U.S. PRODUCERS' 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)).**

Name of firm _____

	Address								
	City	State Zip Code							
	World Wide	Web address							
	Has your firm produced purified carboxymethylcellulose (as defined in the instruction booklet) at any time since January 1, 2005?								
	□ NO	(Sign the certification below and promptly return only this page of the que	stionnaire to the Commission)						
	YES	(Read the instruction booklet carefully, complete all parts of the questionnaire to the Commission so as to be received by the date indicated							
_		CERTIFICATION							
and beli By mean information conducts I ackno	ef and understand ns of this certific tion provided in ed by the Commis wledge that infor	that the information submitted is subject to audit and verification ation I also grant consent for the Commission, and its employed this questionnaire and throughout these reviews in any other sion on the same or similar merchandise.	by the Commission. ees and contract personnel, to use the import-injury proceedings or reviews out these reviews may be used by the						
maintaii proceedi	ning the records of ings relating to the	s, and contract personnel who are acting in the capacity of Confitness reviews or related proceedings for which this information e programs and operations of the Commission pursuant to 5 U.S. in non-disclosure agreements.	is submitted, or in internal audits and						
contract	personnet witt sig								
	f Authorized Offic	ial Title of Authorized Official	Date						
	•	ial Title of Authorized Official Phone: ()	Date						

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.

OMB feedbackWe are interested questionnaire in general or the clarit response or send them to the above a Establishments coveredProvide questionnaire (see page 3 of the instrubblicly traded, please specify the st	y of specific questi address. the name and addre ruction booklet for	ons. Please attacess of establishm reporting guidel	ch such comments ent(s) covered by
questionnaire (see page 3 of the inst	ruction booklet for	reporting guidel	
Support for continuation of order and/or countervailing duty order cure countries?			
Mexico	Support	Oppose	Take no pos
Netherlands	Support	☐ Oppose	Take no pos
Sweden	☐ Support	Oppose	Take no pos

PART I.--GENERAL INFORMATION--Continued

∐ No	YesList	the following information.	
Firm name		Address	Extent of own
domestic or f Netherlands, from Finland	oreign, which are or Sweden into t , Mexico, Nether	rs/exportersDoes your firm he engaged in importing purified he United States or which are elands, or Sweden to the United	CMC from Finland, Mexic ngaged in exporting purified
☐ No	∐ YesList	the following information.	
Firm name		<u>Address</u>	<u>Affiliation</u>
	_		
domestic or for Finland, Mex	oreign, which are ico, Netherlands ified CMC from	countries other than Finland, N	CMC from countries other tes or which are engaged in
☐ No	YesList	the following information.	
E.	nd country	Address	<u>Affiliation</u>
Firm name ar			

PART I.--GENERAL INFORMATION--Continued

☐ No	☐ Yes	sList the following information	
Firm nam	<u>ie</u>	Address	Affiliation
business	plan. Does yo	our company or any related firm le, discuss, or analyze expected mesPlease provide the requested d	we request a copy of your company have a business plan or any internal harket conditions for purified CMC ocuments. If you are not providing
business	plan. Does yo	our company or any related firm le, discuss, or analyze expected m	nave a business plan or any internal narket conditions for purified CMC ocuments. If you are not providing
business	plan. Does yo	our company or any related firm le, discuss, or analyze expected mesPlease provide the requested d	nave a business plan or any internal narket conditions for purified CMC ocuments. If you are not providing

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 <u>calendar-year</u> basis.

II-1.	Please identify the individual to be copart II?	ontacted regarding the confidential information requested in
	Name and title:	
	Please indicate the manner by which part II with questions regarding the st	Commission staff may contact the individual responsible for abmitted confidential information
	E-mail:	Telephone: ()
	Fax: ()	
II-2.		cate whether your firm has experienced any of the following of purified CMC since January 1, 2005.
	(check as many as appropriate)	(please describe)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other (e.g., technology)	

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

II-3.	Anticipated changes in operationsDoes your firm anticipate any changes in the character of your operations or organization (as noted above) relating to the production of purified CMC in the future?							
	□ No	YesSupply 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. Include in your response a specific projection of your firm's capacity to produce purified CMC (in 1,000 pounds) for 2011 and 2012.						
	Anticipated anticipate a	f your response differs for particular orders, please indicate and explain the revocation of specific orders. I changes in operations in the event the order is revokedWould your firm may changes in the character of your operations or organization (as noted above) the production of purified CMC in the future if the antidumping duty orders on						
	purified CM	IC from Finland, Mexico, Netherlands, or Sweden were to be revoked?						
	☐ No	YesSupply 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.						

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

pro	the following in duction capacity IC in the periods	and production			
Product	<u>Period</u>		or allocation ment data (in		
Purified CMC					
	(Quantity	in <i>1,000 poun</i>	ds)		
Item	2005	2006	2007	2008	20
Overall Production Capacity					
Production of: Purified CMC					
Other product 1					
Other product 2					
Production capacity. Production shiftingIs your products in response to a relat products, using the same equi	ive change in the	price of puri			

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

II-8. <u>Trade data.</u>--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of purified CMC in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

Quantity	(in 1,000 p	oounds) an	d value (in	\$1,000)			
		C	alendar ye	ar	•	January-S	September
ltem	2005	2006	2007	2008	2009	2009	2010
Average production capacity ¹ (quantity) (A)							
Beginning-of-period inventories (quantity) (B)							
Production (quantity) (C)							
U.S. shipments: Commercial shipments: quantity (D)							
value (E)							
Internal consumption: ² quantity (F)							
value (G)							
Transfers to related firms: ² quantity (H)							
value (I)							
Export shipments: ³ quantity (J)							
value (K)							
End-of-period inventories (quantity) (L)							
Channels of distribution: U.S. shipments to distributors (quantity) (M)							
U.S. shipments to end users (quantity) (N)							
Employment data: Average number of PRWs (number) (O)							
Hours worked by PRWs (1,000 hours) (P)							
Wages paid to PRWs (value) (Q)							
The production capacity (see definitions ir weeks per year. Please describe the met reported capacity (use additional pages as nec	thodology ι					hours per plain any ch	
² Internal consumption and transfers to rela different basis for valuing these transactions, plusing that basis for each of the periods noted a	lease spec						
³ Identify your principal export markets:							<u> </u>

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

11-9. Reconcination of trade data.	II-9.	Reconciliation of trade data.
------------------------------------	-------	-------------------------------

	(a)	Please note that the quantities reported in question II-10 should reconcile as follows in each period (<i>i.e.</i> , in each column):						
		$\frac{\text{Reconciliation}}{\text{B} + \text{C} - \text{D} - \text{F} - \text{H} - \text{O}}$ $\text{D} + \text{F} + \text{H} = \text{M} + \text{N}$	J = L	explain Do these dat	a reconcile?	'es	☐ NoPlease	
	(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>i.e.</i> , line L of year 2005 should equal line B of year 2006). Do these data reconcile for each adjacent calendar year?						
		Yes.	☐ NoPle	ase explain.				
II-10.	indicate wholly formula	e the nature of the related firms, whether your firm related processed inputs for the related to	ationship be thether the t retained man	tween your fir ransfers were j rketing rights t	m and the related priced at market v o all transfers, an	firm value	s (e.g., joint ventur or by a non-marke	

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

II-11. <u>U.S. shipments by end use</u>.—Report your firm's U.S. shipments (commercial shipments and internal consumption and transfers of purified CMC), by major end use.

				unds, value i	in \$1,000)	_	
			Calendar yea				September
Item	2005	2006	2007	2008	2009	2009	2010
FOOD: ¹						1	
Quantity							
Value							
PERSONAL	_ CARE, COS	METICS & P	HARMACEUT	TICALS:1			
Quantity							
Value							
PAPER & E	BOARD:1						
Quantity							
Value							
OIL FIELD:	1						
Quantity							
Value							
ALL OTHER	R: ²		-	•	-	•	
Quantity							
Value							
TOTAL U	S. SHIPMEN	ITS: ³	•	•	•	<u>'</u>	
Quantity							
Value							
¹ Please in	dicate the rang	es of key produ	ct characteristi	cs for reported	U.S. shipments	during 2009 as	follows:
I		Purity	,				
Fand		(perce					
F00a							
Personal of	care, cosmetics	S,					
	maceuticals						
Oilfield		• • •					
Other							
² Please d	lescribe:						
³ U.S. shi reported in se	pment data (co	mmercial shipn	nents + internal	consumption +	- transfers) sho	uld reconcile wi	th data

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

S	ource, pleas	e elaborate)	and report	the quantity		sons differ by e of such
P	urchases be	low for the	specified pe	erious		
Reasons:						_
(Qu	antity <i>in 1.0</i> 0	00 pounds, v	alue <i>in \$1.0</i>	00)		
Item	2005	2006	2007	2008	2009	January- September 2010
PURCHASES FROM U.S. IMPORTERS ¹ OF PURIFIED CMC FROM.—						
FINLAND: quantity						
value						
MEXICO: quantity						
value						
NETHERLANDS: quantity						
value						
SWEDEN: quantity						
value						
All other countries: quantity						
value						
PURCHASES FROM DOMESTIC PRODUCERS: ² quantity						
value						
PURCHASES FROM OTHER SOURCES: quantity						
Value						
¹ Please list the name of the import source, please identify the source for e			nased this pr	oduct. If you	r suppliers	differ by
² Please list the name of the domes		(a) framelaiah				
Please list the name of the domes	stic producer(s) from which	you purcna	sea tnis proa	uct.	
II-13. Toll productionSince Jandefinition in the instruction						ement (see
☐ No ☐ YesNa	ame firm(s)	:				

PART II.--TRADE AND RELATED INFORMATION--Continued II-14. **FTZ.--**Does your firm produce purified CMC in a foreign trade zone (FTZ)? □ No Yes--Identify FTZ(s): II-15. **Direct imports.--**Since January 1, 2005, has your firm imported purified CMC? ☐ No Yes--COMPLETE AND RETURN A U.S. IMPORTERS' **QUESTIONNAIRE** For questions II-16 and II-17, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders. **Effect of order.**--Describe the significance of the existing antidumping duty orders covering imports of purified CMC from Finland, Mexico, Netherlands, and Sweden in terms of their effect on your firm's production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order. Likely effect of revocation of order.--Would your firm anticipate any changes in its production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of purified CMC in the future if the antidumping duty orders on purified CMC from Finland, Mexico, Netherlands, and 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.--FINANCIAL INFORMATION

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

Please identify the individual to be contacted regarding the confidential information request part III?						
Nam	ne and title:					
	ase indicate the manner by which Commis III with questions regarding the submitted	sion staff may contact the individual responsible for donfidential information.				
Е	E-mail:	Telephone: ()				
F	Fax: ()					
Acco	ounting systemBriefly describe your fi	nancial accounting system.				
A.	When does your fiscal year end (mon If your fiscal year changed during the	th and day)? period examined, explain below:				
B.1.	Describe the lowest level of operation financial statements are prepared that	ns (e.g., plant, division, company-wide) for which include subject merchandise:				
2.3.4.	☐ Yes ☐ No How often did your firm (or parent coannual reports, 10Ks)? Please check ☐ Audited, ☐ unaudited, ☐ and ☐ Monthly, ☐ quarterly, ☐ sen	ompany) prepare financial statements (including relevant items below. nual reports,				
	including internal profit-and-loss stateme	your company submit copies of its financial statements, ents for the division or product group that includes s and worksheets used to compile data for your firm's				
	et accounting systemBriefly describe year cost, etc.).	our cost accounting system (e.g., standard cost, job				
0100	22 2000, 0001).					
	ocation basisBriefly describe your allocatense and other income and expenses.	ation basis, if any, for COGS, SG&A, and interest				
<u></u>	ense and other meome and expenses.					

PART III.--FINANCIAL INFORMATION--Continued

<u>Products</u>	Share of sales
Purified CMC	
YesContinue to question III-	7 below NoContinue to question III-9 be
	7 below NoContinue to question III-9 be ne space provided below, identify the inputs used in the your firm receives from related parties. Related party
Inputs from related firmsIn the production of purified CMC that	ne space provided below, identify the inputs used in the your firm receives from related parties.
Inputs from related firmsIn the production of purified CMC that	ne space provided below, identify the inputs used in the your firm receives from related parties.
inputs from related firmsIn the production of purified CMC that	ne space provided below, identify the inputs used in the your firm receives from related parties.

PART III.--FINANCIAL INFORMATION--Continued

☐ Yes ☐ No

rchased from related
ion should also be
.e., costs reported in
d parties, should only
nent). Reasonable
urchased from related

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

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 purified CMC operations.

	Fiscal years ended					January-September			
ltem						2009	2010		
Non-recurring charges: (In the far left 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-10.)									
1.									
2.									
3.									
4.									
5.									
6.									
7.									

PART III.--FINANCIAL INFORMATION--Continued

III-11. Operations on purified CMC.--Report the revenue and related cost information requested below on the purified CMC operations of your U.S. establishment(s). 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. Provide data for your six most recently completed fiscal years in chronological order from left to right, and for the specified interim periods (see next page). 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 (ii	n 1,000 pound	s) and value	e (in \$1,000)		
Item					
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					
Continued Dumping and Subsidy Offset Act funds received ⁵					
All other income items					
All other income or expenses, net					
Net income or (loss) before income taxes					
Depreciation/amortization included above					
Include only sales (whether domestic or export Please indicate the amount of profits or (losses Year 1 Year 2 Year 3 Year Less discounts, returns, allowances, and prepashipment quantities and values reported in Part II of COGS should include costs associated with int Please report funds received under this act in toperating expenses.	s) on inputs from 4 Year 5 aid freight. The c this questionnair ternal consumpti	related firms t quantities and re. on and transfe	hat were eliminate values should apports to related firms.	d pursuant questi	esponding

PART III.--FINANCIAL INFORMATION--Continued

III-11. Operations on purified CMC.--Continued

* *	00 pounds) and value (in \$1,000)	T
Item	January-September 2009	January-September 2010
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		
Continued Dumping and Subsidy Offset Act funds received⁵		
All other income items		
All other income or expenses, net		
Net income or (loss) before income taxes		
Depreciation/amortization included above		

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

² Please indicate the amount of profits or (losses) on inputs from related firms that were eliminated pursuant question III-8:

shipment quantities and values reported in Part II of this questionnaire.

⁴ COGS should include costs associated with internal consumption and transfers to related firms.

⁵ Please report funds received under this act in the period(s) in which they were received. Do not report these funds as an offset to operating expenses.

PART III.--FINANCIAL INFORMATION--Continued

III-12. <u>Asset values.</u>—Report the total assets associated with the production, warehousing, and sale of purified CMC. 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 six most recently completed fiscal years in chronological order from left to right.

	Value (<i>in \$1,000</i>)	January-September
Item		
ASSETS associated with the production, warehousing, and sale of product: 1. Current assets: A. Cash and equivalents		
B. Accounts receivable, net		
C. Inventories		
D. Other (describe:)		
E. Total current assets (lines 1.A. through 1.D.)		
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.E., 2.C., and 3)		

III-13. <u>Capital expenditures and research and development expenses.</u>--Report your firm's capital expenditures and research and development expenses on purified CMC. Provide data for your six most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

	Value (in \$1,000)						
	Calendar year					January-September	
Item						2009	2010
Capital expenditures							
Research and development expenses							

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Clark Workman (202-205-3248, clark.workman@usitc.gov)

IV-1.	Please identify the individual to be contacted regar part IV.	ding the confidential information requested in
	Name and title:	
	Please indicate the manner by which Commission part IV with questions regarding the submitted com	•
	E-mail:	Telephone: ()
	Fax: ()	-

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 produced domestically and shipped to U.S. **end users** unrelated to your firm by ownership.

<u>Product 1.</u>—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).

<u>Product 3.</u>—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.

<u>Product 4.</u>—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.

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

PRICE DATA--*Continued*

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. plant(s) 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, 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.

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

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

			in pounds, value			
Period of	Product 1			Product 2		uct 3
shipment	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2010:						
Jan-Mar						
Apr-June					1	
July-Sept						
Net value returned goods), f.o.b. your U.S.	point(s) of ship	all discounts, allowants, the latter ac n the first page of l	ctual or adjusted		nd the valu

NoteIf your product does not exact	y meet the product speci	ifications but is competitiv	ve with the specified
product, provide a description of your	product:		

Product 1:	
Product 2:	
Product 3:	

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

IV-2. Pricing data.--Continued

			in pounds, value	in dollars)	T	
Period of	Product 4		Product 5		Product 6	
shipment	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
OctDec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						
¹ Net value	es (<i>i.e.</i> , gross sale	s values less a	Il discounts, allow	ances, rebates,	prepaid freight, a	nd the value

Net values	(<i>i.e.</i> , gros	ss saies vaiue	s iess aii	i discounts,	allowances,	rebates,	prepaid	rreignt,	and the	value of
returned goods),	f.o.b. you	ır U.S. point(s) of shipr	ment; the la	itter actual or	adjusted	d.			
2			′ !			,				

² Pricing product definitions are provided on the first page of Part IV.

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

Product 4:		
Product 5:		
Product 6:		

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

IV-3. **Pricing products.--**

	U.S. selling and import price comparability. — Is the U.S. producer's reported <u>selling</u> prices of the domestic purified CMC at a comparable level of the market as the reported <u>import</u> price data for the products from the subject countries reported by importing end users (i.e., is it appropriate to compare the <u>selling</u> prices of the domestic products with the <u>import</u> 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.
IV-4.	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.

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

Type of sale

Unless otherwise instructed, please answer questions in the rest of Part IV based on your firm's total U.S. sales of its U.S.-produced purified CMC to all U.S. customers during January 2005-September 2010. 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 produce domestically, or for any other reasons, please note such differences.

IV-5. <u>Length of sales period.</u>--Please estimate below the share of your firm's total U.S. commercial shipment quantity during 2009 of its U.S.-produced purified CMC 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 oral agreements and written contracts.

Share of 2009 U.S. commercial shipment

quantity (percent)

		- J F	Territory (Fig. 11-11)	
		Long-term		
		Short-term		
		Spot		
		TOTAL	100 percent	
IV-6.		rm sales provisionsPlease answer ts U.Sproduced purified CMC on a er 2010.		
	(a) Wha	t was is the average duration of an ag	reement/contract?	
	(b) Coul	d prices be renegotiated during the ag	greement/contract period?	Yes No
	(c) Did t	the agreement/contract fix quantity, p	rice, or both? Quantit	ty Price Both
	(d) Did t	the agreement/contract have a meet-o	r-release provision?	☐ Yes ☐ No
IV-7.		rm sales provisionsPlease answer ts U.Sproduced purified CMC on a er 2010.	U 1	1 2
	(a) Wha	t was is the average duration of an ag	reement/contract?	
	(b) Coul	d prices be renegotiated during the ag	greement/contract period?	Yes No
	(c) Did t	the agreement/contract fix quantity, p	rice, or both? Quantit	ty Price Both
	(d) Did t	the agreement/contract have a meet-o	r-release provision?	☐ Yes ☐ No

IV-8.	<u>Price setting</u> How did your firm determine the prices that it charged for U.S. sales during January 2005-September 2010 of its U.Sproduced purified CMC (<i>check all that apply</i>)?					
	☐ Transaction-by-transaction ☐ Contracts					
	Set price lists (if checked, include a copy of a recent price list)					
	Reverse internet auction sales					
	OtherPlease describe:					
	Offici1 lease describe.					
IV-9.	Discount policy/practice Please indicate and describe your firm's discount policies/ practices (check all that apply) involving domestic sales during January 2005-September 2010 of its U.S. produced purified CMC; 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 exceptiondo NOT include any payment discounts covered in IV-10a.					
	Quantity discounts Annual total volume discounts No discounts					
	OtherPlease describe:					
IV-10.	<u>Pricing terms.</u> Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its U.Sproduced purified CMC.					
	(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.bPlease specify shipping point: Delivered					
IV-11.	Shipping information Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its U.Sproduced purified CMC.					
	(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.					

IV-12.	<u>Lead times.</u> What was your firm's share of its 2009 U.S. commercial shipments of its
	domestically produced purified CMC from inventory and produced to order and what was the
	average lead time between customers' orders and the date of delivery?

		Share of U.S.	
	Source	<u>commercial shipments</u> <u>in 2009 (Percent)</u> <u>Lead time</u>	e (days)
	From inventory		
	Produced to order		
	Total	100 %	
IV-13.		nat was the geographic market area in the Unng January 2005-September 2010 of its U.S	
		Geographic area	√ if applicable
	NortheastCT, ME, MA, NH, NJ,	, NY, PA, RI, and VT.	
	MidwestIL, IN, IA, KS, MI, MN,	MO, NE, ND, OH, SD, and WI.	
	SoutheastAL, DE, DC, FL, GA,	KY, MD, MS, NC, SC, TN, VA, and WV.	
	Central SouthwestAR, LA, OK	, and TX.	
	MountainsAZ, CO, ID, MT, NV,	NM, UT, and WY.	
	Pacific CoastCA, OR, and WA.		
	Other.—All other markets in the Un PR, VI, among others.	nited States not previously listed, including AK, F	
IV-14.	product mix, or marketing (includuring January 2005-September No Yes If yes, please describe and quant	Have there been any significant changes in uding sales over the internet) of purified CM 2010? tify if possible. Discuss the time periods where such changes on your firm's U.S. sales price	IC in the United States

IV-15.	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 State 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 ident	ify, including th	he time period.	_	
IV-16.	produced purification sales and, to the	ed CMC, identify the ne extent possible, rep	principal directors the approx	January 2005-September 2 t downstream products assortimate percentage share of d for by the purified CMC.	ciated with sucl	
	Downstream p	<u>oroduct</u>		Share of total cost (percent	<u>)</u>	
IV-17.		l uses Have there beeluring January 2005-Se		in the U.S. end uses or mix	of end uses of	
	☐ No	YesPlease descri	ibe.			
IV-18.		ces of purified CMC ir		e in prices of purified CMC se sector in the U.S. market		
	☐ No	Yes.				
		scuss and identify the priod of any such effect.		products and their associated	end-use sectors	
IV-19.	Technical supp	oort/service provisions	s			

	b) Were the technical support and service provisions priced separately for your firm's sales o U.Sproduced purified CMC during January 2005-September 2010?
	☐ No ☐ YesPlease explain.
20.	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 ☐ YesPlease explain.
	b) Did your customers ever specify/require the type(s) of cellulose to be used in the purified that your firm produced for them during January 2005-September 2010?
	□ No □ Yes
	If yes, please explain below whether your firm, your customer, or both jointly determined the type(s) of cellulose used and why one form of cellulose was chosen over another form.

IV-21.	Raw	materials.—
--------	-----	-------------

		ified CMC during January 2005-September 2010 and the impact of such trends on selling prices and/or quantities of its purified CMC.				
	b) Does your	r firm expect the trends in these import prices to continue in the future?				
	If yes, please	e explain below and identify the future time period of any changes.				
V-22.	Changes in other factors affecting supply.— a) Have any changes occurred in any other factors affecting supply (e.g., changes in availability or prices of energy or labor; transportation conditions; production capacity and/or methods of production; technology; export markets; or alternative production opportunities) of your U.Sproduced purified CMC in the U.S. market since 2005?					
	□ No	YesPlease note the time period(s) of any such changes, the factors(s) involved, and the impact such changes had on your shipment volumes and price				
		b) Do you anticipate any changes in the future in other factors affecting supply of your U.Sproduced purified CMC in the U.S. market?				

IV-23	Export constraints.—Please describe how easily your firm could shift its sales of purified CMC between the U.S. market and export markets during January 2005-September 2010. In your discussion, explain if your firm's U.Sproduced purified CMC produced for export during January 2005-September 2010 was not useable/acceptable in the U.S. market, subject to long-term contracts and/or other supply provisions, or other commercial reasons that would have inhibited or prevented shifting some or all of these products to the U.S. market within a 12-month period during this period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.
IV-24	Barriers to trade.—Were your firm's exports of purified CMC subject to any tariff or non-tariff
1 , 24.	barriers to trade in other countries during January 2005-September 2010?
	No YesPlease list the countries and describe for each country any such barriers and any significant changes in such barriers that occurred during this period, or that are expected to occur in the future.
IV-25.	U.S. inventories Please explain if your firm's U.S. inventories of its U.Sproduced purified CMC 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.

IV-26.	Availability o	<u>f supply (U.Sproduced)</u>				
	(a) Has the availability of U.Sproduced purified CMC in the U.S. market changed since 2005?					
	□ No	YesPlease explain the circumstances and identify the time period of any such changes.				
	market in the finance in the financ	ticipate any changes in the availability of U.Sproduced purified CMC in the U.S. future? No change Decrease te changes in supply, please identify the changes, including the time period and the changes on shipment volumes and prices. Provide any underlying assumptions, evant portions of business plans or other supporting documentation that address this				
IV-27.	Availability of supply (nonsubject).— (a) Has the availability of purified CMC imported from nonsubject countries in the United States changed since 2005? No YesPlease explain.					
	nonsubject con Increase	ticipate any changes in terms of the availability of purified CMC imported from untries in the U.S. market in the future? Decrease Decre				
	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.					

If yes— (a) Please coof these fluth business cy Cyclicat Seasonat Product Other coof Discussions (b) Have th U.S. sectors 2005? No (c) Explain	heck below the type(s) of demand fluctuations and then discuss the nature and timing ctuations during January 2005-September 2010. In addition indicate whether any cles result from changes in the overall economy and/or specific downstream sectors. I (longer than one year for complete cycle) I (within one year for complete cycle) Cycle (completed within one year, or longer than one year—Check one) Competitive condition(s) (specify
(a) Please of these flus business cy Cyclicated Seasonated Producted Other control of the contr	ctuations during January 2005-September 2010. In addition indicate whether any cles result from changes in the overall economy and/or specific downstream sectors. I (longer than one year for complete cycle) I (within one year for complete cycle) cycle (completed within one year, or longer than one year—Check one) competitive condition(s) (specify
Seasona Product Other co	cycle (completed within one year, or longer than one year—Check one) competitive condition(s) (specify
Discussion: (b) Have th U.S. sector: 2005? No	cycle (completed within one year, or longer than one year—Check one) competitive condition(s) (specify
Discussion: (b) Have th U.S. sector: 2005? No	ompetitive condition(s) (specify)
(b) Have th U.S. sectors 2005?	
(b) Have th U.S. sectors 2005?	In addition, identify, if applicable, peak and lowest demand months in a year.
U.S. sectors 2005? No (c) Explain	
U.S. sectors 2005? No (c) Explain	
(c) Explain	ere been any changes in the business cycles or conditions of competition in specific s using purified CMC or for total purified CMC in the U.S. market since January
	Yes Please describe.
	how any U.S. cyclical/seasonal/other demand fluctuations affected your firm's selling
	shipment quantities of its U.Sproduced purified CMC to the U.S. market at any ing January 2005-September 2010.

2005-Septembe		Č	
☐ Increased	☐ No Change	Decreased	☐ Fluctuated
January 2005-S	mand OUTSIDE the United eptember 2010? What princ tify specific foreign countries	ipal factors affected cha	_
Increased	☐ No Change	Decreased	Fluctuated
(a) Do you antic	mand trends cipate any future changes in	total demand for purified	d CMC WITHIN the
States?	cipate any future changes in	_	
(a) Do you antic	eipate any future changes in Yes—Please describe underlying assumptions	total demand for purified be and identify the time parts, along with relevant potential	period. Provide any rtions of business plan
(a) Do you antio	eipate any future changes in Yes—Please describe underlying assumptions	ne and identify the time j	period. Provide any rtions of business plan
(a) Do you antid States? No (b) Do you antid	eipate any future changes in Yes—Please describe underlying assumptions	be and identify the time post, along with relevant postentation that address this demand for purified CM	period. Provide any rtions of business plans issue.

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

IV-31. 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 <u>and</u> 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.

purified CMC, other hydrocolloids, etc.) for purified CMC exist in the U.S. market?

a) Do substitutes (e.g., crude/unrefined CMC, CMC Fluidized Polymer Suspensions, cross-linked

∐ No	es					
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.		☐ No ☐ Yes—Please explain.				
2.		□ No □ Yes—Please explain.				
3.		☐ No ☐ Yes—Please explain.				
4.		☐ No ☐ Yes—Please explain.				
5.		☐ No ☐ Yes—Please explain.				

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

IV-31. Substitutes in demand in the U.S. market for the purified CMC.—Continued

	been any changes in the number or types of products that can be substituted for or changes in the relative importance/mix of existing substitutes during January er 2010?
□ No	YesPlease explain.
	cipate any changes in the number or types of products that can be substituted for or changes in the relative importance/mix of existing substitutes in the future?
☐ No	YesPlease describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

IV-32.	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-SeptemberJune 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 YesPlease describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.					
IV-33.	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.					

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

IV-34. <u>Interchangeability.</u>—Was purified CMC produced in the United States and in other countries interchangeable (*i.e.*, could they physically be used in the same applications) in the U.S. market during January 2005-September 2010? 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	Finland	Mexico	Netherlands	Sweden	Other countries ²		
United States							
Finland							
Mexico							
Netherlands							
Sweden							
The each country-pair where purified CMC was sometimes or never interchangeable during January 2005-September 2010, please explain the factors that limit or preclude interchangeable use and identify the associated country pair(s): Identify any "other countries."							

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

IV-35. Factors other than price.--Were differences other than price (*i.e.*, quality, availability, transportation network, product range, technical support, *etc.*) between purified CMC produced in the United States and imported purified CMC a significant factor in your firm's U.S. sales of its U.S.-produced purified CMC during January 2005-September 2010? 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	Finland	Mexico	Netherlands	Sweden	Other countries ²		
United States							
Finland							
Mexico							
Netherlands							
Sweden							
1 For each country-pair for which factors other than price always or frequently were a significant factor in your firm's U.S. sales of its U.Sproduced purified CMC during January 2005-September 2010, please identify the advantages or disadvantages imparted by such factors and identify the associated country pair(s): 2 Identify any "other countries."							