



DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-918; A-552-812; C-552-813]

Steel Wire Garment Hangers from the People's Republic of China and the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Circumvention of the Antidumping Duty Order on Steel Wire Garment Hangers from the People's Republic of China and the Antidumping and Countervailing Duty Orders on Steel Wire Garment Hangers from the Socialist Republic of Vietnam

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

SUMMARY: The U.S. Department of Commerce (Commerce) preliminarily determines that imports of steel wire garment hangers (hangers), completed in Cambodia using: (1) steel wire or (2) steel wire and paper accessories, produced in the People's Republic of China (China) or the Socialist Republic of Vietnam (Vietnam), are circumventing the antidumping duty (AD) order on hangers from China, or the AD and countervailing duty (CVD) orders on hangers from Vietnam. Interested parties are invited to comment on this preliminary determination.

DATES: Applicable [Insert date of publication in the *Federal Register*].

FOR FURTHER INFORMATION CONTACT: Braeden Lowe, AD/CVD Operations, Office V, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-9124.

SUPPLEMENTARY INFORMATION:

Background

On October 6, 2008 and February 5, 2013, Commerce published in the *Federal Register*

the AD order on hangers from China,¹ and the AD and CVD orders on hangers from Vietnam, respectively.² On August 12, 2025, Commerce initiated country-wide circumvention inquiries pursuant to section 781(b) of the Tariff Act of 1930, as amended (the Act), to determine whether imports of hangers completed in Cambodia using: (1) steel wire or (2) steel wire and paper accessories, produced in China or Vietnam, are circumventing the *China Order* or the *Vietnam Orders* and, accordingly, should be covered by the scope of the *China Order* and the scope of the *Vietnam Orders*.³ On December 31, 2025, Commerce identified Alpha Hanger (Cambodia) Co., Ltd (Alpha Hanger) as the sole mandatory respondent in these circumvention inquiries.⁴

Due to the lapse in appropriations and Federal Government shutdown, on November 14, 2025, Commerce tolled all deadlines in administrative proceedings by 47 days.⁵ Additionally, due to a backlog of documents that were electronically filed via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS) during the Federal Government shutdown, on November 24, 2025, Commerce tolled all deadlines in administrative proceedings by an additional 21 days.⁶ On March 9, June 2, August 31, and September 11, 2026, Commerce extended the time limit for completing the preliminary determinations of these inquiries by a total of 182 days.⁷ Accordingly, the deadline for these preliminary determinations is now September 16, 2026. For a complete description of the events that followed the initiation of these circumvention inquiries, *see* the Preliminary Decision Memorandum applicable to the inquiry pertaining to the *China Order* and the Preliminary

¹ See *Notice of Antidumping Duty Order: Steel Wire Garment Hangers from the People's Republic of China*, 73 FR 58111 (October 6, 2008) (*China Order*).

² See *Steel Wire Garment Hangers from the Socialist Republic of Vietnam: Antidumping Duty Order*, 78 FR 8105 (February 5, 2013); and *Certain Steel Wire Garment Hangers from the Socialist Republic of Vietnam: Countervailing Duty Order*, 78 FR 8107 (February 5, 2013) (collectively, *Vietnam Orders*).

³ See *Steel Wire Garment Hangers from the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Circumvention Inquiries of the Antidumping and Countervailing Duty Orders*, 90 FR 38723 (August 12, 2025) (*Initiation Notice*), and accompanying Initiation Checklists, "Steel Wire Garment Hangers from the People's Republic of China: Circumvention Initiation Checklist" and "Steel Wire Garment Hangers from the Socialist Republic of Vietnam: Circumvention Initiation Checklist."

⁴ See Memorandum, "Respondent Identification," dated December 31, 2025.

⁵ See Memorandum, "Deadlines Affected by the Shutdown of the Federal Government," dated November 14, 2025.

⁶ See Memorandum, "Tolling of all Case Deadlines," dated November 24, 2025.

⁷ See Memoranda, "Extension of Deadline for the Preliminary Determinations in the Circumvention Inquiries Pertaining to Cambodia," dated March 9, June 2, August 31, and September 11, 2026.

Decision Memorandum applicable to the inquiry pertaining to the *Vietnam Orders*.⁸

The Preliminary Decision Memoranda are public documents and are on file electronically via ACCESS, which is available to registered users at <https://access.trade.gov>. In addition, complete versions of the Preliminary Decision Memoranda can be accessed directly at <https://access.trade.gov/frnotices>.

Scope of the Orders

For a complete description of the scope of the *China Order* and the scope of the *Vietnam Orders*, see the China Inquiry PDM and the Vietnam Inquiry PDM, respectively.

Merchandise Subject to the Circumvention Inquiries

These circumvention inquiries cover hangers completed in Cambodia using either: (1) steel wire; or (2) steel wire and paper accessories produced in China or Vietnam, where the hangers are subsequently exported from Cambodia to the United States.

Methodology

Commerce is conducting these inquiries in accordance with section 781(b) of the Act and 19 CFR 351.226. We relied on facts available) under section 776(a) of the Act, including, in part, facts available with adverse inferences under section 776(b) of the Act. For a complete description of the methodology underlying these preliminary determinations, see the Preliminary Decision Memoranda. A list of topics discussed in the Preliminary Decision Memoranda is included as Appendix I to this notice.

Preliminary Circumvention Determination

As detailed in the Preliminary Decision Memoranda, Commerce preliminarily determines that hangers completed in Cambodia using Chinese-origin or Vietnamese origin inputs, *i.e.*, steel wire or steel wire and paper accessories, are circumventing the *China Order* and the *Vietnam*

⁸ See “Decision Memorandum for the Preliminary Affirmative Determination of Circumvention of the Antidumping Duty Order on Steel Wire Garment Hangers from the People’s Republic of China”, dated concurrently with, and hereby adopted by, this notice (China Inquiry PDM), and “Decision Memorandum for the Preliminary Affirmative Determination of Circumvention of the Antidumping and Countervailing Duty Orders on Steel Wire Garment Hangers from the Socialist Republic of Vietnam”, dated concurrently with, and hereby adopted by, this notice (Vietnam Inquiry PDM) (collectively, Preliminary Decision Memoranda).

Orders, each on a country-wide basis. As a result, in accordance with section 781(b) of the Act, we preliminarily determine that this merchandise should be included within the scope of the *China Order* and the scope of the *Vietnam Orders*. See the “Suspension of Liquidation and Cash Deposit Requirements” section below for details regarding suspension of liquidation and cash deposit requirements.

Suspension of Liquidation and Cash Deposit Requirements

Based on the preliminary affirmative country-wide determinations of circumvention with respect to hangers exported from Cambodia, in accordance with 19 CFR 351.226(l)(2), we will direct U.S. Customs and Border Protection (CBP) to suspend liquidation and require a cash deposit of estimated antidumping or countervailing duties on unliquidated entries of inquiry merchandise that were entered, or withdrawn from warehouse, for consumption, on or after August 12, 2025, the date of publication of the initiation of this circumvention inquiry in the *Federal Register*.

Accordingly, because Commerce preliminarily finds that inquiry merchandise is circumventing the *China Order* and *Vietnam Orders*, imports of such merchandise are subject to cash deposit requirements. As explained below, Commerce is preliminarily finding that no exporter of hangers from Cambodia is eligible to certify that its hangers are produced using steel wire or steel wire and paper accessories sourced from another country (*i.e.*, that the hanger inputs are not from China or Vietnam). However, we are establishing a certification program and allowing parties (excluding parties to which Commerce has applied adverse facts available) to certify that entries of hangers exported from Cambodia were produced using Chinese, rather than Vietnamese, steel wire or steel wire and paper accessories. In order to certify that shipments were not subject to the *Vietnam Orders*, the importer and exporter will be required to provide documentation to CBP at the time of entry supporting the claim that the steel wire or steel wire and paper accessories were sourced from China. Should we determine at a later date (*e.g.*, in a certification review) that a party has demonstrated that it should be allowed to certify that the

origin of the steel wire or the steel wire and paper accessories are neither Chinese nor Vietnamese, Commerce intends to release certification language and establish such a certification program at that time.

Consistent with our recent determinations,⁹ where AD/CVD orders from two countries (*i.e.*, China and Vietnam) potentially apply to an entry, Commerce intends to instruct CBP to suspend the entry and collect cash deposits at the rates applicable to the *Vietnam Orders* (*i.e.*, the AD cash deposit rate established for the Vietnam-wide entity (220.68 percent) and the CVD cash deposit rate established for all other companies (31.58 percent)) under the following third-country case numbers: A-555-812 (Vietnam AD), and C-555-813 (Vietnam CVD).

For entries of hangers from Cambodia for which both the exporter and importer have certified in Commerce's dual circumvention certification program that the merchandise was produced using Chinese-origin steel wire or steel wire and paper accessories, Commerce intends to direct CBP to suspend liquidation and require a cash deposit at the AD cash deposit rate established for hangers from China under the following third-country case number: A-555-918.

For unliquidated entries (and entries for which liquidation has not become final) of hangers from Cambodia that were entered, or withdrawn from warehouse on or after August 12, 2025, and made prior to the publication of this preliminary determination, the importer will need to file a post-summary correction with CBP in accordance with CBP's regulations, regarding conversion of such entries from non-AD/CVD type entries to AD/CVD type entries (*e.g.*, from type 01 to type 03). Importers must report those AD/CVD entries using the third-country case numbers identified above and post the required cash deposits for estimated antidumping and countervailing duties.

Public Comment

⁹ See, *e.g.*, *Light-Walled Rectangular Pipe and Tube from the Republic of Korea: Final Affirmative Determination of Circumvention of the Antidumping Duty Order*, 88 FR 77266 (November 9, 2023), where Commerce suspended the entry and collected cash deposits at the highest available rate for entries that were found to be circumventing multiple orders.

Pursuant to 19 CFR 351.226(f)(4), case briefs or other written comments should be submitted to the Assistant Secretary for Enforcement and Compliance no later than seven days after the date of the publication of this notice. Rebuttal briefs, limited to issues raised in case briefs, may be submitted no later than five days after the deadline for case briefs. Parties who submit case or rebuttal briefs in this proceeding are encouraged to submit with each argument: (1) a statement of the issue; (2) a brief summary of the argument; and (3) a table of authorities.

As provided under 19 CFR 351.309(c)(2) and (d)(2), in prior preliminary determinations, we have encouraged interested parties to provide a public executive summary of their brief that should be limited to five pages total, including footnotes. In these inquiries, we instead request that interested parties provide at the beginning of their briefs a public, executive summary for each issue raised in their briefs. Further, we request that interested parties limit their executive summary of each issue to no more than 450 words, not including citations. We intend to use the executive summaries as the basis of the comment summaries included in the issues and decision memorandum that will accompany the final determination in this proceeding. We request that interested parties include footnotes for relevant citations in the executive summary of each issue. Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).

Pursuant to 19 CFR 351.310(c), interested parties who wish to request a hearing must submit a written request to the Assistant Secretary for Enforcement and Compliance, U.S. Department of Commerce, within 30 days after the date of publication of this notice in the *Federal Register*, filed electronically via ACCESS. Hearing requests should contain: (1) the party's name, address, and telephone number; (2) the number of participants and whether any participant is a foreign national; and (3) a list of the issues to be discussed. Issues raised in the hearing will be limited to issues raised in the respective comments. If a request for a hearing is made, Commerce intends to hold the hearing at a date and time to be determined and will notify

the parties through ACCESS. Parties should confirm the date, time, and location of the hearing two days before the scheduled date.

All submissions, including affirmative and rebuttal comments, as well as hearing requests, should be filed using ACCESS. An electronically filed document must be received successfully in its entirety by ACCESS by 5:00 p.m. Eastern Time on the established deadline.

Verification

Because the examined respondent in these circumvention inquiries did not provide information requested by Commerce, and Commerce preliminarily determines the respondent to have been uncooperative, we will not conduct verification.

U.S. International Trade Commission (ITC) Notification

Consistent with section 781(e) of the Act, Commerce will notify the ITC of this preliminary determination to include the merchandise subject to this circumvention inquiry within the *China Order* and the *Vietnam Orders*. Pursuant to section 781(e) of the Act, the ITC may request consultations concerning Commerce's proposed inclusion of the inquiry merchandise. If, after consultations, the ITC believes that a significant injury issue is presented by the proposed inclusion, it will have 60 days from the date of notification by Commerce to provide written advice.

Notification to Interested Parties

This determination is issued and published in accordance with sections 781(b) of the Act 19 CFR 351.226(g)(1).

Dated: September 17, 2026.

Christian L. Bush,

Acting Deputy Assistant Secretary

for Policy and Negotiations.

Appendix I

List of Topics Discussed in the Preliminary Decision Memoranda

- I. Summary
- II. Background
- III. Scope of the *Order(s)*
- IV. Merchandise Subject to the Circumvention Inquiry
- V. Period of Circumvention Inquiry
- VI. Application of Facts Available and Use of Adverse Inference
- VII. Statutory and Regulatory Framework for a Circumvention Inquiry
- VIII. Analysis of Statutory Criteria for the Circumvention Inquiry
- IX. Summary of the Analysis
- X. Country-Wide Affirmative Determination
- XI. Certification Program
- XII. Suspension of Liquidation and Cash Deposit Requirements
- XIII. Recommendation

Appendix II

Certification Program Requirements

The importer is required to complete and maintain the applicable importer certification, and maintain a copy of the applicable producer certification, and retain all supporting documentation for both certifications. With the exception of the entries described below, the importer certification must be completed, signed, and dated by the time the entry summary is filed for the relevant entry.

If the producing company and the exporting company are the same, the importer, or the importer's agent, must submit the importer's certification, the producer/exporter certification, and documentation demonstrating that the country-of-origin of the (1) steel wire or (2) steel wire and paper accessories used in the production of the exported steel wire garment hangers was Chinese. Such certifications and documentation must be submitted to CBP at the time that the entry summary is filed by uploading these documents into the document imaging system (DIS) in the Automated Customs Environment (ACE).

If the producing company and the exporting company are different, the importer, or the importer's agent, must submit the importer's certification, the producer's certification, and the exporter's certification, and documentation demonstrating the Chinese-origin of the (1) steel wire or (2) steel wire and paper accessories used in the production of the exported steel wire garment hangers. Such certifications and documentation must be submitted to CBP at the time that the entry summary is filed by uploading these documents into DIS in ACE.

Where the importer uses a broker to facilitate the entry process, the importer should obtain the entry summary number from the broker. Agents of the importer, such as a broker, however, are not permitted to certify on behalf of the importer. Consistent with CBP's procedures, an importer shall identify certified entries by using the importer's additional

declaration (record 54), AD/CVD Certification Designation (type code 6) when filing an entry summary.¹⁰

Where the producer and the exporter are the same entity, the producer/exporter is required to complete and maintain the applicable producer/exporter certification and provide the importer with a copy of that certification and all supporting documentation (*e.g.*, invoice, purchase order, production records, *etc.*). With the exception of the entries described below, the producer certification must be completed, signed, and dated by the time of shipment of the relevant entry. The producer/exporter certification should be completed by the party producing and exporting the steel wire garment hangers that were manufactured in Cambodia to the United States.

Where the producer and exporter are different entities, (1) the producer is required to complete and maintain the applicable producer certification and provide the importer with a copy of that certification and all supporting documentation (*e.g.*, invoice, purchase order, production records, *etc.*), and (2) the exporter is required to complete and maintain the applicable exporter certification and provide the importer with a copy of that certification and all supporting documentation (*e.g.*, invoice, purchase order, production records, *etc.*).

Additionally, the claims made in the certifications and supporting documentation are subject to verification by Commerce or CBP. Importers and producers are required to maintain the certifications and supporting documentation until the later of: (1) the date that is five years after the latest entry date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.

For all steel wire garment hangers that were entered, or withdrawn from warehouse, for consumption during the period August 12, 2025 (the date of publication of the initiation of these circumvention inquiries), through 45 days from the date on which Commerce published its

¹⁰ See Cargo System Messaging Service #59384253, dated February 12, 2024; *see also Announcing an Importer's Additional Declaration in the Automated Commercial Environment Specific to Antidumping/Countervailing Duty Certifications*, 89 FR 7372 (February 2, 2024).

preliminary circumvention findings in the *Federal Register* , where the entry has not been liquidated (and entries for which liquidation has not become final), the importer and producer certifications should be completed and signed as soon as practicable, but not later than 45 days of the date on which Commerce published its preliminary circumvention findings in the *Federal Register* . The importer's certification, the producer's certification, the commercial invoice, and documentation supporting the country of origin of the steel wire or type of input if not steel wire used to produce the steel wire garment hangers should be uploaded to the DIS in ACE as soon as practicable, but not later than 45 days of the date on which Commerce published its preliminary circumvention findings in the *Federal Register*. For such unliquidated entries made prior to the publication of these preliminary determinations which are suspended under the antidumping and countervailing duty orders, the importer or producer each have the option to complete a blanket certification covering multiple entries, individual certifications for each entry, or a combination thereof.

As discussed in the Preliminary Decision Memoranda, this dual circumvention certification program is not available for companies to which Commerce has applied facts available with adverse inferences. Accordingly, as discussed in the Preliminary Decision Memoranda, Commerce preliminarily determines that Alpha Hanger, Everbrit and Kaining are ineligible to certify that any entries of hangers are made of Chinese-origin (1) steel wire or (2) steel wire and paper accessories.

Interested parties may comment on these certification requirements, and on the certification language contained in this notice in their case briefs.

Appendix III

IMPORTER CERTIFICATION

I hereby certify that:

A. My name is {IMPORTING COMPANY OFFICIAL’S NAME} and I am an official of {IMPORTING COMPANY}, located at {ADDRESS OF IMPORTING COMPANY}.

B. I have direct personal knowledge of the facts regarding the importation into the Customs territory of the United States of the steel wire garment hangers assembled in Cambodia that entered under entry summary number(s), identified below, and are covered by this certification. “Direct personal knowledge” refers to facts the certifying party is expected to have in its own records. For example, the importer should have direct personal knowledge of the importation of steel wire garment hangers, including the producer, exporter and/or foreign seller’s identity and location.

C. If the importer is acting on behalf of the first U.S. customer, include the following sentence as paragraph C of this certification:

The steel wire garment hangers covered by this certification were imported by {IMPORTING COMPANY} on behalf of {U.S. CUSTOMER}, located at {ADDRESS OF U.S. CUSTOMER}.

If the importer is not acting on behalf of the first U.S. customer, include the following sentence as paragraph C of this certification:

{NAME OF IMPORTING COMPANY} is not acting on behalf of the first U.S. customer.

D. The steel wire garment hangers covered by this certification were shipped to {NAME OF PARTY IN THE UNITED STATES TO WHOM THE MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED}.

E. I have personal knowledge of the facts regarding the assembly of the imported products covered by this certification. “Personal knowledge” includes facts obtained from another party, (e.g., correspondence received by the importer (or exporter) from the producer regarding the Chinese inputs used to produce the imported products).

F. This certification applies to the following entries (repeat this block as many times as necessary):

Entry Summary #:

Entry Summary Line Item #:

Foreign Seller’s Address:

Foreign Seller’s Invoice #:

Foreign Seller’s Invoice Line Item #:

Country of Origin of steel wire:

Country of Origin of paper accessories (if applicable):

Producer:

Producer’s Address:

G. The steel wire garment hangers covered by this certification contain only steel wire or steel wire and paper accessories produced in China.

- H. I understand that {IMPORTING COMPANY} is required to maintain a copy of this certification and sufficient documentation supporting this certification (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, certificates of origin, product data sheets, productions records, invoices, *etc.*) until the later of (1) the date that is five years after the latest entry date of the entries covered by the certification or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.
- I. I understand that, if the producer and the exporter are not the same entity, {IMPORTING COMPANY} is required to maintain a copy of the producer certification (attesting to the assembly of the imported merchandise identified above, if the producing company and the exporting company are not the same), and any supporting documentation provided to the importer by the producer, until the later of (1) the date that is five years after the latest entry date of the entries covered by the certification or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.
- J. I understand that, if the producer and the exporter are not the same entity, {IMPORTING COMPANY} is required to maintain a copy of the exporter certification (attesting to the assembly and exportation of the imported merchandise identified above, if the producing company and the exporting company are not the same), and any supporting documentation provided to the importer by the exporter, until the later of (1) the date that is five years after the latest entry date of the entries covered by the certification or (2) the date that is three years after the conclusion of any litigation in United States courts regarding such entries.
- K. I understand that, if the producer and the exporter are the same entity, {IMPORTING COMPANY} is required to maintain a copy of the producer/exporter certification (attesting to

the assembly/exportation of the imported merchandise identified above, if the producing company and the exporting company are the same), and any supporting documentation provided to the importer by the exporter, until the later of (1) the date that is five years after the latest entry date of the entries covered by the certification or (2) the date that is three years after the conclusion of any litigation in United States courts regarding such entries.

L. I understand that {IMPORTING COMPANY} is required to submit a copy of the importer, exporter (as applicable), producer (as applicable), and exporter/producer certifications (as applicable) as part of the entry summary by uploading them into the document imaging system (DIS) in ACE, and to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with the importer certification, and any supporting documentation, and a copy of the exporter, producer, or exporter/producer's certification, and any supporting documentation provided to the importer by such parties, upon request of either agency. Consistent with CBP's procedures, importers shall identify certified entries by using importers' additional declaration (record 54) AD/CVD Certification Designation (type code 06) when filing entry summary.

M. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce.

N. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all entries to which this certification applies are within the scope of the antidumping duty (AD) and countervailing duty (CVD) orders on steel wire garment hangers from Vietnam. I understand that such finding will result in:

- (i) suspension of liquidation at the AD and CVD rates applicable to the Vietnam Order of all unliquidated entries (and entries for which liquidation has not become final) for which these requirements were not met;
- (ii) the importer being required to post the AD and CVD cash deposits determined by Commerce; and
- (iii) the importer no longer being allowed to participate in the certification process.

O. I understand that agents of the importer, such as brokers, are not permitted to make this certification. When a broker or other party was used to facilitate the entry process, {NAME OF IMPORTING COMPANY} obtained the entry summary number and date of entry summary from that party.

P. This certification was completed by the time of filing the entry summary or within 45 days of the date on which Commerce published its preliminary circumvention findings in the *Federal Register*.

Q. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

EXPORTER CERTIFICATION

The party that made the sale to the United States, if different from the party that produced the merchandise, should fill out the exporter certification.

I hereby certify that:

- A. My name is {COMPANY OFFICIAL'S NAME} and I am an official of {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES}, located at {ADDRESS OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES}.
- B. I have direct personal knowledge of the facts regarding the assembly and exportation of the steel wire garment hangers for which sales are identified below. "Direct personal knowledge" refers to facts the certifying party is expected to have in its own records. For example, an exporter should have direct personal knowledge of the use of Chinese inputs in the assembly of hangers imported into the United States, the exportation of steel wire garment hangers, as well as the producer's identity and location.
- C. The steel wire garment hangers covered by this certification were shipped to {NAME OF PARTY IN THE UNITED STATES TO WHOM MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED}.
- D. The steel wire garment hangers covered by this certification contain only steel wire or steel wire and paper accessories produced in China.

- E. This certification applies to the following sales to {NAME OF U.S. CUSTOMER}, located at {ADDRESS OF U.S. CUSTOMER} (repeat this block as many times as necessary):

Foreign Seller's Invoice # to U.S. Customer:

Foreign Seller's Invoice to U.S. Customer Line item #:

Producer Name:

Producer's Address:

Producer's Invoice # to Foreign Seller:

:

- F. I understand that {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES} is required to maintain a copy of this certification and the producer certification (attesting to the assembly of the imported merchandise identified above, if the producing company and the exporting company are not the same), and sufficient documentation supporting these certifications (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, product data sheets, productions records, invoices, *etc.*) until the later of: (1) the date that is five years after the latest date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.

- G. I understand that {NAME OF FOREIGN COMPANY THAT MADE THE SALE TO THE UNITED STATES} is required to provide the U.S. importer with a copy of both this certification and the producer certification, and is required to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with this certification and the producer certification, and any supporting documents, upon request of either agency.

- H. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce.
- I. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all sales to which this certification applies are within the scope of the antidumping duty and countervailing duty orders on steel wire garment hangers from Vietnam. I understand that such a finding will result in:
- (i) suspension of all unliquidated entries at the AD and CVD rates applicable to the Vietnam Order (and entries for which liquidation has not become final) for which these requirements were not met;
 - (ii) the importer being required to post the antidumping duty and countervailing duty cash deposits determined by Commerce; and
 - (iii) the seller/exporter no longer being allowed to participate in the certification process.
- J. I understand that agents of the seller/exporter, such as freight forwarding companies or brokers, are not permitted to make this certification.
- K. This certification was completed at time of shipment or within 45 days of the date on which Commerce published its preliminary circumvention findings in the *Federal Register*.
- L. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

PRODUCER CERTIFICATION

The party that assembled the steel wire garment hangers exported to the United States, if different from the party that exported the merchandise, should fill out the producer certification.

I hereby certify that:

- A. My name is {COMPANY OFFICIAL'S NAME} and I am an official of {NAME OF FOREIGN COMPANY THAT ASSEMBLED THE STEEL WIRE GARMENT HANGERS SOLD TO THE UNITED STATES}, located at {ADDRESS OF FOREIGN COMPANY THAT ASSEMBLED THE STEEL WIRE GARMENT HANGERS SOLD TO THE UNITED STATES}.
- B. I have direct personal knowledge of the facts regarding the assembly and exportation of the steel wire garment hangers for which sales are identified below. "Direct personal knowledge" refers to facts the certifying party is expected to have in its own records. For example, a producer should have direct personal knowledge of the use of Chinese inputs in the assembly of hangers imported into the United States, and the exporter's name and address.
- C. The steel wire garment hangers covered by this certification were sold to {NAME OF FOREIGN COMPANY THAT EXPORTED THE MERCHANDISE TO THE UNITED STATES}, located at {ADDRESS OF FOREIGN COMPANY THAT EXPORTED THE MERCHANDISE TO THE UNITED STATES}.
- D. The steel wire garment hangers covered by this certification were shipped by the {FOREIGN COMPANY THAT EXPORTED THE MERCHANDISE TO THE UNITED STATES} to

{NAME OF PARTY IN THE UNITED STATES TO WHOM MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED}.

- E. The steel wire garment hangers covered by this certification contain only steel wire or steel wire and paper accessories produced in China.
- F. This certification applies to the following sales to {NAME OF FOREIGN EXPORTER}, located at {ADDRESS OF FOREIGN EXPORTER} (repeat this block as many times as necessary):

Producer Name:

Producer's Address:

Producer's Invoice # to Foreign Seller:

Name of Producer of Steel Wire Input:

Address of Supplier of Steel Wire Input:

Name of Producer of Paper Accessory Input:

Address of Supplier of Paper Accessory Input:

- G. I understand that {NAME OF FOREIGN COMPANY THAT ASSEMBLED THE STEEL WIRE GARMENT HANGERS SOLD TO THE UNITED STATES} is required to maintain a copy of this certification and sufficient documentation supporting this certification (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, product data sheets, productions records, invoices, *etc.*) until the later of: (1) the date that is five years after the latest date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.

H. I understand that {NAME OF FOREIGN COMPANY THAT ASSEMBLED THE STEEL WIRE GARMENT HANGERS SOLD TO THE UNITED STATES} is required to provide the {NAME OF FOREIGN EXPORTER} with a copy of this certification and is required to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with this certification, and any supporting documents, upon request of either agency.

I. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce.

J. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all sales to which this certification applies are within the scope of the antidumping duty and countervailing duty orders on steel wire garment hangers from Vietnam. I understand that such a finding will result in:

- (i) suspension of all unliquidated entries at the AD and CVD rates applicable to the Vietnam Order (and entries for which liquidation has not become final) for which these requirements were not met;
- (ii) the importer being required to post the antidumping duty and countervailing duty cash deposits determined by Commerce; and
- (iii) the seller/exporter no longer being allowed to participate in the certification process.

- K. I understand that agents of the seller/exporter, such as freight forwarding companies or brokers, are not permitted to make this certification.
- L. This certification was completed at time of shipment or within 45 days of the date on which Commerce issued its preliminary circumvention findings in the *Federal Register*.
- M. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

PRODUCER/EXPORTER CERTIFICATION

The party that produced and made the sale to the United States should fill out the producer/exporter certification.

I hereby certify that:

- A. My name is {COMPANY OFFICIAL’S NAME} and I am an official of {NAME OF FOREIGN COMPANY THAT ASSEMBLED AND MADE THE SALE TO THE UNITED STATES}, located at {ADDRESS OF FOREIGN COMPANY THAT ASSEMBLED AND MADE THE SALE TO THE UNITED STATES}.
- B. I have direct personal knowledge of the facts regarding the assembly and exportation of the steel wire garment hangers for which sales are identified below. “Direct personal knowledge” refers to facts the certifying party is expected to have in its own records. For example, an exporter/producer should have direct personal knowledge of the use of Chinese inputs in the assembly of steel wire garment hangers imported into the United States.
- C. The steel wire garment hangers covered by this certification were shipped to {NAME OF PARTY IN THE UNITED STATES TO WHOM MERCHANDISE WAS FIRST SHIPPED}, located at {U.S. ADDRESS TO WHICH MERCHANDISE WAS SHIPPED}.
- D. The steel wire garment hangers covered by this certification contain only steel wire or steel wire and paper accessories produced in China.
- E. This certification applies to the following sales to {NAME OF U.S. CUSTOMER}, located at {ADDRESS OF U.S. CUSTOMER} (repeat this block as many times as necessary):

Foreign Producer/Seller’s Invoice # to U.S. Customer:

Foreign Producer/Seller’s Invoice to U.S. Customer Line item #:

Producer/Seller’s Name:

Producer/Seller’s Address:

Name of Producer of Steel Wire Input:

Address of Supplier of Steel Wire Input:

Name of Producer of Paper Accessory Input:

Address of Supplier of Paper Accessory Input:

F. I understand that {NAME OF FOREIGN COMPANY THAT ASSEMBLED AND MADE THE SALE TO THE UNITED STATES} is required to maintain a copy of this certification and sufficient documentation supporting this certification (*i.e.*, documents maintained in the normal course of business, or documents obtained by the certifying party, for example, product data sheets, productions records, invoices, *etc.*) until the later of: (1) the date that is five years after the latest date of the entries covered by the certification; or (2) the date that is three years after the conclusion of any litigation in the United States courts regarding such entries.

G. I understand that {NAME OF FOREIGN COMPANY THAT PRODUCED AND MADE THE SALE TO THE UNITED STATES} is required to provide the U.S. importer with a copy of this certification and is required to provide U.S. Customs and Border Protection (CBP) and/or the U.S. Department of Commerce (Commerce) with this certification, and any supporting documents, upon request of either agency.

H. I understand that the claims made herein, and the substantiating documentation, are subject to verification by CBP and/or Commerce.

I. I understand that failure to maintain the required certification and supporting documentation, or failure to substantiate the claims made herein, or not allowing CBP and/or Commerce to verify the claims made herein, may result in a *de facto* determination that all sales to which this certification applies are within the scope of the antidumping duty and countervailing duty

orders on steel wire garment hangers from Vietnam. I understand that such a finding will result in:

- (i) suspension of all unliquidated entries at the AD and CVD rates applicable to the Vietnam Order (and entries for which liquidation has not become final) for which these requirements were not met;
- (ii) the importer being required to post the antidumping duty and countervailing duty cash deposits determined by Commerce; and
- (iii) the seller/exporter no longer being allowed to participate in the certification process.

J. I understand that agents of the seller/exporter, such as freight forwarding companies or brokers, are not permitted to make this certification.

K. This certification was completed at time of shipment or within 45 days of the date on which Commerce published its preliminary circumvention findings in the *Federal Register*.

L. I am aware that U.S. law (including, but not limited to, 18 U.S.C. §1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. government.

Signature

{NAME OF COMPANY OFFICIAL}

{TITLE OF COMPANY OFFICIAL}

{DATE}

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