



November 14, 2025

MEMORANDUM TO: The Record

FROM: Christopher Abbott
Deputy Assistant Secretary
for Policy and Negotiations,
performing the non-exclusive functions and duties
of the Assistant Secretary for Enforcement & Compliance

SUBJECT: Deadlines Affected by the Shutdown of the Federal Government

As a result of a shutdown of the Federal Government, the Department of Commerce was closed on October 1, 2025, and resumed operations on November 13, 2025. After careful consideration, Enforcement and Compliance, International Trade Administration, has determined that any delay and confusion caused by the closure of the Federal Government will best be minimized by uniformly tolling all Enforcement and Compliance deadlines for the effective duration of the recent closure and sufficient time to resume normal operations (*i.e.*, 47 days),¹ with the exception of submissions due during the shutdown and requests for administrative reviews of suspension agreements and antidumping duty (AD) and countervailing duty (CVD) orders, as further discussed below.

The Antideficiency Act, 31 U.S.C. § 1341 *et seq.*, makes it illegal to operate a government agency absent budgetary authority from Congress. Accordingly, it was impossible for Enforcement and Compliance to operate during the shutdown. It was also impossible for Enforcement and Compliance to accelerate its proceedings by the number of days on which the agency was closed -- we simply lack the resources. Enforcement and Compliance also was not able to consider requests for extensions of any deadlines during the shutdown.

With regard to pending submissions due during the government shutdown, on October 1, 2025, Enforcement and Compliance placed the following notification to the public on ACCESS:

“For all pending submissions, please submit them by the current due date. If you need additional time, you may have an extension of 10 days for questionnaire responses, without submitting a request for an extension of the deadline. For questionnaire

¹ The shutdown began October 1, 2025, and Enforcement and Compliance resumed operations November 13, 2025. Therefore, Enforcement and Compliance was closed for 43 calendar days. In addition, September 30, 2025, involved considerable focus on preparation for the potential for a shutdown. Moreover, beginning November 13, 2025, Enforcement and Compliance is focusing largely on the full resumption of operations by Monday, November 17, 2025. Tolling deadlines by 47 days is also consistent with the extension given on submissions due during the shutdown. Submissions due during the shutdown were extended by two business days from the government reopening, *i.e.*, November 17, 2025.

responses that are due before the government re-opens, if there are questions where you require clarification, please submit answers to all other questions according to the timeline above and separately submit clarification questions by the same deadlines. For all other submissions, you may have an extension of 10 days, without submitting a request for an extension of the deadline, and if the government continues to be closed when your submission is due (including the extension), please submit your response within two business days of the government reopening. The schedule for the submission of rebuttal case briefs will be set by the case team after the government re-opens. For any additional extensions beyond this guidance, please contact the case team once the government re-opens. The submission of factual information to rebut, clarify, or correct factual information contained in questionnaire responses, in accordance with 19 CFR 351.301(c)(v), will activate after the questionnaire response is available in ACCESS after the government reopens.”

Thus, for all submissions that were pending during the shutdown, please follow the above guidance. As noted above, if the government continued be closed when your submission was due, that response is due within two days of the government reopening. Because ACCESS was temporarily disabled on Thursday, November 13, we are providing one additional business day to submit responses that were due during the shutdown. Accordingly, submissions that were due during the shutdown are due on Monday, November 17, 2025, which is 47 days from the date the government shutdown began.

For all other deadlines, Enforcement and Compliance is tolling such deadlines for the effective duration of the recent Federal Government shutdown (*i.e.*, 47 days, which includes the number of days shut down, as well as the days for the shutdown preparation and resumption of operations). With the exception of court-ordered redeterminations and the deadlines specified above, this determination applies to every proceeding before Enforcement and Compliance as of the date of this memorandum, including 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 proposed changes in methodology). It includes deadlines for actions by Enforcement and Compliance (such as preliminary and final determinations in investigations and administrative reviews in AD/CVD proceedings). 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.

Finally, for AD and CVD orders and suspension agreements with October anniversary months, all requests for administrative reviews are due by November 17, 2025. For AD and CVD orders and suspension agreements with November anniversary months, all requests for administrative reviews will now be due by December 31, 2025. Parties that have already submitted a request for review for proceedings with a November anniversary month do not need to resubmit the request. Because normal publication of the notification of opportunity to request a review for proceedings with a November anniversary would have published during the partial shutdown, Enforcement and Compliance will issue a combined opportunity notice with regard to requesting administrative reviews of antidumping and countervailing duty orders and suspension agreements with November and December anniversary months. To ensure alignment of the opportunity notice with the last day of the anniversary month, for purposes of establishing future

deadlines, the last day of the anniversary month for November cases is hereby tolled to December 31, 2025.

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