

Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Crowell & Moring International L.P. 1001 Pennsylvania Avenue, N.W., Washington, DC 20004-2505		2. Registration No. 3988
3. Name of foreign principal Government of Thailand	4. Principal address of foreign principal Department of Foreign Trade Ministry of Commerce Sanamchai Road, Bangkok 10200 THAILAND	

5. Indicate whether your foreign principal is one of the following type:

- Foreign government
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
 - Partnership Committee
 - Corporation Voluntary group
 - Association Other (specify) _____
- Individual—State his nationality _____

6. If the foreign principal is a foreign government, state:

- a) Branch or agency represented by the registrant. Department of Foreign Trade
Ministry of Commerce, Government of Thailand
- b) Name and title of official with whom registrant deals. Mrs. Oranuj Osatananda
Director - General

7. If the foreign principal is a foreign political party, state:

- a) Principal address
- b) Name and title of official with whom the registrant deals. N/A
- c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

- a) State the nature of the business or activity of this foreign principal N/A

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b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No
- Directed by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No
- Controlled by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No
- Financed by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No
- Subsidized in part by a foreign government, foreign political party, or other foreign principal ^{N/A} Yes No

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

N/A

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

Crowell & Moring International, L.P.
By: **Crowell & Moring International, Inc.**
as General Partner by:

Date of Exhibit A <i>Jan 12, 1985</i>	Name and Title Doral S. Cooper President of Crowell & Moring International Inc.	Signature <i>Doral S. Cooper</i>
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INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Crowell & Moring International L.P.	Government of Thailand

Check Appropriate Boxes:

- The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Registrant assists the Government of Thailand in responding to the countervailing duty investigation on malleable cast iron pipe fittings currently being conducted by the U. S. Department of Commerce.

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REGISTRATION STATEMENT

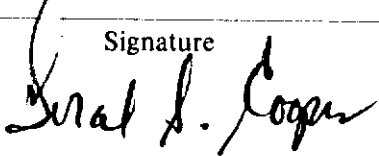
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Registrant performs research and analysis, preparation of drafting submissions to the Department of Commerce, assists the foreign principal in providing the appropriate data to the Department of Commerce, and other related services.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Registrant participates in preparing submissions to the Department of Commerce, and engages in related work involving the Department of Commerce in connection with the countervailing duty investigation referred to in Question 5.

Date of Exhibit B	Name and Title	Signature
1/12/89	Doral S. Cooper President	

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Attachment A

Board of Foreign Trade, Government of the Republic of China

Industrial Research & Development Corporation

Korea Foreign Trade Association

Singapore Trade Development Board

United Nations Conference on Trade and Development (UNCTAD)

Wacker Siltronic Corporation

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C&M INTERNATIONAL LTD.
1001 Pennsylvania Avenue, N.W.
Suite 1275
Washington, D.C., 20004-2505
(202) 624-2895

CROWELL & MORING
1001 Pennsylvania Avenue, N.W.
Suite 1100
Washington, D.C. 20004-2505
(202) 624-2500

October 3, 1988

Mrs. Oranut Osatananda
Director
Foreign Trade Policy Division
Department of Foreign Trade
Ministry of Commerce
Bangkok, Thailand

Dear Mrs. Oranut:

This letter will memorialize the agreement concerning the representation of the Government of Thailand by C&M International Ltd. and Crowell & Moring before the U.S. Government with respect to the countervailing duty investigation on malleable cast iron pipe fittings. This case was filed on August 30, 1988.

In connection with this representation, C&M International Ltd. and Crowell & Moring will provide the services detailed in the attached description of services and such other services as may be necessary or appropriate in defending your interests in this case. C&M International Ltd. is not engaged in the practice of law and will not provide legal advice or services. In our earlier conversations, we discussed this with you. At that time, you stated your intention to retain the services of the Crowell & Moring law firm to provide legal advice and representation with respect to this matter. In connection with the representation of the Government of Thailand before the U.S. Government in the above-referenced matter, Crowell & Moring will provide you such legal advice and services as are appropriate.

C&M International Ltd. will charge you its standard hourly rates for the time that its staff spends on this matter. The current rates for the individuals likely to work on this assignment range from \$110 to \$225 per hour. Crowell & Moring also will charge you its standard hourly rates for attorneys for the time that its attorneys and other staff spend on this matter and will bill you for its expenses. Current hourly rates range from \$90 for junior associates to \$280 for senior partners. C&M International Ltd. and Crowell & Moring will each also bill

Mrs. Oranut Osatananda
October 3, 1988
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C&M INTERNATIONAL LTD.
CROWELL & MORING

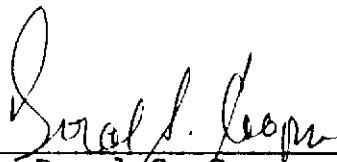
you for their respective expenses, including postage, long distance telephone, administrative overtime, photocopies, word processing, travel, messenger services, computerized research, and meals.

We look forward to a good working relationship and a successful outcome to this matter. If you agree with the terms of this letter, please sign two copies below and return them to C&M International Ltd.

Very truly yours,

C&M INTERNATIONAL LTD.

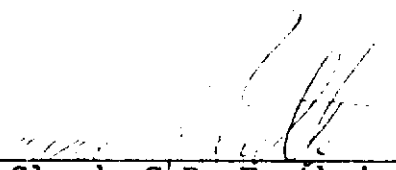
By



Doral S. Cooper
President

CROWELL & MORING

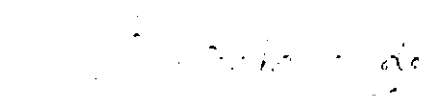
By



Claude G.B. Fontheim
Of Counsel

Attachment

Agreed:



Mrs. Oranut Osatananda

Description of Services

This letter describes services that C&M International, Ltd. and Crowell & Moring will render to the Government of Thailand in connection with the countervailing duty investigation regarding malleable cast iron pipe fittings. In this countervailing duty investigation, these services include:

- (1) Preparation of detailed instructions to each Thai Government agency and each company involved in the investigation (which does not have separate legal counsel) on developing information for the response to the Department of Commerce ("DOC");
- (2) Meetings in Thailand with each agency and each company involved in the investigation (which does not have separate legal counsel) to review the information to be included in the response;
- (3) Preparation of a thorough response detailing with both legal and factual issues;
- (4) Coordination throughout the investigation with the separate legal counsel engaged by Thai companies to ensure consistency of information supplied to the DOC;
- (5) Development of a verification strategy and preparation of all documents necessary for verification;
- (6) Attendance at, and control of, the verification process;
- (7) Consideration of the policy implications and policy options during the course of the investigation; and
- (8) Full briefing of the legal issues and ensuring that a full record has been maintained if an appeal is required.

An estimate of the fees that will be incurred for the performance of these services depends on the number and complexity of the government programs that are used by one or more of the exporters; the number and complexity of the changes in the government programs that have occurred since the last countervailing duty response was filed; and the number of firms that exported to the United States during the review period.

The petition states that there are five Thai producers and exporters of malleable cast iron pipe fittings subject to the investigation; Siam Fittings Co., Ltd., BIS Pipe Fittings Industry Co., Ltd., Thai Malleable Iron & Steel Co., Ltd., Thai Champion Value Co., Ltd., and Thai Cast Industrial Ltd. If all five of these companies in fact exported during the period of review, and interacted with the Thai Government, this case will be more complex.

We do not know at this point which programs were used by the producers and exporters of the subject merchandise. If a company enjoys Board of Investment benefits, there may be some complex issues raised in this case.

The period of review is likely to be calendar year 1987 and the first six months of 1988. As you know, you recently filed a response in the antifriction bearings case that provides detailed information on the operation of the programs alleged to be subsidies during 1987. This should simplify the questionnaire response process in this case somewhat. It may be possible to use certain parts of the prior response (such as the general financial data required by DOC) again. Certain modifications are necessary of course to tailor the response to pipe fittings and to update it through the first six months of 1988. We will re-use the data that we can, which should reduce the cost of the investigation.

Generally, in order to obtain the best possible results in countervailing duty investigations, it is necessary to work very closely with the foreign government and manufacturers from the earliest stage of this investigation. Accordingly, once the DOC issues the questionnaire to the Government of Thailand, we would work very closely with the Government and the manufacturers (and their separate counsels) to prepare the formal questionnaire response. Since the questionnaire response will provide the basis for the DOC's preliminary determination, it is very important that the response should be as complete as possible, while also presenting the required information in the most favorable manner. Although the programs addressed in the petition are similar to those addressed in prior cases, based on the experience at the preliminary stage in the most recent case, it will be preferable to meet with Government and perhaps company officials (along with their separate counsel, if they so desire) in Thailand to complete the preparation of the response.

After assisting in the presentation of the formal questionnaire response to the DOC, briefs would be prepared on your behalf which would contain legal and factual arguments explaining how the information should be used to arrive at the best possible preliminary determination. After issuance of the preliminary determination pre-hearing and post-hearing briefs would be submitted commenting on the methodology used by the DOC in the preliminary determination. Of course, we would also participate in the DOC's public hearing, as well as in informal meetings with DOC staff, as necessary.

Subsequent to the preliminary determination, the DOC will conduct a verification of the information obtained in the questionnaire response. We would advise the government officials prior to the DOC verification, and be present during the DOC's verification at the Government offices and at the individual company offices which do not have separate counsel. We would also examine the DOC's verification report on their meetings with Thai

Government officials to ensure that the reports are accurate and include all facts favorable to you.

We would analyze both the preliminary and final determinations to examine whether the DOC made any errors. We would prepare follow-up submissions to the DOC noting any such mistakes. We will also provide any other services which we agree may be necessary or appropriate in defending your interests in this case.

As we discussed earlier with you, C&M International Ltd. is not engaged in the practice of law and will not provide legal advice or services. Crowell & Moring will provide legal advice and representation with respect to this matter.

We do not expect that the overall fees would exceed \$85,000; if total fees approach this amount, we would notify you. Of course, it is possible that the total fees will be less than this amount. This estimate takes into consideration that the International Trade Commission is not involved in this investigation, that there are no new Thai subsidy programs alleged in the petition, and that there are no upstream subsidy allegations. Should these facts change substantially, it is possible that the overall fees might be higher.