U.S. PURCHASERS' QUESTIONNAIRE

1-HYDROXYETHYLIDENE-1, 1-DIPHOSPHONIC ACID FROM CHINA

This questionnaire must be received by the Commission by JANUARY 17, 2017

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 1-hydroxyethylidene-1, 1-diphosphonic acid ("HEDP") from China (Inv. Nos. 701-TA-558 and 731-TA-1316 (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)). Further information on this questionnaire can be obtained from Aimee Larsen (202-205-3179, Aimee.Larsen@usitc.gov).

Name of firm

Address		
City	State Zip Code	
Website		
Has your firm January 1, 201	ourchased HEDP (as defined on next page) from <u>any</u> source (domestic or foreign) at any ti 4?	ime since
□ NO	(Sign the certification below and promptly return only this page of the questionnaire to the Comm	nission)
☐ YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)	
following lin	k: https://dropbox.usitc.gov/oinv/. (PIN: HEDP)	
	CERTIFICATION	
mmission on the so undersigned, ackn eding or other prod nnel (a) for develop us, and evaluation dix 3; or (ii) by U.S	this questionnaire and throughout this proceeding in any other import-injury proceeding on any other import-injury proceeding or similar merchandise. owledge that information submitted in response to this request for information and seedings may be disclosed to and used: (i) by the Commission, its employees and Officing or maintaining the records of this or a related proceeding, or (b) in internal invests relating to the programs, personnel, and operations of the Commission including a government employees and contract personnel, solely for cybersecurity purposes. I use appropriate nondisclosure agreements.	d throughout fices, and cont estigations, aud ng under 5 U.
of Authorized Offic	ial Title of Authorized Official Date	
	Phone:	
ture	Email address	

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on March 31, 2016, by Compass Chemical International LLC, Smyrna, GA. 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 dumping. Questionnaires and other information pertinent to this proceeding are available at:

http://www.usitc.gov/investigations/701731/2016/1 hydroxyethylidene 1 1 diphosphonic acid china /final.htm

<u>HEDP</u>.-- The product covered by these investigations include all grades of aqueous, acidic (non-neutralized) concentrations of 1-hydroxyethylidene-1,1-diphosphonic acid ("HEDP"), also referred to as hydroxethlylidenendiphosphonic acid, hydroxyethanediphosphonic acid, acetodiphosphonic acid, and etidronic acid. The CAS (Chemical Abstract Service) registry number for HEDP is 2809-21-4.

The merchandise subject to this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheading 2931.90.90. Merchandise covered by the scope may also be imported under HTSUS subheadings 2811.19.6090, 2931.00.9043, 2931.90.9041, and 2931.90.9047. While HTSUS subheadings are provided for convenience and customs purposes only, the written description of the scope of this investigation is dispositive.

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

<u>Verification</u>.-- 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.

completing this	questionnaire.		
Hours	Dollars		
issues of conce and as limited a 25 hours per	rn are adequately addressed and is possible. Public reporting burder	viewed with market participants to ensure that that data requests are sufficient, meaningfun for this questionnaire is estimated to averagor reviewing instructions, gathering data, an	il, ge
reducing the bu	urden, and any suggestions for im your response or send to the O	cy of this burden estimate, suggestions for approving this questionnaire. Please attach sucoffice of Investigations, USITC, 500 E St. SW	h
by this questior one establishm	nnaire, if different from that listed ent should combine the data for a	address of your U.S. establishment(s) covered on the cover page. Firms operating more than all establishments into a single report. n the purchase of HEDP, including auxiliary	
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by this question one establishm "Establishment facilities operat OwnershipIs No	your firm owned, in whole or in pa	on the cover page. Firms operating more than all establishments into a single report. In the purchase of HEDP, including auxiliary or not physically separate from) such facilities. Part, by any other firm? ation. Extent of ownership	

or foreign, w	<u>Related SUBJECT importers/exporters.</u> Does your firm have any related firms, either domestic or foreign, which import HEDP from China into the United States or which export HEDP from China to the United States?					
☐ No	No YesList the following information.					
Firm name		Address	Affiliation			
domestic or	foreign, which impo	s/exportersDoes your firm have a ort HEDP from countries other than on ontries other than China to the United	China into the United State			
☐ No	YesList the	following information.				
Firm name a	and country	Address	Affiliation			
Related pro		irm have any related firms, either de	omestic or foreign, which			
☐ No	YesList the	following information.				
Firm name		Address	Affiliation			

PART II.--PURCHASES

Contact information. Please identify the responsible individual and the manner by which Commission	n
staff may contact that individual regarding the confidential information submitted in this questionnai	re.

Name	
Title	
Email	
Telephone	
Fax	

II-1. <u>Purchases.</u>— Report your firm's total U.S. purchases of HEDP. (Do not include imports for which your firm was the importer of record; such imports should be reported in your U.S. importer's questionnaire.)

Item	2014	2015	2016
		Quantity (in pound	s)
Purchases of HEDP produced in United States			
China			
All other countries ¹			
Sources unknown			
Total purchases	0	0	0
¹ Please identify these countries:			

II-2. <u>Changes in purchasing patterns.</u>--Please indicate how the shares of your firm's purchases of HEDP from different sources have changed since January 1, 2014.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States						
China						
All other countries						
Sources unknown						

l-3.	Purchases from one country onlyIf your firm has purchased HEDP from only one country
	please explain the reasons for doing so.

II-4. <u>Supplier identification.</u>--Please list your firm's <u>FIVE</u> largest suppliers for HEDP since January 1, 2014. Also, provide the share of the quantity of your firm's total purchases of HEDP that each of these suppliers accounted for in 2016.

No.	Supplier's name	City and state	Share of quantity of 2016 purchases
1			%
2			%
3			%
4			%
5			%

PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES

III-1.	Firm typeWhich of the following best describes your firm as a purchaser of HEDP (check all
	that apply)?

End user	Compounder/ formulator	Distributor	Other	Describe other

If your firm is a distributor of HEDP, please answer questions III-2 and III-3.

III-2.	Competition for salesDoes your firm compete for sales to customers with the manufacturers
	or importers from which your firm purchases HEDP?

No	Yes	If yes, please describe.

III-3.	<u>Types of customers</u> What are the major types of consumers to which your firm sells HEI	OP?

If your firm is an end user of HEDP, please answer questions III-4 and III-5.

III-4. <u>End uses.</u>—List the top 3 products your firm makes using HEDP and estimate the percent of your total production cost that is accounted for by HEDP and by other inputs (such as labor, energy, and other raw materials).

	Share of total cost in e	Total (should			
Product(s) your firm produces	HEDP Other inputs				sum to 100.0% across)
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %

III-5. Demand for end use	products
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(a) Has the demand for your firm's final products incorporating HEDP changed since January 1, 2014?

Increased	No change	Decreased	Fluctuated	

(b) Has this had any effect on your firm's demand for HEDP?

No	Yes	Explain

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III-6. Substitutes Can other products be substituted for HEDP?								
□ N	lo	YesPle	ease fill out	the tak	ole.			
	F	nd use in w	hich this		Have c	•	e price of this substitute price for HEDP?	
Substitute		End use in which this substitute is used			Yes		Explanation	
1.								
2.								
3.								
	wn) for HE	DP has char	nged since J	anuary	1, 201	4. Explain an	tside of the United y trends and describe	
Market	Overall increase	No change	Overall decrease	witl	tuate h no trend	Expl	anation and factors	
Within the United States								
Outside the United States								
	of your firm	_	-				low, estimating the DP produced in the	
	Estimated percentage your firm's total 201 purchases of HEDP							
Purchases that did r							%	
Purchases that were required by law or regulation to be domestic product (e.g., government purchases under "Buy American" provisions)						%		
Purchases that were	not requir	ed by law				equired by		
your customers to b		_	ctic produc	+ fo= c+	.hor ===	aconc	%	
Purchases that were (explain:)	e required t	.o be dome	suc produc	t for ot	ner re	asons	%	
Total (should sum to 100.0%)							0.0 %	

III_Q	Conditions	of com	natition
III-9.	Conditions	or com	petition

(a)	Is the HEDP market subject to business cycles (other than general economy-wide
	conditions) and/or other conditions of competition distinctive to HEDP?

Check all	that apply.		Please describe.
	No		Skip to question III-10.
	Yes-Business seasonal bus		
Yes-Other distinctive conditions of competition			
		en any changes uary 1, 2014?	in the business cycles or conditions of competition for
No	Yes	If yes, describe	e.

III-10. <u>Decisions based on producer and country-of-origin.</u>--How often does your firm, and if known, do your customers, make purchasing decisions involving HEDP based on its producer or country of origin?

	Always	Usually	Sometimes	Never	If at least sometimes, explain.			
	Decision based on producer							
Your firm								
Your customers								
		Decision b	ased on counti	y of origi	n			
Your firm								
Your customers								

ı	15	D	urchas	ars' O	Hestic	nnaire	- HFDP
ı). P	\mathbf{u}	-1	1162111	n III ali e	- DEDE

	2014?								
	Availak	oility in t market		No '	Yes ch	-	noting the c	ountries	and reasons for the
	U.Spro	oduced	product						
	Subject	imports	S						
	Nonsuk	oject imp	oorts						
2.	HEDP si order er	Supply constraintsHas any firm refused, declined, or been unable to supply your firm with HEDP since January 1, 2014 (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	Ye	s If y	es, plea	se des	cribe.			
]						
	<u>Purchas</u>	ing freq	uency						
	(a)	(a) How frequently does your firm make purchases of HEDP (check one)?							
		Daily	Weekly	Mo	onthly	Quarterly	Annually	Other	If other, specify
		Daily	Weekly	Mo	onthly	Quarterly	Annually	Other	If other, specify
	(b)					Quarterly changed since			If other, specify
	(b)			ing free	quency				If other, specify
	(b)	Has this	purchas	ing free	quency	changed since			If other, specify
•	Numbe	Has this No	yes Diiers con	ing free	quency please	changed since	e January 1,	2014?	If other, specify
	Number making Supplie	Has this No r of supple a purcha	Yes Diliers contacts Display the series of the series are as a series of the series	If yes,	please LHow a	changed since describe. many supplied and firm	ers does you	2014?	
	Number making Supplie	Has this No r of supple a purcha	Yes Dliers contase? Between	ing free If yes, ntacted ween _ Does yourchase	please How arr? response	changed since describe. many supplied firm n's purchases	ers does youns of HEDP usu	2014? r firm ger	nerally contact before

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III₋16	Change in suppliers	Hac your firm	changed	cuppliare of	inco Ianuary 1	201/12
ш-то.	Change in Suppliers,	nas voui illill	Lilaligeu	SUDDITE S	silice Jaliuai v J	L. 2U14!

No	Yes	If yes, please list the supplier(s), whether the firm was added or dropped, and the reasons for the change.

III-17. New suppliers.--Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2014?

No	Yes	If yes, please identify the firms.

III-18. **Supplier qualification.--**Do you require your suppliers to be or to become certified or qualified to sell HEDP to your firm?

If yes, provide the following information.

- The number of days to qualify a new supplier.
- A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).

No	Number of days	Process and factors

III-19. <u>Failure to certify</u>.--Since January 1, 2014, have any domestic or foreign producers failed in their attempts to certify or qualify their HEDP with your firm or have any producers lost their approved status?

No	If yes, please identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification.

1. 2.							
3.							
Please list any other factors that are	very important in	your purchase de	cisions:				
<u>Purchasing factors</u> Please rate the in purchasing decisions for HEDP.	nportance of the f	following factors i	n your firm's				
Factor	Very important	Somewhat important	Not important				
Availability							
Delivery terms							
Delivery time							
Discounts offered							
Extension of credit							
Minimum quantity requirements							
Packaging							
Price							
Product consistency							
Product range							
Quality meets industry standards							
Quality exceeds industry standards							
Reliability of supply							
Technical support/service							
U.S. transportation costs							
Quality characteristicsWhat charact quality of HEDP?	eristics does your	firm consider wh	en determinin				

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III-23.	Frequency of decisions based on priceHow often does your firm purchase the HEDP that is
	offered at the lowest price?

Always	Usually	Sometimes	Never

III-24. <u>Price leaders.</u>— A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. A price leader is not necessarily the lowest-priced supplier.

Please list the names of any firms you considered price leaders in the HEDP market since January 1, 2014.

Firm(s)	Describe how the firm(s) exhibited price leadership

III-25. Pur	chasing sul	oject imp	orts rather	than do	mestic p	roducts.—
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(a)	Since January 2014,	did your firm purchase	imports of HEDP	from China i	nstead of U.S
	produced HEDP?				

Yes	No
(also respond to parts (b) and (c))	(If "No", skip to next question)

(b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?

Yes	No

(c) If you responded "Yes" to part (a), was price a primary reason for purchasing subject imports rather than domestic product?

Yes	If Yes, estimate the quantity of Chinese imports purchased instead of domestic product since January 2014 (in pounds)	No	If No, please indicate the reason your firm purchased Chinese imports instead of domestic product

III-26. U.S. producers and import competition.—

(a) Since January 1, 2014, in connection with a sale or offer to sell HEDP to your firm, did U.S. producers reduce their prices of domestically produced HEDP in order to compete with lower-priced imports of HEDP from China?

Yes (also respond to	No (If "No", skip to next	
question part (b))	question)	Don't know

(b) If your firm responded "yes", please provide an estimate of the reduction in U.S. producers' prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
%	

PART IV.—PRODUCT COMPARISONS

IV-1. <u>Country knowledge.--</u>Please indicate the countries of origin for HEDP for which your firm has actual marketing/pricing knowledge.

United States	China	India	Other countries	Other countries (specify)

IV-2. <u>Interchangeability.--</u>Is HEDP 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	India	Other countries
United States			
China			
India			
	oducing HEDP that is <i>sor</i> n the factors that limit o		•

IV-3. **Factors other than price.**--Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between HEDP produced in the United States and in other countries a significant factor in your firm's purchases 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	India	Other countries
United States			
China			
India			

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of HEDP, identify the country-pair and report the advantages or disadvantages imparted by such factors:

No	Yes	If yes, identify the countries and explain.
ountry s	sources ?	
	-	

IV-7. <u>Factor country comparisons.</u>—For the factors listed below, please rate how HEDP produced in each country you identified in your response to the first question in Part IV compares with HEDP produced in each of the other countries you identified.

If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.

	<u>Un</u>	HEDP from <u>United States</u> compared to HEDP from <u>China</u>			EDP fro ited Sta ared to from India	<u>ites</u>	<u>Uni</u> compa	EDP fro ited Sta ared to from ther So	HEDP
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability									
Delivery terms									
Delivery time									
Discounts offered									
Extension of credit									
Minimum quantity requirements									
Packaging									
Price ¹									
Product consistency									
Product range									
Quality meets industry standards									
Quality exceeds industry standards									
Reliability of supply									
Technical support/service									
U.S. transportation costs ¹									
¹ A rating of superior on price and U.S. transp	ortation	costs in	dicates	that the	first co	untry ge	enerally	has low	/er

¹ A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.

<u>Factor country comparisons</u>.—*Continued*. IV-7.

	HEDP from <u>China</u> compared to HEDP from <u>India</u>			HEDP from China compared to HEDP from All Other Sources		
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability						
Delivery terms						
Delivery time						
Discounts offered						
Extension of credit						
Minimum quantity requirements						
Packaging						
Price ¹						
Product consistency						
Product range						
Quality meets industry standards						
Quality exceeds industry standards						
Reliability of supply						
Technical support/service						
U.S. transportation costs ¹						
¹ A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.						

generally has lower prices/U.S. transportation costs than the second country.

IV-8. <u>Minimum quality</u>.--How often does HEDP from the following countries meet minimum quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States					
China					
India					
Other:					

IV-9.	Other explanationsIf your firm would like to further explain a response to any question that did not provide a narrative response box, please note the question number and the explanation in the space provided below.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: LINK

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: XXXX

• E-mail.—E-mail the MS Word questionnaire to Aimee.Larsen@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 does not purchase this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

<u>Parties to this proceeding</u>.—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 your firm submits (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.