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Suspension Agreement
Office of Policy/ BAU
PUBLIC DOCUMENT

**THIS DOCUMENT CONTAINS
NO PROPRIETARY INFORMATION**

December 16, 2019

VIA IA ACCESS

Honorable Wilbur L. Ross, Jr.
Secretary of Commerce
U.S. Department of Commerce
Attn: Enforcement and Compliance
APO/Dockets Unit, Room 18022
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

**Re: Sugar from Mexico CVD Agreement: Comments on Proposed
Amendment**

Dear Secretary Ross:

This letter is submitted on behalf of the Government of Mexico in response to the Department's December 4, 2019 notice requesting comments on the proposed amendment to the Agreement Suspending the Countervailing Duty Investigation on Sugar from Mexico ("CVD Agreement") and the associated draft statutory memorandum.

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Secretary of Commerce
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Three issues are addressed below.

First, the Government of Mexico reaffirms the comments its previously submitted on November 14 and November 20, 2019.

Second, in relation to the proposed replacement language for Section V.A., the Government of Mexico observes that that second sentence (“The restrictions in Section V.C. 1 and, as set forth below, in Sections V.C.2 and V.C.3 shall apply to only an amount of 782,530 short tons raw value”) and the fourth sentence (“The restrictions in Sections V.C.2 and V.C.3 below shall apply to only the calculated amount less 100,000 [i.e., 782,530] short tons raw value”) appear to have the same meaning and effect. The Government of Mexico therefore proposes that the redundant fourth sentence be deleted.

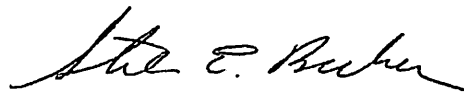
Third, the Government of Mexico reaffirms that for Additional U.S. Needs Sugar offered to Mexico on or after May 1 of any Export Limit Period in accordance with Section II.U of the amendment, it is crucial to retain the 99.5 degrees polarity dividing line between Refined and Other Sugar, as the Department has proposed. This is important because Mexico mills do not normally produce sugar below a polarity of 99.2 for their domestic market, and by May 1 the Mexican sugar harvest season has ended. Maintaining the polarity limit for Other Sugar at 99.5 for Additional U.S. Needs Sugar will maximize the possibility that Mexican producers can quickly provide any additional sugar needed for the U.S. market.

The Government of Mexico thanks the Department for providing this opportunity to submit comments.

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If you have any questions regarding this submission, please let us know.

Respectfully submitted,


A handwritten signature in black ink, appearing to read "Stephan E. Becker". The signature is written in a cursive style with a large initial 'S'.

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Counsel to Government of Mexico

GOVERNMENT CERTIFICATION

I, Aristeo Lopez Sanchez, Legal Counsel for International Trade, Ministry of the Economy of Mexico, currently employed by the Government of Mexico, certify that I prepared or otherwise supervised the preparation of the attached submission of the Government of Mexico's Comments on Proposed Amendment filed on December 16, 2019, pursuant to the *Agreement Suspending the Countervailing Duty Investigation of Sugar from Mexico (C-201-846)*. I certify that the public information and any business proprietary information of the government of Mexico contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

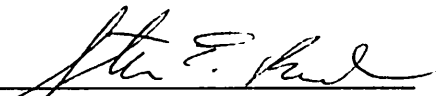
Signature: _____


Aristeo Lopez Sanchez

Date: December 16, 2019

COUNSEL CERTIFICATION

I, Stephan E. Becker, of the law firm Pillsbury Winthrop Shaw Pittman LLP, counsel to the Government of Mexico ("GOM"), certify that I have read the attached submission of the Government of Mexico's Comments on Proposed Amendment filed on December 16, 2019, pursuant to the *Agreement Suspending the Countervailing Duty Investigation of Sugar from Mexico (C-201-846)*. In my capacity as counsel of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: 
Stephan E. Becker

Date: December 16, 2019

PUBLIC CERTIFICATE OF SERVICE

Sugar from Mexico, Case No. C-201-846 Suspension Agreement

I hereby certify that on this date, copies of the foregoing document were served via First Class Mail on the following parties:

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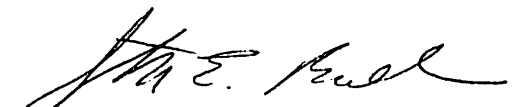
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Date: December 16, 2019



Stephan E. Becker