

**Field Test Comments for questionnaire in support of “Used Electronic Products: An Examination of U.S. Exports,” U.S. International Trade Commission, Investigation No. 332-528.**

Question Number	(Name) Comment	Response
General comment	<p>(Wiggin) The survey is pretty straightforward.</p> <p>(Levine) Generally good style and layout of the survey.</p> <p>(Abramowitz) Show more information in the “Your firm required by law” section. Don’t just cite the relevant law.</p> <p>(Abramowitz) There should be the same data categories across the survey, especially in sections 3 and 4.</p> <p>(Abramowitz) Including brokers and collectors could lead to double counting.</p> <p>(Cade) Check definitions up front to be sure that e-waste and working goods are both clearly defined.</p> <p>(Boswell) The survey is quite long and detailed – would take up to 2 hours to complete. You should better explain the overall benefit to firms, to encourage them to fill it out.</p> <p>(Cade) Use “material recovery” instead of “recycling” throughout the report.</p> <p>(Epperson) Survey is a “comprehensive and discerning tool.” End of life recycled goods are measured in weight, but repair/refurbish goods are measured in units.</p> <p>(St. Denis) Overall, the questionnaire looks good. OEMs should answer the questionnaire.</p>	<p>NA</p> <p>NA</p> <p>Kept as is, since language was cleared by our General Counsel.</p> <p>Left as is. Different categories are used in an attempt to reduce the burden of the survey on non-exporters. As such, section 4 asks for more detail than section 3.</p> <p>While this is possible, excluding brokers and collectors will exclude a substantial proportion of exports. We do plan to try to exclude most collectors from the survey.</p> <p>We don’t use the term e-waste in the questionnaire, so we don’t define it. We do clearly define relevant terms we use: “refurbished goods,” “recycled” and “disposal.”</p> <p>Added language in the introduction section as suggested.</p> <p>Did not amend as suggested but updated introductory definitions to clarify questions.</p> <p>Changed several questions to reflect units rather than weight.</p> <p>NA</p>

General staff question regarding our request for data in tonnage vs. weight in pounds	(Levine, Abramowitz, Cade, Epperson, Roman) Use pounds rather than tons as the unit of measure.	Changed unit value to pounds.
General question regarding whole vs. shredded circuit boards	(Lewis, St. Denis, Roman) Better to distinguish between whole and shredded.	Separated these categories in several questions.
General question regarding wires, cables, and power packs	Generally these are handled separately from the products they came from.	Added separate category in section 4 tables.
Definitions 1 and 2	(Cade) Make sure the distinction is clear between the two.  (St. Denis) Clarify that this broad definition includes the products defined in #9-15.	Clarified the definitions.  Added this to the definition.
Definition 2	(Lewis) "Refurbishment" should be a separate definition from "reclaimed parts" and questions about reclaimed parts should be separate.	No change. Other field testers have said the product categories are too complicated. This suggestion would complicate them further.
Definition 3	(Epperson) Does this include leftover materials after parts have been harvested?	It does and we've clarified the language to reflect this.
Definition 4 (of disposal), raises issues for questions 3.5 and 4.8	(Levine, St. Denis) Survey says disposal is anything you pay for. This is not true. Items such as CRT glass and mercury are "pay to recycle." Amend definition of disposal to include both of these groups.	Clarified language in response.
Definitions 5-17	(Cade, St. Denis, Roman) Offered several suggestions for clarifying definitions 5, 9, 10, and 14, 15, 16, and 17.	The suggestions were incorporated into the revised definition language.
Definitions 13 and 14 (video equipment)	(Abramowitz) CRTs of interest should be better defined.  (Lewis) iPods and MP3 players sometimes have integrated video. It is unclear from the definitions under which definition they fall.	Clarified that all CRT computer monitors and televisions, regardless of size, should be excluded from the "video equipment" category.  Clarified that these devices fall within audio equipment category.
1.1	(Epperson) Identify as "primary" address.	Done.
1.3	(Abramowitz) Respondents may not be aware of whether other affiliates of their company received a questionnaire	We will need to rely on explanatory language requesting respondents to coordinate their responses with their U.S. parent company.
2.2	(Levine) Clarify whether FTEs	Added a clarification to state that

	includes temporary employees	temporary employees should be included.
2.3	(Abramowitz) Change language to clarify.	Done.
	(Lewis) There should be more detail explaining "establishment" and "process electronics." Does this mean facilities that perform reclamation, collection or recycling? Are third parties hired to perform these services included in the definition of "facility"?	Clarified the questions.
2.6D	(Abramowitz) Fix type in Reset box.	Fixed.
2.7B	(Abramowitz, Epperson, St. Denis) Add ISO 9001, ISO 18001, and RIOS as options, leave only one "other" box.  (Lewis) Does the question apply only to recycling operations? If so, would it apply to recycling operations that the respondent hires?  (Cade) Also ask for refurbisher certifications.	Added RIOS, as more people requested that one. Others can use the "other" option.  Clarified both points.  Added a check box for the MS Refurbisher program. Others will be reported in the "other" category.
2.8	(Abramowitz, Cade) Include a choice for "broker".  (Epperson) Clarify "IT asset manager" term.	Deleted question 2.8, combined with question 2.9, integrated these suggestions into 2.9. We've included brokers and defined the terms per field tester comments.
2.9	(Cade) Include a separate choice for repair.  (Roman) Separate categories for glass processing and large vs. small shredders.	Included "repair" together with refurbish and remanufacture.  Agreed on glass processing. Large vs. small shredders seems too complicated.
Section 3 generally	(Levine, Lewis) Clarify whether estimates are acceptable if information is not available.  (St. Denis) Need a question about the value of circuit boards.	Done.  Added as requested.
3.1	(Wiggin, St. Denis) Add categories for IT asset manager and "direct from OEMs".  (Abramowitz) Better to ask for estimated share than ranges. (Abramowitz) Need a choice for	Done.  Ranges are used to reduce the burden on respondents, but the final version deleted most

	<p>contracts with OEM cell phone manufacturers.</p> <p>(Abramowitz) No difference between public and municipal waste collection sites.</p> <p>(Lewis) Please add, "directly from consumers" to the list of the origin of used electronics which could include used electronics returned by consumers for service or simply due to the sellers return policy in addition to take-back programs. In addition, is this question intended to also cover parts and components?</p> <p>(Roman) Recommended language changes for clarity.</p>	<p>ranges; other comments addressed as appropriate.</p> <p>Combined categories in the question.</p> <p>Done and clarified instructions to cover components and parts.</p> <p>Done.</p>
3.2-3.5	(Epperson) Decide how to handle commercial IT asset management fees.	Included instructions on these fees.
3.2	(Cade) Ask for units sold, rather than pounds.	Done. Chose not to include additional question about average age of units refurbished.
3.6	<p>(Wiggin) Eliminate "inputs" after "product." Add "or resale" option in line 1. Split Metals from other commodities in line 4.</p> <p>(Abramowitz) Explain difference between this question and questions 3.2 through 3.5. Why not all in the same table?</p> <p>(Cade) Language is confusing.</p> <p>(Epperson) Prefill total line as 100% to avoid confusion.</p> <p>(Epperson) Add categories for goods refurbished by respondent, and for component parts of CRTs.</p>	<p>Integrated first two comments as requested. Created separate categories for metals, plastics, and glass in line 4.</p> <p>Changes have been made to clarify these questions.</p> <p>Clarified language.</p> <p>Done.</p> <p>Clarified question language.</p>
3.7	<p>(Wiggin, Epperson) Split Metals from other commodities in line 4. Ask about wires and cables separately.</p> <p>(Abramowitz) Question is redundant for firms that are e-stewards certified. Skip this question if answered yes to that in question 2.7B?</p>	<p>Accepted both these suggestions.</p> <p>A change would be too confusing to the flow of the questionnaire. Change not made.</p>

	<p>(Lewis) Concerns over answering this question depending on the destination and type of goods sold.</p> <p>(Cade) Align choices in 3.7D with R2 standard's focused materials.</p>	<p>Such a modification would change meaning. Not addressed by other commenters so question was left as is.</p> <p>Left as is.</p>
3.8	<p>(Lewis, Epperson) Does this apply to refurbished and repaired goods or only to recyclers?</p> <p>(Roman) Suggested asking this question separately, for buyers of hazardous vs. non-hazardous materials.</p>	<p>Changed language to clarify.</p> <p>Done. Addresses similar questions from Lewis and Epperson as well.</p>
3.9 and 3.10	<p>(Levine, Epperson) These two questions seem identical/wording is confusing.</p> <p>(Roman) Add choice for client demand, define hazardous vs. non-hazardous materials with regard to exporting.</p>	<p>Clarified explanatory language for the two questions.</p> <p>Client demand is already covered in another choice. Defining export motivations separately for hazardous vs. non-hazardous materials is confusing and too burdensome. Change not made.</p>
3.11	<p>(Abramowitz) Use absolute estimates, not ranges.</p>	<p>Ranges are used to reduce the burden on respondents.</p>
Section 4 generally	<p>(Levine) Asks for too much detail, especially in the computers and peripherals product groups.</p> <p>(Cade) Add more explanatory language at beginning of section to clarify that these questions are asked in more detail of exporters</p>	<p>Changed product groupings to clarify and for ease of answering.</p> <p>Changed language as requested.</p>
4.1 and 4.2	<p>(Lewis) Suggests a separate option for firms that do not export directly.</p>	<p>Not relevant here, since only firms that directly export should be answering this section. Change not made.</p>
4.3	<p>(Abramowitz) Should 2011 data compare to 2011, not 2012 Schedule B? Is it possible to use check boxes or drop down menus to avoid flipping back and forth to the Schedule B list?</p>	<p>The possible number of Schedule B codes is large, so we would prefer people to choose their own, not choose from a short list defined by us.</p>
4.5 and 4.6	<p>(Wiggin) Move explanatory language before question 4.6 to before question 4.5.</p> <p>(Levine) Repair and resale should be tracked in units/eaches rather than by weight.</p>	<p>Moved language as suggested.</p> <p>Changed question to ask for number of units.</p>
4.5 – 4.9	<p>(Roman) Break out flat screen monitors from other computer</p>	<p>Created separate category for CRTs.</p>

	peripherals and from CRTs.	
5.1 and 5.2	(Abramowitz) Asking for weight or value?  (Epperson, St. Denis, Roman) Add ODM to OEM category, add category for plastics reprocessor.	Clarified language to avoid confusion.  Added as requested.
5.5	(Epperson) Should refer to question 5.3, not 5.4.	Correction made.