U.S. PRODUCERS' QUESTIONNAIRE

STAINLESS STEEL SHEET AND STRIP FROM CHINA

This questionnaire must be received by the Commission by <u>December 6, 2016</u> 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 duty and antidumping investigations concerning stainless steel sheet and strip ("SSSS") from China (Inv. Nos. 701-TA-557 and 731-TA-1312 (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)).

Name of fi	rm		
Address			
City	State Zip Code		
Website			
Has your fir	m produced SSSS (as defined on next page) at any time since January 1, 2013?		
	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)		
YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)		
•	estionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the ink: https://dropbox.usitc.gov/oinv/ . (PIN: SSSS)		

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, the undersigned, acknowledge that information submitted in response to this request for information and throughout this investigation or other proceeding may be disclosed to and used:(i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements

Name of Authorized Official	Title of Authorized Official	Date	
	Phone:		
Signature		Email address	
	Fax:		

PART I.—<u>GENERAL INFORMATION</u>

Background.-- This proceeding was instituted in response to a petition filed on February 12, 2016, by AK Steel Corp., West Chester, Ohio; Allegheny Ludlum, LLC, Pittsburgh, Pennsylvania; North American Stainless, Inc., Ghent, Kentucky; and Outokumpu Stainless USA, LLC, Bannockburn, Illinois. 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 ("Commerce") makes an affirmative determination pertinent to this proceeding are available

at https://www.usitc.gov/investigations/title 7/2016/stainless steel sheet and strip china/final.htm.

Stainless Steel Sheet and Strip ("SSSS") covered by these investigations is stainless steel sheet and strip, whether in coils or straight lengths. Stainless steel is an alloy steel containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements. The subject sheet and strip is a flatrolled product with a width that is greater than 9.5 mm and with a thickness of 0.3048 mm and greater but less than 4.75 mm, and that is annealed or otherwise heat treated, and pickled or otherwise descaled. The subject sheet and strip may also be further processed (e.g., coldrolled, annealed, tempered, polished, aluminized, coated, painted, varnished, trimmed, cut, punched, or slit, etc.) provided that it maintains the specific dimensions of sheet and strip set forth above following such processing. The products described include products regardless of shape, and include products of either rectangular or non-rectangular crosssection where such cross-section is achieved subsequent to the rolling process, i.e., products which have been "worked after rolling" (e.g., products which have been beveled or rounded at the edges). For purposes of the width and thickness requirements referenced above: (1) Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above; and (2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross-section, the width of certain products with nonrectangular shape, etc.), the measurement at its greatest width or thickness applies.

All products that meet the written physical description, and in which the chemistry quantities do not exceed any one of the noted element levels listed above, are within the scope of these investigations unless specifically excluded.

Subject merchandise includes stainless steel sheet and strip that has been further processed in a third country, including but not limited to cold-rolling, annealing, tempering, polishing, aluminizing, coating, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the stainless steel sheet and strip.

Excluded from the scope of these investigations are the following: (1) Sheet and strip that is not annealed or otherwise heat treated and not pickled or otherwise descaled; (2) plate (i.e., flat-rolled stainless steel products of a thickness of 4.75 mm or more); and (3) flat wire (i.e., cold-rolled sections, with a mill edge, rectangular in shape, of a width of not more than 9.5 mm). The products under investigation are currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7219.13.0031, 7219.13.0051, 7219.13.0071, 7219.13.0081, 7219.14.0030, 7219.14.0065, 7219.14.0090, 7219.23.0030, 7219.23.0060, 7219.24.0030, 7219.24.0060, 7219.32.0005, 7219.32.0020, 7219.32.0025, 7219.32.0035, 7219.32.0036, 7219.32.0038, 7219.32.0042, 7219.32.0044, 7219.32.0045, 7219.33.0042, 7219.33.0044, 7219.33.0020, 7219.33.0070, 7219.33.0080, 7219.34.0005, 7219.34.0020, 7219.34.0025, 7219.34.0030, 7219.34.0035, 7219.34.0050, 7219.35.0015, 7219.35.0030,

7219.35.0035, 7219.35.0050, 7219.90.0010, 7219.90.0020, 7219.90.0025, 7219.90.0060, 7219.90.0080, 7220.12.1000, 7220.12.5000, 7220.20.1010, 7220.20.1015, 7220.20.1060, 7220.20.1080, 7220.20.6005, 7220.20.6010, 7220.20.6015, 7220.20.6060, 7220.20.6080, 7220.20.7005, 7220.20.7010, 7220.20.7015, 7220.20.7060, 7220.20.7080, 7220.90.0010, 7220.90.0015, 7220.90.0060, and 7220.90.0080. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this proceeding is dispositive.

<u>**Reporting of information.</u></u>-- 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.</u>**

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.

<u>Release of information</u>.--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. <u>TAA information release</u>.--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?



I-2. <u>Establishments covered</u>.--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.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of SSSS, 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 discu	¹ Additional discussion on establishments consolidated in this questionnaire:			

Business Proprietary

U.S. Producers' Questionnaire – Stainless Steel Sheet and Strip

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

Country	Support	Oppose	Take no position
China (countervailing duty)			
China (antidumping)			

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. <u>**Related importers/exporters.**</u>--Does your firm have any related firms, either domestic or foreign, that are engaged in importing SSSS from China into the United States or that are engaged in exporting SSSS from China 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 SSSS?

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 Michael Szustakowski (202-205-3169, <u>mgs@usitc.gov</u>). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1. <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 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 SSSS since January 1, 2013.

(check as many as appropriate)		(If checked, please describe; leave blank if not applicable)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments (please specify the dates and volume of capacity that was made unavailable)	
	revised labor agreements	
	other (<i>e.g.,</i> technology)	

II-3a. **Production using same machinery.--** Please report your firm's production of products made on the same equipment and machinery used to produce SSSS, and the combined production capacity on this shared equipment and machinery in the periods indicated.

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

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

Quantity (in short tons)						
	Calendar years			January-S	January-September	
Item	2013	2014	2015	2015	2016	
Overall capacity						
Production of In-scope SSSS ¹	0	0	0	0	0	
Thin/ultra-thin gage stainless steel (less than 0.3048 mm)						
All other out-of-scope products ²						
Total production	0	0	0	0	0	
¹ Data entered for production of stainless steel ² Please identify these products:	sheet and strip	will populate he	re once reporte	d in question I	I-7.	

- II-3b. **Operating parameters.--**The production capacity reported in II-3a is based on operating _____ hours per week, _____ weeks per year.
- II-3c. **Capacity calculation.--**Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.

II-3d. **Production constraints**.--Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

Stage of production	2015 capacity (short tons)	Nature of constraint
Raw stainless steel production		
capacity		
Annealing and pickling capacity		
Cold rolling capacity		
Other finishing capacity		

II-3e. Product shifting.-

(i) Is your firm able to switch production (capacity) between SSSS and other products using the same equipment and/or labor?

- (ii) Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.
- II-4. **Tolling**.--Since January 1, 2013, has your firm been involved in a toll agreement regarding the production of SSSS?

"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	YesPlease describe the toll arrangement(s) and name the firm(s) involved

No Yes-- (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:

II-5. Foreign trade zones.--

(a) <u>Firm's FTZ operations</u>.--Does your firm produce SSSS in and/or admit SSSS 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	YesDescribe the nature of your firms operations in FTZs and
	identify the specific FTZ site(s).

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

No/Don't know	YesIdentify the firms and the FTZs.

II-6. Importer.--Since January 1, 2013, has your firm imported SSSS?

"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. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of SSSS in its U.S. establishment(s) during the specified periods.

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

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

"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 <u>net values</u> (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.

"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.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.

II-7. Production, shipment, and inventory data.--Continued

Quantity		and value (in \$1	,0001			
_		Calendar years		January-September		
Item	2013	2014	2015	2015	2016	
Average production capacity ¹ (quantity) (A)						
Beginning-of-period inventories (<i>quantity</i>) (B)						
Production Hot-rolled annealed and pickled SSSS from firm's own steel production (<i>quantity</i>) (C)						
Cold-rolled SSSS from firm's own steel production (<i>quantity</i>) (D)						
Hot-rolled annealed and pickled SSSS from purchased steel (<i>quantity</i>) (E)						
Cold-rolled SSSS from purchased steel (quantity) (F)						
Total in-scope production (G)	0	0	0	0		
U.S. shipments: Commercial shipments: Quantity (H)						
Value (I)						
Internal consumption: Quantity (J)						
Value ² (K)						
Transfers to related firms: Quantity (L)						
Value ² (M)						
Export shipments: ³ Quantity (N)						
Value (O)						
End-of-period inventories ⁴ (<i>quantity</i>) (P)						

II-8. <u>Channels of distribution</u>.-- Report your firm's commercial U.S. shipments by channel of distribution.

Quantit	ty (in short to	ns) and value (i	in \$1,000)		
	Calendar years January-Sept			eptember	
Item	2013	2014	2015	2015	2016
Channels of distribution:					
Commercial U.S. shipments:					
To distributors, processors,					
and service centers (quantity)					
(M)					
To end users (<i>quantity</i>) (N)					

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for commercial U.S. shipments (i.e., line D) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years		January-S	eptember	
Reconciliation	2013	2014	2015	2015	2016
M + N - D = zero ("0"), if not revise.	0	0	0	0	0

II-9. **Commercial U.S. shipments by product grade**.-- Report your firm's commercial U.S. shipments by grade of stainless steel.

	2015		
ltem	Quantity (short tons)	Value (in \$1,000)	
Commercial U.S. shipments:			
Grade 201 (O)			
Grade 304 (P)			
Grade 316 (Q)			
Grade 409 (R)			
Grade 430 (S)			
All others ¹ (T)			
Total (U)	0	0	
¹ Please identify these products:			

<u>RECONCILIATION OF SHIPMENTS BY GRADE</u>-- Please ensure that the quantities and values reported for U.S. producers commercial U.S. shipments by grade (i.e., line U) is equal the quantity and value reported for commercial U.S. shipments (i.e., lines H and I) in 2015 reported in question II-7. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Item	Quantity (short tons)	Value (in \$1,000)
Reconciliation with question II-7, should =		
zero ("0"), if not revise prior to submission.	0	0

II-10. <u>Employment data</u>.--Report your firm's employment-related data related to the production of SSSS and provide an explanation for any trends in these data.

"Production and 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. For the January to September periods, calculate similarly and divide by 9.

"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.

	Calendar years		January-September		
Item	2013	2014	2015	2015	2016
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>1,000 hours</i>)					
Wages paid to PRWs (\$1,000)					

Explanation of trends:

II-11. **<u>Related firms</u>**.--If your firm reported transfers to related firms in question II-7, 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-12. **Purchases**.--Other than direct imports, has your firm otherwise purchased SSSS since January 1, 2013?

"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 supplier where your firm is the importer of record or consignee.

🗌 No

Yes--Report such purchases below and explain the reasons for your firms' purchases:

	(Quan	tity <i>in short to</i>	ons)		
	C	alendar years		January-Septemb	
Item	2013	2014	2015	2015	2016
Purchases from U.S. importers ¹ of SSSS from— China					
All other sources					
Purchases from domestic producers ²					
Purchases from other sources ²					

suppliers differ by source, please identify the source for each listed supplier: _____. ² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this

product:

II-13. <u>Other explanations</u>.--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 Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@usitc.gov).

III-1. <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 III.

Name	
Title	
Email	
Telephone	
Fax	

- III-2. <u>Accounting system</u>.--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 SSSS:
 - 2. Does your firm prepare profit/loss statements for SSSS:
 - 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,
 - Addited, _____annual reports, _____10xs, ____10xs, ___10xs, ____10xs, ___10xs, ____10xs, ____10xs

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes SSSS, as well as specific statements and worksheets) used to compile these data.

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

- III-4. <u>Allocation basis</u>.--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.
- III-5. **Product listing**.--Please list the products your firm produced in the facilities in which your firm produced SSSS, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
	~
SSSS	%
	%
	%
	%
	%

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of SSSS from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

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

III-7. Inputs from related suppliers.--Please identify the inputs used in the production of SSSS that your firm purchases from related suppliers and that are reflected in table III-9a. 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 your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS
Input valuation method (e.g	., related supplier's actual cost, cost plus	, negotiated transfer price, etc.)

III-8. **Inputs purchased from related suppliers.--**Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on SSSS) 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 suppliers as reported in table III-9a.

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- III-9a. Operations on SSSS.--Report the revenue and related cost information requested below on the SSSS operations of your firm's U.S. establishment(s).¹ 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 suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Quant	ity (<i>in short tons)</i> ai				
	-	al years ended		January-Sep	otember
Item	2013	2014	2015	2015	2016
Net sales quantities: ² Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	C
Net sales values: ² Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	C
Cost of goods sold (COGS): ³ Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	C
Gross profit or (loss)	0	0	0	0	C
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	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	C
Depreciation/amortization included above					

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

² 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.

³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

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

III-9b. <u>Financial data reconciliation</u>.--The calculable line items from question III-9a (*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-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific table III-9a 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-9a; i.e., if an aggregate nonrecurring item has been allocated to table III-9a, only the allocated value amount included in table III-9a 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 financial results of the subject product in table III-9a.

	F	Fiscal years ended			January-September	
	2013	2014	2015	2015	2016	
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in table III-9a where the nonrecurring item is	•	em: In these col em reported in ta	umns please repo able III-9a.	ort the amount of	f the relevant	
classified.			Value (<i>\$1,000</i>)			
1. , classified as						
2. , classified as						
3. , classified as						
4. , classified as						
5. , classified as						
6. , classified as						
7. , classified as						

- III-11. <u>Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company</u>.--If non-recurring items were reported in table III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in table III-9a.
- 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 SSSS. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for SSSS in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in table III-9a. Provide data as of the end of your firm's three most recently completed fiscal years.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted.

Total assets should be <u>allocated to the subject products</u> if these assets are also related to other products. Please provide a <u>brief explanation if there are any substantial changes</u> in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value (<i>in \$1,000</i>)			
	Fiscal years ended		
Item	2013	2014	2015
Total assets (net) ¹			
¹ Describe			

III-13. **Capital expenditures and research and development expenses**.--Report your firm's capital expenditures and research and development expenses for SSSS. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (<i>in \$1,000</i>)					
	Fiscal years ended January-September			eptember	
Item	2013	2014	2015	2015	2016
Capital expenditures					
Research and development expenses					
1		· · ·			

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.

² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.

III-14. **Data consistency and reconciliation.--**Please indicate whether your firm's financial data for questions III-9a, 12, and 13 are based on a calendar year or on your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

Do these data in question III-9a reconcile with data in question II-7?

Yes	No	If no, please explain.

III-15. <u>Effects of imports on investment</u>.--Since January 1, 2013, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of SSSS from China?

🗌 No

Yes--My firm has experienced actual negative effects as follows:

(ch	neck as many as appropriate)	(please describe)
	Cancellation, postponement, or rejection of expansion projects	
	Denial or rejection of investment proposal	
	Reduction in the size of capital investments	
	Return on specific investments negatively impacted	
	Other	

No

III-16. Effects of imports on growth and development.--Since January 1, 2013, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of SSSS from China?

Yes--My firm has experienced actual negative effects as follows:

(ch	neck as many as appropriate)	(please describe)
	Rejection of bank loans	
	Lowering of credit rating	
	Problem related to the issue of stocks or bonds	
	Ability to service debt	
	Other	

III-17. <u>Anticipated effects of imports</u>.--Does your firm anticipate any negative effects due to imports of SSSS from China?

No	Yes	If yes, my firm anticipates negative effects as follows:

III-18. <u>Other explanations</u>.--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 MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Aimee Larsen (202-205-3179, Aimee.Larsen@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 quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2013 of the following products produced by your firm.
 - <u>Product 1</u>.—AISI Grade 304, 0.075 inch nominal thickness (0.068-0.082 inch actual), width 48-60 inches, in coils, 2B finish.
 - <u>Product 2</u>.—AISI Grade 304, 0.029 inch nominal thickness (0.0260-0.032 inch actual), width 48-60 inches, in coils, 2B finish.
 - <u>Product 3</u>.—AISI Grade 304, 0.029 inch nominal thickness (0.0260-0.032 inch actual), width 48-60 inches, in coils, polished.
 - <u>Product 4</u>.—AISI Grade 304, 0.036 inch nominal thickness (0.032-0.040 inch actual), width 48-60 inches, in coils, 2B finish.
 - <u>Product 5</u>.—AISI Grade 304, 0.036 inch nominal thickness (0.032-0.040 inch actual), width 48-60 inches, in coils, polished.
 - <u>Product 6</u>.—AISI Grade 304, 0.024 inch nominal thickness (0.0231-0.0260 inch actual), width 48-60 inches, in coils, polished.
 - <u>Product 7</u>.--AISI Grade 409, 0.048 inch nominal thickness (0.0450-0.0510 inch actual), width 48-60 inches, in coils, 2B finish.
 - <u>Product 8</u>.--AISI Grade 430, 0.036 inch nominal thickness (0.032-0.040 inch actual), width 36-48 inches, in coils, polished.

Please note that values should be <u>f.o.b., U.S. point of shipment</u> 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).

During January 2013-September 2016, 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 tables as appropriate.
NoSkip to question IV-3.

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

Report data in actual short tons and actual dollars (not 1,000s).

2013: January-March	Produ uantity	ict 1 Value	Produ Quantity	uct 2 Value	Produ		Produ	
2013: January-March	uantity	Value	Quantity	Value	• • • •			
January-March				value	Quantity	Value	Quantity	Value
-								
A 11.1								
April-June								
July-September								
October-								
December								
2014:								
January-March								
April-June								
July-September								
October-								
December								
2015:								
January-March								
April-June								
July-September								
October-								
December								
2016:								
January-March								
April-June								
July-September								
¹ Net values (<i>i.e.,</i> gross U.S. point of shipment. ² Pricing product defini					id freight, and the	e value of retur	ned goods), f.o.b	. your firm

Product 1:

Product 2:

Product 3:

Product 4:

IV-2. <u>Price data</u>.—Continued.

Report data in actual short tons and actual dollars (not 1,000s).

			(Quantity in sho	rt tons, value i	n dollars)		-	
	Prod	uct 5	Prod	uct 6	Prod	uct 7	Produ	uct 8
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2013:								
January-March								
April-June								
July-September								
October- December								
2014:								
January-March								
April-June								
July-September								
October- December								
2015:								
January-March								
April-June								
July-September								
October- December								
2016:								
January-March								
April-June								
July-September								
¹ Net values (<i>i.e.,</i> § U.S. point of shipment. ² Pricing product c					id freight, and th	e value of retur	rned goods), f.o.b	. your firm's
Note If your firm's proyour firm's proyour firm's product. Al						the specified pr	roduct, provide a	description
Product 5:								
Product 6:								
Product 7:								

Product 8:

<u>Pricing data methodology</u>.—Please describe the method and the kinds of documents/records that were used to compile your price data.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the price data, as Commission staff may contact your firm regarding questions on the price data. The Commission may also request that your company submit copies of the supporting documents/records (such as sales journal, invoices, etc.) used to compile these data.

IV-3. **Price setting.--** How does your firm determine the prices that it charges for sales of SSSS (*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 (*check all that apply*).

Quanti discour	-	No discount policy	Other	Describe

IV-5. Pricing terms.--

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

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 SSSS 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 SSSS in 2015 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

		Туре о	f sale			
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Short-term contracts (multiple deliveries for less than 12 months)	Spot sales (for a single delivery)	Tota l (shoul sum t 100.0%	ld o
Share of 2015 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions</u>.--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced SSSS (or check "not applicable" if your firm does not sell on a long-term, shortterm and/or annual contract basis).

Typical sales contract provisions	ltem	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	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
u, e. pee	Both			
Meet or release	Yes			
provision	No			
Not applicab	le			

IV-8. <u>Lead times</u>.--What is your firm's share of sales 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 SSSS?

Source	Share of 2015 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

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IV-9. Shipping information.--

- (a) What is the approximate percentage of the total delivered cost of U.S.-produced SSSS 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 SSSS 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 %

IV-10. <u>Geographical shipments</u>.-- In which U.S. geographic market area(s) has your firm sold its U.S.produced SSSS since January 1, 2013 (check all that apply)?

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

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

	Share of total cost account	Total	
			(should sum to
End use product	SSSS	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **<u>Substitutes</u>.--** Can other products be substituted for SSSS?

🗌 No

Yes--Please fill out the table.

		End use in which this		Have changes in the price of this substitute affected the price for SSSS?			
	Substitute	substitute is used	No	Yes	Explanation		
1.							
2.							
3.							

IV-13. <u>Demand trends</u>.-- Indicate how demand within the United States and outside of the United States (if known) for SSSS has changed since January 1, 2013. 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					
Outside the United States					

IV-14. **Product changes.--**Have there been any significant changes in the product range, product mix, or marketing of SSSS since January 1, 2013?

No	Yes	If yes, please describe and quantify if possible.

IV-15. Conditions of competition.--

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

Check all th	nat apply.	Please describe.
	Νο	Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for SSSS since January 1, 2013?

No	Yes	If yes, describe.

IV-16. <u>Supply constraints</u>.--Has your firm refused, declined, or been unable to supply SSSS since January 1, 2013 (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.

IV-17. Raw materials.-

(a) How have SSSS raw material prices changed since January 1, 2013?

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 SSSS.

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IV-17. <u>Raw materials</u>.—*Continued*.

(b) Are your firm's selling price for SSSS indexed to raw material costs?

Type of sale	No	Yes	Please explain.
By contract			
Spot market			

IV-18. Surcharges.--

(a) Does your firm employ a surcharge for any of the following inputs (check all that apply)?

			If yes, please describe the surcharge formula applied for each input and whether the formula has changed since 2013.		
Input	No	Yes	Spot sales	Contract	
Nickel					
Chromium					
Manganese					
Molybdenum					
Scrap (iron)					
Energy (natural gas and /or electricity)					
Fuel (for transport)					
Other (describe:)					

(b) How frequently does your firm change or adjust its surcharges for SSSS?

Daily	Weekly	Monthly	Quarterly	Annually	Other	If other, specify

IV-19. Base price.-

- (a) How does your firm determine its base price for SSSS?
- (b) Does your base price include any raw material costs that are not included in your surcharges?

No	Yes	If yes, please identify the raw material(s) and explain how raw material price changes have affected your firm's base price for SSSS

(c) How frequently does your firm change or adjust its base price for SSSS?

Daily	Weekly	Monthly	Quarterly	Annually	Other	If other, specify

IV-20. <u>Interchangeability</u>.--Is SSSS 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	Mexico	Taiwan	Other countries
United States				
China				
Mexico				
Taiwan				
For any country-pair producing stainless steel sheet and strip 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-21. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between SSSS 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	Mexico	Taiwan	Other countries
United States				
China				
Mexico				
Taiwan				
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 stainless steel sheet and strip, identify the country-pair and report the advantages or disadvantages imparted by such factors:				

IV-22. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for SSSS since January 1, 2013. Indicate the share of the quantity of your firm's total shipments of SSSS that each of these customers accounted for in 2015.

	Customer's name	City	State	Share of 2015 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-23. Competition from imports

(a) <u>Lost revenue</u>.--Since January 1, 2013: To avoid losing sales to competitors selling stainless steel sheet and strip from China, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales</u>.--Since January 1, 2013: Did your firm lose sales of stainless steel sheet and strip to imports of this product from China?

No	Yes	

IV-24. <u>Other explanations</u>.--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.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: <u>https://www.usitc.gov/investigations/title_7/2016/stainless_steel_sheet_and_strip_china/final.htm</u>.

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.

• <u>Upload via Secure Drop Box</u>.—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: SSSS

• E-mail.—E-mail the MS Word questionnaire to mgs@usitc.gov; include a scanned copy of the signed certification page (page 1). Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

If your firm <u>does not</u> 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, it is 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.