliance.*

### Appendix I

#### Scope of the Investigation

The merchandise covered by this investigation is laminated woven sacks. Laminated woven sacks are bags consisting of one or more plies of fabric consisting of woven polypropylene strip and/or woven polyethylene strip, regardless of the width of the strip; with or without an extrusion coating of polypropylene and/or polyethylene on one or both sides of the fabric; laminated by any method either to an exterior ply of plastic film such as biaxially-oriented polypropylene (BOPP), polyester (PET), polyethylene (PE), nylon, or any film suitable for printing, or to an exterior ply of paper; printed; displaying, containing, or comprising three or more visible colors (e.g., laminated woven sacks printed with three different shades of blue would be covered by the scope), not including the color of the woven fabric; regardless of the type of printing process used; with or without lining; with or without handles; with or without special closing features (including, but not limited to, closures that are sewn, glued, easy-open (e.g., tape or thread), re-closable (e.g., slider, hook and loop, zipper), hot-welded, adhesive-welded, or press-to-close); whether finished or unfinished (e.g., whether or not closed on one end and whether or not in roll form, including, but not limited to, sheets, lay-flat, or formed in tubes); not exceeding one kilogram in actual weight. Laminated woven sacks produced in the Socialist Republic of Vietnam are subject to the scope regardless of the country of origin of the fabric used to make the sack.

The scope of this investigation excludes laminated woven sacks having each of the following physical characteristics: (1) No side greater than 24 inches, (2) weight less than 100 grams, (3) an open top that is neither sealable nor closable, the rim of which is hemmed or sewn around the entire circumference, (4) carry handles sewn on the open end, (5) side gussets, and (6) either a bottom gusset or a square or rectangular bottom. The excluded items with the above-mentioned physical characteristics may be referred to as reusable shopping bags.

Subject laminated woven sacks are currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 6305.33.0040 and 6305.33.0080. If entered with plastic coating on both sides of the fabric consisting of woven polypropylene strip and/or woven polyethylene strip, laminated woven sacks may be classifiable under HTSUS subheadings 3923.21.0080, 3923.21.0095, and 3923.29.0000. If entered not closed on one end or in roll form (including, but not limited to, sheets, lay-flat tubing, and sleeves), laminated woven sacks may be

classifiable under other HTSUS subheadings, including 3917.39.0050, 3921.90.1100, 3921.90.1500, and 5903.90.2500. If the polypropylene strips and/or polyethylene strips making up the fabric measure more than 5 millimeters in width, laminated woven sacks may be classifiable under other HTSUS subheadings including 4601.99.0500, 4601.99.9000, and 4602.90.0000. Although HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope is dispositive.

## Appendix II

### List of Topics Discussed in the Issues and Decision Memorandum

- I. Summary
- II. List of Issues
- III. Background
- IV. Scope Comments
- V. Scope of the Investigation
- VI. Subsidies Valuation Information
- VII. Benchmarks and Interest Rates
- VIII. Use of Facts Otherwise Available and Adverse Inferences
- IX. Analysis of Programs
- X. Analysis of Comments
- XI. Recommendation

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## DEPARTMENT OF COMMERCE

### International Trade Administration

[C-570-911]

#### Circular Welded Carbon Quality Steel Pipe From the People's Republic of China: Rescission of Countervailing Duty Administrative Review; 2017

**AGENCY:** Enforcement and Compliance, International Trade Administration, Department of Commerce.

**SUMMARY:** The Department of Commerce (Commerce) is rescinding its administrative review of the countervailing duty order on circular welded carbon quality steel pipe (CWP) from the People's Republic of China (China) for the period of review (POR) January 1, 2017, through December 31, 2017.

**DATES:** Applicable April 11, 2019.

**FOR FURTHER INFORMATION CONTACT:** Darla Brown, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-1791.

#### SUPPLEMENTARY INFORMATION:

##### Background

On July 3, 2018, Commerce published in the **Federal Register** a notice of "Opportunity to Request Administrative Review" of the countervailing duty

(CVD) order<sup>1</sup> on circular welded carbon quality steel pipe from China for the POR.<sup>2</sup>

On July 31, 2018, Commerce received timely requests from the petitioners<sup>3</sup> and from Zekelman Industries (Zekelman), a domestic interested party, to conduct an administrative review of the *CVD Order*.<sup>4</sup>

On September 10, 2018, in accordance with section 751(a) of the Tariff Act of 1930, as amended (the Act), Commerce published in the **Federal Register** a notice of initiation of an administrative review of the *CVD Order*.<sup>5</sup> The administrative review was initiated with respect to 128 companies, covering the POR January 1, 2017, through December 31, 2017.

On September 25, 2018, Commerce placed on the record information obtained from U.S. Customs and Border Protection (CBP) indicating that there were no reviewable entries of subject merchandise exported by the companies subject to this administrative review during the POR.<sup>6</sup> On October 17, 2018, Zekelman withdrew its request for review in its entirety.<sup>7</sup>

On November 15, 2018, the petitioners submitted comments regarding alleged discrepancies in the import data on the record.<sup>8</sup> Specifically, the petitioners claim that, although the results of the CBP data query do not provide evidence of reviewable entries of subject merchandise during the POR, data from a third-party subscription service that the petitioners placed on the record purportedly show that there

were substantial imports of CWP from China during the POR. The petitioners argue that this record information suggests that companies under review could be evading the order by misreporting entry types, and the petitioners urge Commerce to obtain CBP entry documents with respect to the entries of CWP for a subset of 27 companies under review, to determine whether these companies misclassified subject merchandise entries as non-subject merchandise entries.<sup>9</sup> In their submission, the petitioners identified 27 of the 128 companies for which Commerce initiated this review which they believe produced and/or exported CWP during the POR.

On February 27, 2019, Commerce placed on the record POR entry data from Datamyne, a public data source, for the 27 companies identified by the petitioners in their November 15, 2018, submission.<sup>10</sup> We invited parties to comment on these data and received timely comments from the petitioners.<sup>11</sup> In their comments, the petitioners reiterate their concerns that Chinese producers and/or exporters of CWP may be attempting to evade the order by misrepresenting entries.<sup>12</sup>

#### Rescission of Review

It is Commerce's practice to rescind an administrative review of a countervailing duty order, pursuant to 19 CFR 351.213(d)(3), when there are no reviewable entries of subject merchandise during the POR for which liquidation is suspended.<sup>13</sup> Normally, upon completion of an administrative review, the suspended entries are liquidated at the countervailing duty assessment rate calculated for the review period. *See* 19 CFR 351.212(b)(2). Therefore, for an administrative review to be conducted, there must be a reviewable, suspended entry that Commerce can instruct CBP to liquidate at the calculated countervailing duty assessment rate calculated for the review period.<sup>14</sup> Accordingly, in the absence of reviewable, suspended entries of subject merchandise during the POR for any of the 128 companies named in our initiation notice, we are now rescinding

<sup>9</sup> *Id.* at 8-10.

<sup>10</sup> *See* Memorandum to the file, "Release of Datamyne Data," dated February 27, 2019.

<sup>11</sup> *See* Letter from Petitioners, "Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Comments on Release of Datamyne Data," dated March 6, 2019.

<sup>12</sup> *Id.* at 6-7.

<sup>13</sup> *See, e.g.,* *Lightweight Thermal Paper from the People's Republic of China: Notice of Rescission of Countervailing Duty Administrative Review; 2015*, 82 FR 14349 (March 20, 2017).

<sup>14</sup> *See* 19 CFR 351.213(d)(3).

<sup>1</sup> *See* *Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Notice of Amended Final Affirmative Countervailing Duty Determination and Notice of Countervailing Duty Order*, 73 FR 42545 (July 22, 2008) (*CVD Order*).

<sup>2</sup> *See* *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Opportunity to Request Administrative Review*, 83 FR 31121 (July 3, 2018).

<sup>3</sup> The petitioners in this proceeding are Independence Tube Corporation and Southland Tube, Incorporated.

<sup>4</sup> *See* Letter from Petitioners, "Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Request for Administrative Review," dated July 31, 2018. *See also* Letter from Zekelman, "Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Request for Administrative Review," dated July 31, 2018.

<sup>5</sup> *See* *Initiation of Countervailing and Countervailing Duty Administrative Reviews*, 83 FR 45596 (September 10, 2018).

<sup>6</sup> *See* Memorandum to the File, "Release of Customs Entry Data from U.S. Customs and Border Protection (CBP)," dated September 25, 2018.

<sup>7</sup> *See* Letter from Zekelman, "Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Withdrawal of Request for Administrative Review," dated October 17, 2018.

<sup>8</sup> *See* Letter from Petitioners, "Circular Welded Carbon Quality Steel Pipe from the People's Republic of China: Comments on Import Data," dated November 15, 2018 (Petitioners' November 15 Letter).