

U.S. PRODUCERS' QUESTIONNAIRE

SUGAR FROM MEXICO

This questionnaire must be received by the Commission by **JANUARY 28, 2015**

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping investigations concerning sugar from Mexico (Inv. Nos. 701-TA-513 and 731-TA-1249 (Final)). 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)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm produced sugar (as defined on next page) at any time since October 1, 2011?</p> <p><input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)</p> <p>Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: SUGAR)</p>

CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission.

By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.

I acknowledge that information submitted in this questionnaire response and throughout this proceeding may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the records of this proceeding or related proceedings for which this information is submitted, or in internal audits and proceedings relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3. I understand that all contract personnel will sign non-disclosure agreements.

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone: _____

Fax: _____

Email address

PART I.—GENERAL INFORMATION

Background. This proceeding was instituted in response to a petition filed on March 28, 2014 by the American Sugar Coalition (“ASC”). The ASC members are: American Sugar Cane League, Thibodaux, LA; American Sugarbeet Growers Association, Washington, DC; American Sugar Refining, Inc., West Palm Beach, FL; Florida Sugar Cane League, Washington, DC; Hawaiian Commercial and Sugar Company, Puunene, HI; Rio Grande Valley Sugar Growers, Inc., Santa Rosa, TX; Sugar Cane Growers Cooperative of Florida, Belle Glade, FL; and United States Beet Sugar Association, Washington, DC. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at http://www.usitc.gov/trade_remedy/731_ad_701_cvd/investigations/2014/sugar/finalphase.htm.

Sugar covered by these investigations as defined by the Department of Commerce scope is raw and refined sugar of all polarimeter readings derived from sugar cane or sugar beets. The chemical sucrose gives sugar its essential character. Sucrose is a nonreducing disaccharide composed of glucose and fructose linked by a glycosidic bond via their anomeric carbons. The molecular formula for sucrose is $C_{12}H_{22}O_{11}$; the International Union of Pure and Applied Chemistry (IUPAC) International Chemical Identifier (InChI) for sucrose is 1S/C12H22O11/c13-l-4-6(16)8(18)9(19)11(21-4)23-12(3-15)10(20)7(17)5(2-14)22-12/h4-11,13-20H,1-3H2/t4-,5-,6-,7-,8+,9-,10+,11-,12+/m1/s1; the InChI Key for sucrose is CZMRCDWAGMRECN-UGDNZRGBSA-N; the U.S. National Institutes of Health PubChem Compound Identifier (CID) for sucrose is 5988; and the Chemical Abstracts Service (CAS) Number of sucrose is 57-50-1.

Sugar described in the previous paragraph includes products of all polarimeter readings described in various forms, such as raw sugar, estandar or standard sugar, high polarity or semirefined sugar, special white sugar, refined sugar, brown sugar, edible molasses, desugaring molasses, organic raw sugar, and organic refined sugar. Other sugar products, such as powdered sugar, colored sugar, flavored sugar, and liquids and syrups that contain 95 percent or more sugar by dry weight are also within the scope of these investigations.

The scope of these investigations does not include (1) sugar imported under the Refined Sugar Re-Export Programs of the U.S. Department of Agriculture;¹ (2) sugar products produced in Mexico that contain 95 percent or more sugar by dry weight that originated outside of Mexico; (3) inedible molasses (other than inedible desugaring molasses noted above); (4) beverages; (5) candy; (6) certain specialty sugars; and (7) processed food products that contain sugar (e.g., cereals). Specialty sugars excluded from the scope of these investigations are limited to the following: caramelized slab sugar candy, pearl sugar, rock candy, dragees for cooking and baking, fondant, golden syrup, and sugar decorations.

Merchandise covered by these investigations is typically imported under the following headings of the HTSUS: 1701.12.1000, 1701.12.5000, 1701.13.1000, 1701.13.5000, 1701.14.1000, 1701.14.5000, 1701.91.1000, 1701.91.3000, 1701.99.1010, 1701.99.1025, 1701.99.1050, 1701.99.5010, 1701.99.5025, 1701.99.5050, and 1702.90.4000. The tariff classification is provided for convenience and customs purposes; however, the written description of the scope of these investigations is dispositive.

¹ This exclusion applies to sugar imported under the Refined Sugar Re-Export Program, the Sugar-Containing Products Re-Export Program, and the Polyhydric Alcohol Program administered by the U.S. Department of Agriculture.

Raw sugar.—Unrefined sugar destined for further processing.

Refined sugar.—Sugar that is not destined for further processing.

Reporting of information.-- If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

Verification.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. §1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR §207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

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

Hours	Dollars

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, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please attach such comments to your response or send to the Office of Investigations, USITC, 500 E St. SW, Washington, DC 20436.

I-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

Yes No

I-2. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

"Establishment"--Each facility of a firm involved in the production of sugar, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments Covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discussion on establishments consolidated in this questionnaire:			

I-3. **Petition support.**--Does your firm support or oppose the petition?

Support	Oppose	Take no position
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information.

Firm name	Address	Extent of ownership (percent)

I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing sugar from Mexico into the United States or that are engaged in exporting sugar from Mexico to the United States?

No Yes--List the following information.

Firm name	Address	Affiliation

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

No Yes--List the following information.

Firm name	Address	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Amy Sherman (202-205-3289, amy.sherman@usitc.gov). Supply all data requested on a crop-year basis.

II-1. **Contact information.**-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

Name	
Title	
Email	
Telephone	
Fax	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of sugar since October 1, 2011.

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns or production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	other (<i>e.g.</i> , technology)	

II-3. **Alternative products using same machinery.**-- Does your firm produce any alternative products (*e.g.*, other than sugar) on the same equipment and machinery used to produce sugar? (Do not count by-products or co-products such as the production of molasses as an "alternative" product produced on the same equipment and machinery used to produce sugar for the purpose of this question--Molasses is a by-product or a co-product that results from raw sugar milling, it is not an alternative product that can be produced on the same machinery and equipment).

- No Yes--Please describe these alternative products and indicate the amounts of each of these products produced by your firm in the October 2013 through September 2014 crop year.

II-4. **Tolling.**--Since October 1, 2011, has your firm been involved in a toll agreement regarding the production of sugar?

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

- No Yes--Please describe the toll arrangement(s) and name the firm(s) involved:
 Your firm refines sugar for other firms (*i.e.*, toller)

Name firm(s) contracted with:

- Your firm contracts for the production of refined sugar using another firm's machinery and equipment (*i.e.*, tollee)

Name the toll producer(s):

II-5. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce sugar in and/or admit sugar into a foreign trade zone (FTZ)?

“Foreign trade zone” is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

- No Yes--Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import sugar into a foreign trade zone (FTZ) for use in distribution of sugar and/or the production of downstream articles?

- No/Don't know Yes--Identify the firms and the FTZs.

II-6. **Importer.**--Since October 1, 2011, has your firm imported sugar (refined or raw)?

“Importer” --The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf. The importer may be the consignee, or the importer of record.

- No Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

II-7. **Nature of sugar production.**—Check all that apply

- Sugar milling *only (complete questions II-8 and II-9, skip questions II-10 through II-13, pick back up at question II-14)*--Primarily relates to firms that mill sugar cane into raw sugar.
- Sugar refining *only (skip questions II-8 and II-9, complete all questions from II-10 forward)*.—Relates to firms that process raw or already partially refined sugar into refined sugar.
- Sugar milling and refining (non-continuous process) *(complete all questions)*. Note that raw sugar produced, stored, and then shipped for refining should be recorded as “internal consumption” in question II-8 and then as production from internal consumption in question II-10.
- Sugar milling and refining (continuous process) *(skip questions II-8 and II-9, complete all questions from II-10 forward)*.--A continuous process is typical of sugar beet processing, but may also apply to certain sugar cane processing operations.
- Sugar melting/filtering only (skip questions II-8 and II-9, complete all questions from II-10 forward)*.

Repackaging.--For the purposes of the data requested in this questionnaire, repacking operations alone should not be reported in the data in questions II-8 through II-16. Data relating to repackaging only operations should only be reported in this questionnaire in question II-17 in relation to your firm's purchases of already refined sugar for resale.

Definitions

“Commercial U.S. shipments”—Shipments made within the United States as a result of an arm’s length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

“Internal consumption” – Product consumed internally by your firm.

“Transfers to related firms”—Shipments made to related domestic firms. Such transactions are valued at fair market value.

“Related firm”—A firm that your firm solely or jointly owns, manages, or otherwise controls. Such transactions are valued at fair market value.

“Export shipments”—Shipments to destinations outside the United States, including shipments to related firms.

“Inventories”--Finished goods inventory, not raw materials or work-in-progress.

II-8. **Production, shipment and inventory data for raw sugar.**--Report your firm's production capacity, production, shipments, and inventories to the production of **raw sugar** in its U.S. establishment(s). U.S. processors with continuous operations resulting in refined sugar as an end product (e.g., typical of sugar beet processing plants) should not report any data in this grid. U.S. processors that produce raw sugar as the first step in a non-continuous process (e.g., typical of sugar cane production) should first report raw sugar operations here then sugar refining operation in question II-10 regardless of whether the firm owns and conducts both production operations.

Milling Operations / Raw Sugar

Quantity (in 1,000 short tons) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Average production capacity ¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production of raw sugar (quantity) (C) ^{2 3}			
U.S. shipments of raw sugar:			
Commercial U.S. shipments:			
Quantity (D)			
Value (E)			
Internal consumption:			
Quantity (F)			
Value ⁴ (G)			
Transfers to related firms:			
Quantity (H)			
Value ⁴ (I)			
Forfeitures to the Commodity Credit Corp:			
Quantity (J)			
Value (K)			
Export shipments of raw sugar: ⁵			
Quantity (L)			
Value (M)			
End-of-period inventories (quantity) (N)			

¹ The production capacity reported is based on operating _____ hours per week, _____ weeks per year. Please describe the constraint(s) that set the limit(s) on your firm's capacity to produce the intermediate product of raw sugar: _____

² What was the average polarity of your firm's raw sugar produced in the October 2013 through September 2014 crop year? _____

³ Please list any by-products or co-products that get produced during your firm's raw sugar milling operations (e.g., molasses) and the quantity of such production in the most recent October 2013 through September 2014 crop year: _____

⁴ Internal consumption and transfers to related firms must be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____

⁵ Identify your firm's principal export markets: _____

Reconciliation of shipments, production, and inventory.--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments including forfeitures (i.e., lines D, F, H, J, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Crop years		
	2011/12	2012/13	2013/14
B + C – D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate. Note that the typical molasses by-product or co-product that results from raw sugar production should not impact this reconciliation, as all molasses data should be removed from the data reported in this question.			

II-9. **Raw material inputs for milling/raw sugar operations.**--Please indicate the share of October 2013-September 2014 production of raw sugar your firm produced from each of the following.

Estimated source of raw sugar production	Share of 2013/14 crop (percent)
Share raw sugar produced from.--	
Own firm's farming operations of sugar cane	%
Purchases of sugar cane.--	
Domestic	%
Imported	%
Subtotal, purchased sugar cane	0.0 %
Member-owner provided sugar cane ¹	%
Other sources or sugar cane ²	%
Total (should sum to 100.0%)	0.0 %
¹ This raw sugar milling your firm done for cooperative member owners. ² Please describe these sources.-- _____.	

II-10. **Production, shipment and inventory data for refined sugar.**--Report your firm's production capacity, production, shipments, and inventories related to the production of all **refined sugar** (regardless the agricultural input) in its U.S. establishment(s). U.S. processors with continuous operations resulting in refined sugar as an end product (e.g., typical of sugar beet processing plants) should only report data in this grid. U.S. processors that produce raw sugar as the first step in a non-continuous process (e.g., typical of sugar cane production) should only report their sugar refining operations in this grid.

Refining or Processing Operations / Refined Sugar

Primary Input

Sugar Beet

Raw Sugar from sugar cane mill

Quantity (1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Average production capacity¹ (quantity) (O)			
Beginning-of-period inventories (quantity) (P)			
Production of refined sugar (quantity):			
from own agricultural operations (Q) ²			
from others' agricultural operations (e.g., co-op) (R) ³			
from purchases of domestic grown sugar crops (S)			
from internal consumption of raw sugar production reported in previous grid (T)			
from purchases of domestic raw sugar and/or refined sugar requiring additional processing (U) ⁴			
from domestic sources (V)	0	0	0
from purchases/imports of Mexican sugar of a polarity less than 99.4 and destined for further processing (W)			
from purchases/imports of Mexican sugar of a polarity between 99.4 and 99.6 and destined for further processing (X)			
from purchases/imports of Mexican sugar of a polarity greater than 99.6 and destined for further processing (Y)			
from purchases/imports of nonsubject sugar of a polarity less than 99.4 and destined for further processing (Z)			
from purchases/imports of nonsubject sugar of a polarity between 99.4 and 99.6 and destined for further processing (AA)			
from purchases/imports of nonsubject sugar of a polarity greater than 99.6 and destined for further processing (AB)			
from <u>import</u> sources (AC)	0	0	0
Total production, refined sugar (AD)	0	0	0

¹ The production capacity reported is based on operating _____ hours per week, _____ weeks per year. Please describe the constraint(s) that set the limit(s) on your firm's capacity to produce refined sugar. _____

² Excludes Co-op production. Your firm actually grows the input (sugar beet) or produces the raw sugar (sugar cane).

³ Production of refined sugar on another entity's input. This is the line to report Co-op production.

⁴ Repacking operations should not be included as production.

II-10. **Production, shipment and inventory data for refined sugar.**--Continued

Quantity (1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
U.S. shipments of refined sugar:⁵			
Commercial U.S. shipments			
Quantity (AE)			
Value (AB)			
Internal consumption			
Quantity (AF)			
Value ⁶ (AG)			
Transfers to related firms:			
Quantity (AH)			
Value ⁶ (AI)			
Forfeitures to the Commodity Credit Corp:			
Quantity (AJ)			
Value (AK)			
Export shipments of refined sugar:⁵			
Quantity (AL)			
Value (AM)			
End-of-period inventories⁷ (quantity) (AN)			
<p>⁵ Shipments of sugar based only on repacking operations should be excluded from this grid.</p> <p>⁶ Internal consumption and transfers to related firms must be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above:</p>			
<p>⁷ Identify your firm's principal export markets: _____</p>			

Reconciliation of inventory, production, and shipments.--Generally, the data reported for end-of-period inventories should be equal to beginning of period inventories, plus production, less total shipments. The following "data check" calculates this reconciliation directly in the MS Word form. If the calculated fields below return values other than zero (i.e., "0"), the data need to be revised prior to submission to the Commission or the reasons for the differences must be explained (e.g., theft, loss, damage, record systems issues, et cetera).

Reconciliation item	Crop years		
	2011/12	2012/13	2013/14
P + AD – AE – AF – AH – AJ – AL – AN = 0 (revise or explain if not equal to zero) ¹	0	0	0
<p>¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate.</p>			

II-11. **Non-beet sugar refining operations.**--If your firm is a sugar refiner that uses raw sugar, semi-refined sugar, or refined sugar as its primary raw material input in further refining operations,

(a) Please check the specific operations included in your firm's refining operations. (check all that apply)

- Liquification
- Filtration
- Affination
- Clarification
- Absorption
- Crystalization
- Drying/Granulization
- Other (Describe:)

(b) Please describe your firm's ability to switch between the various sources of inputs for refined sugar production as reported in the previous question (e.g., lines Q through U, W, and X).

(c) If your firm uses multiple input sources for its refined sugar production (e.g., more than one of lines Q through U, W, and X), please list the reasons for the use of these multiple input sources.

II-12. **Channels of distribution refined sugar.**-- Report your firm's commercial U.S. shipments of refined sugar by channel of distribution and end use market segment.

Quantity (in 1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Channels of distribution:			
Commercial U.S. shipments of refined sugar:			
To distributors (<i>quantity</i>) (AO)			
To grocery chains (<i>quantity</i>) (AP)			
To restaurants and restaurant chains (<i>quantity</i>) (AQ)			
To industrial end users (<i>quantity</i>) (AR)			
To U.S. refiners (<i>quantity</i>) (AS)			
To U.S. melt houses (<i>quantity</i>) (AT)			

Channel reconciliation.--The data reported for channels of distribution should be equal to commercial shipments in the refined sugar grid. The following "data check" calculates this reconciliation directly in the MS Word form. If the calculated fields below return values other than zero (i.e., "0"), the data need to be revised prior to submission to the Commission.

Reconciliation	Crop years		
	2011/12	2012/13	2013/14
AO + AP + AQ + AR + AS +AT– AE = zero ("0"), if not revise.	0	0	0

II-13. **Polarity data.**--Please provide data on the average polarity of the input and output of your refining operations in the October 2013 through September 2014 crop year.

Item	Crop year
	2013/14
Average polarity of inputs used in production ¹	
Average polarity of commercial U.S. shipments ²	
¹ If the average polarity of the inputs to your firm's refining operations differed significantly based on the source of the input, please describe that here: _____. ² If the average polarity of the outputs of your firm's refining operations differed significantly based on the type of product produced, please describe that here: _____	

All Producers

II-14. **Related firms.**--If your firm reported transfers to related firms in question II-8 and/or II-9, please indicate the nature of the relationship between your firm and the related firms (*e.g.*, joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-15. **Sugar melting.**—Does your firm primarily produce liquid sugar?

No Yes--Please provide descriptions of the following

(a) Source and extent of firm's capital and investment.

(b) Quantity and type of inputs sourced in the United States.

(c) Describe the nature of your production-related activities in the United States to produce sugar.

(d) Technical expertise involved in U.S. production activity.

(e) Any other costs and activities in the United States directly leading to the production of sugar.

II-16. **Employment data.**--Report your firm's employment-related data related to the production of sugar and provide any explanation for any trends in these data.

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

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

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

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

Item	Crop years		
	2011/12	2012/13	2013/14
Average number of PRWs (<i>number</i>) In relation to <u>raw sugar</u> operations			
In relation to <u>refined sugar</u> operations			
Hours worked by PRWs (<i>1,000 hours</i>) In relation to <u>raw sugar</u> operations			
In relation to <u>refined sugar</u> operations			
Wages paid to PRWs (<i>value</i>) In relation to <u>raw sugar</u> operations			
In relation to <u>refined sugar</u> operations			

Explanation of trends:

Note.--Report employment data parallel to treatment accorded to trade data in questions II-8 and II-10; Non-continuous operations should report raw sugar employment data separately from refining operations; while continuous operations should report all employment data in the refined sugar operations line items.

II-17. **Purchases.**--Other than direct imports, has your firm otherwise purchased sugar since October 1, 2011?

“Purchase” – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

“Direct import” –A transaction to buy from a foreign producer where your firm is the importer of record or consignee.

No Yes--Report such purchases below and explain the reasons for your firms' purchases:

(Quantity in 1,000 short tons, value in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
PURCHASES OF SUGAR FOR FURTHER PROCESSING:			
Purchases from U.S. importers¹ of sugar from—			
Mexico:			
<i>Quantity</i>			
<i>Value</i>			
All other countries:			
<i>Quantity</i>			
<i>Value</i>			
Purchases from domestic producers²			
<i>Quantity</i>			
<i>Value</i>			
PURCHASES OF SUGAR FOR RE-SALE (NOT FOR FURTHER PROCESSING)³:			
Purchases from U.S. importers¹ of sugar from—			
Mexico:			
<i>Quantity</i>			
<i>Value</i>			
All other countries:			
<i>Quantity</i>			
<i>Value</i>			
Purchases from domestic producers²			
<i>Quantity</i>			
<i>Value</i>			
<p>¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier. _____.</p> <p>² Please list the name of the producer(s) or other U.S. distributor(s) from which your firm purchased this product. _____.</p> <p>³ Inclusive of repackaging operations.</p>			

- II-18. **Other explanations.**--If your firm would like to further explain a response to a question in Part II that did not provide a narrative 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 Charles Yost (202-205-3432, charles.yost@usitc.gov).

III-1. **Contact information.**-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	
Fax	

III-2. **Accounting 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:

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include sugar:

2. Does your firm prepare profit/loss statements for sugar:
 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, 10 Qs,
 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 sugar, as well as those statements and worksheets used to compile data for your firm's questionnaire response.

III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

III-5. **Other products.**--Please list the products your firm produced in the facilities in which your firm produced sugar, 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
Sugar	%
	%
	%
	%
	%

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any other services) used in the production of sugar from any related parties?

Yes--Continue to question III-7. No--Continue to question III-9.

III-7. **Inputs from related parties.**—Please identify the inputs used in the production of the subject product that your firm purchases from related parties. For “Share of total COGS” please report this information by relevant input on the basis of your most recently completed fiscal year. For “Input valuation” please describe the basis, as recorded in the company’s own accounting system, of the purchase cost from the related party; e.g., the related party’s actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related party	Share of total COGS
Input valuation		

III-8. **Inputs purchased from related parties.**--Please confirm that the inputs purchased from related parties, as identified in III-7, were reported in financial results on sugar (questions III-11, III-12, and/or III-13) in a manner consistent with your firm's accounting books and records.

Yes

No--In the space below, please report the valuation basis of inputs purchased from related parties as reported in table III-9.

--

III-9. **Nonrecurring items (charges and gains) included in reported sugar financial results.**--For each annual and interim period for which financial results are reported in questions III-11 and III-12, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific line items in questions III-11 and III-12 where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in questions III-11 and III-12; i.e., if an aggregate nonrecurring item has been allocated to questions III-11 and III-12, only the allocated value amount included in questions III-11 and III-12 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 sugar financial results in questions III-11 and III-12.

Item	Crop years		
	2011/12	2012/13	2013/14
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in questions III-11 and III-12 where the nonrecurring item is included.	Nonrecurring item: In these columns please report the amount (<i>in \$1,000</i>) of the relevant nonrecurring item reported in questions III-11 and III-12.		
1.			
2.			
3.			
4.			
5.			
6.			
7.			

III-10a. **Nature of sugar production.**—Does your firm partake in the following operations?

- Sugar milling *only (complete question III-11, skip question III-12)*²
- Sugar refining *only (skip question III-11, complete question III-12)*
- Sugar milling and refining (continuous or noncontinuous process) *(skip question III-11, complete question III- 12).*³ Note: For firms with noncontinuous processes, a consolidated income statement should be reported in question III-12.
- Sugar melting/filtering *only (skip question III-11, complete question III-12)*

III-10b. **Nature of sugar production.**—Accounting treatment of raw material costs and payments to cooperative members (cooperative distributions):

- (1) If your firm purchases sugar cane or sugar beets in commercial transactions with unrelated parties, the purchase costs of either domestic or foreign origin raw materials should be reported on the line for raw material costs in questions III-11 and III-12; .
- (2) If your firm is an agricultural cooperative, processing cane raws and/or sugar beets report the purchase cost of raw materials (if any) separately from distributions to patrons in questions III-11 and III-12 below.
- (3) If your firm is a member of an agricultural cooperative (reporting data for question III-12), which makes patronage distributions to its members, report the total receipts of sugar cane and sugar beets from your members, and the aggregate acreage your members harvested below. Report the distributions to your member patrons in either question III-11 or III-12. Please describe how those distributions are calculated in question III-13.

Item	Crop years		
	2011/12	2012/13	2013/14
Delivery by coop members to miller or processor/refiner of sugar cane or sugar beets:			
Sugar cane (1,000 short tons)			
Sugar beet (1,000 short tons)			
Harvested acres:			
Sugar cane cooperatives (acres)			
Sugar beet cooperatives (acres)			

² Primarily relates to firms that mill sugar cane into raw sugar.

³ A continuous process is typical of sugar beet processing, but may also apply to certain sugar cane processing operations.

III-11. **Milling operations on sugar.**--Report the revenue and related cost information requested below on the sugar milling operations of your firm's U.S. establishment(s).^{1 2} Do not report resales of purchased sugar. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related parties should be consistent with and based on information in the firm's accounting books and records.

Quantity (in 1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Net sales quantities: ³			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ³			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales values	0	0	0
Cost of goods sold (COGS): ⁴			
Raw materials.--			
Domestic origin			
Foreign origin			
Patronage distributions			
Subtotal, raw materials	0	0	0
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative (SG&A) expenses:			
Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items ⁴			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			
<p>¹ Data to be related in this grid relates primarily to firms that mill sugar cane into raw sugar for sale to refiners.</p> <p>² Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u>.</p> <p>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 questionnaire.</p> <p>⁴ COGS should include <u>costs associated with CS, IC, and Transfers, as well as export shipments in question II-8</u>. If your firm offsets COGS by byproduct revenue (e.g., bagasse), report it in COGS, otherwise report byproduct revenues and coproduct revenues (net of cost) as other income. Report as other income payments received from government programs, including (as applicable) crop insurance proceeds, federal crop disaster payments, CCC loans forfeited, and agricultural program payments.</p>			

III-12. **Processor/Refiner operations on sugar.**--Report the revenue and related cost information requested below on the sugar refining operations of your firm's U.S. establishment(s).^{1,2} Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related parties should be consistent with and based on information in the firm's accounting books and records.

Quantity (in 1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Net sales quantities: ³			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ³			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales values	0	0	0
Cost of goods sold (COGS): ⁴			
Raw materials.--			
Domestic origin			
Foreign origin			
Patronage distributions			
Subtotal, raw materials	0	0	0
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative (SG&A) expenses:			
Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items ⁴			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			

¹ Firms that produce refined sugar should report their data here, inclusive of all continuous operations. Any firm that first produces, stores, and then ships raw sugar should report separate data on milling operations in question III-11 that then feed into this grid (per question III-10b-2).

² Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

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 questionnaire.

⁴ COGS should include costs associated with CS, IC, and Transfers, as well as export shipments in question II-10. If your firm offsets COGS by byproduct revenue, report it in COGS, otherwise report byproduct revenues and coproduct revenues (e.g., animal feeds), net of cost, as other income. Report as other income payments received from government programs, including (as applicable) crop insurance proceeds, federal crop disaster payments, CCC loans forfeited, and agricultural program payments.

III-13. **Distributions to patrons.**—If your firm is an agricultural coop, please describe the basis on which distributions to patrons are calculated in questions III-11 and III-12.

III-14. **Financial data reconciliation.**--The calculable line items from questions III-11 and III-12 (*i.e.*, total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

Yes No--If 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.e.*, expenses are positive and incomes or reversals are negative--instances 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.e.*, income is positive, expenses or reversals are negative).

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.

III-15. **Data consistency and reconciliation.**-- Please note the quantities and values reported in questions III-11 and III-12 should reconcile with the data reported in questions II-8 and/or II-10, respectively, including export shipments, as long as they are reported on the same crop year basis.

Do the data in questions III-11 and III-12 reconcile with data in questions II-8 and/or II-10?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-16. **Financial performance in prior periods.**—Report the selected indicators for your firm’s financial performance for operations of your firm’s U.S. establishment(s) for the specified periods. These data should be consistent with the data reported in questions III-11 and/or III-12.

Quantity (in 1,000 short tons raw value) and value (in \$1,000)			
Item	Crop years		
	2008/09	2009/10	2010/11
Total net sales quantities:			
Total net sales values:			
Operating profit or loss:			
Distributions to coop patrons:			

III-17. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of sugar. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for sugar 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 three 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 (in \$1,000)			
Item	Crop years		
	2011/12	2012/13	2013/14
Total assets (net)— Miller			
Total assets (net)— Processor/Refiner			

Explanation of asset trends:

III-18a. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses on sugar. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in \$1,000)			
Item	Crop years--		
	2011/12	2012/13	2013/14
Capital expenditures Miller			
Processor/Refiner			
Research and development expenses Miller			
Processor/Refiner			

III-18b. **Capital expenditures.**--Please indicate the nature, focus, and significance of your firm's capital expenditures on the subject product.

III-19. **Effects of imports.**--Since October 1, 2011, has your firm experienced any actual negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of sugar from Mexico?

No Yes--My firm has experienced actual negative effects as follows:

<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects
<input type="checkbox"/>	Denial or rejection of investment proposal
<input type="checkbox"/>	Reduction in the size of capital investments
<input type="checkbox"/>	Rejection of bank loans, reduction or limitation on amount of working capital provided by bank or other financial institution
<input type="checkbox"/>	Lowering of credit rating
<input type="checkbox"/>	Problem related to the issue of stocks or bonds
<input type="checkbox"/>	Other (specify):

III-20. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of sugar from Mexico?

No	Yes	If yes, my firm anticipates negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **Other explanations.**--If your firm would like to further explain a response to a question in Part III that did not provide a narrative 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 RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from John Benedetto (202-205-3270, john.benedetto@usitc.gov).

IV-1. **Contact information.**--Please identify the individual that Commission staff may contact regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	
Fax	

PRICE DATA

IV-2. This question requests monthly and value data for your firm's commercial shipments to unrelated U.S. customers since October 1, 2011 of the following products produced by your firm your firm (question IV-2a). Question IV-2b requests information on your firm's contracts for products 1 and 2A.

Product 1.—Sugar, less than 99.6 polarity, sold to sugar refiners.

Product 2A.—Sugar, 99.9 polarity and above, sold to industrial producers of food, beverages or other sugar-containing-products (e.g., General Mills, Mars, Coca Cola, Kraft).

Product 2B.—Sugar, 99.6-99.89 polarity, sold to industrial producers of food, beverages or other sugar-containing-products (e.g., General Mills, Mars, Coca Cola, Kraft).

Product 2C.—Sugar, 99.4-99.59 polarity, sold to industrial producers of food, beverages or other sugar-containing-products (e.g., General Mills, Mars, Coca Cola, Kraft).

Product 3A.—Branded refined sugar sold in packages of 50 lbs. or less to grocery chains (e.g., Safeway, Harris Teeter, Walmart, Costco).

Product 3B.—Private label refined sugar sold in packages of 50 lbs. or less to grocery chains (e.g., Safeway, Harris Teeter, Walmart, Costco).

Product 4.-- Refined sugar sold in packages of 50 kgs. (110.23 lbs.) or less to institutional and/or food service providers (e.g., Sysco, restaurant chains, bakeries, schools, hospitals, prisons).

Product 5A.-- Sugar, 99.9 polarity and above, sold in packages of 50 kgs. (110.23 lbs.) or less to distributors (i.e., companies such as Batory Foods that buy sugar to resell to the industrial trade for use as an ingredient).

Product 5B.-- Sugar, 99.6-99.89 polarity, sold in packages of 50 kgs. (110.23 lbs.) or less to distributors (i.e., companies such as Batory Foods that buy sugar to resell to the industrial trade for use as an ingredient).

Product 5C.-- Sugar, 99.4-99.59 polarity, sold in packages of 50 kgs. (110.23 lbs.) or less to distributors (i.e., companies such as Batory Foods that buy sugar to resell to the industrial trade for use as an ingredient).

Product 6A.-- Sugar, 99.9 polarity and above, sold in bulk to distributors (i.e., companies such as Batory Foods).

Product 6B.-- Sugar, 99.6-99.89 polarity, sold in bulk to distributors (i.e., companies such as Batory Foods).

Product 6C.-- Sugar, 99.4-99.59 polarity, sold in bulk to distributors (i.e., companies such as Batory Foods).

Please note that values for IV-2a should be **f.o.b., U.S. point of shipment** and should not 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).

However, prices for table IV-2b should be delivered prices, but still net of all deductions for discounts or rebates

During October 2011-September 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)?

<input type="checkbox"/>	Yes. --Please complete the following pricing data tables as appropriate.
<input type="checkbox"/>	No. --Skip to question IV-3.

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

Report data in actual hundred-weight and actual dollars (not 1,000s).

<i>(Quantity in hundred-weight, value in dollars)</i>								
Month of shipment	Product 1		Product 2A		Product 2B		Product 2C	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2011:								
October								
November								
December								
2012:								
January								
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
2013:								
January								
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
2014:								
January								
February								
March								
April								
May								
June								
July								
August								
September								

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.

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

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

Report data in actual hundred-weight and actual dollars (not 1,000s).

(Quantity in hundred-weight, value in dollars)						
Month of shipment	Product 3A		Product 3B		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value
2011:						
October						
November						
December						
2012:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2013:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2014:						
January						
February						
March						
April						
May						
June						
July						
August						
September						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.

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

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

Report data in actual hundred-weight and actual dollars (not 1,000s).

(Quantity in hundred-weight, value in dollars)						
Month of shipment	Product 5A		Product 5B		Product 5C	
	Quantity	Value	Quantity	Value	Quantity	Value
2011:						
October						
November						
December						
2012:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2013:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2014:						
January						
February						
March						
April						
May						
June						
July						
August						
September						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.
² Pricing product definitions are provided on the first page of Part IV.

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

Report data in actual hundred-weight and actual dollars (not 1,000s).

(Quantity in hundred-weight, value in dollars)						
Month of shipment	Product 6A		Product 6B		Product 6C	
	Quantity	Value	Quantity	Value	Quantity	Value
2011:						
October						
November						
December						
2012:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2013:						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
2014:						
January						
February						
March						
April						
May						
June						
July						
August						
September						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.
² Pricing product definitions are provided on the first page of Part IV.

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1: _____

Product 2A, 2B, 2C: _____

Product 3A, 3B: _____

Product 4: _____

Product 5A, 5B, 5C: _____

Product 6A, 6B, 6C: _____

IV-3. Price setting.--

(a) How does your firm determine the prices that it charges for sales of sugar (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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) If your firm uses futures prices for price setting or hedging purposes, please explain how these prices are used. Your response should include reference to exchange prices, hedging costs, transportation costs, import tariffs, and any other relevant factors.

(c) Please specify the percentage of your purchases that have prices fixed at time of purchase _____%, between the time of purchase and the time of delivery _____% and the time of delivery _____%.

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-5. Pricing terms.--

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

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced sugar in the 2013/14 crop year was on a (1) long-term contract basis, (2) annual contract basis, (3) 6 month up to 12 month contract basis, (4) short-term contract basis, and (5) spot sales basis?

	Type of sale					Total (should sum to 100.0%)
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	6-12 month contracts (multiple deliveries for 6 months up to 12 months)	Short-term contracts (multiple deliveries for less than 6 months)	Spot sales (for a single delivery)	
Share of your 2013/2014 crop year sales	%	%	%	%	%	0.0 %

(a) Please indicate the percent of your sugar delivered in crop year 2013/14 that was sold:

Sold.--	Share of crop year 2013/14 sales (percent)
More than one year prior to harvest (for cane growers or beet farmers) or production (sugar mills, beet processors, cane refiners)	%
Between six months and one year prior to harvest or production	%
Between one week and six months before harvest or production	%
At the time of, or a week before or a week after harvest or production	%
More than one week after harvest or production	%
Total (should sum to 100.0%)	0.0

(b) Please indicate the percentage of your crop year 2013/2014 crop or production that was sold:

Sold.--	Share of crop year 2013/14 production (percent)
Before June 2013	%
June 2013	%
July 2013	%
August 2013	%
September 2013	%
October 2013	%
November 2013	%
December 2013	%
January 2014	%
February 2014	%
March 2014	%
April 2014	%
May 2014	%
After May 2014	%
Total (should sum to 100.0%)	0.0

IV-7. **Contract provisions.**— Please fill out the table regarding your firm’s typical sales contracts for sugar (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 for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	<i># of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price tied to futures contract	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Meet or release provision	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV-8. **Lead times.**--What is your firm’s share of sales both from inventory and produced to order and what is the typical lead time between a customer’s order and the date of delivery for your firm’s sales of its U.S.-produced sugar?

Source	Share of 2013/14 crop year sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9. Shipping information.--

- (a) What is the approximate percentage of the total delivered cost of sugar that is accounted for by U.S. inland transportation costs? _____ percent
- (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 sugar that are delivered the following distances from its 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%)	0.0 %

- V-10. **Geographical shipments.**-- In which U.S. geographic market area(s) has your firm sold its U.S.-produced sugar since October 1, 2011 (check all that apply)?

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

IV-11. **End uses.**--List the end uses of the sugar that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by sugar and other inputs?

End use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	Sugar	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **Substitutes.**-- Can other products be substituted for sugar?

No Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the prices of this substitute affected the price for sugar?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-13. **Demand trends.**-- Indicate how demand within the United States and outside of the United States (if known) for sugar has changed since October 1, 2011. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of sugar since October 1, 2011?

No	Yes	If yes, please describe and quantify if possible.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-15. Conditions of competition.--

(a) Is the sugar market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to sugar? If yes, describe.

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question IV-15(c)
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Trends in world sugar prices relative to U.S. prices (e.g. whether U.S. prices are above the loan rate)	
<input type="checkbox"/> Yes-Trends in refining capacity	
<input type="checkbox"/> Yes-Trends in acreage planted	
<input type="checkbox"/> Yes-Trends in usage of GMO seeds	
<input type="checkbox"/> Yes-Trends in world's use of biofuels	
<input type="checkbox"/> Yes-Other distinctive conditions of competition (e.g. weather, government policies)	

(b) If yes, have there been any changes in the business cycles or conditions of competition for sugar since October 1, 2011?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

(c) Please describe your interaction with the U.S. government in the areas of data collection, monitoring, and information sharing regarding supply and demand in the U.S. sugar market.

--

Please answer the following questions based on your firm's experience.

(d) How does the U.S. government influence U.S. prices for raw and refined sugar?

--

(e) How does the U.S. government interact with U.S. producers of raw and refined sugar?

--

IV-16. **Supply constraints.**--Has your firm refused, declined, or been unable to supply sugar since October 1, 2011 (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, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-17. **Raw materials.**--How have the prices of the raw materials used to produce sugar changed since October 1, 2011?

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 sugar.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-18. **Interchangeability.**--Is sugar 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 O 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

O = *no familiarity* with products from a specified country-pair

Country-pair	Mexico	All Other Countries
United States		
Mexico	X	
For any country-pair producing sugar 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:		

IV-19. **Factors other than price.**--Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between sugar 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 O 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

O = *no familiarity* with products from a specified country-pair

Country-pair	Mexico	All Other Countries
United States		
Mexico	X	
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 purchases of sugar, identify the country-pair and report the advantages or disadvantages imparted by such factors:		

IV-20. **Global sugar prices.**—

Please describe the trends in global sugar prices since October 1, 2011. Please attach any data that your firm has on global sugar prices.

Please describe the relationship between U.S. and global sugar prices, i.e., how are the prices of U.S. sugar related to global sugar prices?

IV-21. Raw sugar, refined sugar, and estandar.--

(a) If you are a sugar refiner or industrial user, can you use raw sugar, estandar, semi-refined and/or fully refined sugar interchangeably in one or all of the same applications?

No	Yes	If yes, please describe the specific applications.
<input type="checkbox"/>	<input type="checkbox"/>	

(b) If the answer to question IV-21(a) is yes, please indicate the sugars of different polarities that you have used interchangeably.

- raw sugar and estandar
- estandar and semi- or fully refined sugar
- semi-refined and fully refined sugar
- all types

(c) If you are a sugar refiner or industrial user and when sugar suitable for use in your or your customers' application is available from domestic sources, Mexico or a third country, will you typically pay a premium for sugar from any of these different sources of supply?

No	Yes	If yes, please indicate the source of the sugar for which you will pay a premium price and the amount of the premium you are typically willing to pay.
<input type="checkbox"/>	<input type="checkbox"/>	

(d) Has the availability of Mexican sugar in the United States had a material impact on the price of sugar in the U.S. market over the crop years 2011/2012, 2012/2013, and 2013/2014?

No	Yes	If yes, please describe the impact and, in particular, whether Mexican sugar placed downward pressure on U.S. producer prices.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for sugar since October 1, 2011. Indicate the share of the quantity of your firm's total shipments of sugar that each of these customers accounted for in crop year 2013/14.

	Customer's name	City	State	Share of 2013/14 crop year sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-23. Competition from imports

- (a) **Lost revenue.**--Since October 1, 2011: To avoid losing sales to competitors selling sugar from Mexico, did your firm:

	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales.**--Since October 1, 2011: Did your firm lose sales of sugar to imports of sugar from Mexico?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- (c) If you indicated “yes” to any of the above, you can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at http://usitc.gov/trade_remedy/question.htm. Note that the Commission may contact the firms named to verify the allegations reported. **Please do not resubmit allegations provided previously.**

Is your firm submitting the lost sales/lost revenues worksheet?

<input type="checkbox"/>	No—Please explain.
<input type="checkbox"/>	Yes—Please complete the worksheet and submit via the Commission dropbox. https://dropbox.usitc.gov/oinv/ . (PIN: SUGAR)

- IV-24. **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.

PART V.--ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from Amy Sherman (202-205-3289, amy.sherman@usitc.gov).

V-1. **HFCS Production.**--Since October 1, 2011, has your firm produced high fructose corn syrup (HFCS)?

HFCS.--A sweetener made from corn composed of either 42 percent or 55 percent fructose.

No Yes--**COMPLETE AND RETURN A SEPARATE HFCS PRODUCER QUESTIONNAIRE**

All firms (i.e., whether or not producers of HFCS) should respond to the following:

V-2 **Comparability of types of sweetener products.**--For each of the following indicate whether refined sugar and HFCS are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

(a) **Characteristics and Uses.**-- The differences and similarities in the physical characteristics and end uses between refined sugar and HFCS.

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their characteristics and uses:

(b) **Interchangeability.**--The ability to substitute refined sugar and HFCS in the same application.

Fully interchangeable	Mostly interchangeable	Somewhat interchangeable	Not at all interchangeable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their interchangeability:

V-2 **Comparability of types of sweetener products.--Continued**

- (c) **Manufacturing facilities, production processes, and production employees.**-- Whether refined sugar and HFCS are manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Fully the same	Mostly the same	Somewhat the same	Not at all the same	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their manufacturing processes:

- (d) **Channels of distribution.**-- Channels of distribution/market situation through which refined sugar and HFCS are sold (i.e., sold direct to end users, through distributors, etc.).

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their channels of distribution:

V-2 **Comparability of types of sweetener products.--Continued**

(e) **Customer and producer perceptions.**--Perceptions as to the differences and/or similarities in refined sugar and HFCS in the market (*e.g.*, sales/marketing practices).

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their customer and producer perceptions:

(f) **Price.**--Whether prices are comparable or differ between refined sugar and HFCS.

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their prices:

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: http://www.usitc.gov/investigations/701731/2014/sugar_mexico/final.htm.

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

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

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

- **E-mail.**—E-mail your questionnaire to amy.sherman@usitc.gov; include a scanned copy of the signed certification page (page 1). *Please note that submitting your questionnaire by e-mail may subject your firm’s business proprietary information to transmission over an unsecure environment and to possible disclosure. If you choose this option, the Commission warns you that any risk involving possible disclosure of such information is assumed by the submitter and not by the Commission.*

If your firm does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

Parties to this proceeding.—If your firm is a party to this proceeding, you are required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR §207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR §207.7). Service of the questionnaire must be made in paper form.