

U.S. PRODUCERS' QUESTIONNAIRE

SEAMLESS REFINED COPPER PIPE AND TUBE FROM CHINA AND MEXICO

This questionnaire must be received by the Commission by no later than October 14, 2009

See page 4 of the Instruction Booklet for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigations concerning seamless refined copper pipe and tube from China and Mexico (Inv. Nos. 731-TA-1174-1175 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
World Wide Web address _____
Has your firm produced seamless refined copper pipe and tube (as defined in the instruction booklet) at any time since January 1, 2006?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Read the instruction booklet carefully, complete all parts of the questionnaire, and return the entire questionnaire to the Commission so as to be received by the date indicated above)

CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission.

By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout these investigations in any other import-injury investigations conducted by the Commission on the same or similar merchandise.

I acknowledge that information submitted in this questionnaire response and throughout these investigations may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the records of these investigations or related proceedings for which this information is submitted, or in internal audits and investigations relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3. I understand that all contract personnel will sign non-disclosure agreements.

_____ <i>Name of Authorized Official</i>	_____ <i>Title of Authorized Official</i>	_____ <i>Date</i>
_____ <i>Signature</i>	_____ <i>Phone: ()</i>	_____ <i>E-mail address</i>
	_____ <i>Fax ()</i>	

PART I.—GENERAL INFORMATION

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the questionnaire. Send comments regarding the accuracy of this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW, Washington, DC 20436.

I-1a. Please report below the actual number of hours required and the cost to your firm of preparing the reply to this questionnaire and completing the form.

_____hours _____dollars

I-1b. We are interested in any comments you may have for improving this questionnaire in general or the clarity of specific questions. Please attach such comments to your response or send them to the above address.

I-2. Provide the name and address of establishment(s) covered by this questionnaire (see page 3 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol.

I-3. Do you support or oppose the petition?

Support Oppose Take no position

PART I.--GENERAL INFORMATION--Continued

I-4. Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Extent of ownership</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-5. Does your firm have any related firms, either domestic or foreign, which are engaged in importing seamless refined copper pipe and tube from China or Mexico into the United States or which are engaged in exporting seamless refined copper pipe and tube from China or Mexico to the United States?

No Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-6. Does your firm have any related firms, either domestic or foreign, which are engaged in the production of seamless refined copper pipe and tube?

No Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Elizabeth Haines (202-205-3200, Elizabeth.haines@usitc.gov). **Supply all data requested on a calendar-year basis.**

II-1. Who should be contacted regarding the requested trade and related information?

Company contact: _____
Name and title

() _____
Phone number E-mail address

II-2. Has your firm experienced any plant openings, relocations, expansions, acquisitions, consolidations, closures, or prolonged shutdowns because of strikes or equipment failure; curtailment of production because of shortages of materials; or any other change in the character of your operations or organization relating to the production of seamless refined copper pipe and tube since January 1, 2006?

No Yes--Supply details as to the time, nature, and significance of such changes.

II-3. Does your firm produce other products on the same equipment and machinery used in the production of seamless refined copper pipe and tube?

No Yes--List the following information.

Basis for allocation of capacity data (e.g., sales): _____

Products produced on same equipment and share of total production in 2008 (in percent):

<u>Product</u>	<u>Percent</u>
<u>Seamless refined copper pipe and tube</u>	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

PART II.--TRADE AND RELATED INFORMATION--Continued

II-4. Please describe the constraint(s) that set the limit(s) on your production capacity and your ability to shift production capacity between products.

II-5. Does your firm produce other products using the same production and related workers employed to produce seamless refined copper pipe and tube?

No Yes--List the following information.

Basis for allocation of capacity data (e.g., sales): _____

Products produced using the same workers and share of total production in 2008 (in percent):

<u>Product</u>	<u>Percent</u>
<u>Seamless refined copper pipe and tube</u>	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

II-6. Since January 1, 2006, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of seamless refined copper pipe and tube?

No Yes--Name firm(s): _____.

II-7. Does your firm produce seamless refined copper pipe and tube in a foreign trade zone (FTZ)?

No Yes--Identify FTZ(s): _____.

II-8. Since January 1, 2006, has your firm imported seamless refined copper pipe and tube?

No Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

PART II.--TRADE AND RELATED INFORMATION--Continued

II-9. Report your firm's production capacity, production, shipments, inventories, and employment related to the production of seamless refined copper pipe and tube in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar years			January-June	
	2006	2007	2008	2008	2009
Average production capacity¹ (quantity)					
Beginning-of-period inventories (quantity)					
Production (quantity)					
U.S. shipments:					
Commercial shipments:					
Quantity of commercial shipments					
Value of commercial shipments					
Internal consumption:					
Quantity of internal consumption					
Value ² of internal consumption					
Transfers to related firms:					
Quantity of transfers					
Value ² of transfers					
Export shipments:³					
Quantity of export shipments					
Value of export shipments					
End-of-period inventories⁴ (quantity)					
Channels of distribution:					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
Employment data:					
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (value)					
¹ The production capacity (see definitions in instruction booklet) reported is based on operating ___ hours per week, ___ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary). <hr/>					
² Internal consumption and transfers to related firms must be valued at fair market value. In the event that you use a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: <hr/>					
³ Identify your principal export markets: _____ 					
⁴ Reconciliation of data.--Please note that the quantities reported above should reconcile as follows: beginning-of-period inventories, plus production, less total shipments, equals end-of-period inventories. Do the data reported reconcile? 					
<input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____					

PART II.--TRADE AND RELATED INFORMATION--Continued

II-10. If you reported transfers to related firms in question II-9, please indicate the nature of the relationship between your firm and the related firms (*e.g.*, joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-11. Other than direct imports, has your firm otherwise purchased seamless refined copper pipe and tube since January 1, 2006? (See definitions in the instruction booklet.)

No Yes--Report such purchases below for the specified periods.¹

(Quantity in 1,000 pounds, value in \$1,000)					
Item	Calendar years			January-June	
	2006	2007	2008	2008	2009
PURCHASES FROM U.S. IMPORTERS² OF SEAMLESS REFINED COPPER PIPE AND TUBE FROM--					
China:					
<i>Quantity</i>					
<i>Value</i>					
Mexico:					
<i>Quantity</i>					
<i>Value</i>					
All other countries:					
<i>Quantity</i>					
<i>Value</i>					
PURCHASES FROM DOMESTIC PRODUCERS:²					
<i>Quantity</i>					
<i>Value</i>					
PURCHASES FROM OTHER SOURCES:²					
<i>Quantity</i>					
<i>Value</i>					
¹ Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate.					
² Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier.					

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Mary Klir (202-205-3247, mary.klir@usitc.gov).

III-1. Who should be contacted regarding the requested financial information?

Company contact: _____
Name and title

() _____
Phone number E-mail address

III-2. Briefly describe your financial accounting system.

- A. When does your fiscal year end (month and day)? _____
If your fiscal year changed during the period examined, explain below:

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include subject merchandise:

- 2. Does your firm prepare profit/loss statements for the subject merchandise:
 Yes No
- 3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 Audited, unaudited, annual reports, 10Ks, 10Qs,
 Monthly, quarterly, semi-annually, annually
- 4. Accounting basis: GAAP, cash, tax, or other comprehensive (specify) _____

Note: The Commission may request that your company submit copies of its financial statements, including internal profit-and-loss statements for the division or product group that includes seamless refined copper pipe and tube, as well as those statements and worksheets used to compile data for your firm's questionnaire response.

III-3. Briefly describe your cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. Briefly describe your allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

PART III.--FINANCIAL INFORMATION--Continued

III-5. Other products.--Please list any other products you produced in the facilities in which you produced seamless refined copper pipe and tube, and provide the share of net sales accounted for by these other products in your most recent fiscal year:

<u>Products</u>	<u>Share of sales</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III-6. Does your firm receive inputs (raw materials, labor, energy, or any other services) used in the production of seamless refined copper pipe and tube from any related firm?

Yes—Continue to question III-7 below. No--Continue to question III-10 below.

III-7. In the space provided below, identify the inputs related to the production of seamless refined copper pipe and tube that your firm receives from related parties.

<u>Input</u>	<u>Related party</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III-8. With respect to the related companies identified in response to question III-7 above, are their financial statements consolidated with your firm's financial statements? (In other words, are profits or losses arising from intercompany transactions eliminated?)

Yes—Continue to question III-9 below. No--Continue to question III-10 below.

PART III.--FINANCIAL INFORMATION--Continued

III-9. All intercompany profit on inputs purchased from related parties that is eliminated pursuant to formal financial statement consolidation should also be eliminated from the costs reported to the Commission in question III-11 (i.e., costs reported in question III-11, to the extent that they reflect inputs purchased from related parties, should only reflect the related party's cost and not include an associated profit component). Reasonable methods for determining and eliminating the associated profit on inputs purchased from related parties are acceptable.

Has your firm complied with the Commission's instructions regarding costs associated with inputs purchased from related parties?

Yes No

III-10. Nonrecurring charges.--For each annual and interim period for which financial results are reported in question III-11, please indicate in the schedule below the specific nonrecurring charges, the particular expense/cost line items from question III-11 where the associated charges are included, a brief description of the charges, and the associated values (*in \$1,000*). Nonrecurring charges would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's seamless refined copper pipe and tube operations.

Item	Fiscal years ended--			January-June	
	_____	_____	_____	2008	2009
Non-recurring charges: (In this column please provide a brief description of each nonrecurring charge and indicate the particular expense/cost line items where the associated charges are included in question III-11.)					
1.					
2.					
3.					
4.					
5.					
6.					
7.					

PART III.--FINANCIAL INFORMATION--Continued

III-11. Operations on seamless refined copper pipe and tube.--Report the revenue and related cost information requested below on the seamless refined copper pipe and tube operations of your U.S. establishment(s).¹ **Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value and purchases from related firms must be at cost.**² Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Mary Klir at (202) 205-3247 before completing this section of the questionnaire.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2008	2009
Net sales quantities: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
Net sales values: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
Cost of goods sold (COGS): ⁴					
Raw materials					
Direct labor					
Other factory costs					
Total COGS					
Gross profit or (loss)					
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses					
Operating income (loss)					
Other income and expenses:					
Interest expense					
All other expense items					
All other income items					
All other income or expenses, net					
Net income or (loss) before income taxes					
Depreciation/amortization included above					
<p>¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.</p> <p>² Please list the expense categories and amounts of any profits on internal inputs or inputs from related firms that are reflected on your books but which are eliminated from the costs reported below.</p> <p>³ Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.</p> <p>⁴ COGS should include costs associated with internal consumption and transfers to related firms.</p>					

PART III.--FINANCIAL INFORMATION--Continued

III-12. Asset values.--Report the total assets (*in \$1,000*) associated with the production, warehousing, and sale of seamless refined copper pipe and tube. If your firm does not maintain some or all of the specific asset data in the normal course of business, please estimate it based upon some rational method (such as production, sales, or costs) that is consistent with your cost allocations in the previous question. Your finished goods inventory value should reconcile with the inventory quantity data reported in Part II. Provide data as of the end of your three most recently completed fiscal years in chronological order from left to right.

Item	Fiscal years ended--		
	_____	_____	_____
Assets associated with the production, warehousing, and sale of product:			
1. Current assets:			
A. Cash and equivalents			
B. Accounts receivable, net			
C. Inventories (finished goods)			
D. Inventories (raw materials and work in process)			
E. Other (describe: _____)			
F. Total current assets (lines 1.A. through 1.E.)			
2. Property, plant, and equipment			
A. Original cost of property, plant, and equipment			
B. Less: Accumulated depreciation			
C. Equals: Book value of property, plant, and equipment			
3. Other (describe: _____)			
4. Total assets (lines 1.F., 2.C., and 3)			

III-13. Capital expenditures and research and development expenditures.--Report your firm's capital expenditures and research and development expenditures on seamless refined copper pipe and tube. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

Item	Value (<i>in \$1,000</i>)				
	Fiscal years ended--			January-June	
	_____	_____	_____	2008	2009
Capital expenditures					
Research and development expenditures					

PART III.--FINANCIAL INFORMATION--Continued

III-14. Since January 1, 2006, has your firm experienced any actual negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of seamless refined copper pipe and tube from China or Mexico?

- No Yes--My firm has experienced actual negative effects as follows:
- Cancellation, postponement, or rejection of expansion projects
 - Denial or rejection of investment proposal
 - Reduction in the size of capital investments
 - Rejection of bank loans
 - Lowering of credit rating
 - Problem related to the issue of stocks or bonds
 - Other (specify) _____

III-15. Does your firm anticipate any negative impact of imports of seamless refined copper pipe and tube from China or Mexico?

PART IV.--PRICING AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Jim Fetzer (202-708-5403, james.fetzer@usitc.gov)

IV-1. **Contact information (Price)**--Who should be contacted regarding the requested pricing and related information?

Company contact:

()

PRICE DATA

This section requests quarterly quantity and value data, f.o.b. your U.S. point of shipment, for your commercial shipments to unrelated U.S. customers during January 2006–June 2009 of the following products produced by your firm.

Product 1-- Seamless refined copper pipe and tube, 1/2" Type L, hard temper, 20' lengths

Product 2-- Seamless refined copper pipe and tube, 3/8" OD, ACR/RST coil, 50'-100' lengths

Product 3-- Seamless refined copper pipe and tube, 3/8" OD, inner-grooved LWC, 0.0115" – 0.0180" bottom wall thickness

Product 4-- Seamless refined copper pipe and tube, 3/8" OD, smooth bore LWC, 0.0115" - 0.0180" wall thickness

Please note that total dollar values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Total dollar values should reflect the *final net* amount paid to you (i.e., should be net of all deductions for discounts or rebates). See instruction booklet.

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-2. **Pricing data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

(Quantity in pounds, value in dollars)				
Period of shipment	Product 1		Product 2	
	Quantity	Value	Quantity	Value
2006:				
January-March				
April-June				
July-September				
October-December				
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.
² Pricing product definitions are provided on the first page of Part IV.

Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:

Product 1: _____

Product 2: _____

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-2. **Pricing data.**—Continued

(Quantity in pounds, value in dollars)				
Period of shipment	Product 3		Product 4	
	Quantity	Value	Quantity	Value
2006:				
January-March				
April-June				
July-September				
October-December				
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				
<p>¹ Net values (<i>i.e.</i>, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.</p> <p>² Pricing product definitions are provided on the first page of Part IV.</p> <p>Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:</p> <p>Product 3: _____</p> <p>Product 4: _____</p>				

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-3. **Price setting.**-- How does your firm determine the prices that it charges for sales of seamless refined copper pipe and tube (*check all that apply*)? If your firm issues price lists, please include a copy of a recent price list with your submission. If your price list is large, please only submit some sample pages.

- Transaction by transaction Contracts Set price lists
- Internet sales
- Other--Please describe: _____
- _____
- _____

IV-4. **Discount policy.**-- Please indicate and describe your firm's discount policies (*check all that apply*).

- Quantity discounts Annual total volume discounts No discount policy
- Other--Please describe: _____
- _____
- _____

IV-5. **Pricing terms for seamless refined copper pipe and tube.**--

- (a) What are your firm's typical sales terms for its U.S.-produced seamless refined copper pipe and tube (*e.g.*, 2/10 net 30 days)? _____.
- (b) On what basis are your prices of domestic seamless refined copper pipe and tube usually quoted? (check one)
- F.o.b.--Please specify point: _____ Delivered

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced seamless refined copper pipe and tube in 2008 were on a (1) long-term contract basis (multiple deliveries for more than 12 months), (2) short-term contract basis (multiple deliveries up to and including 12 months), and (3) spot sales basis (for a single delivery)?

<u>Type of sale</u>	<u>Share of sales (percent)</u>
Long-term contracts	_____
Short-term contracts	_____
Spot sales	_____

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-7. **Long-term contract provisions.**--If you sell on a long-term contract basis, please answer the following questions with respect to provisions of a typical long-term contract.

- (a) What is the average duration of a contract? _____
- (b) Can prices be renegotiated during the contract period? Yes No
- (c) Does the contract fix quantity, price, or both? Quantity Price Both
- (d) Does the contract have a meet-or-release provision? Yes No

IV-8. **Short-term contract provisions.**--If you sell on a short-term contract basis, please answer the following questions with respect to provisions of a typical short-term contract.

- (a) What is the average duration of a contract? _____
- (b) Can prices be renegotiated during the contract period? Yes No
- (c) Does the contract fix quantity, price, or both? Quantity Price Both
- (d) Does the contract have a meet-or-release provision? Yes No

IV-9. **Lead times.**--What is your share of sales both from inventory and produced to order and what is the average lead time between a customer's order and the date of delivery for your firm's sales of your U.S.-produced seamless refined copper pipe and tube?

<u>Source</u>	<u>Share of sales in 2008</u>	<u>Lead time</u>
From inventory	_____	_____
Produced to order	_____	_____
Total	100 %	

IV-10. **Shipping information.**--

- (a) What is the approximate percentage of the total delivered cost of seamless refined copper pipe and tube that is accounted for by U.S. inland transportation costs? _____ percent.
- (b) Who generally arranges the transportation to your customers' locations? (check one)
 Your firm or purchaser
- (c) What proportion of your sales are delivered within 100 miles of your production facility? _____ percent. Within 101 to 1,000 miles? _____ percent. Over 1,000 miles? _____ percent.

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-11. **Geographical shipments.**-- What is the geographic market area in the United States served by your firm's PC strand? (check all that apply)

Geographic area	√ if applicable
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	
Midwest. —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	
Southeast. —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	
Central Southwest. —AR, LA, OK, and TX.	
Mountains. —AZ, CO, ID, MT, NV, NM, UT, and WY.	
Pacific Coast. —CA, OR, and WA.	
Other. —All other markets in the United States not previously listed, including AK, HI, PR, VI, among others.	

IV-12. **End uses.**--Describe the end uses of the seamless refined copper pipe and tube that you manufacture. For each end-use product, what percentage of the total cost is accounted for by seamless refined copper pipe and tube?

<u>End use</u>	<u>Share of total cost (percent)</u>
_____	_____
_____	_____
_____	_____
_____	_____

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-13. **Substitutes.**--Please list in order of importance any products that may be substituted for seamless refined copper pipe and tube. For each possible substitute product, please describe the degree of substitutability and indicate whether changes in the price of the substitute affect the price for seamless refined copper pipe and tube, and to what degree, the length of any time lag of such an effect.

Substitute	Application	Have changes in the prices of this substitute affected the price for seamless refined copper pipe and tube?
1.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
2.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
3.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
4.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
5.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>

IV-14. **Demand trends.**--

(a) How has the demand within the United States for seamless refined copper pipe and tube changed since January 1, 2006? What principal factors affect changes in demand?

- Increased
 No Change
 Decreased
 Fluctuated

PART IV.--PRICING AND RELATED INFORMATION--Continued

(b) How has the demand outside the United States (if known) for seamless refined copper pipe and tube changed since January 1, 2006? What principal factors affect changes in demand?

- Increased No Change Decreased Fluctuated

IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of seamless refined copper pipe and tube since 2006?

- No Yes--Please describe and quantify if possible.

IV-16. **Business cycles.**--

(a) Is seamless refined copper pipe and tube market subject to business cycles or conditions of competition (including seasonal business) distinctive to seamless refined copper pipe and tube?

- No (skip to question IV-16.) Yes-- Please describe below and then answer part (b).

(b) If yes, have there been any changes in the business cycles or conditions of competition for seamless refined copper pipe and tube since January 1, 2006?

- No Yes-- Please describe.

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply seamless refined copper pipe and tube since January 1, 2006 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, etc.)?

No Yes-- Please describe.

IV-18. **Raw materials.**--Please describe any trends in the prices of raw materials used to produce seamless refined copper pipe and tube and whether your firm expects these trends to continue.

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-19. **Interchangeability.**--Is seamless refined copper pipe and tube produced in the United States and in other countries interchangeable (*i.e.*, can they physically be used in the same applications)? Please indicate below, using “A” to indicate that the products from a specified country-pair are *always* interchangeable, “F” to indicate that the products are *frequently* interchangeable, “S” to indicate that the products are *sometimes* interchangeable, “N” to indicate that the products are *never* interchangeable, and “0” to indicate *no familiarity* with products from a specified country-pair.¹

Country-pair	China	Mexico	Canada	Malaysia	Other countries
United States					
China					
Mexico					
Canada					
Malaysia					

¹ For any country-pair producing seamless refined copper pipe and tube which is *sometimes* or *never* interchangeable, please explain the factors that limit or preclude interchangeable use:

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-20. **Factors other than price.**--Are differences other than price (*i.e.*, quality, availability, transportation network, product range, technical support, *etc.*) between seamless refined copper pipe and tube produced in the United States and in other countries a significant factor in your firm's sales of the products? Please indicate below, using "A" to indicate that such differences are *always* significant, "F" to indicate that such differences are *frequently* significant, "S" to indicate that such differences are *sometimes* significant, "N" to indicate that such differences are *never* significant, and "0" to indicate *no familiarity* with products from a specified country-pair.¹

Country-pair	China	Mexico	Canada	Malaysia	Other countries
United States					
China					
Mexico					
Canada					
Malaysia					

¹ For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of seamless refined copper pipe and tube, identify the country-pair and report the advantages or disadvantages imparted by such factors:

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-19. **Customer Identification**--Please identify below the names and addresses of your firm's 10 largest customers for seamless refined copper pipe and tube during 2006-2008. Please also provide the name and telephone number of a contact person and the share of the quantity of your firm's total shipments of seamless refined copper pipe and tube that each of these customers accounted for in 2008.

No.	Customer's name	Street address (not P.O. box), city, state, and zip code	Contact person	Area code and telephone number	Share of 2008 sales (%)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

PART IV.--PRICING AND RELATED INFORMATION--Continued

IV-21. **COMPETITION FROM IMPORTS--LOST SALES.** --THIS SECTION IS TO BE COMPLETED ONLY BY NON-PETITIONERS. (Note: petitioners may provide allegations involving quotes made AFTER the filing of the petition.)

Since January 1, 2006: Did your firm lose sales of seamless refined copper pipe and tube to imports of these products from China and Mexico?

No Yes

If yes, please furnish as much of the following information as possible for each affected transaction. Document such allegations of lost sales whenever possible (documentation could include copies of invoices, sales reports, or letters from customers). Please note that the Commission may contact the firms named to verify the allegations reported.

- Customer name, contact person, phone and fax numbers
- Specific product(s) involved
- Date of your price quotation
- Quantity involved
- Your rejected price quotation (total delivered value)
- The country of origin of the competing imported product
- The accepted price quotation of the imported product (total delivered value)

Customer name, contact person, phone and fax numbers	Product	Date of quote	Quantity (pounds)	Rejected U.S. price (total value-- dollars)	Country of origin	Competing import price (total value— dollars)