U.S. PRODUCERS' QUESTIONNAIRE

CERTAIN LIGHTWEIGHT THERMAL PAPER FROM CHINA AND GERMANY

This questionnaire must be received by the Commission by no later than **SEPTEMBER 5**, 2014

See 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 countervailing duty and antidumping duty orders concerning certain lightweight thermal paper from China and Germany (Inv. Nos. 701-TA-451 and 731-TA-1126-1127 (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 firm's possession (19 U.S.C. § 1333(a)).

Name of firm

City			State	Zıp Coa	e	
World Wide	Web addre	ess				
instruction boo your firm a "pr	oklet) at any t roducer" if yo	ime since January	1, 2008? For purpel coats base paper,	oses of this quest	paper") (as defined in ionnaire, you should aper, or performs con	consider
□ NO	(Sign the cert	ification below and	promptly return only	this page of the qu	estionnaire to the Com	mission)
☐ YES			efully, complete all posons to be received by		nnaire, and return the ened above)	itire
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PART I.—GENERAL INFORMATION

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

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

Hours	Dollars

- I-1b. <u>OMB feedback</u>.--We are interested in any comments you may have for improving this questionnaire in general or the clarity of specific questions. Please attach such comments to your firm's response or send them to the above address.
- I-2. **Establishments covered.--** Provide the city, state, zip code, and brief description of each establishment(s) covered by this questionnaire (see page 3 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table.

Establishments Covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discus	sion on establishments co	nsolidated in this question	nnaire:

I-3. <u>Position regarding continuation of order.</u>--Does your firm support or oppose continuation of the antidumping and/or countervailing duty order currently in place for certain LW thermal paper from the following countries?

Country	Support	Oppose	Take no position
China			
Germany			

PART I.--GENERAL INFORMATION--Continued

Firm name	Address	Extent of ownership (percent)
		W /
domestic or foreign, that are Germany into the United St China or Germany to the United United United St	e engaged in importing certa tates or that are engaged in e	firm have any related firms, either in LW thermal paper from China axporting certain LW thermal pape
Firm name	Address	Affiliation
		L
domestic or foreign, that are than China or Germany into thermal paper from countries.	e engaged in importing certa	•
domestic or foreign, that are than China or Germany into thermal paper from countries.	e engaged in importing certa to the United States or that are es other than China or Germa	in LW thermal paper from countries engaged in exporting certain LW any to the United States?
domestic or foreign, that are than China or Germany into thermal paper from countries No YesLi	e engaged in importing certa o the United States or that are es other than China or Germa est the following information	in LW thermal paper from countrie engaged in exporting certain LW any to the United States?

PART I.--GENERAL INFORMATION--Continued

ousiness plan. Does your comp	oany or any related firm hav	e request a copy of your company we a business plan or any internal ket conditions for certain LW the

PART II.--TRADE AND RELATED INFORMATION

Fax

Further information on this part of the questionnaire can be obtained from Nathanael Comly (<u>nathanael.comly@usitc.gov</u>; 202-205-3174). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1.	Contact inform	nation Please identify the responsib	le individual and the manner by which
	Commission sta	aff may contact that individual regardi	ng the confidential information submitted in part
	II.		
	Name		
	Title		
	Email		
	Telephone		

II-2. <u>Changes in operations.--</u>Please indicate whether your firm has experienced any of the following changes in relation to the production of certain LW thermal paper since January 1, 2008.

(che	ck as many as appropriate)	(please describe)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	New products (e.g. BPA-free paper)	
	other (e.g., technology, modernization or upgrade of equipment)	

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

II-3.	<u>Anticipated changes in operations</u> Does your firm anticipate any changes in the character of your firm's operations or organization (as noted above) relating to the production of certain LW thermal paper 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 your response a specific projection of your firm's capacity to producertain LW thermal paper (in short tons) for 2014 and 2015.	ss le in				
	uestion II-4, if your firm's response differs for particular orders, please indicate and explain the ular effect of revocation of specific orders. Anticipated changes in operations in the event the order is revokedWould your firm anticipate any changes in the character of your firm's operations or organization (as noted above) relating to production of certain LW thermal paper in the future if the countervailing duty or antidumping dut orders on certain LW thermal paper from China and/or Germany were to be revoked?	ate the				
	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 your response a specific projection of your firm's capacity to producertain LW thermal paper (in short tons) for 2014 and 2015.	ess e in				

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

II-5a. **Production and capacity.--** Please report your firm's production of certain LW thermal paper, production of products made on the same equipment and machinery used to produce certain LW thermal paper, and the combined production capacity on this shared equipment and machinery in the periods indicated.

Coating/jumbo roll machinery

(Quantity in short tons)							
Item	2008	2009	2010	2011	2012	2013	Jan-Jun 2014
Overall production capacity on coating/jumbo roll machinery							
Production of: Certain LW thermal paper							
Other thermal paper ²							
Other products ³							
¹ Certain LW thermal paper product ² Please identify: ³ Please identify:	ion should e	equal produc	tion data rep	oorted in II-7			

Conversion (cutting, slitting) machinery

		(Quantity in	n short tons)				
Item	2008	2009	2010	2011	2012	2013	Jan-Jun 2014
Overall production capacity on conversion (cutting, slitting) machinery							
Production of: Certain LW thermal paper							
Other thermal paper ²							
Other products ³							
² Please identify: ³ Please identify: II-5b. Operating parameters. II-5a is based on operating	The prod	uction capa	city (see de	efinitions in		n booklet) 1	reported in
II-5c. <u>Capacity calculation</u> l reported in II-5a, and exp			0.5		culate over	all product	ion capacit

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

_	duction constrai	intsPlease describe the constraint(s) that set the limit(s) on your firm's
Pro	duct shifting.—	
(i)	•	able to switch production (capacity) between certain LW thermal paper and other ng the same equipment and/or labor?
	☐ No	Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
(ii)	products (e.g	the the factors that affect your firm's ability to shift production capacity between g., time, cost, relative price change required, etc.), and the degree to which these nee or constrain such shifts.

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

II-7. Trade data – U.S. producers of jumbo rolls.--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of jumbo rolls of certain LW thermal paper in your firm's U.S. establishment(s) during the specified periods. U.S. producers of jumbo rolls are producers who conduct coating operations in the United States. Coaters that also perform conversion operations, such as slitting and packaging, on the jumbo rolls that they produce in the United States should report data for all operations (both coating and conversion) in this table, and should not complete table II-8. Table II-8 is reserved for those firms who exclusively slit and package jumbo rolls that are purchased or imported.

	Quantit	y (in short	tons) and	value (in \$	1,000)			
			Calend	lar year			Janua	ry-June
Item	2008	2009	2010	2011	2012	2013	2013	2014
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. commercial shipments to distributors (quantity) (M)								
U.S. commercial shipments to end users (<i>quantity</i>) (N)								
Employment data: Average number of PRWs (number) (O)								
Hours worked by PRWs (1,000 hours) (P)								
Wages paid to PRWs (<i>value</i>) (Q)								

Table notes next page.

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

II-7. Trade data – U.S. producers of jumbo rolls.—Continued

The production capacity (see weeks per year. Please des	cribe the me	ethodology					hours per walain any char	
reported capacity (use additional p	ages as ne	cessary).						
2 Internal consumption and train	nefers to rel	ated firms	should be v	alued at fair	market valu	e In the ev	vent that you	r firm
uses a different basis for valuing the data using that basis for each of the	nese transa	ctions, plea	se specify t					
³ Identify your firm's principal e	export marke	ets:						·
RECONCILIATION OF CHANNEL	_ DATA							
Please ensure that the quantities reported for commercial values other than zero (i.e., "0"), the	reported for U.S. shipm	nents (i.e., li	ine D) in ea	ch time perio	od. If the cal	lculated field	ds below retu	ırn
	,			ar years			January	
Reconciliation item	2008	2009	2010	2011	2012	2013	2013	2014
Reconciliation should = 0 (if not revise)	0	0	0	0	0	0	0	0
RECONCILIATION OF SHIPMEN	T INVENT		PODLICTI	ON DATA				
Generally, the data reported for the inventories (i.e., line B), plus produ differences are not due to data en provide any likely explanations for	uction (i.e., l try errors in	line C), less completing	total shipn this form, theft, loss, d	nents (i.e., lir out rather act amage, reco	nes D, F, H, tually reflec	and J). Ple t your firm's	ease ensure i records; and .).	that any d also
Decree What we to a	0000	0000		ar years	0040	0040	January	
Reconciliation item Reconciliation should = 0 (if not,	2008	2009	2010	2011	2012	2013	2013	2014
either revise data or explain the								
reason for the discrepancy below)	0	0	0	0	0	0	0	0
Explanation for reconciliation not h	nolding:							
								·
Also please note the of-period inventorion line B of year 2009	es reported	l in the sub	sequent c	alendar yea	r (<i>i.e.</i> , line	L of year	•	
☐ Yes		NoPle	ase explai	n.				

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

II-8. Trade data – U.S. converters.--Report your firm's production capacity, production, shipments, inventories, and employment related to the conversion of jumbo rolls into certain LW thermal paper products in your firm's U.S. establishment(s) during the specified periods. This table is for those firms who exclusively slit and package jumbo rolls that are purchased or imported. Coaters that also perform slitting and packaging operations on jumbo rolls they produce in the United States should use table II-7.

	Quantity	(in short	tons) and v	alue (in \$1	1,000)			
			Calend	ar year			Januar	y-June
Item	2008	2009	2010	2011	2012	2013	2013	2014
Purchases of jumbo rolls quantity (A)								
value (B)								
Average conversion capacity ¹ (quantity) (C)								
Beginning-of-period inventories (quantity) (D)								
Production from (quantity) U.S. produced jumbo rolls (E)								
Foreign-sourced jumbo rolls: Imported from subject sources (F)								
Imported from nonsubject sources (G)								
Total production	0	0	0	0	0	0	0	0
U.S. shipments: Commercial shipments: quantity (H)								
value (I)								
Internal consumption: ² quantity (J)								
value (K)								
Transfers to related firms: ² quantity (L)								
value (M)								
Export shipments: ³ quantity (N)								
value (O)								
End-of-period inventories (quantity) (P)								
Channels of distribution: U.S. commercial shipments to distributors (quantity) (Q)								
U.S. commercial shipments to end users (<i>quantity</i>) (R)								
Employment data: Average number of PRWs (number) (S)								
Hours worked by PRWs (1,000 hours) (T)								
Wages paid to PRWs (<i>value</i>) (U)								

Table notes next page.

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

The production capacity (see weeks per year. Please des reported capacity (use additional p	cribe the me	thodology					_ hours per w lain any char	
	ages as nec							
² Internal consumption and tra uses a different basis for valuing that data using that basis for each of the	hese transad	ctions, pleas	se specify tl					
³ Identify your firm's principal e	export marke	ets:						
RECONCILIATION OF CHANNEI	DATA							
Please ensure that the quantities quantities reported for commercial values other than zero (i.e., "0"), the second control of the commercial values of the control of the	reported for I U.S. shipm	ents (i.e., lii	ne H) in ead	ch time perio	d. If the cal	culated field	ds below retu	ırn
	-		Calenda	ar years			January	-June
Reconciliation item	2008	2009	2010	2011	2012	2013	2013	2014
Reconciliation should = 0 (if not revise)	0	0	0	0	0	0	0	0
RECONCILIATION OF SHIPMEN	T, INVENTO	ORY AND P	RODUCTION	ON DATA				
Generally, the data reported for th inventories (i.e., line D), plus prod ensure that any differences are no records; and also provide any like	uction (i.e., l ot due to dat	ines E, F aı a entry erro	nd G), less i rs in comple	total shipme eting this for	nts (i.e., line m, but rathe	es H, J, L, a er actually r	nd N). Pleas eflect your fir	se m's
			Calenda	ar years			January	-June
Reconciliation item	2008	2009	2010	2011	2012	2013	2013	2014
December 1 in the second of th								
Reconciliation should = 0 (if not, either revise data or explain the reason for the discrepancy below)	0	0	0	0	0	0	0	0
either revise data or explain the		0	0	0	0	0	0	0
either revise data or explain the reason for the discrepancy below)		0	0	0	0	0	0	
either revise data or explain the reason for the discrepancy below)	e quantities reported in	reported f	or end-of-jquent caler	period inve	ntories sho	ould equal of year 200	the beginni	ng-of-
either revise data or explain the reason for the discrepancy below) Explanation for reconciliation not I Please note that the period inventories in	e quantities reported in	reported f the subsec	or end-of-jquent caler	period invendar year (i. adjacent ca	ntories sho	ould equal of year 200	the beginni	ng-of-
either revise data or explain the reason for the discrepancy below) Explanation for reconciliation not l Please note that the period inventories in D of year 2009).	e quantities reported in	reported f the subsec	or end-of- quent caler e for each	period invendar year (i. adjacent ca	ntories sho	ould equal of year 200	the beginni	ng-of-

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

шво р	rocessed inputs from sources	other than your r	
		the paper your fir	a contad in 2012 was produced from b
<u>Coati</u> (i)			n coated in 2013 was produced from ba
	What share, by weight, of t	ed firm produced	•
	What share, by weight, of t	ed firm produced Share	•
Coati (i)	What share, by weight, of t that your firm or an affiliate	ed firm produced	•
	What share, by weight, of t that your firm or an affiliate	ed firm produced Share	•

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

II-11. <u>U.S. shipments by basis weight.</u>—Report your firm's U.S. commercial shipments of certain LW thermal paper by specified basis weights during the specified periods.

		January-June								
Item	2008	2009	Calend 2010	2011	2012	2013	2013	2014		
	Jumbo rolls									
U.S. shipments of LW thermal paper of:										
Less than 49.9 g/m ² quantity										
value										
49.9 g/m ² to 60 g/m ² quantity										
value										
Over 60 g/m ² to 70 g/m ² quantity										
value										
Total shipments ¹ quantity										
value										
			•	Slit	rolls	•				
U.S. shipments of LW thermal paper of:										
Less than 49.9 g/m ² quantity										
value										
49.9 g/m ² to 60 g/m ² quantity										
value										
Over 60 g/m ² to 70 g/m ² quantity										
value										
Total U.S. shipments ¹ quantity										
value										
¹ Total U.S. shipments shoul	d equal the	se reported	d in question	ns II-7 or II-	8 (<i>i.e.</i> line [D). If they do	not, pleas	e explair		

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

II-12. <u>U.S. shipments - BPA.</u>—Report your firm's U.S. commercial shipments of certain LW thermal paper for the specified Bisphenol A ("BPA") content during the specified periods.

	Quant	ity (in <i>sho</i>	rt tons) and	d value (in	\$1,000)			
			Calend	ar year			Janua	ry-June
Item	2008	2009	2010	2011	2012	2013	2013	2014
		•		Jumb	o rolls		•	•
U.S. shipments of LW thermal paper of:								
BPA-containing quantity								
value								
BPA-free quantity								
value								
Total shipments ¹ quantity								
value								
				Slit	rolls			
U.S. shipments of LW thermal paper of:								
BPA-containing quantity								
value								
BPA-free quantity								
value								
Total U.S. shipments ¹ quantity								
value								
¹ Total U.S. shipments shoul	d equal tho	ose reported	in question	ns II-7 or II-	8 (<i>i.e.</i> line [D). If they do	o not, pleas	e explain:

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

II-13.	PurchasesOther than direction of certain LW thermal paper.						
	d	iffer by sou		elaborate) a	and report th		ur firms' reaso and value of su
	Reasons:						
		(Quan	tity in short	tons)			
	Item	2008	2009	2010	2011	2012	2013
				Jumi	bo rolls		
IMPOF THER!	HASES FROM U.S. RTERS ¹ OF CERTAIN LW MAL PAPER FROM.— ina						
Ge	rmany						
	other countries						
	HASES FROM DOMESTIC UCERS: ²						
PURC	HASES FROM OTHER						
SOUR	UE3.			Slit	t rolls		
IMPOF THER!	HASES FROM U.S. RTERS ¹ OF CERTAIN LW MAL PAPER FROM.— ina						
Ge	rmany						
All	other countries						
	HASES FROM DOMESTIC UCERS:2						
PURC	HASES FROM OTHER CES:						
	lease list the name of the import y source, please identify the sou				this product.	If your firm's	suppliers
² P	lease list the name of the domes	tic producer	(s) from whic	h your firm p	ourchased this	s product.	
II-14.	Toll productionSince Jar definition in the instruction	booklet) re	garding the	production	of certain I	W thermal	paper?
	No YesNa	ime firm(s)	:				·
I-15.	FTZDoes your firm prod	uce certain	LW therma	l paper in a	foreign trac	de zone (FT	Z)?
	□ No □ YesIde	entify FTZ((s):				·
I-16.	Direct imports. Since Janu	uary 1, 200	8, has your	firm impor	ted certain I	W thermal	paper?
	□ No □ Yes <i>Co</i>	OMPLETE	AND RET	IIRNAII	S IMPORT	ERS' OUF	STIONNAIR

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

For questions II-17 and II-18, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

II-17.	Effect of ordersDescribe the significance of the existing countervailing duty and/or antidumping duty orders covering imports of certain LW thermal paper from China and/or Germany in terms of its 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.
II-18.	Likely effect of revocation of ordersWould 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 certain LW thermal paper in the future if the countervailing duty and/or antidumping duty orders on certain LW thermal paper from China and/or Germany 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 for any trends or projections you may provide.
II-19.	Other explanationsIf your firm would like to further explain a response to a question in Part II that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Mary Klir (Email <u>mary.klir@usitc.gov</u>; 202 205 3247).

TD' .1	e e
Title Emai	
Telep	
Fax	Mone
-	Sunting system. Briefly describe your firm's financial accounting system.
A.	When does your firm's fiscal year end (month and day)? If your firm's fiscal year changed during the data-collection period, explain below:
B.1.	Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include certain LW thermal paper:
2.	Does your firm prepare profit/loss statements for certain LW thermal paper: Yes No
3.	How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below. Audited, unaudited, annual reports, 10Ks, 10Qs, Monthly, quarterly, semi-annually, annually
4.	Accounting basis: GAAP, cash, tax, or other comprehensive basis of accounting (specify)
	Note: The Commission may request that your company submit copies of its financial statements including internal profit-and-loss statements for the division or product group that includes certain LW thermal paper, as well as those statements and worksheets used to compile data for
	your firm's questionnaire response.
	accounting systemBriefly describe your firm's cost accounting system (e.g., standard job order cost, etc.).
	accounting systemBriefly describe your firm's cost accounting system (e.g., standard

PART III.--FINANCIAL INFORMATION--Continued

Yes Yes

☐ No

III-5.	Other productsPlease list the products your firm produces in the facilities in which it produces
	certain LW thermal paper, and provide the share of net sales accounted for by these other
	products in your firm's most recent fiscal year.

	Products	Share of sales
	Certain LW thermal paper	%
		%
		%
		%
		%
III-6.	Does your firm purchase inputs (raw materials, labor, energy production of certain LW thermal paper from any related firm YesContinue to question III-7. NoContinue to Inputs from related firmsIn the space provided below, it production of certain LW thermal paper that your firm purch	o question III-9. Hentify the inputs used in the
	Input	Related party
III-8.	Inputs from related firms at cost.—All intercompany profit parties should be eliminated from the costs reported to the C costs reported in question III-10 should only reflect the relate associated profit component). Reasonable methods for deter associated profit on inputs purchased from related parties are Has your firm complied with the Commission's instructions inputs purchased from related parties?	ommission in question III-10 (i.e., ed party's cost and not include an emining and eliminating the e acceptable.

PART III.--FINANCIAL INFORMATION--Continued

III-9. Nonrecurring items (charges and gains) included in certain LW thermal paper financial results.--For each annual and interim period for which financial results are reported in question III-10, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific table III-10 line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), as reflected in table III-10; i.e., if an aggregate nonrecurring item has been allocated to table III-10, only the allocated value amount included in table III-10 should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported certain LW thermal paper financial results in tables III-10.

		Fiscal years ended					January-June	
	2008	2009	2010	2011	2012	2013	2013	2014
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific table III-10 line item where the nonrecurring item is included.		ring item: I			report the a	nmount (<i>in \$</i>	1,000) of the	e relevant
1.								
2.								
3.								
4.								
5.								
6.								
7.								

PART III.--FINANCIAL INFORMATION--Continued

III-10(a)U.S. operations relating to certain LW thermal paper.--Report the revenue and related cost information requested below on the certain LW thermal paper operations of your firm's U.S. establishment(s) during the specified periods. Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value and purchases from related firms must be at cost.²

	Quantity (in s	short tons) and	d value (<i>in</i> \$1,	,000)				
	Fiscal years ended							
Item	2008	2009	2010	2011	2012	2013		
Net sales quantities: ³ Commercial sales ("CS")								
Internal consumption ("IC")								
Transfers to related firms								
Total net sales quantities	0	0	0	0	0	0		
Net sales values: ³ Commercial sales								
Internal consumption								
Transfers to related firms								
Total net sales values	0	0	0	0	0	0		
Cost of goods sold (COGS): ⁴ Raw materials								
Direct labor								
Other factory costs								
Total COGS	0	0	0	0	0	0		
Gross profit or (loss)	0	0	0	0	0	0		
Selling, general, and administrative (SG&A) expenses: Selling expenses								
General and administrative expenses								
Total SG&A expenses	0	0	0	0	0	0		
Operating income (loss)	0	0	0	0	0	0		
Other expenses and income: Interest expense								
All other expense items								
All other income items								
Net income or (loss) before income taxes	0	0	0	0	0	0		
Depreciation/amortization included above								

Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u>.
 Please <u>eliminate any profits or (losses) on inputs from related firms</u> pursuant question III-7.
 Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

COGS should include costs associated with CS, IC, and Transfers, as well as export shipments in question II-7/II-8.

PART III.--FINANCIAL INFORMATION--Continued

III-10(a) U.S. operations relating to certain LW thermal paper.—Continued

Item	January-June 2013	January-June 2014
Net sales quantities: ³	, ca e e	
Commercial sales ("CS")		
Internal consumption ("IC")		
Transfers to related firms		
Total net sales quantities	0	(
Net sales values: ³		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales values	0	(
Cost of goods sold (COGS): ⁴ Raw materials		
Direct labor		
Other factory costs		
Total COGS	0	(
Gross profit or (loss)	0	(
Selling, general, and administrative (SG&A) expenses: Selling expenses		
General and administrative expenses		
Total SG&A expenses	0	0
Operating income (loss)	0	0
Other expenses and income: Interest expense		
All other expense items		
All other income items		
Net income or (loss) before income taxes	0	(
Depreciation/amortization included above		

Note -- The table above contains calculations that will appear when you have entered data in the MS word form fields.

¹ Include only sales (whether domestic or export) and costs related to your <u>U.S. manufacturing operations</u>.
2 Please eliminate any profits or (losses) on inputs from related firms pursuant question III-7.
3 Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionaire.

⁴ COGS should include costs associated with CS, IC, and Transfers, as well as export shipments in question II-7/II-8.

PART III.--FINANCIAL INFORMATION--Continued

III-10(b)<u>U.S. operations relating to certain LW thermal paper</u>.--*Continued*

sales quantities and valoss)) have been calculated fields return the corre	nciliationThe calculable line items from question III-10 (i.e., total net values, total COGS, gross profit (or loss), total SG&A, and net income (or ulated from the data submitted in the other line items. Do the calculated ect data according to your firm's financial records ignoring non-material arise due to rounding?
	f the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.
; ; ;	Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (<i>i.e.</i> , expenses are positive and incomes or reversals are negativeinstances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (<i>i.e.</i> , income is positive, expenses or reversals are negative).
1	If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

PART III.--FINANCIAL INFORMATION--Continued

III-11. **For U.S. converters – value added.**—For the reported raw material costs in III-10(a), please provide the percentage of total raw material costs that reflect U.S. content (raw material inputs purchased from U.S. producers) and the percentage of total raw material costs that reflect foreign content (directly imported or purchased imports of raw material inputs) for your firm's most recently completed fiscal year.

Item	Value added (percent)
Raw material costs:	
U.S. content – jumbo rolls	
U.S. content – other than jumbo rolls ¹	
Foreign content ²	
Total (should sum to 100.0%)	0
¹ Please identify the other raw materials sourced in the United States: ² Please identify the raw materials and the country source(s):	

III-12. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of certain LW thermal paper. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for certain LW thermal paper in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with your firm's cost allocations in the previous question. Provide data as of the end of your firm's six most recently completed fiscal years.

Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted. Total assets should be allocated to the subject products if these assets are also related to other products. Please provide a brief explanation if there are any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value (<i>in</i> \$1,000)							
		Fiscal years ended					
Item	2008	2009	2010	2011	2012	2013	
Total assets (net)							

PART III.--FINANCIAL INFORMATION--Continued

III-13. <u>Capital expenditures and research and development expenses.</u>—Report your firm's capital expenditures and research and development expenses on certain LW thermal paper. Provide data for your firm's six most recently completed fiscal years, and for the specified interim periods.

Value (<i>in \$1,000</i>)								
	Fiscal years ended January-June							
Item	2008	2009	2010	2011	2012	2013	2013	2014
Capital expenditures								
Research and development expenses								

III-14.	<u>Data consistency and reconciliationPlease indicate whether your firm's financial data for</u>
	questions III-10 through III-13 are based on a calendar year or your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-10 should reconcile with the data reported in questions II-7/II-8 (including export shipments) as long as they are reported on the same calendar year basis.

Do these data in question III-10 reconcile with data in questions II-7/II-8?

Yes	No	If no, please explain.

III-15.	Other explanationsIf your firm would like to further explain a response to a question in Part III
	that did not provide a narrative response box, please note the question number and the
	explanation in the space provided below. Please also use this space to highlight any issues your
	firm had in providing the data in this section, including but not limited to technical issues with the
	MS Word questionnaire.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Amelia Preece (202-205-3250, amelia.preece@usitc.gov).

<u>Contact information</u>.-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	
Fax	

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

PRICE DATA

- IV-1. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2008 of the following products produced by your firm.
 - <u>Product 1.--</u>Thermal paper in jumbo rolls, made with Bisphenol A (BPA), with a target caliper of 2.2 to 2.5 mils (55.9 to 63.5 microns), with a target basis weight of at least 49.9 g/m² and up to 60 g/m², not top-coated, white/non-colored paper, black image color, not printed on the non-thermal coated side, standard sensitivity.
 - <u>Product 2.--</u>Thermal paper in jumbo rolls, made free of BPA, with a target caliper of 2.2 to 2.5 mils (55.9 to 63.5 microns), with a target basis weight of at least 49.9 g/m² and up to 60 g/m², not top-coated, white/non-colored paper, black image color, not printed on the non-thermal coated side, standard sensitivity.
 - <u>Product 3.--</u> Thermal paper in jumbo rolls, made with PBA, with a target caliper of less than 2.2 (less than 55.9 microns), with a target basis weight of less than 49.9 g/m², not top-coated, white/non-colored paper, black image color, not printed on the non-thermal coated side, standard sensitivity.
 - <u>Product 4.--</u> Thermal paper in jumbo rolls, made free of BPA, with a target caliper of less than 2.2 (less than 55.9 microns), with a target basis weight of less than 49.9 g/m², not top-coated, white/non-colored paper, black image color, not printed on the non-thermal coated side, standard sensitivity.
 - **Product 5.** --Thermal paper in slit rolls, made with PBA, with a target caliper of 2.2 to 2.5 mils (55.9 to 63.5 microns), with a target basis weight of at least 49.9 g/m² and up to 60 g/m², not top-coated, white/non-colored paper, black image color, standard sensitivity, measuring 3-1/8 (+/- 1/16) inch by 230 (+/- 10) feet, without printing on the non-thermal coated side.
 - **Product 6.** --Thermal paper in slit rolls, made free of BPA, with a target caliper of 2.2 to 2.5 mils (55.9 to 63.5 microns), with a target basis weight of at least 49.9 g/m² and up to 60 g/m², not top-coated, white/non-colored paper, black image color, standard sensitivity, measuring 3-1/8 (+/- 1/16) inch by 230 (+/- 10) feet, without printing on the non-thermal coated side.
 - **Product 7.** --Thermal paper in slit rolls, made with PBA, with a target caliper of less than 2.2 (less than 55.9 microns), with a target basis weight of less than 49.9 g/m², not top-coated, white/non-colored paper, black image color, standard sensitivity, measuring 3-1/8 (+/- 1/16) inch by 230 (+/- 10) feet, without printing on the non-thermal coated side.
 - **Product 8.** --Thermal paper in slit rolls, made free of BPA, with a target caliper of less than 2.2 (less than 55.9 microns), with a target basis weight of less than 49.9 g/m², not top-coated, white/non-colored paper, black image color, standard sensitivity, measuring 3-1/8 (+/- 1/16) inch by 230 (+/- 10) feet, without printing on the non-thermal coated side.

Please note that values should be <u>delivered</u> and should include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates). See instruction booklet.

During January 2008-June 2014, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question IV-3.

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

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

Report quantity in thousands of square feet (msf). Report value in actual dollars (not 1,000s).

	Produ	ıct 1	Produ	ıct 2	Prod	uct 3	Prod	uct 4
Period of shipment	Quantity (msf)	Value (dollars)	Quantity (msf)	Value (dollars)	Quantity (msf)	Value (dollars)	Quantity (msf)	Value (dollars)
2008:	,	,	, ,	,	, ,	,	` ,	,
January-March								
April-June								
July-September								
October-December								
2009: January-March								
April-June								
July-September								
October-December								
2010: January-March								
April-June								
July-September								
October-December								
2011:								
January-March								
April-June								
July-September								
October-December								
2012:								
January-March								
April-June								
July-September								
October-December								
2013: January-March								
April-June								
July-September								
October-December								
2014:								
January-March								
April-June								
¹ Net values (<i>i.e.</i> , gro returned goods), f.o.b. you ² Pricing product define	ur firm's U.S.	point of sh	ipment.		ebates, pre	paid freight	, and the va	lue of
NoteIf your firm's product product, provide a descrip								
Product 1:								
Product 2:								_
Product 3:								

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

IV-2. **Pricing data.--**Continued.

Report quantity in thousands of square feet (msf). Report value in actual dollars (not 1,000s).

Period of shipment Quantity (msf) Value (dollars) (msf) (dollars) (msf) Value (msf) Value (msf) (dollars) (msf) Value (msf) (msf) (msf) Value (msf) (msf) (msf) (msf) Value (msf) (msf) (msf) Value (msf) (msf	
2008: January-March	
January-March January-March	•
	•
·	•
July-September October December	•
October-December 2009:	
January-March	
April-June	•
July-September	
October-December	
2010:	
January-March	
April-June April-June	•
July-September July-September	•
October-December	
2011:	
January-March January-March	January-March
April-June	April-June
July-September July-September	July-September
October-December	October-December
2012:	112:
January-March January-March	•
April-June April-	April-June
July-September July-September	July-September
October-December	October-December
2013:	
January-March January-March	•
April-June April-	•
July-September July-September	<u> </u>
October-December October-December	
2014:	
January-March January-March	•
April-June	
¹ Net values (<i>i.e.</i> , gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.	
² Pricing product definitions are provided on the first page of Part IV.	
I making product domination and promote and page of reality.	og p. oaaot ao
Note If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of the product. Also, please explain any anomalies in your firm's reported pricing days.	
Product 5:	
Product 6:	
Product 7:	
Product 8:	

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

If your response to any question in this section differs for slit rolls versus jumbo rolls, please explain.

IV-3. **Price setting.--** How does your firm determine the prices that it charges for sales of certain LW thermal paper (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe typical range of values of such discounts and, if "other," describe type of discount

IV-5. **Pricing terms.--**

(a) What are your firm's typical sales terms for its U.S.-produced certain LW thermal paper?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)

(b) On what basis are your firm's prices of domestic certain LW thermal paper usually quoted *(check one)*?

Delivered	F.o.b.	If f.o.b., specify point

IV-6. <u>Contract versus spot.--</u> Approximately what share of your firm's sales of its U.S.-produced certain LW thermal paper in 2012 and 2013 was on a (1) long-term contract basis, (2) short-term contract basis, and (3) spot sales basis?

	Long-term contracts (multiple deliveries for more than 12 months)	Short-term contracts (multiple deliveries up to and including 12 months)	Spot sales (for a single delivery)	Total (should sum to 100.0%)
Share of your 2012 sales	%	%	%	0
Share of your 2013 sales	%	%	%	0

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

IV-7. Contract provisions.— Please fill out the table regarding your firm's typical sales contracts for certain LW thermal paper (or check "not applicable" if your firm does not sell on a long-term and/or short-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries up to and including 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	Number of days		
Price renegotiation (during the	Yes		
contract period)	No		
	Quantity		
Fixed quantity and/or price	Price		
	Both		
Most or release provision	Yes		
Meet or release provision	No		
Not applicable			

IV-8. <u>Lead times.</u>—What is the typical lead time between a customer's order and the date of delivery for your firm's sales of your firm's U.S.-produced certain LW thermal paper?

Source	Share of 2013 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0 %	

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

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IV-9.	Shin	nıng	intorr	nation
エV‐ノ・		MILLE	11111 01 1	11auvii

(a)	What is the approximate percentage of the total delivered cost of certain LW thermal paper that is accounted for by U.S. inland transportation costs? %
(b)	Who generally arranges the transportation to your firm's customers' locations? your firm purchaser (check one)

(c) Indicate the approximate percentage of your firm's sales of certain LW thermal paper that are delivered the following distances from your firm's production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0 %

IV-10. <u>Geographical shipments.--</u> In which U.S. geographic market area(s) has your firm sold its U.S.-produced certain LW thermal paper since January 1, 2008 (check all that apply)?

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 United States not previously listed, including AK, HI, PR, and VI, among others.	

IV-11. <u>End uses.--</u>List the end uses of the certain LW thermal paper that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by certain LW thermal paper and other inputs?

	Share of total cos accoun		
End use product	Certain LW thermal paper	Other inputs	Total (should sum to 100.0% across)I
	%	%	0
	%	%	0
	%	%	0

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

IV-12.	Changes in end usesHave there been any changes in the end uses of certain LW thermal paper
	since January 1, 2008? Do you anticipate any future changes?

	Changes in end uses	No	Yes				Explain	
	Changes since January 1, 2008							
	Anticipated changes							
IV-1	V-13. Substitutes Can other products be substituted for certain LW thermal paper? No YesPlease fill out the table.							
	Have changes in the prices of this substitute affected the price for certain LW thermal paper?							
Substitute		End use in which this substitute is used			No	Yes	Explanation	
1.								
2.								
3.								

IV-14. <u>Changes in substitutes.--</u> Have there been any changes in the number or types of products that can be substituted for certain LW thermal paper since January 1, 2008? Do you anticipate any future changes?

Changes in substitutes	No	Yes	Explain and report if they have affected the price of LW thermal paper.
Changes since January 1, 2008			
Anticipated changes			

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

IV-15. **Raw materials.--** Indicate how certain LW thermal paper raw materials prices have changed since January 1, 2008, and how you expect they will change in the future.

Raw materials prices	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for certain LW thermal paper.
Changes since January 1, 2008					
Anticipated changes					

IV-16. **Product offerings.** – Please fill in the following table for the products you sell.

Ranges of widths in inches	Percent standard print sensitivity	Ranges of calipers	Ranges of basis weights	Percent with advertising on back	Percent BPA free
	%			%	%

IV-17. <u>Printer approval certification.</u> – Please list the five largest thermal printer manufacturers (e.g., IBM, Epson) that have approved your LW thermal paper for use in their machines.

	Name of printer manufacturer
1	
2	
3	
4	
5	

IV-19.

IV-20.

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

IV-18.	Availability of supply Has the availability of certain LW thermal paper in the U.S. market	et
	changed since January 1, 2008? Do you anticipate any future changes in availability?	

	ility in the market	U.S.	No	Yes	Please explain, noting the countries and reasons for the changes.	
Changes since January 1 2008:						
U.Sprod	luced prod	uct				
Imports fr	rom China					
Imports fr	rom Germa	any				
Nonsubje	ct imports					
Anticipat	ted chang	es:				
U.Sprod	luced prod	uct				
Imports fr	rom China					
Imports fr	rom Germa	any				
Nonsubje	ct imports					
thermal pa	Supply constraintsHas your firm refused, declined, or been unable to supply certain LW thermal paper since January 1, 2008 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, etc.)?					
No	Yes	If yes,	pleas	se de	scribe and report the types of customers affected.	
Export constraintsDescribe how easily your firm can shift its sales of certain LW thermal paper between the U.S. market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting certain LW thermal paper between the U.S. and alternative country markets within a 12-month period.						

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

IV-21.	Product changes Have there been any significant changes in the product range, product mix,
	or marketing of certain LW thermal paper since January 1, 2008? Do you anticipate any future
	changes?

Changes in product range, product mix, or marketing	No	Yes	Explain
Changes since January 1, 2008			
Anticipated changes			

IV-22. <u>Demand trends.--</u> Indicate how demand within the United States and outside of the United States (if known) for certain LW thermal paper has changed since January 1, 2008, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors	
Demand since January 1, 2008						
Within the United States						
Outside the United States						
Anticipated future demand						
Within the United States						
Outside the United States						

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

IV-23. Conditions of competition.

Yes-Business cycles (e.g. seasonal business) Yes-Other distinctive conditions of competition D) If yes, have there been any changes in certain LW thermal paper since Januar	n the business cycles or conditions of competition
seasonal business) Yes-Other distinctive conditions of competition o) If yes, have there been any changes in certain LW thermal paper since Januar	n the business cycles or conditions of competition
Yes-Other distinctive conditions of competition D) If yes, have there been any changes in certain LW thermal paper since January	n the business cycles or conditions of competition
certain LW thermal paper since Janua	
No Yes If yes, describe.	
No Yes If yes, describe.	
(d) Has the competition at different leve	els of trade in the U.S. market changed since 200
No Yes If yes, describe.	
	rket prices of certain LW thermal paper in U.S. a information as to time periods and regions for a

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

- IV-25. 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 certain LW thermal paper supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including China and Germany, and (3) the world as a whole. Of particular interest is such data from 2008 to the present and forecasts for the future.
- IV-26. <u>Barriers to trade</u>.--Are your firm's exports of certain LW thermal paper subject to any tariff or non-tariff barriers to trade in other countries?

No	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2008, or that are expected to occur in the future.

IV-27. <u>Interchangeability.</u>—Is certain LW thermal paper produced in the United States and in other countries interchangeable (*i.e.*, can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

0 = no familiarity with products from a specified country-pair

Country-pair	China	Germany	Other countries		
United States					
China					
Germany					
For any country-pair producing certain LW thermal paper which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:					

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

IV-28. <u>Factors other than price.</u>—Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between certain LW thermal paper produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N =such differences are *never* significant

0 = no familiarity with products from a specified country-pair

Country-pair	China	Germany	Other countries			
United States						
China						
Germany						
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of certain LW thermal paper, identify the country-pair and report the advantages or disadvantages imparted by such factors:						

IV-29. Other explanations—If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.