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Customs and International Trade Bar Association

Quarterly Newsletter
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MESSAGE FROM THE PRESIDENT

Dear CITBA Colleagues:

Effective June 1, 2014, I succeeded Jim Cannon as your President. Jim did a great job in leading CITBA over the last two years, and I thank and congratulate him for his service to CITBA's members and to the customs and trade bar generally. I am fortunate that Jim remains on CITBA's Board and is generous with his time. I rely on his counsel often. We also have a great Board, with responsible and energetic members who, like me, are eager to move CITBA to the next level. Here are a few of the things we have in mind going forward.

First, we want to add more young members. CITBA offers a great avenue for associates in law firms, junior lawyers at the agencies, and judicial clerks to meet their peers and begin forming relationships that they will enjoy and benefit from for many years. We are forming a Younger Lawyers Committee composed of law firm and government lawyers. With this new committee's help, we will sponsor events to give younger CITBA members a leg up in pursuing their careers in customs and trade.

Second, we want more government lawyers, including folks from Justice, Customs, Commerce, ITC, and USTR. We are a better organization to the extent we have more interaction between the private bar and government lawyers. Everyone will benefit.

Third, we are improving our membership application process and our dues notices to make it easier to join CITBA and to remain a member of CITBA. Unfortunately, a number of former members have inadvertently fallen off our membership list by missing our annual dues notices, which have not always been issued in a timely manner. We promise to do better. We will also be reaching out to some of you to make sure that your colleagues are aware of the benefits of CITBA.

Finally, we want to continue our longstanding close relationship with the U.S. Court of International Trade and to improve our growing relationship with the U.S. Court of Appeals for the Federal Circuit. CITBA will continue to offer its members ample opportunities to hear from and interact with the Judges who hear our customs and trade matters. This is a key benefit of CITBA membership, which we will be diligent to preserve and enhance.

In this issue:

Links of interest:

CITBA Homepage

US CIT Homepage

US Court of Appeals for the Federal Circuit Homepage

US Customs and Border Protection

Bureau of Industry and Security

Office of Foreign Assets Control

International Trade Administration

US International Trade Commission

CITBA is now on LinkedIn!

Join us at

www.linkedin.com

In that regard, please mark your calendars to join us at the Dolley Madison House next to the Federal Circuit courthouse for a reception on September 11 at 5:30-7:00 welcoming the two new Chiefs of the Court of International Trade and the Federal Circuit. We will hear brief remarks from Chief Judge Prost and Chief Judge Stanceu, and we will all have a chance to converse with the judges over a glass of wine or a beer.

I look forward to seeing you at many CITBA events. If you every have an idea for improving CITBA's service to its members, please let me know.

Best regards,

Joe

NEW CITBA BOARD OF DIRECTORS

We are pleased to announce the new CITBA Board of Directors:

President	Joseph W. Dorn
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Secretary	Kathleen W. Cannon
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At Large Member	(VACANT)
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CITBA & Related News

UPCOMING PROGRAMS

SEPTEMBER 11, 2014
Court of Appeals for the Federal Circuit
Dolley Madison House, 1520 H Street, NW
Washington, DC 20005
Reception to Welcome the New Chief Judges of the Federal Circuit and the Court of International Trade
Join other members of the Bench and Bar for an informal discussion and wine and beer reception. This event, co-sponsored by CITBA and the International Trade Committee of the Federal Circuit Bar Association, will include brief remarks by Chief Judge Sharon Prost of the Court of Appeals for the Federal Circuit, Chief Judge Timothy C. Stanceu of the Court of International Trade.
Please visit the following link to register for this event:
http://events.signup4.com/fcbacitbareception

PAST CITBA Events

MAY 29, 2014
New York, NY – Court of International Trade
Seminar and CITBA Annual Meeting
This CLE program provided an in-depth review of numerous current issues faced by customs and international trade practitioners appearing before the CIT. Panelists included practitioners, current and former agency officials, and Judges of the Court. The first half of the CLE program explored best practices in litigation and mediation before the Court, including on-going efforts to use mediation to manage and resolve cases at the Court. The second half of the program examined trade and customs enforcement actions that are being pursued outside of the Court or in novel ways at the Court, and panelists discussed efforts to ensure the Court's jurisdiction remains current with the scope of today's trade and customs practice. Following the seminar, CITBA held a reception and its annual meeting, including election of the Board of Directors.

MAY 23, 2014
US Chamber of Commerce, 1615 H Street NW
Washington, DC
FCBA International Series Event
CITBA members participated in this program organized by the Federal Circuit Bar Association as part of its annual International Series' Washington, DC program. In collaboration with the United States Chamber of Commerce, representatives from several countries continued the Series' on-going theme of "innovation and best practices" – treating the full spectrum of topics ranging from invention, to capital formation, intellectual property protection, trade, procurement, and enforcement. Participants included government, judicial, litigation, and stakeholder representatives.

ANNOUNCEMENTS

NEWS FROM THE CLERK OF THE COURT OF INTERNATIONAL TRADE
*By: Scott Warner and Stephen Swindell**

We have a new Chief Judge!

If you haven't already heard, there's a new chief judge in town! With our former chief judge, Judge Donald C. Pogue, taking senior status, Judge Thomas C. Stanceu stepped into the position on July 1st. Judge Stanceu spent 13 years in private practice and 15 years with the federal government before his appointment to the Court by President George W. Bush in 2003. We would like to thank Judge Pogue for his guidance and leadership throughout his tenure and we look forward to working with Chief Judge Stanceu!

Closing of Attorney Renewal Registration

Over 1,500 members of the bar completed the attorney renewal registration process, with the majority taking advantage of the Clerk's Office new electronic payment system. This new ability allowed the Clerk's Office to process these renewals much faster than before. We will continue to seek improvements to this process as we get closer to the next renewal period in 2019. A big thank you to all who continued their membership in the Court's admission roll!

If you happened to miss the June 1st deadline, you will have to apply for admission to the Court as a new member per Rule 74(e). The Application for Admission, as well as information on the admission process, can be found on the Attorney Information page of the Court's website at: www.cit.uscourts.gov. If you have any questions, feel free to call our Attorney Admissions Office at: (212) 264-2812.

Rule Amendments

The latest round of amendments to the Rules of the Court took effect on July 1st. Rule 26.1 was deleted to eliminate potential inconsistences between Rules 26 and 30 and to follow standard federal practice regarding costs to parties conducting depositions. Technical corrections were also made to Rules 5 and 82. Information on these amendments can be found on the Court's website.

Save the Date!

Get ready to dust off those conference shoes! The What: The 18th Judicial Conference. The When: Monday, December 1st, 2014. The Where: New York Palace Hotel at 455 Madison Avenue. The How: Stay tuned for future updates!

**Stephen Swindell is the Supervisor and Scott Warner is the Operations Manager for Case Management at the Court of International Trade.*

FEDERAL CIRCUIT AND CIT CASE SUMMARIES

*By: Claudia Burke & Stephen Tosini**

Federal Circuit Affirms Court of International Trade Decision Ordering Reliquidation of Entry Pursuant to Ruling Letter. *International Custom Products, Inc. v. United States* [O'Malley, Reyna, Wallach]. On April 14, 2014, the Federal Circuit affirmed the Court of International Trade's (CIT) decision ordering reliquidation of ICP's white sauce under the "sauces and preparations therefor" classification heading as required by the United States Customs and Border Protection (CBP) in its ruling letter. The Federal Circuit agreed with the CIT that the ruling letter was an interpretive ruling representing the CBP's official position classifying ICP's white sauce as "sauces and preparations therefor," and that CBP's subsequent issuance of a notice of action reclassifying all pending and future entries of white sauce as "butter and . . . dairy spreads," improperly revoked the ruling letter without CBP adhering to the statutory notice and comment procedures.

Federal Circuit Affirms Commerce Application of Adverse Inferences in Countervailing Duty Investigation. *Fine Furniture Ltd. v. United States* [Newman, Plager, Chen]. On April 23, 2014, the Federal Circuit affirmed the CIT's decision sustaining Department of Commerce's (Commerce) application of adverse inferences to determine the countervailing duty levied on the importation of multi-layered wood flooring from China. During the investigation, the government of China failed to provide pricing data of electricity rates as requested by Commerce, thereby creating a gap in the record. Although Fine Furniture fully cooperated, the Federal Circuit held the Commerce properly applied adverse inferences to find that the Chinese electricity program provided a financial contribution and to determine the benchmark price for electricity. The Federal Circuit observed that the statute clearly provided Commerce authority to use adverse inferences to substitute for information not provided by an interested party, including "the government of a country in which [the subject] merchandise is produced and manufactured," regardless of whether doing so would affect a cooperating respondent.

Federal Circuit Affirms CBP Classification of Merchandise. *Deckers Corp. v. United States* [Prost, Schall, O'Malley]. On May 13, 2014, the Federal Circuit affirmed CBP's classification of Decker's teva sandals under a particular subheading of the Harmonized Tariff Schedule of the United States (HTSUS). The Federal Circuit held that Deckers's claim that its sandals should be classified under a different heading, namely "training shoes," was already considered and decided by *Deckers Corp. v. United States*, 532 F.3d 1312 (Fed. Cir. 2008), and that this prior decision was binding. Rejecting Deckers's claim that the court should consider its challenge to CBP's classification pursuant to the clear error exception, the Federal Circuit held that it could alter a tariff classification construction by a prior panel only as an en banc court.

Federal Circuit Remands Commerce Use of Facts Otherwise Available To Calculate Antidumping Duty Rate. *Mueller Comercial de Mexico, S. de R.L. de C.V. v. United States* [Newman, Dyk, Tartanto]. On May 29, 2014, the Federal Circuit remanded Commerce's decision to use facts otherwise available to calculate Mueller's antidumping duty rate. The Federal Circuit held that Commerce's rationale that using the three least favorable transactions from one of Mueller's

suppliers would yield the most accurate duty margin, was unsupported by substantial evidence. The Federal Circuit did not, however, reverse Commerce's determination because it found that Commerce's second deterrence rationale provided a possible factor supporting the rate adopted.

Federal Circuit Affirms Commerce Antidumping Duty Decision. *Lifestyle Enter., Inc. v. United States* [Rader, Linn, Taranto, JJ.]. On June 2, 2014, the Federal Circuit affirmed in part and reversed in part a CIT decision addressing Commerce's calculation of antidumping duty rates for Chinese furniture. Although the government did not participate in the intervenor's appeal regarding the value of the wood input, the Federal Circuit reversed the CIT's valuation, holding lawful Commerce's original calculation of antidumping duty rates. The Federal Circuit also sustained Commerce's determination to exclude a certain financial statement from its input analysis because the statement was unreliable.

Federal Circuit Invalidates Commerce Countervailing Duty Regulation. *MacLean-Fogg Co. v. United States* [Clevenger, Newman, JJ.; Reyna, J., dissenting]. On June 3, 2014, the Federal Circuit reversed a CIT judgment regarding the results of Commerce's countervailing duty investigation into aluminum extrusions from China. At issue was the method by which Commerce calculated the rate to be applied to producers who were not individually investigated. The majority concluded that Commerce's regulation, which excluded the rates of voluntary respondents from the calculation, was inconsistent with the statute. In a dissent, Judge Reyna found the statute to be ambiguous on the precise question presented, and would have deferred to Commerce's regulation as a reasonable interpretation.

Federal Circuit Affirms Commerce Corroboration of Adverse Facts Available Rate. *Essar Steel, Ltd. v. United States* [Newman, Lourie, Taranto]. On June 12, 2014, the Federal Circuit affirmed Commerce's corroboration of the adverse facts available rate from the administrative review of the countervailing duty order covering certain hot-rolled carbon steel flat products from India. Because Commerce did not have information regarding company-specific benefits provided under the subsidy program at issue, the Federal Circuit held that Commerce properly satisfied the statute's requirement to corroborate the selected rate "to the extent practicable" when it used a net subsidy rate derived from data for nine other subsidy programs that were similar to the subsidy program at issue.

Federal Circuit Reverses Commerce's Scope Determination. *Fedmet Res. Corp. v. United States* [Rader, Reyna; Wallach, dissenting]. On June 20, 2014, the Federal Circuit reversed the CIT's decision affirming Commerce's determination that Fedmet's magnesia carbon alumina brick falls within the scope of the antidumping and countervailing duty orders covering certain imports of magnesia carbon bricks. The majority held that the language of the duty orders were ambiguous, but that the descriptions of the merchandise contained in the petition, initial investigation, and determinations of Commerce and the International Trade Commission (19 C.F.R. § 351.225(k)(1) or the "(k)(1) sources") were dispositive and confirmed that Fedmet's bricks are not within the scope of the orders. The majority further held that Commerce erred when it relied on evidence outside the (k)(1) sources in making its scope determination. In a dissent, Judge Wallach found that the (k)(1) sources were not dispositive and that Commerce properly considered the factors set forth in 19 C.F.R. § 351.225(k)(2).

Federal Circuit Affirms In Part CBP Classification of Merchandise. *Riddell, Inc. v. United States* [Newman, Lourie, Taranto]. On June 24, 2014, the Federal Circuit affirmed in part and reversed in part CBP's classification of Riddell's imported football jerseys, pants, and girdles. The Federal Circuit affirmed CBP's classification of this merchandise as "articles of apparel" and rejected Riddell's claim that CBP should have classified these merchandise as "sports equipment." Relying upon the classification notes and prior precedent, the Federal Circuit determined that "to the extent 'sports equipment' encompasses articles worn by a user, those articles are not apparel-like and are almost exclusively protective in nature." The Federal Circuit concluded that because

Riddell's jerseys, pants, and girdles did not contain any protective padding, they did not constitute football "equipment," but instead constituted "articles of apparel." The Federal Circuit reversed CBP's classification of girdles under a certain subheading of "articles of apparel," an issue that the government did not dispute.

Federal Circuit Reaffirms Limits of Section 1581(i) Jurisdiction. *Chemsol LLC v. United States* [O'Malley, Wallach, JJ, Mayer, SJ]. On June 24, 2014, the Federal Circuit affirmed the CIT's judgment dismissing for lack of jurisdiction a challenge to the merits of a CBP extension of liquidation. By statute CBP can extend the one year period to liquidate entries, up to three times and did so in this case to investigate potential fraud. Chemsol did not file a protest but filed suit in the CIT under section 1581(i) alleging that it need not wait until the conclusion of the statutory period before seeking review of CBP's decision. The Federal Circuit, agreeing with the CIT, held that section 1581(i) is unavailable when section 1581(a) could have been available at the end of the statutory period. The court distinguished and limited its prior ruling in *Ford Motor Co. v. United States*, 688 F.3d 1319 (Fed. Cir. 2012) because in *Ford*, appellants alleged that CBP had failed to extend the liquidation at all.

Claudia Burke and Stephen Tosini are attorneys with the Department of Justice, Civil Division, National Courts Section.* ***These summaries are not a document of the U.S. Department of Justice, nor does it represent the official views of the Department of Justice.*

FEATURE ARTICLE

Notes On The Extension Of The Argentina/Brazil Automotive FTA. Will There Be A Definitive Negotiation Of A Mercosur Automotive Agreement?

By Samanta Madsen Santamarina

Just hours before the expiration of the 38th Additional Protocol to Economic Complementation Agreement # 14 (known as ACE 14), Brazil and Argentina enforced an extension of said Agreement, which will allow them to extend the terms of their free trade of automobiles and auto-parts for one more year.

This extension, contained in the 40th Additional Protocol to ACE 14, in force since last July 1st, has been the result of a series of meetings which failed to resolve the issues both countries have been raising for some years now, related to their mutual exchange for this sector. Time was of the essence, and in order to prevent the fall of the trade preferences of a leading sector of the mutual trade, both countries agreed to extend the current regime (with some twitches) and set up a negotiation schedule for the creation of new terms of trade, involving the rest of their MERCOSUR partners, which could mean, if negotiations work, the achievement of a unified automotive regime for the MERCOSUR, after more than two decades of existence.

Brief History of this Exchange

The automotive industry has always been a very relevant sector both for Argentina and for Brazil, and the competition between them has been going on for years, as has their mutual trade.

Even before the creation of MERCOSUR, Argentina and Brazil recognized the importance of their mutual trade and within the framework of the Latin American Association for Integration (*Asociación Latino Americana de Intergración - ALADI)* they agreed upon the ACE 14 to regulate the terms of their mutual trade.

Later on, in 1991, within the same ALADI Framework, the MERCOSUR was created and developed, and a FTA was agreed upon to regulate the trade of the 4 MERCOSUR Members at that time: the ACE 18. But the MERCOSUR members could not agree upon terms for the automotive exchange, and the frictions between Argentina and Brazil were delaying the implementation of the MERCOSUR FTA.

The Economic Complementation Agreement #18, or ACE 18, which is the MERCOSUR FTA, expressly allows bilateral agreements among the parties, so Argentina and Brazil, given the sensitiveness of this industry, chose to keep the validity of the ACE 14 to regulate their automotive trade, expressly excluding the matters therein from the scope of the MERCOSUR FTA.

Therefore, since then the trade between both countries has been regulated by two separate agreements: one for the automotive sector, and one for the rest. The concretion on a MERSCOSUR automotive agreement has been a long since expressed desire, which is apparently on the way to being concrete.

In the meantime, Argentina and Brazil have extended, amended and sustained this double regime, but have made their provisions of automotive trade more profound: since 2000, additional Protocols to the ACE 14 not only act as their mutual automotive trade tool, but also regulate each country's trade with third countries, as well as internal matters related to the industry. This last fact was key in hurrying the concretion of the extension: if no extension was enforced, Argentina and Brazil would have lost their internal automotive regulation, with no possibility to refer to any other internal regulation or even to the ACE 18.

The Content of the Extension Protocol

The main aspect of this extension is the reinstatement of the "flex": an exchange coefficient both countries were subject to until January 2014, which determined the amount Brazil was allowed to import into Argentina per dollar exported by Argentina to Brazil. After fierce negotiations and a 6-month period with no limit to the mutual trade (from January 14 to June 14), the flex was set at 1.5 (the previous amount was 1.9 and Argentina had sought to lower it to 1.3).

Besides that, the content of the 38th Protocol remains the same: in fact, no change is needed within the certificates of origin for these products, which shall remain valid as issued, with no need to make any changes if issued after the enforcement of the extension. This means that the MERCOSUR Origin Regime shall continue to regulate the formalities, validity and content of the ACE 14 Certificates of Origin; whereas the actual rule of origin for auto products shall remain under the provisions of the 38th Protocol, until June 30th 2015.

The novelty is the definition of a negotiation agenda, which shall be conducted throughout the validity of this extension, since neither country wished to continue trading under the terms currently in force.

The Negotiation Points

Annex I of the Protocol sets forth the agenda for the negotiation of the terms of a new agreement which should be enforced in the second semester of 2015. These points include:

- The redesign of the flex, in order to sectorize the coefficient as per Argentina's request: The goal is to set different terms of trade for auto parts and vehicles.
- Modification of the origin regime, in order to elevate the Regional Content Index required for vehicles and auto parts: this is part of an increased protection policy for the sector, instated in both countries, tending to attract and retain investment to increase local production and thus equilibrate the trade balance.

- Generating the basis of a common industrial policy for auto parts
- Designing the basis pf the relationship between auto parts and vehicle manufacturers
- Reconciling the technical regulations currently in force in each country, aiming to increase active and passive security in vehicles.
- Definition of national promotional measures for the sector

Last but not least, the parties have compromised to set the basis for a MERCOSUR automotive policy, which, if achieved, could lead to a much wanted unification of the automotive trade for this block.

* *Samanta Madsen Santamaria is* Manager of Customs and Trade Advisory Services for Sandler & Travis Trade Advisory Services Argentina, resident in the Buenos Aires office.

DRAFT…FILE…SLEEP…REPEAT

Case Studies and Meditations on Trade Remedies

Editor's Note: Beginning with this edition of the CITBA Newsletter, we are creating a new op-ed and commentary type column for those among us who live and breathe trade remedies. It is no secret that these cases involve numerous, often voluminous submissions made under tight deadlines. We hope to hear your tales from the trenches and thoughts on key developments in this area (of course, you don't have to be a trade remedies junkie to contribute). You can send your war stories and news to mludwikowski@strtrade.com - ***Mark***

Nails and Tires

Nails and tires don't go well together. Unless you are a tire repair shop or a trade remedies attorney. (Run-flat tires can only get you so far, but probably not out of the scope of the new tires case).

Two new antidumping and countervailing duty petitions were filed within days of each other signaling further resurgence in trade remedies activity.

On May 29, Mid Continent Steel & Wire Inc., filed a petition on Steel Nails from India, Korea, Malaysia, Oman, Taiwan, Turkey and Vietnam. Steel nails have been a popular product in U.S. trade remedies lore, having been subject to several cases including:

1978 – antidumping petition on steel wire nails from Canada;

1979 – antidumping case on steel wire nails from Korea (self-initiated by the Department of Treasury under the Trigger Price Mechanism ("TPM"));

1981 – antidumping case on steel wire nails from Japan, Korea, and Yugoslavia (self-initiated by Commerce under TPM);

1982 – countervailing petition on steel wire nails from Korea;

1984 – section 201 petition covering carbon and certain alloy steel products, including steel wire nails;

1985 – antidumping petition on steel wire nails from China, Poland and Yugoslavia;

1987 – section 303 petition alleging bounties or grants on steel wire nails from Thailand and New Zealand;

1989 – section 303 petition alleging bounties or grants on steel wire nails from Malaysia;

1996 – antidumping petition on collated roofing nails from China, Korea, and Taiwan;

2001 – section 201 petition covering certain steel products (the ITC ultimately made a negative determination with regard to carbon and steel alloy nails);

2007 – antidumping petition on steel nails from China and the United Arab Emirates ("UAE") (the ITC reached a negative determination on nails from the UAE);

2011 – antidumping petition on steel nails from the UAE (this time the case went to order).

In the current round of steel nails cases, the ITC held its preliminary vote on July 11, 2014 and made an affirmative determination with respect to Korea, Malaysia, Oman, Taiwan, and Vietnam. The Commission made negative determinations with respect to India and Turkey based on negligible shipments from those countries.

Subsequently, on June 3, the United Steelworkers union ("USW") filed an antidumping and countervailing duty petition against imports of Chinese tires. This new case follows the 2009 Section 421 "China Safeguards" investigation which has historically been the first and only successful such action so far.

According to the petition, USW represents workers at factories which represent 78.6 percent of U.S. production. However, respondents questioned USW's standing to file the case and argued that petitioner only represents workers at 9 of the 23 plants where subject tires are produced domestically. Respondents claimed that since this only amounted to 39 percent of production, it was not enough to meet the 50 percent support required by statute to proceed with the case. Consequently, Commerce decided to poll the industry, to determine if petitioner had the requisite industry support. Ultimately, Commerce determined that the support requirement was met and initiated the case. On July 22, the ITC unanimously voted to reach an affirmative preliminary injury finding in the AD/CVD case.

Up GOES the Dumping Margin

In a rather unusual development, the antidumping investigations on Grain-Oriented Electrical Steel (GOES) from Germany, Japan, and Poland saw all the mandatory respondents throw in the towel and decline to respond to Commerce's questionnaires. As a result, final dumping margins issued by Commerce on July 17, were higher for each of the mandatories (99 – 241 percent) than the "all others" country-wide rates. Either the U.S. market is not a priority or respondents have plans to ramp up production in other countries. The ITC is scheduled to issue its final determination on August 30.

CITBA Online

Please look for further announcements and copies of past newsletters at http://www.citba.org.

Membership

CITBA now allows dues payment through PayPal. PayPal allows members to send money without sharing financial information, with the flexibility to pay for membership using their account balances, bank accounts or credit cards. PayPal is an eBay company and is made up of three leading online payment services. More information about Pay Pal can be found at https://www.paypal.com.

Not a CITBA member? Apply for membership now! CITBA offers different membership levels - active, associate and retired/student. For additional information, check out the CITBA website http://www.citba.org/joinCITBA.php

Are you already a member, but late in paying your dues? Need to update your contact information? Get current today and enjoy the benefits of membership. Contact William J. Maloney at wmaloney@rode-qualey.com for details.

DISCLAIMER:

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