# **U.S. PRODUCERS' QUESTIONNAIRE**

# DIOCTYL TEREPHTHALATE (DOTP) FROM KOREA

This questionnaire must be received by the Commission by <u>April 11, 2017</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 antidumping duty investigation concerning dioctyl terephthalate ("DOTP") from Korea (Inv. No. 731-TA-1330 (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 firm \_\_

City	State	Zip Co	de	
Website				
Has your firm produce 2014?	ed dioctyl terephthalate (DOTP) (as de	efined on next pag	e) at any time since Janua	ry 1,
NO (Sign th	he certification below and promptly return	n <b>only</b> this page of th	ne questionnaire to the Comr	mission)
YES (Comp	lete all parts of the questionnaire, and ret	curn the entire quest	ionnaire to the Commission)	
•	ire via the U.S. International Trades://dropbox.usitc.gov/oinv/. (PIN:			
	CERTIFICAT	s questionnaire is	•	
dge and belief and unde of this certification I al tion provided in this qua mission on the same or ndersigned, acknowledg ling or other proceeding rel (a) for developing or , and evaluations relati ix 3; or (ii) by U.S. gover	herein supplied in response to this erstand that the information submitt lso grant consent for the Commiss estionnaire and throughout this pro	s questionnaire is ted is subject to a sion, and its employeeding in any other sponse to this report the Commission related proceeding of	udit and verification by the loyees and contract personant persona	the Commission. Be sonnel, to use the lings conducted be and throughout the fices, and contracted the grant of the contracted the line of
dge and belief and unde of this certification I al tion provided in this qua mission on the same or ndersigned, acknowledg ling or other proceeding rel (a) for developing or , and evaluations relati ix 3; or (ii) by U.S. gover	herein supplied in response to this erstand that the information submitted lso grant consent for the Commission estionnaire and throughout this processimilar merchandise.  The general tension of the contract of the programs, personnel, as the programs, personnel, as the programs and contract personnent employees and contract personnent.	s questionnaire is ted is subject to a sion, and its employeeding in any other sponse to this report the Commission related proceeding of	udit and verification by the loyees and contract personant persona	the Commission. Be sonnel, to use the lings conducted be and throughout the fices, and contracted the grant of the contracted the line of
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#### PART I.—GENERAL INFORMATION

**Background.** This proceeding was instituted in response to a petition filed on June 30, 2016, by Eastman Chemical Company, Kingsport, Tennessee. Antidumping duties may be assessed on the subject imports as a result of this proceeding 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 dumping. Questionnaires and other information pertinent to this proceeding are available at:

https://www.usitc.gov/investigations/701731/2016/dioctyl\_terephthalate\_dotp\_korea/final.htm.

<u>Dioctyl terephthalate ("DOTP").</u>--The product covered by this investigation is dioctyl terephthalate ("DOTP"), regardless of form.

DOTP that has been blended with other products is included within this scope when such blends include constituent parts that have not been chemically reacted with each other to produce a different product. For such blends, only the DOTP component of the mixture is covered by the scope of this investigation.

DOTP that is otherwise subject to this investigation is not excluded when commingled with DOTP from sources not subject to this investigation. Commingled refers to the mixing of subject and non-subject DOTP. Only the subject component of such commingled products is covered by the scope of the investigation. DOTP has the general chemical formulation  $C_6H_4(C_8H_{17}COO)_2$  and a chemical name of "bis (2-ethylhexyl) terephthalate" and has a Chemical Abstract Service ("CAS") registry number of 6422-86-2. Regardless of the label, all DOTP is covered by this investigation.

Subject merchandise is currently classified under subheading 2917.39.20 of the Harmonized Tariff Schedule of the United States ("HTSUS"). Subject merchandise may also be imported under subheadings 2917.39.70 or 3812.20.10 of the HTSUS. While the CAS registry number and HTSUS classification are provided for convenience and customs purposes, the written description of the scope of this investigation is dispositive.

**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.

<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.

<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. <u>OMB statistics</u>.--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 releaseIn 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. <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 DOTP, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	De	escription
1				
2				
3				
4				
5				
6				
<sup>1</sup> Additional discu	ssion on establishments con	solidated in this quest	ionnaire:	<u></u> .
<b>Country</b> Korea	Support	Oppose	Take	no position
	firm owned, in whole or ir		1	Extent of
□ No □ Y			1	Extent of ownership (percent)
□ No □ Y	esList the following info		1	ownership
□ No □ Y	esList the following info		1	ownership
□ No □ Y	esList the following info		1	ownership
□ No □ Y	esList the following info		1	ownership
Firm name  Related importers/e. oreign, that are engaged in exporting	esList the following info	have any related fire rom Korea into the U United States?	ms, either d	ownership (percent)
Firm name  Related importers/expressions, that are engaged in exporting  No	Address  Address  ExportersDoes your firm aged in importing DOTP from Korea to the	have any related fire rom Korea into the U United States?	ms, either d	ownership (percent)
Firm name  Related importers/e. oreign, that are engaged in exporting	Address  Address  ExportersDoes your firm aged in importing DOTP from Korea to the description of the des	have any related fire rom Korea into the U United States?	ms, either d	ownership (percent)
Firm name  Related importers/exoreign, that are engaged in exporting  No	Address  Address  ExportersDoes your firm aged in importing DOTP from Korea to the description of the des	have any related fire rom Korea into the U United States?	ms, either d	ownership (percent)

I-6.	Related producersDoes your engaged in the production of Do	firm have any related firms, either do OTP?	omestic or foreign, that are
	No YesList the	e following information.	
	Firm name	Country	Affiliation

## PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Porscha Stiger (202-205-3241, <a href="mailto:porscha.stiger@usitc.gov">porscha.stiger@usitc.gov</a>). Supply all data requested on a <a href="mailto:calendar-year">calendar-year</a> basis.

II-1.	Contact informationPlease 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. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of DOTP since January 1, 2014.

(chec	k 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	
	revised labor agreements	
	other (e.g., 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 DOTP, 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 metric	tons)	
		Calendar years	
Item	2014	2015	2016
Overall production capacity			
Production of: DOTP <sup>1</sup>	0	0	0
Other products <sup>2</sup>			
Total	0	0	0
<sup>1</sup> Data entered for production of <sup>2</sup> Please identify these products:		nce reported in questio	n II-7.

II-3b.	Operating parametersThe production capacity reported in II-3a is based on operating ho per week, weeks per year.
II-3c.	<u>Capacity calculation</u> Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.
II-3d.	<u>Production constraints</u> Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

II-3e.	<u>Produ</u>	ct shifting.—
	(i)	Is your firm able to switch production (capacity) between DOTP and other products using the same equipment and/or labor?
		No Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
	(ii)	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.		gSince January 1, 2014, has your firm been involved in a toll agreement regarding the ction of DOTP?
	materi	<b>greement"</b> Agreement between two firms whereby the first firm furnishes the raw als and the second firm uses the raw materials to produce a product that it then returns first firm with a charge for processing costs, overhead, etc.
	□ No	YesPlease describe the toll arrangement(s) and name the firm(s) involved
II-5.	<u>Foreig</u>	n trade zones
	(a)	<u>Firm's FTZ operations</u> Does your firm produce DOTP in and/or admit DOTP into a foreign trade zone (FTZ)?
		<b>"Foreign trade zone"</b> 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)	Other firms' FTZ operationsTo your knowledge, do any firms in the United States import DOTP into a foreign trade zone (FTZ) for use in distribution of DOTP and/or the production of downstream articles?  No/Don't know  YesIdentify the firms and the FTZs.
II-6.	Import	terSince January 1, 2014, has your firm imported DOTP?
	merch	rter" – The person or firm primarily liable for the payment of any duties on the andise, or an authorized agent acting on his behalf. The importer may be the consignee, importer of record.
	☐ No	YesCOMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE

- II-7. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of DOTP 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. Such transactions are valued at fair market value.
  - "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 (in metric tons) and value (in \$1,000)			
		Calendar years	
Item	2014	2015	2016
Average production capacity <sup>1</sup> (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity) (C)			
U.S. shipments:  Commercial shipments:  Quantity (D)			
Value (E)			
Internal consumption:  Quantity (F)			
Value² (G)			
Transfers to related firms:  Quantity (H)			
Value² (I)			
Export shipments: <sup>3</sup> Quantity (J)			
Value (K)			
End-of-period inventories <sup>4</sup> (quantity) (L)			
<sup>1</sup> The production capacity reported is based of methodology used to calculate production capacity internal consumption and transfers to relat uses a different basis for valuing these transact data using that basis for each of the periods now a lidentify your firm's principal export market	acity, and explain any c ed firms must be value ions, please specify tha ted above:	changes in reported capaci ed at fair market value. In	ity the event that your firm

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

		Calendar years	
Reconciliation	2014	2015	2016
B + C - D - F - H - J - L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0
<sup>1</sup> Explanation if the calculated fields above are	returning values other than z	ero (i.e., "0") but are noneth	eless accurate:

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

Quantity	(in metric tons) and	value ( <i>in \$1,000</i> )	
		Calendar years	
Item	2014	2015	2016
Channels of distribution: Commercial U.S. shipments: To distributors or brokers (quantity) (M)			
To end users (quantity) (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	
Reconciliation	2014	2015	2016
M + N - D = zero ("0"), if not revise.	0	0	0

Explanation of trends:

II-9. <u>Employment data</u>.--Report your firm's employment-related data related to the production of DOTP 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.

"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	
Item	2014	2015	2016
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

wholly owned subsidiary), whether the transfers were priced	ated firms ( <i>e.g.,</i> joint venture,
market formula, whether your firm retained marketing rights	•

II-11.	<u>Purchases</u> Other than 2014?	direct imports, has yo	ur firm otherwise purcha	ased DOTP since January 1,
			m a U.S. corporate entit has directly imported th	•
	"Direct import" –A tran record or consignee.	nsaction to buy from a f	Foreign supplier where y	our firm is the importer of
	□ No □ Yes	Report such purchase purchases:	es below and explain the	reasons for your firms'
		(Quantity in mo	etric tons)	
			Calendar years	
	Item	2014	2015	2016
<b>impor</b> Kor				
All other sources  Purchases from domestic producers <sup>2</sup>				
Purchases from other sources <sup>2</sup>				
supplie	lease list the name of the ir ers differ by source, please lease list the name of the p	identify the source for ea	ch listed supplier:	
II-12.	that did not provide a r	narrative box, please no ow. Please also use thi	ote the question number s space to highlight any i	

# PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Charles Yost (202-205-3432) <a href="mailto:charles.yost@usitc.gov">charles.yost@usitc.gov</a>

charles	s.yost@usitc.gov	
III-1.		nation Please identify the responsible individual and the manner by which aff may contact that individual regarding the confidential information submitted
	Name	
	Title	
	Email	
	Telephone	
	Fax	
III-2.	Accounting sys	temBriefly 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 DOTP:
	2.	Does your firm prepare profit/loss statements for DOTP:  Yes No
	<ol> <li>4.</li> </ol>	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, 10 Qs, annually, annually, annually, annually  Accounting basis: GAAP, cash, tax, or other comprehensive
	٦.	basis of accounting (specify)
	used in i regardir submit o profit-ai	As requested in Part I of this questionnaire, please keep all supporting documents/records the preparation of the financial data, as Commission staff may contact your firming questions on the financial data. The Commission may also request that your company copies of the supporting documents/records (financial statements, including internal and-loss statements for the division or product group that includes DOTP, as well as specific ents and worksheets) used to compile these data.
III-3.	Cost accounting cost, job order	<b>g system</b> Briefly describe your firm's cost accounting system ( <i>e.g.</i> , standard cost, <i>etc</i> .).
III-4.		<b>s</b> Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and se and other income and expenses.

Does your firm purchase inputs (raw materials, labor, energy, or production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		Share of sales
production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		%
production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		%
production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		%
production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		%
production of DOTP from any related suppliers (e.g., inclusive of firms, divisions and/or other components within the same com  YesContinue to question III-7.  NoContinue to question III-7.	other components within the same company)?  Description III-7. NoContinue to question  Description III-7. No-		%
Inputs from related suppliersPlease identify the inputs used	om related suppliers and that are reflected in the ort this information by relevant input on the befor "Input valuation" please describe the basisting system, of the purchase cost from the relations.	<u>_</u>	
your firm purchases from related suppliers and that are reflected total COGS" please report this information by relevant input or completed fiscal year. For "Input valuation" please describe the company's own accounting system, of the purchase cost from the related supplier's actual cost, cost plus, negotiated transfer prior value.		io question iii-7.	

Input valuation as recorded in the firm's accounting books and records

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II-8.	Inputs purchased from related suppliersPlease confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-10a (financial results on DOTP) in a manner consistent with your firm's accounting books and records. Yes
	NoIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in table III-10a.
III-9a.	<u>Co-products/by-products.</u> — Describe other products that are produced during the course of your firm's production of DOTP:
II-9b.	<u>Co-products/by-products.</u> — State how your firm classifies revenues from the sale of other products produced during the course of producing DOTP:
	Co-product or as By-Product
	For co-products, state how costs were allocated between the co-product and DOT:
III-9c.	<b>By-products.</b> —if your answer to III-9b is as "by-products," state how your firm normally classifies the by-product revenue from the sale of residual materials and other products and report the revenues associated with the sale or transfer of such by-products for your firm's three most recently completed fiscal years.
	Fiscal years

	Fiscal years			
Item	2014	2015	2016	
		Value (in \$1,000)		
Classification of revenues from sale of by-products Included in "net sales value"				
Reduction of COGS				
Included in "all other income"				
Other <sup>1</sup>				
Total by-product revenue <sup>2</sup>	0	0		

<sup>&</sup>lt;sup>1</sup> Please describe "other" \_\_\_\_\_.

<sup>2</sup> Your firm's total by-product revenue reported here will be populated in question III-10a as an offset to total COGS.

III-10a. Operations on DOTP.--Report the revenue and related cost information requested below on the DOTP operations of your firm's U.S. establishment(s). 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. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Charles Yost at 202-205-3432 before completing this section of the questionnaire.

Quantity (ii	n metric tons) and value	e (in \$1,000)	
	Fiscal years ended		
Item	2014	2015	2016
Net sales quantities: <sup>2</sup>			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: <sup>2</sup> Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS): <sup>3</sup> Raw materials			
Direct labor			
Other factory costs			
Less: by-product revenue <sup>4</sup>	0	0	0
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			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			

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

<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> COGS (whether for domestic or export sales) should include costs associated with CS, IC, transfers, and Tolling.

<sup>&</sup>lt;sup>4</sup> By-product revenue will populate here once reported in question III-9c.

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

III-10b.	<u>Financial data reconciliation</u> The calculable line items from question III-10a ( <i>i.e.</i> , 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	☐ NoI	f the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.		
			Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers ( <i>i.e.</i> , expenses are positive and incomes or reversals are negativeinstances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number ( <i>i.e.</i> , income is positive, expenses or reversals are negative).		
			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-11. 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-10a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific table III-10a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), i.e., if an aggregate nonrecurring item has been allocated to table III-10a, only the allocated value amount 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-10a.

		Fiscal years ended	
	2014	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-10a where	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in table III-10a.		
the nonrecurring item is 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-12.	Classification of identified nonrecurring items (charges and gains) in the accounting books and					
	records of the companyIf non-recurring items were reported in table III-11 above, please					
	identify where your company recorded these items in your accounting books and records in					
	normal course of business.					

III-13. <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 DOTP. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for DOTP 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-10a. 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 (in \$1,000)			
	Fiscal years ended		
Item	2014	2015	2016
Total assets (net) <sup>1</sup>			
<sup>1</sup> Describe			

III-14. <u>Capital expenditures and research and development expenses</u>.--Report your firm's capital expenditures and research and development expenses for DOTP. Provide data for your firm's three most recently completed fiscal years.

Value (in \$1,000)			
	Fiscal years ended		
Item	2014	2015	2016
Capital expenditures <sup>1</sup>			
Research and development expenses <sup>2</sup>			

<sup>&</sup>lt;sup>1</sup> Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product. \_\_\_\_\_

<sup>&</sup>lt;sup>2</sup> Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product. \_\_\_\_\_

III-15.	Data consistency	and reconciliation	Please indicate	whether ye	our firm's financia	al data foi
	questions III-10a,	13, and 14 are base	ed on a calendar	year or on	our firm's fiscal	year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-10a 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.

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.

	Full year data		
Reconciliation	2014	2015	2016
Quantity: Trade data from part II less financial data from part III, = zero ("0") except as noted above.	0	0	0
Value: Trade data from part II less financial data from part III, = zero ("0") except as noted above.	0	0	0

Do these data in question III-10a reconcile with data in question II-7?

Yes	No	If no, please explain.

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III-16.	<u>Effects of imports on investment</u> Since January 1, 2014, 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 DOTP from Korea?					
	No YesMy firm has experienced actual negative effects as follows:					
		(check 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				
III-17. Effects of imports on growth and developmentSince January 1, 2014, 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 advaversion of the product) as a result of imports of DOTP from Korea?  No YesMy firm has experienced actual negative effects as follows:						
	Γ	(check as many as appropriate)	(please describe)			
	[	Rejection of bank loans	(preuse describe)			
		Lowering of credit rating				
		Problem related to the issue of stocks or bonds				

Ability to service debt

Other

III-18.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports of
	DOTP from Korea?

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

III-19.	Other explanationsIf 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 John Benedetto (202-205-3270, john.benedetto@usitc.gov).

IV-1. <u>Contact information</u>.--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, 2014 of the following products produced by your firm.
  - <u>Product 1</u>.-- Dioctyl terephthalate in 20 MT containers, including tank trucks, flexitanks or flexitainers, and/or isotanks.
  - **<u>Product 2.--</u>** Dioctyl terephthalate in bulk, including railcars and bulk liftings.

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

During January 2014-December 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 table(s) as appropriate.
NoSkip to question IV-3.

**Price data**.--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

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

	(Quantity	in metric tons, value i	in dollars)		
	Prod	luct 1	Product 2		
Period of shipment	Quantity	Value	Quantity	Value	
014:					
January-March					
April-June					
July-September					
October-December					
015:					
January-March					
April-June					
July-September					
October-December					
016:					
January-March					
April-June					
July-September					
October-December					
1			tes, and the value of returne		

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 2:

Please describe why your firm generally sells its U.S.-produced DOTP in the form(s) it does (i.e., 20 MT containers, or bulk, or both) including whether the price of DOTP in one form affects whether you sell DOTP in that form or another.

<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 DOTP (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. <u>Discount policy.--</u> Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

- IV-5. Pricing terms.--
  - (a) What are your firm's typical sales terms for its U.S.-produced DOTP?

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 DOTP 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 DOTP in 2016 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

		Type of 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)	<b>Spot sales</b> (for a single delivery)	Total (should sum to 100.0%	)
Share of 2016 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 DOTP (or check "not applicable" if your firm does not sell on a long-term, short-term and/or annual 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	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
aa, o. pee	Both			
Meet or release	Yes			
provision	No			
Not applicable				

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 DOTP?

Source	Share of 2016 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9.	<b>Shipping</b>	information
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(a)	What is the approximate percentage of the total delivered cost of U.Sproduced DOTF
	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 DOTP 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 DOTP since January 1, 2014 (check all that apply)?

Geographic area	√ if applicable
NortheastCT, 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. **End uses.**--List the end uses of the DOTP that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by DOTP and other inputs?

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

IV-12. <u>Substitutes</u>	-Can other p	roducts be	substituted	for DOTP?		
□N	lo [	YesPlea	ase fill out th	e following	tables.	
		The number of end use applications in which the specified product can be used as a substitute for DOTP  Describe the limitations of the				
Potential Substitute	All	Most	Some	None	specified substitute product	
DINP (diisononyl phthalate)						
DOP (dioctyl phthalate						
DPHP (di(2-propylheptyl) phthalate						
Other(s) <sup>1</sup>						
<sup>1</sup> Describe the oth	er(s):					
	Have	changes in	the price of	this substit	ute affected the price for DOTP	
Potential Substitute	No	Yes			Explain	
DINP						
DOP						
DPHP						
Other(s)						

IV-13.	<b>Demand trends</b> Indicate how demand within the United States and outside of the United
	States (if known) for DOTP has changed since January 1, 2014. 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 changesHave there been any significant changes in the product range, product mix,
	or marketing of DOTP since January 1, 2014?

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

## IV-15. Conditions of competition.--

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

Check all that apply.		Please describe.
	No	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 DOTP since January 1, 2014?

No	Yes	If yes, describe.

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IV-16.	<u>Supply constraints.</u> Has your firm refused, declined, or been unable to supply DOTP 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	Yes	If yes, please describe.

IV-17. Raw materials.--How have DOTP raw material prices changed since January 1, 2014?

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 DOTP.

IV-18. <u>Interchangeability</u>.--Is DOTP 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	Korea	Other countries		
United States				
Korea				
For any country-pair producing DOTP 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. <u>Factors other than price.</u>—Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between DOTP 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	Korea	Other countries		
United States				
Korea				
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant				

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

IV-20. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for DOTP since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of DOTP that each of these customers accounted for in 2016.

	Customer's name	City	State	Share of 2016 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

## IV-21. Competition from imports

(a) <u>Lost revenue</u>.--Since January 1, 2014: To avoid losing sales to competitors selling DOTP from Korea, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>--Since January 1, 2014: Did your firm lose sales of DOTP to imports of this product from Korea?

No	Yes	

IV-22.	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.

# **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

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

https://www.usitc.gov/investigations/701731/2016/dioctyl terephthalate dotp korea/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.

• <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: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: DOTP

• E-mail.—E-mail the MS Word questionnaire to john.benedetto@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>**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.