



OTTAWA, August 11, 2009

4214-24

## STATEMENT OF REASONS

**concerning a preliminary determination with  
respect to the dumping of**

**CERTAIN MATTRESS INNERSPRING UNITS  
ORIGINATING IN OR EXPORTED FROM  
THE PEOPLE'S REPUBLIC OF CHINA**

## DECISION

Pursuant to subsection 38(1) of the *Special Import Measures Act*, the President of the Canada Border Services Agency made a preliminary determination of dumping on July 27, 2009, respecting mattress innerspring units, with or without edgeguards, originating in or exported from the People's Republic of China.

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Cet *Énoncé des motifs* est également disponible en français. Veuillez vous reporter à la section « Renseignements ».  
This *Statement of Reasons* is also available in French. Please refer to the "Information" section.

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**SUMMARY OF EVENTS**

[1] On March 6, 2009, the Canada Border Services Agency (CBSA) received a complaint from Globe Spring & Cushion Company Ltd. (complainant) of Toronto, Ontario, alleging that imports of certain mattress innerspring units originating in or exported from the People's Republic of China (China) are being dumped and causing injury to the Canadian industry.

[2] On March 27, 2009, pursuant to subsection 32(1) of the *Special Import Measures Act* (SIMA), the CBSA informed the complainant that the complaint was properly documented. The CBSA also notified the government of China that a properly documented complaint had been received.

[3] The complainant provided evidence to support the allegations that subject goods from China have been dumped. The evidence also disclosed a reasonable indication that the dumping has caused injury or is threatening to cause injury to the Canadian industry producing these goods.

[4] In accordance with subsection 31(1) of SIMA, the President of the CBSA (President) was of the opinion that there was evidence that the subject goods have been dumped, as well as evidence that disclosed a reasonable indication that the dumping have caused injury or was threatening to cause injury. Accordingly, the President initiated an investigation into the alleged injurious dumping of the subject goods on April 27, 2009.

[5] Upon receiving notice of the initiation of the investigation, the Canadian International Trade Tribunal (Tribunal) started a preliminary injury inquiry into whether the evidence disclosed a reasonable indication that the alleged dumping of the subject goods have caused injury or retardation or was threatening to cause injury. On June 26, 2009, pursuant to subsection 37.1(1) of SIMA, the Tribunal determined that there was evidence that disclosed a reasonable indication that the dumping of the subject goods has caused injury.

[6] On July 27, 2009, pursuant to subsection 38(1) of SIMA, the President made a preliminary determination of dumping with respect to the subject goods.

**PERIOD OF INVESTIGATION**

[7] The investigation covered all subject goods imported into Canada from April 1, 2008 to March 31, 2009, the period of investigation (POI).

**INTERESTED PARTIES****Complainant**

[8] The complainant represents a major proportion of the production of like goods in Canada, accounting for a major proportion of the domestic industry.

The name and address of the complainant is:

Globe Spring & Cushion Company Ltd.  
4040 Chesswood Drive  
Downsview, Toronto, Ontario  
M3J 2B9

**Exporters**

[9] At the initiation of the investigation, the CBSA identified 31 potential exporters<sup>1</sup> of subject goods. These exporters were identified from import documentation and from the complaint. The CBSA sent a Request for Information (RFI) to each of the identified potential exporters of subject goods.

[10] Information obtained during the preliminary phase of the investigation has resulted in the number of potential exporters of subject goods being increased to 33.

**Importers**

[11] At the initiation of the investigation, the CBSA identified 61 potential importers of subject goods. These importers were identified from import documentation and from the complaint. The CBSA sent an importer RFI to each of the identified potential importers of subject goods.

[12] Information obtained during the preliminary phase of the investigation has resulted in the number of potential importers of subject goods being decreased to 57.

**PRODUCT DEFINITION**

[13] For the purpose of this investigation, the subject goods are defined as:

“mattress innerspring units, with or without edgeguards, used in the manufacture of innerspring mattresses, originating in or exported from the People’s Republic of China.”

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<sup>1</sup> Exporters includes vendors as well.

## Additional Product Information<sup>2</sup>

[14] Innersprings comprise the basic core used in the production of mattresses. While there are other technologies used for the core of a mattress, such as foam or air, steel wire innersprings remain the dominant mattress core in most markets around the world. A mattress innerspring is comprised of coils attached with wires (helicals). The top and bottom of the innerspring are framed with border rods, and side support is provided with flat springs called edgeguards that are clipped to the border rods. Certain innersprings have individual steel wire coils wrapped in a fabric pocket, and these pockets are glued together to produce the innerspring unit.

[15] There are four basic styles of innersprings:

1. Bonnell or Open coil. This is the oldest design and still the most popular in the mattress industry. The coil has an hourglass shape that tapers towards the middle of the coil, and each coil is attached to adjacent coils with helicals (or wire spirals).
2. Offset coil. This is similar to the Bonnell, but has a squared/flat head (top and bottom) and is more cylindrical in shape.
3. Pocket or Marshall coil. This is a cylindrical steel wire coil, with each individual coil enclosed in its own fabric pocket. The individual coils are then glued together to form the shape of the innerspring unit.
4. Continuous coil. Continuous coils have irregular shapes, but each row of coils or a lattice work of coils is made from a single piece of wire, with each row attached by helicals to another row.

[16] The basic mattress innerspring mattress sizes are: single (or "twin"), double, queen and king, though there are a wide range of variations available, including, extra long, different thicknesses or heights of coils, different coil count/wire gauge combinations, and other custom specifications.

## Production Process<sup>3</sup>

[17] A mattress manufacturer will begin its mattress production with the metal innerspring unit. A flex net or flexolator is added to each side of the innerspring unit to prevent subsequent layers of the finished mattress from being depressed into the coils. The mattress manufacturer then adds insulation, cloth or foam padding, and finally covers the product with fabric, usually quilted. For a foam-encased innerspring mattress, the entire innerspring unit will be enclosed with foam insulation, and then covered with fabric.

[18] The degree of support provided by an innerspring is a function of the number of coils and the wire gauge. The number of coils, or coil count, in a mattress generally ranges from 300 to 800, depending on the mattress size and the firmness desired.

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<sup>2</sup> Globe Spring & Cushion Company Non-Confidential Complaint, pages 1-2.

<sup>3</sup> Ibid, pages 1-3.

[19] Gauge of the wire used to produce coils is also a factor in the firmness of a mattress; the higher the gauge, the thinner the diameter of the coil wire and the softer the mattress. Wire gauges tend to range between 12.5 gauge (2.52 mm) to 15.5 gauge (1.70 mm). Thus, different coil number/wire gauge combinations may be employed to attain the same or various levels of support.

[20] Border rods (also referred to as border wires) are used to connect coils at the top and bottom edges of the innerspring to help retain shape and reduce sagging. Edgeguards are flat springs that attach to border rods to prevent edge breakdown. Mattress manufacturers can and do purchase border rods and edgeguards separately. For most innersprings sold in the Canadian market, border rods are in the range of 6 gauge (4.88 mm) to 9 gauge (3.77 mm).

[21] When innersprings must be transported long distances, they are typically compressed to maximize use of container space. The compressed innersprings may be crated (typically 12 to 20 to a crate) or, for pocket coil innersprings, packed in rolls of eight to ten. When a mattress manufacturer receives crates or rolls of innersprings, it must install the edgeguards (and in some cases, the border rods) itself. Chinese innersprings are likely compressed for shipment to Canada.

[22] Edgeguards are a critical structural component of a finished mattress innerspring. Because of cost advantages to shipping compressed innersprings, most mattress manufacturers have the capacity to affix edgeguards on mattress innersprings. The complainant routinely ships edgeguards with compressed innerspring shipments, as do Chinese exporters. Single- and double-sized innerspring units require 12 edgeguards, while 14 edgeguards are used for a queen-sized innerspring and 16 for a king-sized innerspring unit.

### **Classification of Imports**

[23] The goods in question are usually classified under the three following Harmonized System (HS) classification numbers:

9404.10.00.00

9404.29.00.00

7320.20.90.10

[24] This listing of HS codes is for convenience of reference only. Refer to the product definition for authoritative details regarding the subject goods.

### **CANADIAN INDUSTRY**

[25] The CBSA found that the following companies produce mattress innerspring units in Canada:

Globe Spring & Cushion Company Ltd. of Toronto, Ontario  
 Simmons Canada Inc. of Mississauga, Ontario  
 Marshall Mattress Company Limited of North York, Ontario

[26] The CBSA found that the complainant was the only producer in Canada of mattress innerspring units for sale as mattress innerspring units. The other producers further manufacture their mattress innerspring units into finished mattresses before sale. Simmons Canada Inc. and Marshall Mattress Company Limited provided letters to the CBSA in support of the complaint filed by Globe Spring & Cushion Company Ltd.

### **IMPORTS INTO CANADA**

[27] The CBSA refined the estimated volume of imports based on information obtained during the preliminary phase of the investigation, including information received from exporters and importers.

[28] The following table presents, for purposes of the preliminary determination, the CBSA's estimates of the share of imports of mattress innerspring units during the POI:

***CBSA Estimates of Import Share During the POI  
(By Volume)***

<b>Country</b>	<b>April 1, 2008 to March 31, 2009</b>
China	53.0%
USA	41.6%
Other	5.4%
<b>Total Imports</b>	100%

### **INVESTIGATION PROCESS**

[29] At the initiation of the investigation, the CBSA requested information from 31 potential exporters and 61 potential importers.

[30] The CBSA received four complete submissions from exporters of subject goods (cooperative exporters). Two of the four exporters shipped the subject goods to Canada through three intermediary companies. A submission was received from a fifth exporter, Zibo Senbao Furniture Co., Ltd., but this submission was incomplete. All five exporters that provided submissions are located in China. In addition, one company that was sent an exporter RFI responded that it did not export subject goods.

[31] The CBSA received 14 responses to the RFI from importers as follows: nine provided a response pertaining to this investigation and four importers reported that they do not import subject goods.

## **DUMPING INVESTIGATION**

### **Normal Value**

[32] Normal values are generally based on the domestic selling prices of the goods in the country of export, or on the full cost of the goods including administrative, selling and all other costs plus a reasonable amount for profit.

### **Export Price**

[33] The export price of goods sold to importers in Canada is generally based on the lesser of the exporter's sale price for the goods or the importer's purchase price. These prices are adjusted where necessary by deducting the costs, charges, expenses, duties and taxes resulting from the exportation of the goods.

### **Summary of Preliminary Results of Dumping Investigation**

[34] The determination of the volume of dumped goods was calculated by taking into consideration each exporter's net aggregate dumping results. Where a given exporter has been determined to be dumping on an overall or net basis, the total quantity of exports attributable to that exporter (i.e. 100%) is considered dumped. Similarly, where a given exporter's net aggregate dumping results are zero, then the total quantity of exports deemed to be dumped by that exporter is zero.

[35] In calculating the estimated margin of dumping, the estimated margins of dumping found in respect of each exporter were weighted according to each exporter's volume of subject goods exported to Canada during the POI.

[36] Based on the preceding, 89.5% of the subject goods from China were dumped by an estimated weighted average margin of dumping of 57.3%, as a percentage of export price.

[37] Under subsection 35(1) of SIMA, the President is required to terminate an investigation prior to the preliminary determination if he is satisfied that the margin of dumping of the goods of a country is insignificant or that the volume of dumped goods of a country is negligible. Pursuant to subsection 2(1) of SIMA, a margin of dumping of less than 2% is defined as insignificant, whereas a volume of dumped goods from a country forming less than 3% of total imports is considered negligible.

[38] The estimated margin of dumping of subject goods from China is above 2% and is, therefore, not insignificant. As well, the volume of dumped goods from China is above 3%, and is, therefore, not negligible.

### **Preliminary Dumping Results by Exporter**

[39] Specific margins of dumping for each of the exporters in China that provided a complete and timely response to the CBSA's dumping RFI are as follows:



**Keynor Asia & Import/Export Co., Ltd.**

[40] Keynor Asia & Import/Export Co., Ltd. (Keynor Asia) is incorporated in Shanghai, China, as a limited liability company. Keynor Asia produces mattress innerspring units for sale domestically and for export. Keynor Asia also sells certain natural stone material and chemical products.

[41] The subject goods exported to Canada by Keynor Asia are shipped directly to unrelated importers in Canada. A company related to Keynor Asia, Keynor Spring Manufacturing (KSM) of Vancouver, British Columbia, provides certain services to Keynor Asia in respect of the subject goods exported to Canada. However, KSM does not take possession of the goods and has no inventory or warehouse in Canada. After arriving at the port in Canada, the goods are shipped inland directly to unrelated importers in Canada.

[42] During the period of investigation, when exporting subject goods to Canada, Keynor Asia used the services of Shanghai A J Import & Export Co. and Shanghai SMIC 4<sup>th</sup> Party Logistics Inc. (formerly Spring Air China Inc.), both of China. These two companies secured requisite export documentation as required by Chinese law, paid inland freight in China, received the export tax refund from the government of China and remitted such refunds to Keynor, converted United States dollars paid by the importer into Chinese Renminbi and then remitted these funds to Keynor Asia, less an amount that is kept by the export service company.

[43] For subject goods exported to Canada by Keynor Asia, export prices were estimated using the methodology of section 24 of SIMA, based on the lesser of the importer's purchase price and the exporter's selling price, less all costs, charges and expenses resulting from the exportation of the goods.

[44] Keynor Asia had domestic sales of mattress innerspring units during the POI. However, because the domestic sales of the models were made to a single purchaser, normal values were estimated for Keynor Asia using the methodology of paragraph 19(b) of SIMA, as the sum of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. In estimating normal values, the CBSA included the portion of value-added tax (VAT) not refunded by the tax authority on the exported goods. The amount for profit was estimated based on the profit earned by Keynor Asia on sales of mattress innerspring units sold to unrelated customers in its domestic market.

**Margin of Dumping**

[45] In estimating the margin of dumping for Keynor Asia, the total normal value was compared with the total export price for all subject goods exported to Canada by the company during the POI. It was found that the subject goods exported to Canada by Keynor Asia were dumped by an estimated 7.8% expressed as a percent of export price.

**Foshan Jingxin Steel Wire & Spring Co., Ltd.**

[46] Foshan Jingxin Steel Wire & Spring Co., Ltd. (Foshan Jingxin) is a limited liability company incorporated in China. Foshan Jingxin produces mattress innerspring units and various bedding accessories.

[47] The subject goods exported to Canada by Foshan Jingxin are shipped directly to unrelated importers in Canada. During the period of investigation, when exporting subject goods to Canada, Foshan Jingxin used the services of two companies in China.

[48] For subject goods exported to Canada by Foshan Jingxin, export prices were estimated using the methodology of section 24 of SIMA, based on the lesser of the importer's purchase price and the exporter's selling price, less all costs, charges and expenses resulting from the exportation of the goods.

[49] Foshan Jingxin had domestic sales of mattress innerspring units during the POI. However, because the domestic sales of the models were made to a single purchaser, normal values were estimated for Foshan Jingxin using the methodology of paragraph 19(b) of SIMA, as the sum of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. In estimating normal values, the CBSA included the portion of VAT not refunded by the tax authority on the exported goods. The amount for profit was estimated based on the profit earned by Foshan Jingxin on sales of mattress innerspring units sold to unrelated customers in its domestic market.

[50] For some models of subject goods exported by Foshan Jingxin, cost information was not provided in the original submission. Accordingly, the normal values for these goods were estimated on the basis of an advance over the export price equal to the highest amount by which the normal value exceeded the export price in an individual transaction of a cooperative exporter, expressed as a percentage of export price. The total quantity of such sales was about 1% of the total quantity of all subject goods exported by Foshan Jingxin for the period of investigation.

**Margin of Dumping**

[51] In estimating the margin of dumping for Foshan Jingxin, the total normal value was compared with the total export price for all subject goods exported to Canada by the company during the POI. It was found that the subject goods exported to Canada by Foshan Jingxin were dumped by an estimated 3.2% expressed as a percent of export price.

**Tai Wa Hong**

[52] Tai Wa Hong is a privately held company with an office in Macau and a manufacturing plant in Guangdong Province, China.

[53] During the POI, all subject goods were purchased by unrelated importers in Canada. All such importers were mattress manufacturers. As Tai Wa Hong is not legally authorized to export goods from its factory in China, the subject goods were exported using the services of a trading company.

[54] For subject goods exported by Tai Wa Hong, export prices were estimated using the methodology of section 24 of SIMA, based on the lesser of the importer's purchase price and the exporter's selling price, less all costs, charges and expenses resulting from the exportation of the goods.

[55] During the POI, Tai Wa Hong had no domestic sales of the like goods. Consequently, normal values were estimated using paragraph 19(b) of SIMA, based on the sum of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. In estimating normal values, the CBSA included the portion of VAT not refunded by the tax authority on the exported goods. Since Tai Wa Hong did not have domestic sales of mattress innerspring units, the amount for profit was based on the weighted average profit earned on domestic sales of mattress innerspring units by Keynor Asia, Foshan Jingxin, and Zhao Gang.

[56] For some models of subject goods exported by Tai Wa Hong, cost information was not provided in the original submission. Accordingly, the normal values for these goods were estimated on the basis of an advance over the export price. The advance, expressed as a percentage of export price, represents the highest amount by which the normal value exceeded the export price in an individual transaction of a cooperative exporter. The total quantity of such sales was about 10% of the total quantity of all subject goods exported by Tai Wa Hong for the POI.

#### Margin of Dumping

[57] In estimating the margin of dumping for Tai Wa Hong, the total normal value was compared with the total export price for all subject goods exported to Canada by the company during the POI. It was found that the subject goods exported to Canada by Tai Wa Hong were dumped by an estimated 27.2% expressed as a percent of export price.

#### **Zhao Gang Furniture Industry Co., Ltd.**

[58] Zhao Gang Furniture Industry Co., Ltd. (Zhao Gang) is a privately held limited liability company that was established in 2003. Zhao Gang produces furniture hardware that includes mattress innerspring units as well as cushion inner springs, sofa springs, fixing wire, zigzag springs, spring coils, mattress borders and edge guards.

[59] During the POI, all subject goods exported to Canada by Zhao Gang were purchased by an unrelated importer. The subject goods exported to Canada were shipped through Foshan Junjing Industrial Co., Ltd. (Junjing), which holds a Chinese export license that permits the export of the subject goods to Canada. Junjing is a privately held limited liability company and was established in 1996, and has been operating as a trading company in the sales of a wide range of products since that time.

[60] For subject goods exported to Canada by Zhao Gang, export prices were estimated using the methodology of section 24 of SIMA, based on the lesser of the importer's purchase price and the exporter's selling price less all costs, charges and expenses resulting from the exportation of the goods.

[61] Zhao Gang had domestic sales of mattress innerspring units during the POI. Where applicable, normal values were estimated for Zhao Gang using the methodology of section 15 of SIMA based on domestic selling prices of like goods. In the absence of domestic sales of certain models or in the instance of domestic sales of a model to a single purchaser, normal values were estimated using the methodology of paragraph 19(b) of SIMA, as the sum of the cost of production, a reasonable amount for administrative, selling and all other costs, and a reasonable amount for profits. In estimating normal values, the CBSA included the portion of VAT not refunded by the tax authority on the exported goods. The amount for profit was estimated based on the profit earned by Zhao Gang on sales of mattress innerspring units sold in its domestic market.

#### Margin of Dumping

[62] In estimating the margin of dumping for Zhao Gang, the total normal value was compared with the total export price for all subject goods exported to Canada by the company during the POI. The total export price exceeded the total normal value, and as a result, the subject goods exported to Canada by Zhao Gang were estimated not to be dumped.

#### **Non-Cooperative Exporters - Margin of Dumping**

[63] For the exporters that did not provide a complete response to the RFI, the margins of dumping were estimated using an advance of 177.4%. The advance, expressed as a percentage of export price, represents the highest amount by which the normal value exceeded the export price on an individual transaction of a cooperative exporter.

#### SUMMARY OF RESULTS

##### **Period of Investigation – April 1, 2008 to March 31, 2009**

<b>Country</b>	<b>Estimated Margin of Dumping</b>	<b>Estimated Dumped Goods as Percentage of Total Exports from China</b>	<b>Imports from China as Percentage of Total Imports from All Countries</b>	<b>Volume of Dumped Goods from China as Percentage of Total Imports from All Countries</b>
China	57.3%	89.5%	53.0%	47.4%

#### DECISION

[64] Based on the preliminary results of the investigation, the CBSA on July 27, 2009, made a preliminary determination of dumping respecting the subject goods originating in or exported from the People's Republic of China, pursuant to subsection 38(1) of SIMA.

## **PROVISIONAL DUTY**

[65] Pursuant to subsection 8(1) of SIMA, provisional duties will be applied to dumped subject goods that are released during the provisional period commencing on the day the preliminary determination is made, and ending on the earlier of the day on which the CBSA causes the investigation to be terminated pursuant to subsection 41(1) or the day on which the Tribunal makes an order or finding under subsection 43(1).

[66] Provisional anti-dumping duty is based on the estimated margin of dumping and is expressed as a percentage of the export price of the goods. Appendix 1 contains the estimated margins of dumping and the rates of provisional duties, payable on subject goods released from the CBSA on or after July 27, 2009.

[67] Provisional duties are payable by the importer in Canada. Importers are required to pay provisional duties in cash or by certified cheque. Alternatively, they may post security equal to the amount payable. Importers should contact their CBSA regional office if they require further information on the payment of provisional duty or the posting of security. If the importers of such goods do not indicate the required SIMA code or do not correctly describe the goods in the CBSA documents, an administrative monetary penalty could be imposed. The imported goods are also subject to the *Customs Act*. As a result, failure to pay duties within the specified time will result in the application of the provisions of the *Customs Act* regarding interest.

## **FUTURE ACTION**

### **The Canada Border Services Agency**

[68] The CBSA will continue its investigation and will make a final decision by October 26, 2009.

[69] If the CBSA is satisfied that the goods were dumped and that the margin of dumping is not insignificant, a final determination will be made. Otherwise, the CBSA will terminate the investigation and any provisional duties paid, or security posted, will be returned to importers.

### **The Canadian International Trade Tribunal**

[70] The Tribunal has begun its full inquiry into the question of injury to the Canadian industry. The Tribunal is expected to issue its finding by November 24, 2009.

[71] If the Tribunal finds that the dumping has not caused injury or is not threatening to cause injury, the proceedings will be terminated and all provisional duties collected, or security posted, will be returned. If the Tribunal makes a finding of injury, anti-dumping duties will be imposed on imports of subject goods.

[72] For purposes of the preliminary determination of dumping, the CBSA has responsibility for determining whether the actual and potential volume of dumped goods is negligible. After the preliminary determination of dumping, the Tribunal assumes this responsibility. In accordance with subsection 42(4.1) of SIMA, the Tribunal is required to terminate its inquiry in respect of any goods if the Tribunal determines that the volume of dumped goods from a country is negligible.

### **RETROACTIVE DUTY ON MASSIVE IMPORTATIONS**

[73] Under certain circumstances, anti-dumping duty can be imposed retroactively on subject goods imported into Canada. When the Tribunal conducts its inquiry on material injury to the Canadian industry, it may consider if dumped goods that were imported close to or after the initiation of the investigation constitute massive importations over a relatively short period of time and have caused injury to the Canadian industry. Should the Tribunal issue a finding that there were recent massive importations of dumped goods that caused injury, imports of subject goods released by the CBSA in the 90 days preceding the day of the preliminary determination could be subject to anti-dumping duty.

### **UNDERTAKINGS**

[74] After a preliminary determination of dumping, exporters may give a written undertaking to revise selling prices to Canada so that the margin of dumping or the injury caused by the dumping is eliminated.

[75] Acceptable undertakings must account for all, or substantially all, of the exports to Canada of the dumped goods. In the event that an undertaking is accepted, the required payment of provisional duty on the goods would be suspended.

[76] In view of the time needed for consideration of undertakings, written undertaking proposals should be made as early as possible, and no later than 60 days after the preliminary determination of dumping. Further details regarding undertakings can be found in the CBSA's Memorandum D14-1-9, available online at:

**[www.cbsa-asfc.gc.ca/publications/dm-md/d14/d14-1-9-eng.html](http://www.cbsa-asfc.gc.ca/publications/dm-md/d14/d14-1-9-eng.html)**

[77] SIMA allows all interested parties to make representations concerning any undertaking proposals. The CBSA will maintain a list of interested parties and will notify them should an undertaking proposal be received. Persons wishing to be notified must provide their name, address, telephone, fax, or email address, to one of the officers listed below. Interested parties may also consult the CBSA Web site noted below for information on undertakings offered in this investigation. A notice will be posted on the CBSA Web site when an undertaking proposal is received. Interested parties have nine days from the date the undertaking offer is received to make representations.

**PUBLICATION**

[78] A notice of this preliminary determination of dumping will be published in the Canada Gazette pursuant to paragraph 38(3)(a) of SIMA.

**INFORMATION**

[79] This *Statement of Reasons* has been provided to persons directly interested in these proceedings. It is also posted on the CBSA's Web site at the address below. For further information, please contact the officers identified as follows:

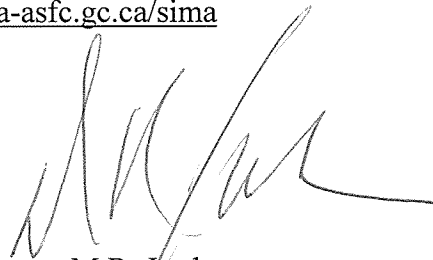
**Mail:** SIMA Registry and Disclosure Unit  
Anti-dumping and Countervailing Program  
Canada Border Services Agency  
100 Metcalfe Street, 11th Floor  
Ottawa, ON K1A 0L8  
CANADA

**Telephone:** Jody Grantham 613-954-7405  
Peter Dupuis 613-954-7341

**Fax:** 613-948-4844

**E-mail:** [simaregistry@cbsa-asfc.gc.ca](mailto:simaregistry@cbsa-asfc.gc.ca)

**Web site:** [www.cbsa-asfc.gc.ca/sima](http://www.cbsa-asfc.gc.ca/sima)



M.R. Jordan  
Director General  
Trade Programs Directorate

Attachment

**APPENDIX 1 – SUMMARY OF ESTIMATED MARGINS OF DUMPING**

<b>Exporter</b>	<b>Estimated Margin of Dumping*</b>	<b>Provisional Duty*</b>
<b><i>Co-operative Exporters:</i></b>		
Keynor Asia & Import/Export Co., Ltd.	7.8%	7.8%
Foshan Jingxin Steel Wire & Spring Co., Ltd.	3.2%	3.2%
Zhao Gang Furniture Industry Co., Ltd.	0%	0%
Tai Wa Hong	27.2%	27.2%
<b><i>Non-cooperative Exporters:</i></b>		
Zibo Senbao Furniture Co., Ltd.	177.4%	177.4%
All Other Exporters	177.4%	177.4%

\*Expressed as a percentage of export price.