

HOW TO CLASSIFY BEARINGS AND DETERMINE ANTI-DUMPING DUTIES

Sample for Needle/Cylindrical Bearings

Needle/Cylindrical Bearings

1. Determine exact description of bearing per information on the Bearing Detail Sheet

Let's assume that our importer is bringing in some bearings that shipped from **Yamaha Motors** in Japan. We have reviewed the commercial invoice and note that the description states "**Roller Bearing, Needle**". Since this description is not sufficient to determine the exact classification, we have faxed the Bearing Detail Sheet to the importer, and the following is his response.

REQUEST FOR BEARING DATA DETAIL (CFR 141.89)

TO:
SELLERS INV.#

DATE:
FILE REF:

YOUR P.O.#

U.S. Customs is keenly interested in the following detail of certain bearings or bearing parts that you are importing. Incorrect or missing information may unnecessarily require you to pay special duties of as much as 214% or more. Please provide this information as accurately and as quickly as possible.

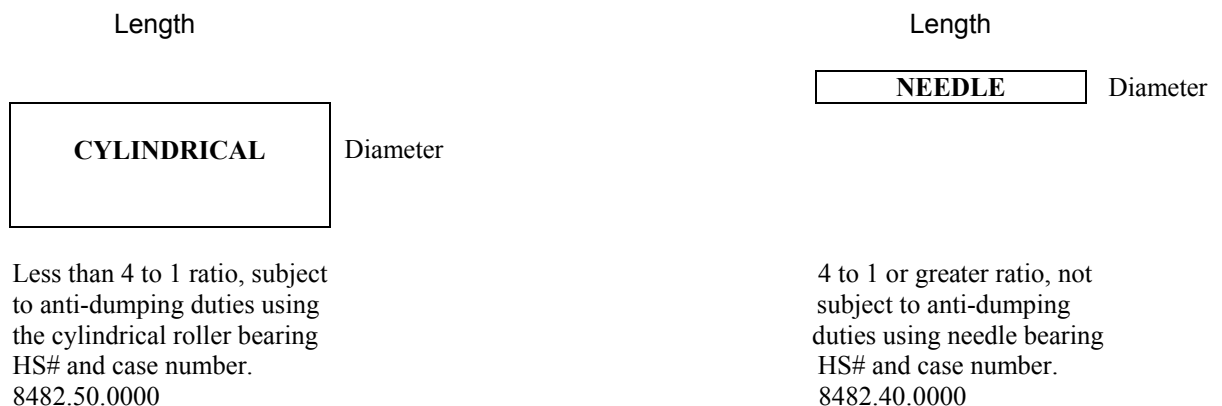
IS THIS BEARING.....(Check one for each part)

	Part#/Invoice Description	Actual Manufacturer of Bearings	Country of Origin	Ball? See 2 Below	Roller? See 3 Below	Combination? See 4	Plain Shaft? See 6	Housed See 5 Below
A	ROLLER BEARING, NEEDLE	NTN	JP	X				
B								
C								
D								

2. **If a ball bearing**, is it (check one only) integral shaft thrust linear angular contact radial other
 - a) If integral shaft, provide outside diameter in millimeters.
 - b) If angular contact, specify if wheel hub unit, and whether wheel hub unit is flanged.
 - c) If radial, please indicate outside diameter of bearing in millimeters (MM). Also, if multiple rows of balls, indicate whether double, triple, etc; also indicate when radial bearings are maximum or full capacity type.
 - d) If other (eg: clutch release bearings, ball and cage assemblies sold as complete unit, etc.), specify type.
NOTE: If ball bearings are unground, this should be indicated.
3. **If a roller bearing**, is it (check one only) cylindrical needle spherical tapered
 - a) If cylindrical or needle, indicate length and diameter of rolling element in MM.
 - b) If tapered, indicate outside diameter of cup in MM. Also, show whether these are cup and cone assemblies being shipped together in sets, or cone assemblies being shipped separately. Also, if wheel hub units, this should be specified, and indicate if the wheel hub unit is flanged.
NOTE: If roller bearings are linear, this should be indicated.
4. **If a combination ball/roller or roller/roller bearing**, indicate types of elements: ball/spherical ball/needle roller ball/cylindrical roller needle roller/cylindrical roller other
 - a) If cylindrical or needle, indicate length and diameter of rolling element in MM.
 - b) If tapered, indicate outside diameter of bearing in MM.
 - c) If other, specify the particular elements present.
5. **If a housed bearing** is it (check one only) ball roller combination plain
 - a) Indicate type of bearing incorporated and indicate information specified above for the roller elements of that particular type of bearing.
 - b) Specify type of housing (ie: flange, take-up, cartridge, hangar units, or other type)
6. **If plain shaft bearing**, it is spherical *or* it is not spherical it is housed *or* it is unhoused
7. **For bearing parts**, indicate:
What type bearing the item is a part of
Identity of part (ie: cups, tapered roller, ball, ring, cage, etc.)
For balls indicate intended use (ie: ball bearings, CV joints, etc.)
For needles, provide dimensions (length and diameter) of rolling element in MM
8. **Finishing Process**: Indicate if bearings/parts are not completely finished (ie: green, unground ,etc)

While the invoice and the detail form describe these as needle bearings, the dimensions of the rollers as shown (ie: 3.0 X 10.8 mm) indicates these are **cylindrical**, not needle. Here's why:

In 1991, The International Trade Administration issued a scope ruling on needle verses cylindrical bearings. The ITA determined that needle roller bearings with a roller length-to-diameter ratio of **less than 4:1 are not needle bearings, but cylindrical bearings** and as such are subject to antidumping. If the roller length-to-diameter ratio is **4:1 or greater, they are needle roller bearings** and are not subject to dumping. Thus, you are to apply the 4 to 1 ratio (length to diameter) in determining whether a roller bearing is a "needle bearing" or a "cylindrical roller bearing".



Therefore, the bearings on our invoice are not needle, but cylindrical.

2. Determine Case Number

Now that we know our classification is 8482.50.0000 Cylindrical Bearings, we need to determine the case number that applies. The best place to start is to query the HS# through ABI (ADA/CVD Query). The resulting report will list all of the case numbers that apply to the tariff numbers queried. These case numbers are listed by manufacturer and/or shipper. When the Department of Commerce instigates a preliminary review of a commodity that is being investigated for possible antidumping violations, they assign a case number to the product being investigated. Let's break apart the components of the case number:

1. Case# A588203000 **A** = Antidumping (C is for Countervailing Duties)
 - 588** = Numeric Schedule C Country Code (in this case, **Japan**)
 - 203** = Specific Case Number (in this case, for **cylindrical bearings**)
 - 000** = Vendor/Manufacturer/Shipper specific number (in this case, 000 for **all others** that do not have their own case number.)

2. Case# A588203009 **A** = Antidumping
 - 588** = Numeric Schedule C Country Code (in this case, **Japan**)
 - 203** = Specific Case Number (in this case, for **cylindrical bearings**)
 - 009** = Vendor/Manufacturer/Shipper specific number (in this case 009 for the manufacturer: **NTN**.)****

***Note: The last 3 digits for any given vendor/manufacturer/shipper will always be the same regardless of the type of bearing involved. (ie: 009 is always for NTN, 000 is always the general "slush" number)

3. Case#A588203024 **A** = Antidumping
 - 588** = Numeric Schedule C Country Code (in this case, **Japan**)

203 = Specific Case Number (in this case for **cylindrical bearings**)
024 = Vendor/Manufacturer/Shipper specific number (in this case, 024 for the shipper **Yamaha**)

In looking at our query print-out, it appears that we have three different case numbers to choose from, number 1, 2 or 3. To determine the correct case number, we must refer to the Department of Commerce instructions which state:

“If the merchandise is **exported by a firm other than the manufacturer**, the following instructions apply:

- A) If the **exporter** of the subject merchandise has its own rate (case number) use the exporter’s rate for determining the cash deposit rate.
- B) If the exporter of the subject merchandise does not have its own rate, but the **manufacturer** has its own rate, the cash deposit rate (case number) will be the manufacturer’s rate.
- C) Where neither the exporter nor the manufacturer currently has its own rate, or the manufacturer is **unknown**, use the “all others” rate for establishing the case deposit rate(case number).”

For our example here, the shipper is **Yamaha** and the manufacturer is **NTN**. Following the above instructions, we would use **Yamaha’s** case number since they are the firm who exported the goods.

Therefore, your invoice should include all of the following information:

Roller Bearings, Needle **3.0 X 10.8 mm (Cylindrical)**
Anti-Dumping Duties Due
Manufacturer: NTN – Japan
Shipper: Yamaha Motors
Case #A588-203-024 (duty rate) %

###Important: Be sure and include an “Anti-Dumping Reimbursement Statement” with your entry summary.