production processes and into particular finished goods exported to the United States. DOC invited public comment on this new approach in October 2006.

(c) Calculation of dumping margin. There have been significant developments regarding the calculation and establishment of dumping margins related to "zeroing," "targeted dumping" and the "all others" rate.

i) Zeroing. The U.S. practice of by assigning a value of zero to individual non-dumped comparison sales has been challenged in a series of WTO dispute settlement cases and found to be inconsistent with the Anti-dumping Agreement. Although all forms of zeroing have been found WTO-inconsistent, in all of the contexts in which they are applied, the United States has so far formally renounced zeroing only in the context of average-to-average comparisons in original investigations. In March 2006, DOC requested public comments on the calculation of weighted average dumping margins in original AD investigations. In December 2006, DOC published a notice pursuant to Section 123 of theURAA formally adopting the proposed change in practice and stating that it "will no longer make average-to-average comparisons in investigations without providing offsets for non-dumped comparisons."[8]

ii) Targeted dumping methodology. One result of the partial abandonment of zeroing has been increased attention to use of the "targeted dumping" or "average-to-transaction" methodology, which involves comparing a weighted average normal value to the export prices. Section 777A(d)(1)(B) of the Tariff Act allows this approach to be used if there is a pattern of export prices or CEPs that differs significantly among purchasers, regions or periods of time, and the differences cannot be taken into account using one of the more traditional comparison methods. In November 2007, DOC requested public comment on a "determining whether targeted dumping is occurring in AD investigations," and on "standards and tests that may be appropriate in a targeted dumping analysis." Noting that it had "very limited" experience in using this comparison methodology and very little by way of pertinent regulations, DOC requested comments and suggestions on what guidelines, thresholds and tests it should use in determining whether targeted dumping is occurring. In a final determination on Coated Free Sheet (CFS) Paper from the Republic of Korea,[9] DOC found that certain customers and regions were being targeted and applied the "targeted dumping" comparison method. In particular, this determination suggests how targeted dumping analysis may be used in conjunction with other comparison methods. The investigation itself concluded with a negative final injury determination.

iii) All others rate. The "all others" rate applicable to exporters not receiving individual dumping margin calculations is generally derived, under Section 735(c)(5)(A) of the Tariff Act, by trade weight-averaging individually calculated rates, excluding

8 71 Fed. Reg. 77722, December 27, 2006.

9 72 Fed. Reg. 60630 (October 25, 2007).