



November 24, 2025

**MEMORANDUM TO:** The Record

**FROM:** Department of Commerce, International Trade Administration,  
Office of Enforcement and Compliance

**SUBJECT:** Tolling of all Case Deadlines

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As a result of a lapse in appropriations, the Department of Commerce was closed on October 1, 2025, and resumed operations on November 13, 2025. As a result, on November 14, 2025, Enforcement and Compliance, International Trade Administration, tolled certain deadlines in antidumping duty (AD) and countervailing duty (CVD) proceedings by 47 days.<sup>1</sup>

During the shutdown, Enforcement and Compliance received a total of 8,535 documents in ACCESS. Since the government reopened on Thursday, November 13, 2025, Enforcement and Compliance has been diligently addressing the backlog of documents, while additional submissions were filed by external parties and we prepared case documents for release to external parties. Approximately 6,000 documents from external parties and those generated by the Enforcement and Compliance case teams are still awaiting processing by Enforcement and Compliance's ACCESS team. ACCESS is processing a volume of pending submissions beyond the normal levels, contributing to slowness and delays across the workflow.

In addition, ACCESS has experienced two outages since the government reopened. Finally, as noted by some external parties, ACCESS normally makes a business proprietary document available to Administrative Protective Order (APO)-authorized lead attorneys for 14 days after it is filed in ACCESS. Enforcement and Compliance staff have been persistently working to expand that 14-day window in ACCESS to make documents filed during the shutdown available for a longer period.

After further consideration, Enforcement and Compliance has determined that it is necessary to toll all current case deadlines by an additional 21 calendar days to address the issues discussed above. This includes deadlines for all AD/CVD segments and proceedings, including petitions, investigations, administrative reviews, sunset reviews, changed circumstances reviews, expedited CVD reviews, scope inquiries, covered merchandise inquiries, circumvention inquiries, and includes proceedings relating to the U.S. Foreign-Trade Zones Board and any deadlines for submitting comments not connected with a specific proceeding (e.g., requests for comments on

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<sup>1</sup> See Memorandum, "Deadlines Affected by the Shutdown of the Federal Government," dated November 14, 2025 (First Tolling Memo). The First Tolling Memo is available on the main website of Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS): <https://access.trade.gov>.



proposed changes in methodology). If the new deadline falls on a weekend or a Federal holiday, in accordance with our practice, the deadline will be moved to the next business day.<sup>2</sup>

We are not tolling court-ordered redeterminations. We are not tolling the deadline for parties to request administrative reviews of AD/CVD orders with November anniversary months; that deadline remains December 31, 2025. *See* First Tolling Memo at 2. **Further, any deadlines established for the submission of information or data by the Enforcement and Compliance case team for external parties are not tolled by this memorandum.**

Interested parties should contact the Enforcement and Compliance staff assigned to a specific proceeding if there are further questions.

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<sup>2</sup> *See Notice of Clarification: Application of “Next Business Day” Rule for Administrative Determination Deadlines Pursuant to the Tariff Act of 1930, As Amended*, 70 FR 24533 (May 10, 2005).