

U.S. IMPORTERS' QUESTIONNAIRE

**PURIFIED CARBOXYMETHYLCELLULOSE FROM FINLAND,
MEXICO, NETHERLANDS, AND SWEDEN**

This questionnaire must be received by the Commission by no later than December 3, 2010

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 review of the antidumping duty orders concerning purified carboxymethylcellulose ("purified CMC") from Finland, Mexico, Netherlands, and Sweden (invs. Nos. 731-TA-1084-1087 (Review)). 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)).**

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>World Wide Web address _____</p> <p>Has your firm imported purified CMC (as defined in the instruction booklet) <i>from any country</i> at any time since January 1, 2005?</p> <p><input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><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)</p>

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 reviews in any other import-injury investigations or reviews conducted by the Commission on the same or similar merchandise.

I acknowledge that information submitted in this questionnaire response and throughout these reviews 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 reviews 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.

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

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 40 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. **OMB statistics.**--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. **OMB feedback.**--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. **Establishments covered.**--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. **Ownership.**--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>
_____	_____	_____
_____	_____	_____
_____	_____	_____

PART I.--GENERAL INFORMATION--Continued

I-4. **Related SUBJECT importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing purified CMC from Finland, Mexico, Netherlands, or Sweden into the United States or which are engaged in exporting purified CMC from Finland, Mexico, Netherlands, or Sweden to the United States?

No Yes--List the following information.

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

I-5. **Related NONSUBJECT importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing purified CMC from countries other than Finland, Mexico, Netherlands, or Sweden into the United States or which are engaged in exporting purified CMC from countries other than Finland, Mexico, Netherlands, or Sweden to the United States?

No Yes--List the following information.

<u>Firm name and country</u>	<u>Address</u>	<u>Affiliation</u>

I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which are engaged in the production of purified CMC?

No Yes--List the following information.

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

I-7. **Nature of import operations.**--Please indicate the nature of your firm's importing operations on purified CMC. More than one answer may be applicable.

- | | |
|--|---|
| <input type="checkbox"/> Importer of record | <input type="checkbox"/> Takes title to the imported product(s) |
| <input type="checkbox"/> Consignee of the imported products(s) | <input type="checkbox"/> Customs broker or freight forwarder |

PART I.--GENERAL INFORMATION--Continued

I-8. **Consignees.**--If your firm is an importer of record of purified CMC but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

<u>Firm name</u>	<u>Address</u>	<u>Contact person and phone number</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-9. **FTZs or bonded warehouse.**--Please indicate whether your firm enters purified CMC into, or withdraws such merchandise from, foreign trade zones or bonded warehouses.

- Foreign trade zones No Yes
- Bonded warehouses No Yes

I-10. **TIB.**--Please indicate whether your firm imports purified CMC under the TIB (temporary importation under bond) program.

- No Yes

I-11. **Business plan.**--In Parts II and III of this questionnaire we request a copy of your company's business plan. Does your company or any related firm have a business plan or any internal documents that describe, discuss, or analyze expected market conditions for purified CMC?

- No Yes--Please provide the requested documents. If you are not providing the requested documents, please explain why not.

I-12. **Other investigations.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief investigations in the United States or in any other countries?

- No Yes--Please specify.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Cynthia Trainor (202-205-3354, cynthia.trainor@usitc.gov)**. **Supply all data requested on a calendar-year basis.**

II-1. Please identify the individual to be contacted regarding the confidential information requested in part II?

Name and title: _____

Please indicate the manner by which Commission staff may contact the individual responsible for part II with questions regarding the submitted confidential information.

E-mail: _____ Telephone: (____) _____

Fax: (____) _____

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of purified CMC since January 1, 2005.

(check as many as appropriate) (please describe)

office/warehouse openings..... _____

office/warehouse closings _____

relocations

expansions

acquisitions.....

consolidations.....

prolonged shutdowns or importation curtailments

revised labor agreements

other.....

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

II-3. **Anticipated changes in operations.**--Does your firm anticipate any changes in the character of your operations or organization (as noted above) relating to the importation of purified CMC in the future?

- No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

For question II-4, if your response differs for particular orders, please indicate and explain the particular effect of revocation of specific orders.

II-4. **Anticipated changes in operations in the event the order is revoked.**--Would your firm anticipate any changes in the character of your operations or organization (as noted above) relating to the importation of purified CMC in the future if the antidumping duty orders on purified CMC from Finland, Mexico, Netherlands, or Sweden were to be revoked?

- No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

II-5. **Arranged imports.**--Has your firm imported or arranged for the importation of purified CMC from Finland, Mexico, Netherlands, or Sweden for delivery after September 30, 2010?

- No Yes—Report the information below:

Source	Delivery date(s)	Quantity (<i>pounds</i>)
Finland		
Mexico		
Netherlands		
Sweden		
Total	XXXX	

II-6. **Reasons for importing if producer.**--If your firm also produces purified CMC in the United States, please indicate your reasons for importing this product. If your reasons differ by source, please elaborate.

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

II-7a1. **Imports from Finland.**--Does your firm import purified CMC from Finland?

- No. Yes-- Report your firm's imports and your firm's shipments and inventories of purified CMC imported from Finland by your firm during the specified periods. (See definitions in the instruction booklet.)

FINLAND

Quantity (in 1,000 pounds), value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Beginning-of-period inventories (quantity) (A)							
Imports:							
Quantity (B)							
Value (C)							
U.S. shipments:							
Commercial shipments:							
Quantity (D)							
Value (E)							
Internal consumption/company transfers:							
Quantity (F)							
Value ¹ (G)							
Export shipments: ²							
Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (K)							
U.S. shipments to end users (quantity) (L)							
¹ Sales to related firms (including internal consumption) must be valued at fair market value. In the event that you use a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above:							
² Identify your principal export markets: _____							

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

II-7a2. **Imports from Mexico.**--Does your firm import purified CMC from Mexico?

- No. Yes-- Report your firm's imports and your firm's shipments and inventories of purified CMC imported from Mexico by your firm during the specified periods. (See definitions in the instruction booklet.)

MEXICO

Quantity (in 1,000 pounds), value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Beginning-of-period inventories (quantity) (A)							
Imports:							
Quantity (B)							
Value (C)							
U.S. shipments:							
Commercial shipments:							
Quantity (D)							
Value (E)							
Internal consumption/company transfers:							
Quantity (F)							
Value ¹ (G)							
Export shipments: ²							
Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (K)							
U.S. shipments to end users (quantity) (L)							
¹ Sales to related firms (including internal consumption) must be valued at fair market value. In the event that you use a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above:							
² Identify your principal export markets: _____							

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

II-7a3. **Imports from Netherlands.**--Does your firm import purified CMC from Netherlands?

- No. Yes-- Report your firm's imports and your firm's shipments and inventories of purified CMC imported from Netherlands by your firm during the specified periods. (See definitions in the instruction booklet.)

NETHERLANDS

Quantity (in 1,000 pounds), value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Beginning-of-period inventories (quantity) (A)							
Imports:							
Quantity (B)							
Value (C)							
U.S. shipments:							
Commercial shipments:							
Quantity (D)							
Value (E)							
Internal consumption/company transfers:							
Quantity (F)							
Value ¹ (G)							
Export shipments: ²							
Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (K)							
U.S. shipments to end users (quantity) (L)							
¹ Sales to related firms (including internal consumption) must be valued at fair market value. In the event that you use a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above:							
² Identify your principal export markets: _____							

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

II-7a4. **Imports from Sweden.**--Does your firm import purified CMC from Sweden?

- No. Yes-- Report your firm's imports and your firm's shipments and inventories of purified CMC imported from Sweden by your firm during the specified periods. (See definitions in the instruction booklet.)

SWEDEN

Quantity (in 1,000 pounds), value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Beginning-of-period inventories (quantity) (A)							
Imports:							
Quantity (B)							
Value (C)							
U.S. shipments:							
Commercial shipments:							
Quantity (D)							
Value (E)							
Internal consumption/company transfers:							
Quantity (F)							
Value ¹ (G)							
Export shipments: ²							
Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (K)							
U.S. shipments to end users (quantity) (L)							
¹ Sales to related firms (including internal consumption) must be valued at fair market value. In the event that you use a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above:							
² Identify your principal export markets: _____							

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

II-7b. **Imports from ALL OTHER SOURCES.**--Does your firm import purified CMC from countries other than Finland, Mexico, Netherlands, or Sweden?

- No. Yes-- Report your firm's imports and your firm's shipments and inventories of purified CMC imported from countries other than Finland, Mexico, Netherlands, or Sweden by your firm during the specified periods. (See definitions in the instruction booklet.)

ALL OTHER SOURCES COMBINED

Quantity (in 1,000 pounds), value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Beginning-of-period inventories (quantity) (A)							
Imports:							
Quantity (B)							
Value (C)							
U.S. shipments:							
Commercial shipments:							
Quantity (D)							
Value (E)							
Internal consumption/company transfers:							
Quantity (F)							
Value ¹ (G)							
Export shipments:²							
Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (K)							
U.S. shipments to end users (quantity) (L)							
¹ Sales to related firms (including internal consumption) must be valued at fair market value. In the event that you use a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above:							
² Identify your principal export markets: _____							

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

II-8. Reconciliation of import data.--

- (a) Please note that the quantities reported in question II-7 should reconcile as follows in each period (*i.e.*, in each column):

Reconciliation

$$A + B - D - F - H = J$$

Do these data reconcile? Yes No--(Please explain: _____)

$$D + F = K + L$$

Do these data reconcile? Yes No--(Please explain: _____)

- (b) Please note that the quantities reported for end-of-period inventories should equal the beginning-of-period inventories reported in the subsequent calendar year (*i.e.*, line J of year 2005 should equal line A of year 2006). Do these data reconcile for each adjacent calendar year?

Yes. No--Please explain.

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

II-9. **U.S. shipments by enduse.**—Report your firm's U.S. shipments (commercial shipments and internal consumption of purified CMC imported to your U.S. establishment(s), by major end use). **Report separately for each country listed, photocopying as many pages as you need.**

Finland Mexico Netherlands Sweden

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>							
Item	Calendar years					January-September	
	2005	2006	2007	2008	2009	2009	2010
FOOD:¹							
<i>Quantity</i>							
<i>Value</i>							
PERSONAL CARE, COSMETICS & PHARMACEUTICALS:¹							
<i>Quantity</i>							
<i>Value</i>							
PAPER & BOARD:¹							
<i>Quantity</i>							
<i>Value</i>							
OIL FIELD:¹							
<i>Quantity</i>							
<i>Value</i>							
ALL OTHER:²							
<i>Quantity</i>							
<i>Value</i>							
TOTAL U.S. SHIPMENTS:³							
<i>Quantity</i>							
<i>Value</i>							
¹ Please indicate the ranges of key product characteristics for reported U.S. shipments during 2009 as follows: Purity (percent) Food _____ Personal care, cosmetics, . . . _____ & pharmaceuticals Oilfield _____ Other _____							
² Please describe: _____							
³ U.S. shipment data (commercial shipments + internal consumption + transfers) should reconcile with data reported in section II-7.							

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

For questions II-10 and II-11, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

II-10. **Effect of orders.**--Describe the significance of the existing antidumping duty orders covering imports of purified CMC from Finland, Mexico, Netherlands, or Sweden in terms of its effect on your firm's imports, U.S. shipments of imports, and inventories. You may wish to compare your firm's operations before and after the imposition of the order.

II-11. **Likely effect of revocation of orders.**--Would your firm anticipate any changes in its imports, U.S. shipments of imports, or inventories of purified CMC in the future if the antidumping duty orders on purified CMC from Finland, Mexico, Netherlands, or Sweden were to be revoked?

No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation for any trends or projections you may provide.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from **Clark Workman (202-205-3348, clark.workman@usitc.gov)**.

III-1. Please identify the individual to be contacted regarding the confidential information requested in part III.

Name and title: _____

Please indicate the manner by which Commission staff may contact the individual responsible for part III with questions regarding the submitted confidential information.

E-mail: _____ Telephone: () _____

Fax: () _____

PRICE DATA

If your firm imported purified CMC from any of the subject countries (Finland, Mexico, Netherlands, and Sweden) during January 2005-September 2010, (1) report the requested selling price data in section III-2 if your firm sold the imported purified CMC to end users in the U.S. market, or (2) report the requested import price data in section III-3 if your firm used internally its imported purified CMC to produce downstream products. If your firm did NOT import purified CMC from subject countries, skip to question III-5.

III-2. **Quarterly sales price data.--**

This section requests quarterly selling quantity and value data during January 2005-September 2010 for your firm's U.S. commercial shipments of the following purified CMC products that it imported from each of the subject countries and shipped to U.S. **end users** unrelated to your firm by ownership.

Product 1.—High viscosity (approximately 1,000 to 3,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7HF; CP Kelco–Cekol 30,000; Akzo–Akucel AF278; Amtex–PE 31FG.

Product 2.—Very high viscosity (approximately 2,500 to 9,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7H4F and 9H4F; CP Kelco–Cekol 50,000; Akzo–Akucell 280X and 298X; Amtex–F1-4000 and F1-6000 (both formerly included in PE 32 FG).

Product 3.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7MF; CP Kelco–Cekol 700; Akzo–Akucel AF150 and AF 170; Amtex–F2 750.

PART III.--PRICING AND MARKET FACTORS--Continued

III-2. Quarterly sales price data.--Continued

Product 4.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon–7MT; CP Kelco–Finnfix 700; Akzo–None; Amtex–P 2 750.

Product 5.—Low viscosity (approximately 20 to 1,000 Mpas in 4 percent solution, 5 to 100 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon (98 percent CMC minimum)–7L1, 7L2, and 7L; CP Kelco (98 percent CMC minimum)–Finnfix 5, Finnfix 10, and Finnfix 30; Akzo–None; Amtex (92 percent CMC minimum)–P2-10, P2-30, and P2-75.

Product 6.—High viscosity (minimum 1,500 Mpas in 1 percent solution), degree of substitution 0.8 to 1.5 (i.e., 8 to 15 carboxymethyl groups per 10 anhydroglucose units), to oilfield customers. This product is often sold to customers bearing the particular customer's trade name for its oil drilling product, such as Drispac, Milpac, and Polypac. Less frequently, the product bears a proprietary name of the manufacturer, such as Aqualon's Aquapac or Akzo's Staflo. In all cases, the specifications and not the label on the bag should be the controlling factor in reporting.

Please note that quarterly dollar selling values should be on a f.o.b. U.S. point(s)-of-shipment basis (including those shipped directly from your U.S. port(s)-of-entry and from your U.S. warehouse(s)) and should not include U.S.-inland transportation costs to your end-user customers. For any sales that were on a delivered basis from your firm's U.S. shipping points, deduct from the delivered price all such U.S.-inland freight to your end-user customers and report the resulting effective f.o.b. U.S. sales values (*do not report transactions where you cannot report values, either actual or adjusted, on a f.o.b. basis*). Report the U.S. f.o.b. sales value and quantity data NET of returns, discounts, allowances, and rebates; also deduct any U.S. freight costs to your customers' receiving points that were absorbed by your firm (i.e., not charged to your customers). *See instruction booklet.*

Note.—*Please report the requested selling price data separately for each subject country from which your firm imported the specified purified CMC products.*

PART III.--PRICING AND MARKET FACTORS--Continued

III-2. **Quarterly sales price data.**--Report below the quarterly sales price data¹ for the pricing products² imported from each of the subject countries and sold by your firm to end users. Answer separately for each applicable subject country and *copy this table as needed to complete your response.*

Finland Mexico Netherlands Sweden (Check one)

(Quantity in pounds, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

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(s) of shipment; the latter actual or adjusted.

² Pricing product definitions are provided on the first two pages of Part III.

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: _____

Product 3: _____

PART III.--PRICING AND MARKET FACTORS--Continued

III-2. Quarterly sales price data.--Continued

Finland Mexico Netherlands Sweden (Check one)

(Quantity in pounds, value in dollars)						
Period of shipment	Product 4		Product 5		Product 6	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

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(s) of shipment; the latter actual or adjusted.

² Pricing product definitions are provided on the first two pages of Part III.

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 4: _____

Product 5: _____

Product 6: _____

PART III.--PRICING AND MARKET FACTORS--Continued

III-3. **Quarterly import price data.**—

Report the price data requested in this section only if your firm is an end user of purified CMC that imported purified CMC from one or more of the subject countries for its internal use to produce downstream products.

This section requests quarterly import price and quantity data during January 2005-September 2010 for your firm's U.S. imports of the following purified CMC products from the subject countries from suppliers *unrelated by ownership to your firm.*

Product 1.—High viscosity (approximately 1,000 to 3,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon-7HF; CP Kelco-Cekol 30,000; Akzo-Akucel AF278; Amtex-PE 31FG.

Product 2.—Very high viscosity (approximately 2,500 to 9,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon-7H4F and 9H4F; CP Kelco-Cekol 50,000; Akzo-Akucel 280X and 298X; Amtex-F1-4000 and F1-6000 (both formerly included in PE 32 FG).

Product 3.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon-7MF; CP Kelco-Cekol 700; Akzo-Akucel AF150 and AF 170; Amtex-F2 750.

Product 4.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon-7MT; CP Kelco-Finnfix 700; Akzo-None; Amtex-P 2 750.

Product 5.—Low viscosity (approximately 20 to 1,000 Mpas in 4 percent solution, 5 to 100 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon (98 percent CMC minimum)-7L1, 7L2, and 7L; CP Kelco (98 percent CMC minimum)-Finnfix 5, Finnfix 10, and Finnfix 30; Akzo-None; Amtex (92 percent CMC minimum)-P2-10, P2-30, and P2-75.

Product 6.—High viscosity (minimum 1,500 Mpas in 1 percent solution), degree of substitution 0.8 to 1.5 (i.e., 8 to 15 carboxymethyl groups per 10 anhydroglucose units), to oilfield customers. This product is often sold to customers bearing the particular customer's trade name for its oil drilling product, such as Drispac, Milpac, and Polypac. Less frequently, the product bears a proprietary name of the manufacturer, such as Aqualon's Aquapac or Akzo's Staflo. In all cases, the specifications and not the label on the bag should be the controlling factor in reporting.

PART III.--PRICING AND MARKET FACTORS--Continued

III-3. Quarterly import price data.—Continued

The total dollar import values should be on a c.i.f., landed, duty-paid, U.S. port(s)-of-entry basis (including that shipped directly to your U.S. warehouse(s)) and should not include U.S.-inland transportation costs from the U.S. port(s)-of-entry to your U.S. warehouse(s). For your imports that were on a delivered basis to your U.S. warehouse(s), deduct from the delivered price all such U.S.-inland freight from the port(s) of entry and report the resulting effective c.i.f., landed, duty-paid U.S. port(s) of entry import value (*do not report transactions where you cannot report import values, either actual or adjusted, on a c.i.f., landed, duty-paid, U.S. port(s)-of-entry basis*). Total dollar c.i.f., landed, duty-paid values should reflect the *final net* amount paid by your firm (i.e., should be net of all deductions for discounts, rebates, etc.). See instruction booklet.

Note.—Please report the requested import price data separately for each subject country from which your firm imported the specified purified CMC products.

PART III.--PRICING AND MARKET FACTORS--Continued

III-3. **Quarterly import price data.**--Report below the quarterly import price data¹ for the pricing products² imported from each of the subject countries and used internally by your firm. Answer separately for each applicable subject country and *copy this table as needed to complete your response.*

Finland Mexico Netherlands Sweden (Check one)

(Quantity in pounds, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), c.i.f., landed, duty-paid U.S. port(s)-of-entry; the latter actual and/or adjusted.

² Pricing product definitions are provided on the first two pages of Part III and the first page of section III-3.

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:

Product 3:

PART III.--PRICING AND MARKET FACTORS--Continued

III-3. Quarterly import price data.--Continued

Finland Mexico Netherlands Sweden (Check one)

<i>(Quantity in pounds, value in dollars)</i>						
Period of shipment	Product 4		Product 5		Product 6	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) , c.i.f., landed, duty-paid U.S. port(s)-of-entry; the latter actual and/or adjusted.

² Pricing product definitions are provided on the first two pages of Part III and the first page of section III-3.

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 4: _____

Product 5: _____

Product 6: _____

PART III.--PRICING AND MARKET FACTORS--Continued

III-4. **Pricing products.--**

U.S. selling and import price comparability.— Is the U.S. producer's reported selling prices of the domestic purified CMC at a comparable level of the market as the reported import price data for the products from the subject countries reported by importing end users (i.e., is it appropriate to compare the selling prices of the domestic products with the import prices of the subject imported products reported by importing end users)?

No Yes

If no, please explain the reason(s) why, including any costs of importing purified CMC that were not reflected in the reported import price data.

PART III.--PRICING AND MARKET FACTORS--Continued

III-5. **Price comparisons among countries.**-- Please compare market prices of purified CMC in the United States vis-a-vis market prices of purified CMC in each of the subject countries, and, if known, in individual third-country markets during January 2005-September 2010. Provide the bases for any price comparisons (f.o.b., delivered, etc.), and note the specific information as to price level, products, time period, and countries for each such price comparison.

Unless otherwise instructed, please answer questions in the rest of Part III based on your firm's total U.S. imports of purified CMC during January 2005-September 2010. Report for sales if your firm sells its imported purified CMC; or report for imports if your firm is a U.S. end user that imports purified CMC for its internal use. If your responses differ by sales to different types of U.S. customers (distributors, end users, or types of distributors/end users), by product specifications of the purified CMC that you import, or for any other reasons, please note such differences. *Note.—Only importers that sell their imported purified CMC should respond to questions referring to sales or shipments of purified CMC. Questions that involve responses of both resellers and end users of their imported purified CMC are marked with a “*”.*

III-6. **Length of sales period.**--Please estimate below the share of your firm's total U.S. commercial shipment quantity during 2009 of its imported purified CMC from each applicable subject country that was on a (1) long-term basis (multiple deliveries for more than 12 months after the sales agreement), (2) short-term basis (multiple deliveries up to and including 12 months), and (3) spot sales basis (usually one-time delivery, within 30 days of the sales agreement). The three different sales bases include both verbal agreements and written contracts.

Country source	Share of 2009 commercial shipment quantity (percent)			
	Long-term	Short-term	Spot	TOTAL
Finland				100 percent
Mexico				100 percent
Netherlands				100 percent
Sweden				100 percent

PART III.--PRICING AND MARKET FACTORS--Continued

III-7. **Long-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its imported purified CMC from the subject countries on a typical long-term basis during January 2005-September 2010. Answer separately for each applicable subject country and *copy this question as needed to complete your response*; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

(a) What was is the average duration of an agreement/contract? _____

(b) Could prices be renegotiated during the agreement/contract period? Yes No

(c) Did the agreement/contract fix quantity, price, or both? Quantity Price Both

(d) Did the agreement/contract have a meet-or-release provision? Yes No

III-8. **Short-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its imported purified CMC from the subject countries on a typical short-term basis during January 2005-September 2010. Answer separately for each applicable subject country and *copy this question as needed to complete your response*; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

(a) What was is the average duration of an agreement/contract? _____

(b) Could prices be renegotiated during the agreement/contract period? Yes No

(c) Did the agreement/contract fix quantity, price, or both? Quantity Price Both

(d) Did the agreement/contract have a meet-or-release provision? Yes No

PART III.--PRICING AND MARKET FACTORS--Continued

III-9. **Price setting.**-- How did your firm determine the prices that it charged for U.S. sales during January 2005-September 2010 of its imported purified CMC from the subject countries (*check all that apply*)? Answer separately for each applicable subject country and *copy this question as needed to complete your response*; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

Transaction-by-transaction Contracts

Set price lists (if checked, include a copy of a recent price list)

Reverse internet auction sales

Other--Please describe: _____

III-10. **Discount policy/practice.**-- Please indicate and describe your firm's discount policies/ practices (*check all that apply*) involving U.S. sales during January 2005-September 2010 of its imported purified CMC from the subject countries; include in your discussion any discounts applied to purified CMC bundled with other products your firm sells (explain below). Please include discounts that your firm offered even though it may not have a stated discount policy. The one exception--do NOT include any payment discounts covered in III-11a. Answer separately for each applicable subject country and *copy this question as needed to complete your response*; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

Quantity discounts Annual total volume discounts No discounts

Other--Please describe: _____

III-11. **Pricing terms.**--Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its imported purified CMC from the subject countries. Answer separately for each applicable subject country and *copy this question as needed to complete your response*; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

(a) What were your firm's typical sales terms (*e.g.*, 2/10 net 30 days)? _____.

(b) On what basis were your prices usually quoted? (Check one)

F.o.b.--Please specify shipping point: _____ Delivered

PART III.--PRICING AND MARKET FACTORS--Continued

III-12. **Shipping information.**-- Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its imported purified CMC from the subject countries. Answer separately for each applicable subject country and copy this question as needed to complete your response; (Note.—If your firm's response is the same for two or more of its subject country sources, check the applicable countries in a single response.)

Finland Mexico Netherlands Sweden (Check as applicable)

(a) What was the approximate percentage of the total delivered price that was accounted for by U.S. inland transportation costs? _____ percent.

(b) Who generally arranged the transportation to your customers' locations? (Check one)

Your firm Purchaser.

(c) What proportion of your sales was delivered within 100 miles of your production facility? _____ percent. Within 101 to 1,000 miles? _____ percent. Over 1,000 miles? _____ percent.

(d) When you sell your firm's imported purified CMC from the subject countries, what is the U.S. shipping point?

U.S. port of entry Your U.S. storage facility

III-13. **Lead times.**--What was your firm's share of its 2009 U.S. commercial shipments of its imported purified CMC from the subject countries that was from inventory and produced to order and what was the average lead time between customers' orders and the date of delivery? Answer separately for each applicable subject country and copy this question as needed to complete your response.

Finland Mexico Netherlands Sweden (Check one)

<u>Source</u>	<u>Share of U.S. commercial shipments in 2009 (Percent)</u>	<u>Lead time (days)</u>
From inventory	_____	_____
Produced to order	_____	_____
Total	100 %	

PART III.--PRICING AND MARKET FACTORS--Continued

III-14. Geographical shipments.—

a) What was the geographic market area in the United States served by your firm's U.S. commercial shipments during January 2005-September 2010 of its imported purified CMC from the subject countries? (Check all that apply) Answer separately for each applicable subject country and copy this question as needed to complete your response.

Finland Mexico Netherlands Sweden (Check as applicable)

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

b) What was the geographic market area in the United States served by your firm's U.S. commercial shipments during January 2005-September 2010 of its imported purified CMC from all other countries (nonsubject countries)? (Check all that apply)

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

PART III.--PRICING AND MARKET FACTORS--Continued

III-15. **Product/marketing changes.**--Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of purified CMC in the United States during January 2005-September 2010?

No Yes

If yes, please describe and quantify if possible. Discuss the time periods when any such changes occurred, and the impact of any such changes on your firm's U.S. sales prices and quantities of its U.S.-produced purified CMC, or, if an importing end user, its import quantities and prices.

III-16. **Anticipated product/marketing changes.**—Do you anticipate any changes in the product range, product mix, or marketing (including sales over the internet) of purified CMC in the United States in the future? Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue

No Yes—Please identify, including the time period.

III-17. **End uses.**--Based on your firm's U.S. sales during January 2005-September 2010 of its imported purified CMC from the subject countries, or, if an importing end user its imports, identify the principal direct downstream products associated with such sales or, if an importing end user, its imports (and, to the extent possible, report the approximate percentage share of the total cost to produce each downstream product that was accounted for by the purified CMC. In addition, identify the country-of-origin of imported purified CMC. Answer separately for each applicable subject country and *copy this question as needed to complete your response.*

Finland Mexico Netherlands Sweden (Check as applicable)

<u>Downstream product</u>	<u>Share of total cost (percent)</u>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

PART III.--PRICING AND MARKET FACTORS--Continued

III-18. **Changes in end uses.**--Have there been any changes in the U.S. end uses or mix of end uses of purified CMC during January 2005-September 2010?

No Yes--Please describe.

III-19. **Price effects among end-use sectors.**—Did a change in sales prices of purified CMC in one end-use sector affect prices or quantities of purified CMC in another end-use sector in the U.S. market during January 2005-September 2010?

No Yes.

If yes, please discuss and identify the purified CMC products and their associated end-use sectors, and the time period of any such effect.

III-20. **Technical support/service provisions.**--

a) What technical support/service provisions were important for your firm's customers in your sales of purified CMC that your firm imported during January 2005-September 2010? Please identify the country(ies) of origin of the purified CMC that you discuss.

b) Were the technical support and service provisions priced separately for your firm's sales of its imported purified CMC during January 2005-September 2010? Please identify the country(ies) of origin of the purified CMC that you discuss.

No Yes--Please explain.

PART III.--PRICING AND MARKET FACTORS--Continued

III-21. Cellulose preferences/requirements.—

a) Do cotton linters versus wood pulp, or some other form of cellulose, used as an input in the production of purified CMC, result in better quality and/or performance of the purified CMC?

No Yes--Please explain.

b) Did your customers, or, if an importing end user, did your firm ever specify/require the type(s) of cellulose to be used in the purified CMC that your firm imported for them/your firm during January 2005-September 2010?

No Yes

If yes, please explain below whether your firm, its customer or both, or, if an importing end user, your firm, its supplier or both jointly determined the type(s) of cellulose used and why one form of cellulose was chosen over another form. Please identify the country(ies) of origin of the purified CMC that you discuss.

III-22. Shift sales.—Describe how easily your firm can shift its sales of purified CMC from the subject countries between the U.S. market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting purified CMC from the subject countries between the U.S. and alternative country markets within a 12-month period during January 2005-September 2010. Identify the subject country(ies) that you discuss.

PART III.--PRICING AND MARKET FACTORS--Continued

III-23. **U.S. inventories.**--Please explain if your firm's U.S. inventories of its imported purified CMC from the subject countries during January 2005-September 2010 were committed to customers by supply agreements, or other commercial reasons that would have prevented your firm from using some or all of this inventory to increase shipments to the U.S. market within a 12-month period during this period. Identify the subject country(ies) that you discuss.

III-24. **Availability of supply (subject).**--

(a) Has the availability of imported purified CMC from the subject countries changed in the U.S. market since January 2005?

No Yes--Please explain. Identify the subject country(ies) that you discuss.

(b) Do you anticipate any changes in the availability of imported purified CMC from the subject countries in the U.S. market in the future?

Increase No change Decrease

If you anticipate changes in supply, please identify the changes, including the time period and the impact of such changes on shipment volumes and prices. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue. Identify the subject country(ies) that you discuss.

PART III.--PRICING AND MARKET FACTORS--Continued

III-25. Availability of supply (nonsubject).—

(a) Has the availability of purified CMC imported from nonsubject countries changed in the U.S. market since 2005?

No Yes--Please explain. Identify the country(ies) that you discuss.

(b) Do you anticipate any changes in terms of the availability of purified CMC imported from nonsubject countries in the U.S. market in the future?

Increase No change Decrease

If you anticipate changes in supply, please identify the changes, including the country(ies) of origin, the time period, and the impact of such changes on shipment volumes and prices. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART III.--PRICING AND MARKET FACTORS--Continued

III-26. **Cyclical/seasonal U.S. demand.**—Was total U.S. demand for purified CMC subject to any cyclical/seasonal fluctuations, product cycles, or other U.S. competitive conditions of competition distinctive to purified CMC during January 2005-September 2010?

- No Yes

If yes—

(a) Please check below the type(s) of demand fluctuations and then discuss the nature and timing of these fluctuations during January 2005-September 2010. In addition indicate whether any business cycles result from changes in the overall economy and/or specific downstream sectors.

- Cyclical (longer than one year for complete cycle)
 Seasonal (within one year for complete cycle)
 Product cycle (completed within one year, or longer than one year—Check one)
 Other competitive condition(s) (specify _____)

Discussion:--In addition, identify, if applicable, peak and lowest demand months in a year.

(b) For resellers, please explain how any U.S. cyclical/seasonal/other demand fluctuations affected your firm's sales prices and shipment quantities of its imported purified CMC from the subject countries in the U.S. market at any time(s) during January 2005-September 2010. Identify the subject country(ies) and periods that you discuss.

(c) For importing end users, please explain how any U.S. cyclical/seasonal/other demand fluctuations affected your firm's import quantities and/or prices of its imported purified CMC from the subject countries in the U.S. market at any time(s) during January 2005-September 2010. Identify the subject country(ies) and periods that you discuss.

PART III.--PRICING AND MARKET FACTORS--Continued

III-27. Demand trends.--

(a) How did total demand WITHIN the United States for purified CMC change during January 2005-September 2010? What principal factors affected changes in demand?

- Increased No Change Decreased Fluctuated

(b) How did demand OUTSIDE the United States (if known) for purified CMC change during January 2005-September 2010? What principal factors affected changes in demand? If applicable, identify specific foreign countries.

- Increased No Change Decreased Fluctuated

III-28. Anticipated demand trends.--

(a) Do you anticipate any future changes in total demand for purified CMC WITHIN the United States?

- No Yes—Please describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

(b) Do you anticipate any future changes in demand for purified CMC OUTSIDE the United States? If applicable, identify specific foreign countries that you refer to.

- No Yes—Please describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART III.--PRICING AND MARKET FACTORS--Continued

III-29. Substitutes in demand in the U.S. market for the subject purified CMC.—

Substitution in demand refers to products that can, based on market price considerations and household-consumer/industrial-user preferences or technical requirements, reasonably be expected to substitute for each other when the price of one product changes vis-a vis the price of the other product—some consumers/industrial users may require greater price changes than others before they switch among the alternative products.

a) Do substitutes (e.g., crude/unrefined CMC, CMC FPS, cross-linked purified CMC, other hydrocolloids, etc.) for purified CMC exist in the U.S. market?

No Yes

If yes, please list in descending order of importance any products, other than the subject purified CMC, that may be substituted for purified CMC in the U.S. market during January 2005-September 2010. For each possible substitute product, please give examples of applications and end uses involving the substitute and indicate whether changes in the price of the substitute affect the price and/or quantity of purified CMC (also estimate the length of any time lag of such an effect).

Substitute product	Description of applications and end uses	Have changes in the prices of this substitute affected the price and/or quantity of purified CMC during January 2005-September 2010?
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/>

PART III.--PRICING AND MARKET FACTORS--Continued

III-29. Substitutes in demand in the U.S. market for the purified CMC.—Continued

b) Have there been any changes in the number or types of products that can be substituted for purified CMC or changes in the relative importance/mix of existing substitutes during January 2005-September 2010?

No Yes--Please explain.

c) Do you anticipate any changes in the number or types of products that can be substituted for purified CMC or changes in the relative importance/mix of existing substitutes in the future?

No Yes--Please describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART III.--PRICING AND MARKET FACTORS--Continued

III-30. Substitutes in demand in the U.S. market among types/grades of purified CMC.--

a) Do various types/grades of purified CMC substitute for each other in the U.S. market?

- No Yes

If yes, please discuss below the extent to which purified CMC products could substitute for each other during January 2005-September 2010 and identify the end uses in which this substitution could occur. For each possible substitution discussed, please indicate the extent to which any such substitution actually occurred during January 2005-September 2010.

b) Do you anticipate any changes in the number or types of purified CMC products that can be substituted for each other or changes in the relative importance/mix of existing substitutes in the future?

- No Yes--Please describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

III-31. **Market studies.**—Please provide as a separate attachment to this request any studies, surveys, etc., that you are aware of that quantify and/or otherwise discuss purified CMC demand and supply (the latter including production capacity and capacity utilization) in (1) the United States, (2) each of the other major producing/consuming countries, including Finland, Mexico, Netherlands, and Sweden, and (3) the world as a whole. Of particular interest is such data since January 2005 and forecasts for the future.

