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Canada Border
Services Agency

Agence des services
frontaliers du Canada



SIMA Registry and Disclosure Unit
Trade and Anti-dumping Programs Directorate
Canada Border Services Agency
100 Metcalfe Street, 11th Floor
Ottawa, Ontario K1A 0L8
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Submission received electronically

Soumission reçu électroniquement

Submission Date /
Date de soumission

October 05, 2024

PUBLIC

October 5, 2024

Canada Border Services Agency
Trade and Anti-Dumping Programs Directorate
SIMA Registry and Disclosure Unit
Canada Border Services Agency
100 Metcalfe Street, 11th Floor.
Ottawa, ON K1A 0L8

Dear Sir or Madam,

**RE: Carbon Steel Welded Pipe 2 (CSWP2) – Response to Nova’s Letter Dated
September 30, 2024**

This letter is submitted on behalf of our client, Thai Premium Pipe Co., Ltd. ("TPP"), in response to the letter filed by Nova Steel Inc. and Nova Tube Inc. (collectively "Nova") on September 30, 2024.

In its letter, Nova contends that the Canada Border Services Agency (CBSA) is not obligated to initiate a normal value review (NVR) as submitted by TPP. Nova asserts that such a review is an administrative proceeding and that the decision to initiate an NVR lies solely within the CBSA's discretion.

TPP submits that the issue of whether the CBSA's decision is discretionary or obligatory is extraneous to the matter at hand. Whether discretionary or obligatory, TPP acknowledges that the decision of whether or not to initiate an NVR rests solely with the CBSA.

Rather than engaging in an unproductive debate on this irrelevant point, we wish to emphasize that Nova has not presented any new substantive information in its recent submission.

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Instead, Nova has merely reiterated its previous arguments, which TPP has already addressed and demonstrated lacks any factual or legal foundation.

We respectfully request that the CBSA refrain from publishing TPP's submission to invite further comments from other interested parties. Nova is the only other party interested in TPP's request to initiate a normal value review.

The fact that Nova, despite being given numerous opportunities, has neither provided any new information to justify further consideration since its original submission and given that TPP has thoroughly demonstrated the lack of merit in Nova's initial submission, inviting Nova to provide further comments to TPP's current submission is unwarranted.

TPP once again requests that the CBSA initiate the normal value review based on the merits of its request to initiate an NVR in its initial submission of June 5, 2024.

We appreciate your attention to this matter and look forward to a favorable resolution.

Yours truly,

A handwritten signature in black ink, appearing to read 'Richard Chung', with a stylized flourish at the end.

Richard Chung, CPA
RC International Trade Consultants