



# **INSTRUCTION BOOKLET: GENERAL INFORMATION, INSTRUCTIONS, AND DEFINITIONS FOR COMMISSION QUESTIONNAIRES**

## **Aluminum Extrusions from China Inv. Nos. 701-TA-475 and 731-TA-1177 (Final)**

*Further information.--If you have any questions concerning the enclosed questionnaire(s) or other matters related to these investigations, you may contact the following members of the Commission's staff:*

**Ed Petronzio**, investigator (202-205-3176; E-mail [edward.petronzio@usitc.gov](mailto:edward.petronzio@usitc.gov))  
regarding general questions and trade and related information;

**David Boyland**, auditor (202-708-5403; E-mail [david.boyland@usitc.gov](mailto:david.boyland@usitc.gov))  
regarding financial information; and

**James Fetzer**, economist (202-708-5403; E-mail [james.fetzer@usitc.gov](mailto:james.fetzer@usitc.gov))  
regarding pricing, market, and related information.

## **GENERAL INFORMATION**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

**Background.**--The final phase of these investigations is being conducted as a result of affirmative preliminary determinations by the Department of Commerce ("Commerce") under section 703 of the Tariff Act of 1930 (19 U.S.C. § 1671b) ("the Act") that certain benefits which constitute subsidies are being provided to manufacturers, producers, or exporters in China of aluminum extrusions,<sup>1</sup> and under section 733 of the Act (19 U.S.C. § 1673b) that such products are being sold in the United States at less than fair value ("LTFV").<sup>2</sup> As a result of Commerce's preliminary subsidy and LTFV determinations, the U.S. Department of Homeland Security, Customs and Border Protection Agency ("Customs") has been instructed to suspend liquidation of all imports of aluminum extrusions from China and require a cash deposit or bond on these imports. Definitive countervailing duty ("CVD") and/or antidumping duties ("AD") may be assessed on imports of aluminum extrusions from China as a result of these investigations if the U.S. International Trade Commission ("Commission") makes an affirmative determination of injury, threat, or material retardation, and if the Commerce makes an affirmative determination of subsidization and/or dumping.

**Petition.**--The investigations were requested in a petition filed on March 31, 2010, by the Aluminum Extrusions Fair Trade Committee and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union.

**Correspondence.**--Address all correspondence to the United States International Trade Commission, Washington, DC 20436. Hearing-impaired individuals can obtain information regarding these investigations via the Commission's TDD terminal (202-205-1810).

**Due date of questionnaire(s).**--Return the completed questionnaire(s) to the United States International Trade Commission by no later than:

# **FEBRUARY 8, 2011**

Please make sure the completed questionnaire(s) is sent to the attention of Ed Petronzio ([edward.petronzio@usitc.gov](mailto:edward.petronzio@usitc.gov)). Return only one copy of the completed questionnaire(s), but please keep a copy for your records so that you can refer to it if the Commission staff contacts you with any questions during the course of the investigations.

**Service of questionnaire response(s).**--In the event that your firm is a party to these investigations, you are required to serve a copy of the questionnaire(s), once completed, on other parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A certificate of service must accompany the copy of the completed questionnaire(s) you submit (see 19 CFR § 207.7) and a list of such parties is maintained by the Commission's Secretary online at web address:

[http://www.usitc.gov/secretary/fed\\_reg\\_notices/service\\_lists/serv\\_lists\\_antidump.htm](http://www.usitc.gov/secretary/fed_reg_notices/service_lists/serv_lists_antidump.htm)

---

<sup>1</sup> See *Aluminum Extrusions From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination*, 75 FR 54302, September 7, 2010, and *Aluminum Extrusions From the People's Republic of China: Alignment of Final Countervailing Duty Determination With Final Antidumping Duty Determination*, 75 FR 57441, September 21, 2010.

<sup>2</sup> See *Aluminum Extrusions From the People's Republic of China: Notice of Preliminary Determination of Sales at Less Than Fair Value, and Preliminary Determination of Targeted Dumping*, 75 FR 69403, November 12, 2010, and *Aluminum Extrusions From the People's Republic of China: Postponement of Final Determination of Sales at Less Than Fair Value*, 75 FR 73041, November 29, 2010.

## **GENERAL INFORMATION--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

**Confidentiality.**--The commercial and financial data furnished in response to the enclosed questionnaire(s) that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, nonnumerical characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

**Verification.**--The information submitted in the enclosed questionnaire(s) is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all your workpapers and supporting documents used in the preparation of the questionnaire response(s).

**Release of information.**--The information provided by your firm in response to the questionnaire(s), as well as any other business proprietary information submitted by your firm to the Commission in connection with the investigations, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with these investigations or other import-injury investigations conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of certain aluminum extrusions and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting these investigations. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

## **INSTRUCTIONS**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

**Answer all questions.**--Do not leave any question or section blank unless a questionnaire expressly directs you to skip over certain questions or sections. If the answer to any question is "none," write "none." **If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates--and indicate in the appropriate question in section I of the questionnaire a discussion of those responses which include estimates.** Answers to questions and any necessary comments or explanations should be supplied in the space provided or on separate sheets included with your questionnaire submission.

**Consolidate all U.S. establishments.**--Report the requested data for your establishment(s) located in the United States (including Puerto Rico). Firms operating more than one establishment should combine the data for all establishments into a single report.

## **INSTRUCTIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

**Electronic completion.**--Your firm is encouraged (but not required) to complete the questionnaire electronically in MS Word format. The MS Word versions of all the questionnaires in these investigations are available online at the ITC web page or may be obtained directly from the Commission's Investigator, Ed Petronzio (202-205-3176, [edward.petronzio@usitc.gov](mailto:edward.petronzio@usitc.gov)).

**Electronic submission.**--To the degree that it is possible and not overly burdensome, the Commission requests that responding firms submit their questionnaire responses electronically in MS Word format. The completion and receipt of questionnaire responses in the MS Word format allows the Commission to easily compile and analyze submitted data. There are three electronic submissions options detailed below. Paper and hardcopy submissions are also accepted.

### **SUBMISSION OPTIONS**

- 1) **Upload via Secure Drop Box.**--Upload the completed questionnaire in MS Word format along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: <https://dropbox.usitc.gov/oinv/>

Pin: OINV

- 2) **E-mail.**--E-mail the completed questionnaire to Ed Petronzio ([edward.petronzio@usitc.gov](mailto:edward.petronzio@usitc.gov)) in MS Word format and include a scanned copy of the signed certification page (page 1).<sup>3</sup>
- 3) **Compact disc (CD).**--Copy or burn the completed questionnaires in MS Word format along with a scanned copy of the signed certification page (page 1), and mail the CD to the address below via overnight mail service (regular U.S. mail undergoes security treatments that often damage CDs).
- 4) **U.S. mail or overnight mail service.**--Mail to the following address:

**United States International Trade Commission  
Office of Investigations, Room 615  
500 E Street SW  
Washington, DC 20024 (overnight)  
Washington, DC 20436 (U.S. mail)**

- 5) **Fax.**--Fax to 202.205.3205.

**Note to parties.**--If you are a party to the investigations, and service of the questionnaire(s) is required, such service should be made in paper form pursuant to the applicable Commission rules for the purposes of service. However, all parties are instructed to encourage their clients to complete the questionnaires electronically and to forward any electronically completed questionnaires in the underlying MS Word format to the Commission's Investigator (e-mail or upload) at the time of service.

---

<sup>3</sup> Please note that submitting your questionnaire by e-mail may subject your firm's business proprietary information to transmission over an unsecure environment and to possible disclosure. If you choose this option, the Commission warns you that any risk involving possible disclosure of such information is assumed by the submitter and not by the Commission.

## **DEFINITIONS**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

### **Definition of “Aluminum Extrusions” (based on Commerce’s Scope).--<sup>4</sup>**

The merchandise covered by this investigation is aluminum extrusions which are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by The Aluminum Association commencing with the numbers 1, 3, and 6 (or proprietary equivalents or other certifying body equivalents). Specifically, the subject merchandise made from aluminum alloy with an Aluminum Association series designation commencing with the number 1 contains not less than 99 percent aluminum by weight. The subject merchandise made from aluminum alloy with an Aluminum Association series designation commencing with the number 3 contains manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight. The subject merchandise made from an aluminum alloy with an Aluminum Association series designation commencing with the number 6 contains magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight. The subject aluminum extrusions are properly identified by a four-digit alloy series without either a decimal point or leading letter. Illustrative examples from among the approximately 160 registered alloys that may characterize the subject merchandise are as follows: 1350, 3003, and 6060.

Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, other solid profiles, pipes, tubes, bars, and rods. Aluminum extrusions that are drawn subsequent to extrusion (“drawn aluminum”) are also included in the scope.

Aluminum extrusions are produced and imported with a variety of finishes (both coatings and surface treatments), and types of fabrication. The types of coatings and treatments applied to subject aluminum extrusions include, but are not limited to, extrusions that are mill finished (i.e., without any coating or further finishing), brushed, buffed, polished, anodized (including bright-dip anodized), liquid painted, or powder coated. Aluminum extrusions may also be fabricated, i.e., prepared for assembly. Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, knurled, swaged, mitered, chamfered, threaded, and spun. The subject merchandise includes aluminum extrusions that are finished (coated, painted, etc.), fabricated, or any combination thereof.

Subject aluminum extrusions may be described at the time of importation as parts for final finished products that are assembled after importation, including, but not limited to, window frames, door frames, solar panels, curtain walls, or furniture. Such parts that otherwise meet the definition of aluminum extrusions are included in the scope. The scope includes aluminum extrusions that are attached (*e.g.*, by welding or fasteners) to form subassemblies, *i.e.*, partially assembled merchandise.

Subject extrusions may be identified with reference to their end use, such as heat sinks, door thresholds, or carpet trim. Such goods are subject merchandise if they otherwise meet the scope definition, regardless of whether they are finished products and ready for use at the time of importation.

The following aluminum extrusion products are excluded: Aluminum extrusions made from aluminum alloy with an Aluminum Association series designations commencing with the number 2 and containing in excess of 1.5 percent copper by weight; aluminum extrusions made from aluminum alloy with an Aluminum Association series designation commencing with the number 5

---

<sup>4</sup> Taken from *Aluminum Extrusions From the People’s Republic of China: Notice of Preliminary Determination of Sales at Less Than Fair Value, and Preliminary Determination of Targeted Dumping*, 75 FR 69403, November 12, 2010.

## **DEFINITIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

and containing in excess of 1.0 percent magnesium by weight; and aluminum extrusions made from aluminum alloy with an Aluminum Association series designation commencing with the number 7 and containing in excess of 2.0 percent zinc by weight.

The scope also excludes finished merchandise containing aluminum extrusions as parts that are fully and permanently assembled and completed at the time of entry, such as finished windows with glass, doors, picture frames, and solar panels. The scope also excludes finished goods containing aluminum extrusions that are entered unassembled in a "kit." A kit is understood to mean a packaged combination of parts that contains, at the time of importation, all of the necessary parts to fully assemble a final finished good.

The scope also excludes aluminum alloy sheet or plates produced by other than the extrusion process, such as aluminum products produced by a method of casting. Cast aluminum products are properly identified by four digits with a decimal point between the third and fourth digit. A letter may also precede the four digits. The following Aluminum Association designations are representative of aluminum alloys for casting: 208.0, 295.0, 308.0, 355.0, C355.0, 356.0, A356.0, A357.0, 360.0, 366.0, 380.0, A380.0, 413.0, 443.0, 514.0, 518.1, and 712.0. The scope also excludes pure, unwrought aluminum in any form.

The scope also excludes collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) Length of 37 mm or 62 mm, (2) outer diameter of 11.0 mm or 12.7 mm, and (3) wall thickness not exceeding 0.13 mm.

Imports of the subject merchandise are provided for under the following categories of the Harmonized Tariff Schedule of the United States ("HTS"): 7604.21.0000, 7604.29.1000, 7604.29.3010, 7604.29.3050, 7604.29.5030, 7604.29.5060, 7608.20.0030, and 7608.20.0090. The subject merchandise entered as parts of other aluminum products may be classifiable under the following additional Chapter 76 subheadings: 7610.10, 7610.90, 7615.19, 7615.20, and 7616.99 as well as under other HTS chapters. While HTS subheadings are provided for convenience and customs purposes, the written description of the scope in this proceeding is dispositive.

**Heat Sinks.**--Heat sinks (at all levels of production) are a subset of aluminum extrusions typically used in electronic equipment as a thermal controlling tool and should be reported as part of all data reported in section II of the Commission questionnaires. The following definitions should be used to assist in reported data on the alternative product section of the questionnaires (part V of the U.S. producers' questionnaire or part IV of the U.S. importers' questionnaire).

**Heat Sink Blanks.**--Heat sink blanks are the full length aluminum extrusions used to produce finished heat sinks. In other words, these are the pre-fabricated, pre-tested inputs in the production of heat sinks (post any stretching or aging processes applied). (Note.--The industry often just refers to heat sink blanks as "heat sinks", but here for the purposes of these questionnaires we are making the distinction between the final product and this intermediate product)

**Fabricated Heat Sinks.**--Fabricated heat sinks should be understood to be any heat sink blank that has been cut-to-length, precision machined, and or otherwise fabricated to the end product specifications, but not yet tested, assembled onto other materials, or packaged.

**Finished Heat Sinks.**--Finished heat sinks should be understood to be the final product ready to be sold to electronic manufacturers. Finished heat sinks differ from fabricated heat sinks in that they have been

## **DEFINITIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

fully test and assured to comply with the required end-use specifications.

**Firm.**--An individual proprietorship, partnership, joint venture, association, corporation (including any subsidiary corporation), business trust, cooperative, trustee in bankruptcy, or receiver under decree of any court.

**Related firm.**--A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

**Establishment.**--Each facility of a firm in the United States involved in the production, importation, and/or purchase of certain aluminum extrusions (as defined above), including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

**United States.**--For purposes of this investigation, the 50 States, Puerto Rico, the U.S. Virgin Islands, and the District of Columbia.

**Importer.**--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing certain aluminum extrusions (as defined above) into the United States from a foreign manufacturer or through its selling agent.

**Imports.**--Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty) or consignee (i.e., to which the merchandise was first delivered).

**Import quantities.**--Quantities reported should be net of returns in short tons.

**Import values.**--Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (*i.e.*, all charges except inland freight in the United States).

**Purchaser.**--Any person or firm engaged, either directly or through a parent company or subsidiary, in purchasing aluminum extrusions from another firm that produces, imports, or otherwise distributes aluminum extrusions.

**Purchases.**--Purchases from all sources, ***not*** including direct imports from foreign producers (which should be reported as imports in a U.S. importers' questionnaire).

**Purchase quantities.**--Quantities reported should be net of returns in short tons.

**Shipments.**--Shipments of products produced in or imported by your U.S. establishment(s). Include shipments to the contracting firm of product produced by your firm under a toll agreement.

**Shipment quantities.**--Quantities are to be reported in short tons and should be net of returns.

**Shipment values.**--Values reported should be 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. The value of domestic shipments to the contracting firm under a toll agreement is the conversion fee (including profit).

## **DEFINITIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

### **Types of shipments:**

**U.S. shipments.**--Commercial shipments, internal consumption, and transfers to related firms within the United States.

**Commercial shipments.**--Shipments, other than internal consumption and transfers to related firms, within the United States.

**Internal consumption.**--Product consumed internally by your firm.

**Transfers to related firms.**--Shipments made to related domestic firms.

**Toll shipments.**--Shipments of extrusions produced on your extrusions presses and drawing machines (but not necessarily finishing or fabrication machinery) under a toll agreement whereby the shipment values reflects only conversion costs. Shipments of another firm's aluminum extrusions that your firm has only finished under a tolling arrangement (*e.g.*, painted, anodized) should not be reported as part of your firms' U.S. shipments.

**Export shipments.**--Shipments to destinations outside the United States, including shipments to related firms.

**Inventories.**--Finished goods inventory, not raw materials or work-in-progress. Inventories may represent aluminum extrusions at different levels of finishing (*i.e.*, some inventory may be painted extrusions, some may be anodized extrusions, and some may be mill finish extrusions) or fabrication, based on the intended end use.

**Market Sectors.**--Major end-use applications for aluminum extrusions as defined by the Aluminum Extruders Council.

**Building and Construction.**--Windows, doors, carpet framing, shower doors, tub enclosures, railings, high-rise curtain wall, highway and bridge construction, framing members, other various structures

**Transportation.**--Automotive (cars, buses, trucks, trailer/van/container vehicles), heavy rail, light rail and other mass transit vehicles, recreational vehicles, aircraft, aerospace, and marine machinery;

**Engineered Products.**--Consumer and commercial products - air conditioners, appliances, furniture, lighting, sports equipment, personal watercraft; electrical power units, heat sinks, coaxial cables, bus bars; machinery & equipment, food displays, refrigeration; medical equipment, display structures, laboratory equipment and apparatus.

**Finishing capabilities.**--A description of the types of finishes given to aluminum extrusions. These are understood to relate to coats given to aluminum extrusions, such as a layer of anodized material, or paint, and not other fabrication services. For the purposes of reporting a break-out of U.S. shipments, the mill-finished, anodized, and painted categories should be understood to be mutual exclusive categories that represent the universe of aluminum extrusions. Bright-dipped extrusions should be reported as anodized extrusions, except where requested otherwise.

**Mill finished.**--A type of finish to aluminum extrusions that does not involve any further processing after the extrusion/drawing, stretching, cutting, and aging processes.



## **DEFINITIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

**Anodized.**--This process involves the use of electrolysis to encourage oxygen ions to combine with aluminum to form a hard aluminum oxide film or seal, thus enhancing the durability and beauty of the profile. Pretreatment steps to the anodizing process may include alkaline cleaning to remove organic contaminants and acid cleaning to remove inorganic contaminants. The extrusion profile is immersed in a tank containing an acid-based electrolyte solution. Electric current is passed through the solution while the temperature is carefully controlled. The electric current causes oxygen ions to be released from the electrolyte solution and to be drawn to the surface of the aluminum profile, which serves as an anode.

**Painted.**--Both specialty liquid paints and powder coatings may be applied to the aluminum profile. Thermoplastic or thermoset polymer powder coatings are applied using an electrostatic gun to impart a positive electric charge to the powder. The powder is accelerated toward and adheres to the negatively charged aluminum profile. After the powder is applied, the profile is baked in an oven where the powder particles are melted to a liquid state which then fuses with the profile to form a homogeneous surface finish. The surface is then cooled to form a hard coating.

**Other finishes.**--For the purpose of responding to Commission questionnaires, please report any extrusion without anodized or painted finishes as mill finished. Other finishes such as metallic brushing, buffing, polishing, et cetera should be reported under one of the primary three categories provided above. For example, brushed nickel will likely be reported as an anodized product as it is eventually anodized, and non-painted, non-anodized extrusions that have been buffed and polished would be reported as mill finish, et cetera.

**Bright Dipped.**--This is a type of anodizing process. The aluminum extrusion is first polished to remove fine scratches and then submerged typically in a phosphoric acid and nitric acid bath and heated to an elevated temperature. It is then anodized to protect the surface finish and to apply color to the profile.

**Type of extrusion.**--The following categories should be considered mutually exclusive and representative of the the universe of aluminum extrusions together.

**Custom.**--Any aluminum extrusion that was designed specifically to the customer's specification and is not a standard shape.

**Standardized.**--Any aluminum extrusion that is produced to a standard shape and is not customer specific.

The following definitions apply only to the **U.S. PRODUCERS' QUESTIONNAIRE**:

**Production capability.**--A description of the types of extrusion presses or drawing machines used by your firm in the production of aluminum extrusions.

**Extrusion press.**--Any machinery that extrudes heated aluminum into shapes, thus producing aluminum extrusions.

**Drawing machine.**--Any machinery that draws heated aluminum into shapes, thus producing aluminum extrusions (as defined by Commerce's scope to include drawn product).

**Fabrication capabilities.**-- A description of the types of fabrication services by your firm in the production of

## **DEFINITIONS--Continued**

(Instruction Booklet, in Inv. Nos. 701-TA-475 and 731-TA-1177, Aluminum Extrusions from China (Final))

aluminum extrusions. For example, drilling holes, crimping, notching, et cetera.

**Average production capacity.**--The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (*i.e.*, using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

**Toll agreement.**--Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, *etc.*

**Production.**--All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

**PRWs.**--Production and related workers ("PRWs"), including working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

**Average number employed.**--Add the number of employees, both full-time and part-time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

**Hours worked.**--Include time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight-time hours.

**Wages paid.**--Total wages paid before deductions of any kind (*e.g.*, withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

**Fiscal year.**--The 12-month period between settlement of your firm's financial accounts.

**Purchases other than direct imports.**--Purchases from U.S. producers, U.S. importers, and other U.S. sources, excluding direct imports (which should be reported as imports in a U.S. importers' questionnaire).