
LOST SALES AND LOST REVENUE SURVEY

**COLD-DRAWN MECHANICAL TUBING OF CARBON AND ALLOY STEEL FROM
CHINA, GERMANY, INDIA, ITALY, KOREA, AND SWITZERLAND**

This survey must be received by the Commission by **May 3, 2017**
See last page for filing instructions.

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning cold-drawn mechanical tubing of carbon and alloy steel ("cold-drawn mechanical tubing") from China, Germany, India, Italy, Korea, and Switzerland (Inv. Nos. 701-TA-576-577 and 731-TA-1362-1367 (Preliminary)). The information requested in the survey 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 possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Lauren Gamache (lauren.gamache@usitc.gov, 202-205-3489).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____
Has your firm purchased cold-drawn mechanical tubing (as defined on next page) at any time since January 1, 2014?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the survey to the Commission)
<input type="checkbox"/> YES (Complete all parts of the survey, and return the entire survey to the Commission)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: CDMT)

CERTIFICATION

I certify that the information herein supplied in this survey 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 submitting this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this survey 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** _____

Signature _____ **Phone** _____ **Email address** _____

GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on April 19, 2017, by ArcelorMittal Tubular Products, Shelby, Ohio; Michigan Seamless Tube, LLC, South Lyon, Michigan; PTC Alliance Corp., Wexford, Pennsylvania; Webco Industries, Inc., Sand Springs, Oklahoma; and Zekelman Industries, Inc., Farrell, Pennsylvania. Countervailing and/or 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 of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2017/cold_drawn_mechanical_tubing_china_germany_in_dia/preliminary.htm.

Cold-drawn mechanical tubing covered by these investigations is cold-drawn mechanical tubing of carbon and alloy steel of circular cross-section, in actual diameters less than 13 inches (less than 331 mm), and regardless of wall thickness, surface finish, end finish or industry specification. The subject cold-drawn mechanical tubing is a tubular product with a circular cross-sectional shape that has been cold-drawn or otherwise cold-finished after the initial tube formation in a manner that involves a change in the diameter or wall thickness of the tubing, or both. The subject cold-drawn mechanical tubing may be produced from either welded (e.g., electric resistance welded, continuous welded, etc.) or seamless (e.g., pierced, pilgered or extruded, etc.) carbon or alloy steel tubular products. It may also be heat treated after cold working (annealed, normalized, quenched and tempered, stress relieved or finish annealed). Typical cold-drawing methods for subject merchandise include, but are not limited to, drawing over mandrel, rod drawing, and sink drawing.

Subject cold-drawn mechanical tubing is typically certified to meet industry specifications for cold-drawn tubing including but not limited to: (1) American Society for Testing and Materials (ASTM) or American Society of Mechanical Engineers (ASME) specifications ASTM A-512, ASTM A-513 Type 3 (ASME SA513 Type 3), ASTM A-513 Type 4 (ASME SA513 Type 4), ASTM A-513 Type 5 (ASME SA513 Type 5), ASTM A-513 Type 6 (ASME SA513 Type 6), ASTM A-519 (cold-finished); (2) SAE International (Society of Automotive Engineers) specifications SAE J524, SAE J525, SAE J2833, SAE J2614, SAE J2467, SAE J2435, SAE J2613; (3) Aerospace Material Specification (AMS) AMS T-6736 (AMS 6736), AMS 6371, AMS 5050, AMS 5075, AMS 5062, AMS 6360, AMS 6361, AMS 6362, AMS 6371, AMS 6372, AMS 6374, AMS 6381, AMS 6415; (4) United States Military Standards (MIL) MIL -T-5066 and MIL-T-6736; (5) foreign standards equivalent to one of the previously listed ASTM, ASME, SAE, AMS or MIL specifications including but not limited to: (a) German Institute for Standardization (DIN) specifications DIN 2391-2, DIN 2393-2, DIN 2394-2; (b) European Standards (EN) EN 10305-1, EN 10305-2, EN 10305-4, EN 10305-6 and European national variations on those standards (e.g., British Standard (BS EN), Irish Standard (IS EN) and German Standard (DIN EN) variations, etc.); (c) Japanese Industrial Standard (JIS) JIS G 3441 and JIS G 3445; and (6) proprietary standards that are based on one of the above listed standards. The subject cold-drawn mechanical tubing may also be dual or multiple certified to more than one standard.

Steel products included in the scope of these investigations are products in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight. For purposes of this scope, the place of cold-drawing determines the country of origin of the subject merchandise. Subject merchandise that is subject to minor working in a third country that occurs after drawing in one of the subject countries including, but not limited to, heat

treatment, cutting to length, straightening, nondestruction testing, deburring or chamfering, remains within the scope of the investigation. All products that meet the written physical description are within the scope of these investigations unless specifically excluded or covered by the scope of an existing order. Merchandise that meets the physical description of cold-drawn mechanical tubing above is within the scope of the investigations even if it is also dual- or multiple-certified to an otherwise excluded specification listed below.

The following products are outside of, and/or specifically excluded from, the scope of these investigations: (1) cold-drawn stainless steel tubing, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight; (2) products certified to one or more of the following ASTM, ASME or American Petroleum Institute (API) specifications listed below: ASTM A-53; ASTM A-106; ASTM A-179 (ASME SA 179); ASTM A-192 (ASME SA 192); ASTM A-209 (ASME SA 209); ASTM A-210 (ASME SA 210); ASTM A-213 (ASME SA 213); ASTM A-334 (ASME SA 334); ASTM A-423 (ASME SA 423); ASTM A-498; ASTM A-496 (ASME SA 496); ASTM A-199; ASTM A-500; ASTM A-556; ASTM A-565; API SL; and API 5CT; except that any cold-drawn tubing product certified to one of the above excluded specifications will not be excluded from the scope if it is also dual- or multiple-certified to any other specification that otherwise would fall within the scope of these investigations.

The products subject to the investigations are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers: 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, 7306.50.5030. The HTSUS subheadings above are provided for convenience and customs purposes only. The written description of the scope of the investigations is dispositive.

Reporting of information.-- If information is not readily available from your records, provide carefully prepared estimates.

Confidentiality.--The data furnished in response to this survey 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.

Release of information.--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

Contact information.--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

PURCHASE INFORMATION

1. **Purchases.**—Report your firm’s total U.S. purchases of cold-drawn mechanical tubing. Estimates are acceptable. (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 short tons)		
Purchases of cold-drawn mechanical tubing produced in—			
United States			
China			
Germany			
India			
Italy			
Korea			
Switzerland			
Subject sources	0	0	0
All other countries ¹			
Sources unknown			
Total purchases	0	0	0
¹ Please identify these countries:			

2. **Changes in purchasing patterns.**—Please indicate how the shares of your firm’s purchases of cold-drawn mechanical tubing from different sources have changed since January 1, 2014.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Germany	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Italy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Switzerland	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

3. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase cold-drawn mechanical tubing.

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions:	

4. **Purchasing subject imports rather than domestic products.**—

(a) Since January 2014, did your firm purchase imports of cold-drawn mechanical tubing from China, Germany, India, Italy, Korea, and/or Switzerland instead of U.S.-produced cold-drawn mechanical tubing? **Respond for each subject country.**

Source	Yes (also respond to parts (b) and (c))	No (If “No” for all countries, skip to next question)
China	<input type="checkbox"/>	<input type="checkbox"/>
Germany	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>
Italy	<input type="checkbox"/>	<input type="checkbox"/>
Korea	<input type="checkbox"/>	<input type="checkbox"/>
Switzerland	<input type="checkbox"/>	<input type="checkbox"/>

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

Source	Yes	No
China	<input type="checkbox"/>	<input type="checkbox"/>
Germany	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>
Italy	<input type="checkbox"/>	<input type="checkbox"/>
Korea	<input type="checkbox"/>	<input type="checkbox"/>
Switzerland	<input type="checkbox"/>	<input type="checkbox"/>

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

Source	Yes	If Yes, estimate the quantity of imports purchased instead of domestic product since January 2014 (in short tons)	No	If No, please indicate the reason your firm purchased imports instead of domestic product.
China	<input type="checkbox"/>		<input type="checkbox"/>	
Germany	<input type="checkbox"/>		<input type="checkbox"/>	
India	<input type="checkbox"/>		<input type="checkbox"/>	
Italy	<input type="checkbox"/>		<input type="checkbox"/>	
Korea	<input type="checkbox"/>		<input type="checkbox"/>	
Switzerland	<input type="checkbox"/>		<input type="checkbox"/>	

5. **U.S. producers and import competition.**—

- (a) Since January 1, 2014, in connection with a sale or offer to sell cold-drawn mechanical tubing to your firm, did U.S. producers reduce their prices of domestically produced cold-drawn mechanical tubing in order to compete with lower-priced imports of cold-drawn mechanical tubing from the subject countries? **Respond for each subject country.**

Source	Yes (also respond to question part (b))	No (If “No” for all countries, skip to next question)	Don’t know
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Germany	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Italy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Switzerland	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes” to any of the above countries, 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.

Source	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.
China	%	
Germany	%	
India	%	
Italy	%	
Korea	%	
Switzerland	%	

6. **Method of purchase**--Please provide a general description of your firm's method(s) of purchase (e.g., individual purchase, contract, bids, Internet purchases, etc.) for cold-drawn mechanical tubing.

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7. **Other explanations**--Please provide any additional comments in this box.

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OMB INFORMATION

8. **OMB statistics**--Please report the actual number of hours required and the cost to your firm of completing this survey.

Hours	Dollars

The questions in this survey 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 survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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

HOW TO FILE YOUR SURVEY RESPONSE

Please do not attempt to modify the format or permissions of the survey document.

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

• **Upload via Secure Drop Box.**—Upload the MS Word survey 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/>
- **Enter Investigation:** Select “**INVESTIGATION-SPECIFIC MENU ITEM**” in the drop down menu
- **Pin:** **CDMT**

• **E-mail.**—E-mail the MS Word survey to lauren.gamache@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 did not purchase this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.