U.S. PRODUCERS' QUESTIONNAIRE

CERTAIN NEW PNEUMATIC OFF-THE-ROAD TIRES FROM CHINA, INDIA, AND SRI LANKA

This questionnaire must be received by the Commission by <u>January 22, 2016</u>

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping and countervailing duty investigations concerning certain new pneumatic off-the-road tires ("OTR tires") from China, India, and Sri Lanka (Inv. Nos. 701-TA-551-553 and 731-TA-1307-1308 (Preliminary)). 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 Code		
Website			
Has your firm produced OTR tires (as defined on next page) or mounted OTR on rims in the United States at any time since January 1, 2012?			
NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)			
YES (Complet	te all parts of the questionnaire, and return the entire questionnaire to the Commission)		
Tenoring mix. Inteps.	://dropbox.usitc.gov/oinv/. (PIN: OTR2) CERTIFICATION		
ge and belief and underst as of this certification I a	erein supplied in response to this questionnaire is complete and correct to the be cand that the information submitted is subject to audit and verification by the Commiss also grant consent for the Commission, and its employees and contract personnel, t		
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Fax: _

PART I.—GENERAL INFORMATION

Background. These proceedings were instituted in response to a petition filed on January 8, 2016, by Titan Tire Corporation of Des Moines, Iowa and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC of Pittsburgh, Pennsylvania. Antidumping and/or countervailing duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to these proceedings are available at

https://www.usitc.gov/investigations/701731/2016/certan new pneumatic off the road tires china/preliminary.htm.

<u>OTR tires</u> covered by these investigations include the following: new pneumatic tires designed for off-the-road (OTR) and off-highway use, subject to exceptions identified below. Certain OTR tires are generally designed, manufactured and offered for sale for use on off-road or off-highway surfaces, including but not limited to, agricultural fields, forests, construction sites, factory and warehouse interiors, airport tarmacs, ports and harbors, mines, quarries, gravel yards, and steel mills. The vehicles and equipment for which certain OTR tires are designed for use include, but are not limited to: (1) agricultural and forestry vehicles and equipment, including agricultural tractors, combine harvesters, agricultural high clearance sprayers, industrial tractors, log-skidders, agricultural implements, highway-towed implements, agricultural logging, and agricultural, industrial, skid-steers/mini-loaders; (2) construction vehicles and equipment, including earthmover articulated dump products, rigid frame haul trucks, front end loaders, dozers, lift trucks, straddle carriers, graders, mobile cranes, compactors; and (3) industrial vehicles and equipment, including smooth floor, industrial, mining, counterbalanced lift trucks, industrial and mining vehicles other than smooth floor, skid-steers/mini-

¹ Agricultural tractors are dual-axle vehicles that typically are designed to pull farming equipment in the field and that may have front tires of a different size than the rear tires.

² Combine harvesters are used to harvest crops such as corn or wheat.

³ Agricultural sprayers are used to irrigate agricultural fields.

⁴ Industrial tractors are dual-axle vehicles that typically are designed to pull industrial equipment and that may have front tires of a different size than the rear tires.

⁵ A log-skidder has a grappling lift arm that is used to grasp, lift and move trees that have been cut down to a truck or trailer for transport to a mill or other destination.

^b Skid-steer loaders are four-wheel drive vehicles with the left-side drive wheels independent of the right-side drive wheels and lift arms that lie alongside the driver with the major pivot points behind the driver's shoulders. Skid-steer loaders are used in agricultural, construction and industrial settings.

⁷ Haul trucks, which may be either rigid frame or articulated (*i.e.*, able to bend in the middle) are typically used in mines, quarries and construction sites to haul soil, aggregate, mined ore, or debris.

⁸ Front loaders have lift arms in front of the vehicle. They can scrape material from one location to another, carry material in their buckets, or load material into a truck or trailer.

⁹ A dozer is a large four-wheeled vehicle with a dozer blade that is used to push large quantities of soil, sand, rubble, etc., typically around construction sites. They can also be used to perform "rough grading" in road construction.

¹⁰ A straddle carrier is a rigid frame, engine-powered machine that is used to load and offload containers from container vessels and load them onto (or off of) tractor trailers.

¹¹ A grader is a vehicle with a large blade used to create a flat surface. Graders are typically used to perform "finish grading." Graders are commonly used in maintenance of unpaved roads and road construction to prepare the base course onto which asphalt or other paving material will be laid.

¹² I.e., "on-site" mobile cranes designed for off-highway use.

loaders, and smooth floor off-the-road counterbalanced lift trucks.¹³ The foregoing list of vehicles and equipment generally have in common that they are used for hauling, towing, lifting, and/or loading a wide variety of equipment and materials in agricultural, construction and industrial settings. Such vehicles and equipment, and the descriptions contained in the footnotes are illustrative of the types of vehicles and equipment that use certain OTR tires, but are not necessarily all-inclusive.

While the physical characteristics of certain OTR tires will vary depending on the specific applications and conditions for which the tires are designed (*e.g.*, tread pattern and depth), all of the tires within the scope have in common that they are designed for off-road and off-highway use. Except as discussed below, OTR tires included in the scope of the proceeding range in size (rim diameter) generally but not exclusively from 8 inches to 54 inches. The tires may be either tube-type¹⁴ or tubeless, radial or non-radial, and intended for sale either to original equipment manufacturers or the replacement market.

Certain OTR tires, whether or not attached to wheels or rims, are included in the scope. However, if a subject tire is imported attached to a wheel or rim, only the tire is covered by the scope. Subject merchandise includes certain OTR tires produced in the subject countries whether attached to wheels or rims in a subject country or in a third country.

Excluded from the scope of these investigations are any products covered by the existing antidumping and countervailing duty orders on certain OTR tires from the People's Republic of China. See Certain New Pneumatic Off-the-Road Tires From the People's Republic of China: Notice of Amended Final Affirmative Determination of Sales at Less Than Fair Value and Antidumping Duty Order, 73 Fed. Reg. 51,624 (Dep't Commerce Sept. 4, 2008); Certain New Pneumatic Off-the-Road Tires From the People's Republic of China: Countervailing Duty Order, 73 Fed. Reg. 51,627 (Dep't Commerce Sept. 4, 2008). 15

In addition, specifically excluded from the scope are new pneumatic tires designed, manufactured and offered for sale primarily for on-highway or on-road use, including passenger cars, race cars, station wagons, sport utility vehicles, minivans, mobile homes, motorcycles, bicycles, on-road or on-highway trailers, light trucks, and trucks and buses. Such tires generally have in common that the symbol "DOT" must appear on the sidewall, certifying that the tire conforms to applicable motor vehicle safety standards. Such excluded tires may also have the following designations that are used by the Tire and Rim Association:

Prefix letter designations:

P--Identifies a tire intended primarily for service on passenger cars;

LT--Identifies a tire intended primarily for service on light trucks; and,

ST--Identifies a special tire for trailers in highway service.

¹³ A counterbalanced lift truck is a rigid framed, engine-powered machine with lift arms that has additional weight incorporated into the back of the machine to offset or counterbalance the weight of loads that it lifts so as to prevent the vehicle from overturning. An example of a counterbalanced lift truck is a counterbalanced fork lift truck. Counterbalanced lift trucks may be designed for use on smooth floor surfaces, such as a factory or warehouse, or other surfaces, such as construction sites, mines, etc.

¹⁴ While tube-type tires are subject to the scope of this proceeding, tubes and flaps are not subject merchandise and therefore are not covered by the scope of this proceeding, regardless of the manner in which they are sold (*e.g.*, sold with or separately from subject merchandise).

¹⁵ In these prior investigations, the Department found that imports of OTR tires mounted on wheels were not within the scope of subject merchandise. *See Certain New Pneumatic Off-The-Road Tires from the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value and Partial Affirmative Determination of Critical Circumstances*, 73 Fed. Reg. 40,485 (Dep't Commerce July 15, 2008) and accompanying Issues and Decision Memorandum at Comment 19.

Suffix letter designations:

TR--Identifies a tire for service on trucks, buses, and other vehicles with rims having specified rim diameter of nominal plus 0.156" or plus 0.250";

MH--Identifies tires for Mobile Homes;

HC--Identifies a heavy duty tire designated for use on "HC" 15" tapered rims used on trucks, buses, and other vehicles. This suffix is intended to differentiate among tires for light trucks, and other vehicles or other services, which use a similar designation. Example: 8R17.5 LT, 8R17.5 HC;

LT--Identifies light truck tires for service on trucks, buses, trailers, and multipurpose passenger vehicles used in nominal highway service; and

MC--Identifies tires and rims for motorcycles.

The following types of tires are also excluded from the scope: Pneumatic tires that are not new, including recycled or retreaded tires and used tires; non-pneumatic tires, including solid rubber tires; tires of a kind designed for use on aircraft, all-terrain vehicles, and vehicles for turf, lawn and garden, golf and trailer applications. Also excluded from the scope are radial and bias tires of a kind designed for use in mining and construction vehicles and equipment that have a rim diameter equal to or exceeding 39 inches. Such tires may be distinguished from other tires of similar size by the number of plies that the construction and mining tires contain (minimum of 16) and the weight of such tires (minimum 1500 pounds).

The subject merchandise is currently imported under Harmonized Tariff Schedule of the United States ("HTSUS") statistical reporting numbers: 4011.20.1025, 4011.20.1035, 4011.20.5030, 4011.20.5050, 4011.61.00.00, 4011.62.00.00, 4011.63.00.00, 4011.69.00.50, 4011.92.00.00, 4011.93.40.00, 4011.93.8000, 4011.94.4000, 4011.94.8000, 8431.49.9038, 8431.49.9090, 8709.90.0020, and 8716.90.1020. Tires meeting the scope description may also be imported under the following HTSUS provisions: 4011.99.4550, 4011.99.8550, 8424.90.9080, 8431.20.0000, 8431.39.0010, 8431.49.1090, 8431.49.9030, 8432.90.0005, 8432.90.0015, 8432.90.0030, 8432.90.0080, 8433.90.5010, 8503.00.9560, 8708.70.0500, 8708.70.2500, 8708.70.4530, and 8716.90.5035. While HTSUS provisions are provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.

Unmounted OTR tires. -- OTR tires that are not attached to wheels or rims.

Mounted OTR tires. – OTR tires that are attached to wheels or rims.

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.

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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of OTR tires and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

Yes

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

Hours	Dollars

No

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?

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

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

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
1 Additional discu	ussion on establishments con	solidated in this questic	onnaire:

I-3.	Petition supportDoes	your firm support or	oppose the petition?
	· ctitioii suppoit	your min support or	oppose the petition

Country	Support	Oppose	Take no positio
China - AD			
China - CVD			
India - AD			
India - CVD			
Sri Lanka - CVD			
Firm name	Address		Extent of ownership (percent)
			ownership
delated importers/exporters/exporters, that are engaged tates or that are engaged tates?	d in importing OTR tire	es from China, India,	or Sri Lanka into the
oreign, that are engage tates or that are engage tates?	d in importing OTR tire	es from China, India, es from China, India	or Sri Lanka into the

I-6.	-	lated producersDoes your firm have any related firms, either domestic or foreign, that are gaged in the production of OTR tires?			
	☐ No ☐ YesList the following information.				
	Firm name	Address	Affiliation		

Title Email Telephone

Fax

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Justin Enck (202-205-3363, Justin.enck@usitc.gov). Supply all data requested on a calendar-year basis.

II-1.	Contact inform	ation Please identify the responsible individual and the manner by which
	Commission sta in part II.	Iff may contact that individual regarding the confidential information submitted
	Name	

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 OTR tires since January 1, 2012.

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

- II-3a. **Production using same machinery.--** Please report your firm's production of products made on the same equipment and machinery used to produce OTR tires, 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.

II-3a. **Production using same machinery.**—Continued

	Quantity (i	in number of t	tires)		
	Calendar years			January-September	
Item	2012	2013	2014	2014	2015
	1	Unn	nounted OTR ti	res ⁷	
Overall capacity on the machinery and equipment that produces unmounted OTR tires ¹ (A)					
Production on the same machinery and equipment of: Unmounted OTR tires ² (B)	0	0	0	0	0
Other products ³ (C)					
Total production (D)	0	0	0	0	0
	·	Mo	ounted OTR tire	es ⁷	
Overall capacity on the machinery and equipment that mounts OTR tires ⁴ (E)					
Production on the same machinery and equipment of: Mounted OTR tires ⁵ (F)	0	0	0	0	0
Other products ⁶ (G)					
Total production (H)	0	0	0	0	0

¹ If your firm does not produce any other products (*i.e.*, no data in line C) on the same machinery and equipment as unmounted OTR tires, then the capacity reported in line A should be exactly equal to the capacity data reported in question II-7 (line I). If, however, your firm does produce "other" products on the same machinery and equipment, then the capacity reported in this question (line A) should cover the production of subject unmount OTR tires and the other products in line C, while capacity reported in question II-7 (line I) should be an allocated capacity amount based on product mix (*i.e.*, only a portion of the overall capacity reported here).

² Data entered for production of unmounted OTR tires will populate here once reported in question II-7.

³ Please identify these products produced using the same machinery and equipment as used to produce unmounted OTR tires: _____.

⁴ If your firm does not produce any other products (*i.e.*, no data in line G) on the same machinery and equipment as it mounts OTR tires, then the capacity reported in line E should be exactly equal to the capacity data reported in question II-9 (line X). If, however, your firm does produce "other" products on the same machinery and equipment, then the capacity reported in this question (line E) should cover the production of subject mounted OTR tires and the other products in line G, while capacity reported in question II-9 (line X) should be an allocated capacity amount based on product mix (*i.e.*, only a portion of the overall capacity reported here).

⁵ Data entered for production of mounted OTR tires will populate here once reported in question II-9.

⁶ Please identify these products produced using the same machinery and equipment as used to mount OTR tires:

⁷Defined on page 4.

II-3b. **Operating parameters.--**The production capacity reported in II-3a is based on:

	Unmounted OTR tires	Mounted OTR tires
Hours 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.

Unmounted OTR tires	Mounted OTR tires

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

Unmounted OTR tires	Mounted OTR tires			

(i)	<u>Unmounted OTR Tires</u> Is your firm able to switch production (capacity) between
• •	unmounted OTR tires and other products using the same equipment and/or labor?
	No Yes (<i>i.e.</i> , have produced other products or are able to produce other products). Please identify other actual or potential products:
(ii)	<u>Unmounted OTR Tires</u> Please describe the factors that affect your firm's ability to shift production capacity between products (<i>e.g.</i> , time, cost, relative price change, etc.), and th degree to which these factors enhance or constrain such shifts.
(iii)	Mounted OTR TiresIs your firm able to switch production (capacity) between mounted OTR tires and other products using the same equipment and/or labor?
	No Yes (<i>i.e.</i> , have produced other products or are able to produce other products). Please identify other actual or potential products:
(iv)	Mounted OTR Tires 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.
	gSince January 1, 2012, has your firm been involved in a toll agreement regarding the ction of OTR tires or the mounting of OTR tires?
	greement" 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.

11-5.	. Foreign trade zones								
	(a)	<u>Firm's FTZ operations</u> Does your firm produce OTR tires in and/or admit OTR tires into a foreign trade zone (FTZ)?							
		"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.							
	No YesDescribe the nature of your firms operations in FTZs and identify the specific FTZ site(s).								
	(b)	Other firms' FTZ operationsTo your knowledge, do any firms in the United States import OTR tires into a foreign trade zone (FTZ) for use in distribution of OTR tires and/or the production of downstream articles?							
		☐ No/Don't know ☐ YesIdentify the firms and the FTZs.							
II-6.	<u>Import</u>	terSince January 1, 2012, has your firm imported OTR tires?							
	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							

Definitions

"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.

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

"Internal consumption" – Product consumed internally by your firm.

"Transfers to related firms" – Shipments made to related domestic firms. Such transactions are valued at fair market value.

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

"Export shipments" – Shipments to destinations outside the United States, including shipments to related firms.

"Inventories" — Finished goods inventory, not raw materials or work-in-progress.

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 for unmounted OTR tires**.--Report your firm's production capacity, production, shipments, and inventories related to the production of **unmounted OTR tires** in its U.S. establishment(s) during the specified periods.

	Quantity (in n	umber of tires) a	nd value (in \$1,0	000)	
		Calendar years		January-S	eptember
Item	2012	2013	2014	2014	2015
Average production capacity¹ (quantity) (I)					
Beginning-of-period inventories (quantity) (J)					
Production (quantity) (K)					
U.S. shipments: Commercial shipments: ² Quantity (L)					
Value (M)					
Internal consumption: ³ <i>Quantity</i> (N)					
Value ⁴ (O)					
Transfers to related firms: Quantity (P) Value ⁴ (Q)					
Export shipments: ⁵ Quantity (R)					
Value (S)					
End-of-period inventories (quantity) (T)					
¹ The production capacity re the methodology used to calcu ² Report the share of your 2 ³ Internal consumption inclu operations are reported in que ⁴ Internal consumption and uses a different basis for valuin data using that basis for each of ⁵ Identify your firm's princip	ulate production ca 014 commercial shades OTR tires that estion II-9). transfers to relate ng these transaction	apacity, and explain in the property of OTR tiles of OTR	n any changes in reges that were sold and to a wheel or till lued at fair market	ported capacity with kits: re assembly prior t value. In the even	o sale (mounting

II-7. <u>Production, shipment and inventory data for unmounted OTR tires</u>.--Continued

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line T) should be equal to the beginning-of-period inventories (i.e., line I), plus production (i.e., line K), less total shipments (i.e., lines L, N, P, R). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Calendar years			January-September	
Reconciliation	2012	2013	2014	2014	2015
I + K - L - N - P - R - T = should equal zero ("0") or provide an explanation.1	0	0	0	0	0
¹ Explanation if the calculated fields ab nonetheless accurate:	ove are returr	ning values oth	ner than zero (i.e., "0") but a	re

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

Quantity (in number of tires)							
		Calendar years	January-September				
Item	2012	2013	2014	2014	2015		
Channels of distribution: Commercial U.S. shipments: To OEM (quantity) (U)							
To distributors (quantity)(V)							
To tire mounters (quantity) (W) ¹							
¹ Indicate the name of the tire	mounters:			<u>'</u>			

	Calendar years			Calendar years January-Septen		eptember
Reconciliation	2012	2013	2014	2014	2015	
U + V + W- L = zero ("0"), if not						
revise.	0	0	0	0	0	

II-9. **Production, shipment and inventory data for mounted OTR tires**.--Report your firm's production capacity, production, shipments, and inventories related to the production of OTR tires mounted on wheel and tire assemblies (mounted OTR tires) in its U.S. establishment(s) during the specified periods.

Quantity (in number of tires) and value (in \$1,000)1					
		Calendar yea	rs	January-S	eptember
Item	2012	2013	2014	2014	2015
Average production capacity ² (quantity) (X)					
Beginning-of-period inventories (quantity) (Y)					
Production of mounted OTR tires (quantity): Using OTR tires your firm produced internally (Z) ³					
Using domestically produced OTR tires your firm purchased (AA)					
Using OTR tires manufactured in— China (AB) ⁴					
India (AC) ⁵					
Sri Lanka (AD) ⁶					
Using OTR tires manufactured in a subject country (AE)	0	0	0	0	0
Using OTR tire imports from a nonsubject country (i.e., other than China, India, or Sri Lanka) (AF)					
Total production of mounted OTR tires (AG)	0	0	0	0	0
U.S. shipments of mounted OTR tires Commercial shipments: Quantity (AH)					
Value (AI)					
Internal consumption: ⁷ Quantity (AJ)					
Value (AK)					
Transfers to related firms: Quantity (AL)					
Value (AM)					
Export shipments: ⁸ Quantity (AN)					
Value (AO)					
End-of-period inventories (quantity) (AP)					

Footnotes next page

II-9. Production, shipment and inventory data for mounted OTR tires.—Continued

¹ Quantities should be based on the number of tires (not whole assemblies) and shipment values reported in this table
should reflect only the value of the tire (and not the value of the wheel, rim, or tire assembly on which the OTR tire is
mounted).
² The production capacity (see definitions section above) reported is based on operating hours per week,
weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in
reported capacity (use additional pages as necessary)
³ These tires are a subset of the production reported in II-7.
⁴ Please provide the name of the producer(s)
⁵ Please provide the name of the producer(s)
⁶ Please provide the name of the producer(s)
⁷ Internal consumption and transfers to related firms must be valued at fair market value. In the event that your firm uses
a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data
using that basis for each of the periods noted above:
⁸ Identify your firm's principal export markets:

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line AP) should be equal to the beginning-of-period inventories (i.e., line Y), plus total production (i.e., line AG), less total shipments (i.e., lines AH, AJ, AL, AN). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Calendar years			January-September	
Reconciliation	2012	2013	2014	2014	2015
Y + AG - AH - AJ - AL - AN -AP= should equal zero ("0") or provide an					
explanation. ¹	0	0	0	0	0
1- 1			/		

¹ Explanation if the calculated fields above are returning values other than zero (*i.e.*, "0") but are nonetheless accurate:_____.

II-10. <u>Channels of distribution</u>.--Report your firm's commercial U.S. shipments by channel of distribution.

Quantity (in number of tires)								
		Calendar years	January-September					
Item	2012	2013	2014	2014	2015			
Channels of distribution:								
Commercial U.S. shipments:								
To OEM (<i>quantity</i>) (AQ)								
To Distributors (quantity)(AR)								

		Calendar years	January-September		
Reconciliation	2012	2013	2014	2014	2015
AQ + AR – AH = zero ("0"), if not					
revise.	0	0	0	0	0

II-11. <u>Employment data</u>.--Report your firm's employment-related data related to the production of OTR tires and provide any explanation for any trends in these data.

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

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

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

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

		Calendar years			September
Item	2012	2013	2014	2014	2015
		OTR tire p	production ope	rations	
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					
		OTR tire	mounting oper	rations	
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

Explanation of trends:			

II-12.	Related firmsIf your firm reported transfers to related firms in question II-7, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.					
II-13.	Purchases of unmounted purchased unmounted "Purchase" – A transaction	OTR tires sinc	e January 1, 20	12?		
	producer, a U.S. distrib			•	•	
	"Direct import" –A tran of record or consignee		y from a foreigr	n producer wh	nere your firm	is the importer
	☐ No ☐ Yes	sReport such purchases:	purchases belo	w and explair	n the reasons f	or your firms'
		(Quantit	ty in number of	f tiros)		
		_	Calendar years	-	lanuary-S	eptember
	Item	2012	2013	2014	2014	2015
				nounted OTR		
import	ases from U.S. ters ¹ of unmounted res from—					
India	a					
Sri L	anka					
All o	ther sources					
Purcha produc	ases from domestic cers ²					
Purcha source	ases from other es ²					
supplie	ease list the name of the ing rs differ by source, please ease list the name of the p	identify the sou	irce for each liste	d supplier:	·	

II-14.	Purchases of mounted already mounted OTR			imports, has	your firm oth	erwise purchased		
	alleady illounted OTK	tiles silice Jaili	uary 1, 2012:					
	"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.							
	((Discretises and () A top					:- 4h - :		
	"Direct import" –A tra- of record or consignee		y from a foreign	i producer wr	nere your firm	is the importer		
		. Danart such	nurchasas hala	w and avalair	a tha raasans	for vour firms!		
	∐ No	purchases:	purchases belo	w and explain	i tile reasons i	ioi your iiriis		
		(Quantit	ty in number of	tires)				
		1	Calendar years	-	January-	September		
	Item	2012	2013	2014	2014	2015		
			Mo	ounted OTR t	ires			
			oses of the this			-		
		<u>is </u>	the location wh	ere the tire v	was manufacti	ured		
	ases from U.S. ters ¹ of mounted OTR							
tires f								
Chir	na							
Indi	a							
Sri L	_anka							
All	other sources							
Purch: produ	ases from domestic cers ²							
Purch:	ases from other es ²							
¹ Pl	lease list the name of the i	mporter(s) from	which your firm	purchased this	s product. If you	ır firm's import		
	ers differ by source, please lease list the name of the p					- d th: d		
. Pi	lease list the name of the p	iroducer(s) or o	.s. distributor(s) i	irom which you	ur IIIIII purchasi	ed this product:		
II-15.	Other explanations	-		-	-	•		
	that did not provide a the space provided bel			•				
	providing the data in the questionnaire.		•					

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@usitc.gov).

	Nama	T
	Name Title	
	Email	
	Telephone	
	Fax	
III-2.	Accounting sys	stemBriefly 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 OTR tires:
	2.	Does your firm prepare profit/loss statements for OTR tires:
	3.	How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below. Audited, unaudited, annual reports, 10Ks, 10 Qs,
	4.	Monthly, quarterly, semi-annually, annually Accounting basis: GAAP, cash, tax, or other comprehensive basis of accounting (specify)
	used in regardi submit profit-a	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 firm ing 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 OTR tires, as well as a statements and worksheets) used to compile these data.
III-3.	Cost accounting	ng systemBriefly describe your firm's cost accounting system (e.g., standard

interest expense	and other income and expenses.	
	es, and provide the share of net sa	produced in the facilities in which your firm ales accounted for by these products in you
Products		Share of sales
OTR tires		%
		%
		%
		%
		%
related firms, divi	e to question III-7.	ntinue to question III-9a.
that your firm pu of total COGS" plo recently complete your company's o	rchases from related suppliers and ease report this information by re ed fiscal year. For "Input valuatio own accounting system, of the pu	inputs used in the production of OTR tires d that are reflected in table III-9a. For "Shar levant input on the basis of your most on" please describe the basis, as recorded in trehase cost from the related supplier; e.g.,
the related suppl market value.	lier's actual cost, cost plus, negot	iated transfer price to approximate fair
Input	Related supplier	Share of total COGS (per
		%
		%
		%
		%

III-8.	<u>Inputs purchased from related suppliers</u> Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on OTR tires) 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-9a.

In relation to COGS data:

- Integrated producers that manufacture mounted and unmounted tires (complete both III-9a and III-9b for COGS, as relevant)
- Tire producers with no mounting operations (complete only III-9a for COGS); response will populate in III-9b
- Mounters (complete only III-9b for COGS)
- III-9a. Internally produced unmounted OTR tires costs recognized in COGS.--Report the requested cost information specific to OTR tires (actual tire production) produced in your firm's U.S. establishment(s) and recognized in financial results reported in question III-9b). Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in \$1,000)							
	Fi	scal years ended		January-	September		
ltem	2012	2013	2014	2014	2015		
Cost of internally produced unmounted OTR tires recognized in COGS (question III-9b): Raw materials (internally produced unmounted OTR tires) ¹							
Direct labor(internally produced unmounted OTR tires)							
Other factory costs (internally produced unmounted OTR tires)							
Total cost of internally produced unmounted OTR tires	0	0	0	0	0		
¹ Identify the primary components of your fir	m's raw material o	costs:					

- III-9b. Operations on all OTR tires (both mounted and unmounted).-- Report the revenue and related cost information requested below on all OTR tires operations (including mounted and unmounted OTR tire sales) of your firm's U.S. establishment(s).¹ Do not report resales of products that were not produced or mounted by your firm. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Jennifer Brinckhaus at (202) 205-3188 before completing this section of the questionnaire.
 - Net sales quantities should be in 1,000s of tires. For firms with tire mounting operations, report quantities based on tires not completed assemblies.
 - Net sales values should be in \$1,000s. For firms with tire mounting operations, report values exclusive of (e.g., deducting the) value of the wheel, rim, or tire assembly on which the OTR tires are mounted.

Quantity (in number of tires) and value (in \$1,000)						
	Fisc	al years ended-	-	January-Se	eptember	
Item	2012	2013	2014	2014	2015	
Net sales quantities: ² Commercial sales ("CS")						
Internal consumption ("IC")						
Transfers to related firms ("Transfers")						
Total net sales quantities	0	0	0	0	0	
Net sales values: ² Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values ³	0	0	0	0	0	
Cost of goods sold (COGS): ⁴ Cost of internally produced unmounted OTR tires recognized in COGS ⁵ (from III-9a)	0	0	0	0	0	
Purchased domestic OTR tires recognized in COGS (U.Sorigin tires)						
Purchased imported OTR tires recognized in COGS (foreign-origin tires)						
Raw materials (mounting operations only) ⁶						
Direct labor (mounting operations only)						
Other factory costs (mounting operations only)	_	_				
Total COGS	0	0	0	0	0	
Gross profit or (loss)	0	0	0	0	0	

III-9b. Operations on all OTR tires (both mounted and unmounted).--Continued

Quantity (i	n number of tires	s) and value (in	\$1,000)		
	Fis	scal years ended	d	January-S	eptember
Item	2012	2013	2014	2014	2015
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	(
Operating income (loss)	0	0	0	0	(
Other expenses and income: Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	
Depreciation/amortization included above					

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

³ Net sale values of any mounted OTR tires should be exclusive of (*e.g.*, deducting the) value of the wheel, rim, or tire assembly on which the OTR tire is mounted. Please report below (1) the cost of the wheel, rim, or tire assembly and (2) the value attributable to the wheel, rim, or assembly that you excluded from your calculation of the net sales values above for your sales of mounted OTR tires:

	Fiscal years ended			January-September	
Item	2012	2013	2014	2014	2015
Cost of wheel, rim, or tire assembly					
Amount excluded from net sale value					
attributable to wheel, rim, or assembly					

⁴ COGS (whether for domestic or export sales) should include <u>costs associated</u> with CS, IC, and Transfers.

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

² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

⁵ Total cost of internally produced unmounted OTR tires recognized in COGS are reported in question III-9a and will populate in this grid.

⁶ Other raw materials should not include the cost of wheel, rim, or tire assembly on which the OTR tires is mounted since those values are to have been deducted already from the net sales value.

III-9c.	<u>Financial data reconciliation</u> The calculable line items from question III-9a and III-9b (<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	NoIf 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-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-9b, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific table III-9b line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), as reflected in table III-9b; i.e., if an aggregate nonrecurring item has been allocated to table III-9b, only the allocated value amount included in table III-9b 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-9b.

	Ī	Fiscal years ende	January-September					
	2012 2013 2014							
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in table III-9a or III-9b where the nonrecurring item is classified.	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in table III-9a or III-9b. Value (\$1,000)							
		1	Value (\$1,000)	1	I			
1. , classified as								
2. , classified as								
3. , classified as								
4. , classified as								
5. , classified as								
6. , classified as								
7. , classified as								

III-11.	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-10 above, please
	identify where your company recorded these items in your accounting books and records in the
	normal course of business; i.e., just as responses to question III-10 identify where these items
	are reported in table III-9b.

			_

III-12. <u>Asset values</u>.--Report the <u>total</u> assets (*i.e.*, both current and long-term assets) associated with the production, warehousing, and sale of OTR tires. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for OTR tires 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-9b. Provide data as of the end of your firm's three most recently completed fiscal years.

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

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

Value (<i>in \$1,000</i>)						
		Fiscal years ended				
Item	2012	2013	2014			
Total assets (net) relating to: 1 Unmounted OTR tires						
Mounted OTR tires						
Total assets (net)	0	0	0			
Describe						

III-13. <u>Capital expenditures and research and development expenses</u>.--Report your firm's capital expenditures and research and development expenses for OTR tires. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in \$1,000)							
	Fis	cal years ended-		January-Se	ptember		
Item	2012	2013	2014	2014	2015		
Capital expenditures: Unmounted OTR tires							
Mounted OTR tires							
Total Cap-Ex	0	0	0	0	0		
Research and development expenses Unmounted OTR tires							
Mounted OTR tires							
Total R&D expenses	0	0	0	0	0		

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

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

Calendar year	Fiscal year	Specify fiscal year

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

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

Yes	No	If no, please explain.

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

	negative	of imports on investmentSince January 1, 2012, has your firm experienced any actual ve effects on its return on investment or the scale of capital investments as a result of s of OTR tires from China, India, and Sri Lanka?						
	☐ No ☐ YesMy firm has experienced actual negative effects as follows:							
		(che	ck as r	many as appropriate)	(please describe)			
				ation, postponement, ction of expansion				
				or rejection of nent proposal				
				ion in the size of investments				
	Return on specific investments negatively impacted			nents negatively				
			Other					
II-15b. I	II-15b. Does your firm's response differ by country?							
	No	,	Yes	If yes, indicate which	country and why:			

	Effects of imports on growth and developmentSince January 1, 2012, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of OTR tires from China, India, and Sri Lanka?								
	No YesMy firm has experienced actual negative effects as follows:								
	(check as many as appropriate)				(please describe)				
			Rejecti	on of bank loans					
	Lowering of credit rating								
		Problem related to the issue of stocks or bonds							
	Ability to service debt								
			Other						
III-16b. I	II-16b. Does your firm's response differ by country?								
	No Yes If yes, indicate which		If yes, indicate which o	country and why:					

III-17a.	a. <u>Anticipated effects of imports</u> Does your firm anticipate any negative effects due to import OTR tires from China, India, and Sri Lanka?						
	No	Yes	If yes, my firm anticipates negative effects as follows:				
III-17b.	Does your	firm's res	ponse differ by country?				
	No	Yes	If yes, indicate which country and why:				
	18. Other explanationsIf your firm would like to further explain a response to a question in Part 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 Wo questionnaire.						

PART IV.-- PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Lauren Gamache (202-205-3489, lauren.gamache@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, 2012 of the following products produced by your firm.

<u>Irrigation pivot tire, size 11.2-38, ply rating of 6, weight from 90 to 125 lbs., rim width 10 inches.</u>

- <u>Product 1.--</u> Irrigation pivot tire, size 11.2-38, ply rating of 6, weight from 90 to 125 lbs., rim width 10 inches, *unmounted, tire only*.
- <u>Product 2</u>.-- Irrigation pivot tire, size 11.2-38, ply rating of 6, weight from 90 to 125 lbs., rim width 10 inches, sold as part of a kit.
- <u>Product 3.--</u> Irrigation pivot tire, size 11.2-38, ply rating of 6, weight from 90 to 125 lbs., rim width 10 inches, wheel-mounted tire.

Rear farm tire, size 9.5-24, ply rating of 6, weight from 48 to 58 lbs., rim width 8 inches.

- <u>Product 4.--</u> Rear farm tire, size 9.5-24, ply rating of 6, weight from 48 to 58 lbs., rim width 8 inches, *unmounted, tire only*.
- <u>Product 5.--</u> Rear farm tire, size 9.5-24, ply rating of 6, weight from 48 to 58 lbs., rim width 8 inches, sold as part of a kit.
- <u>Product 6.--</u> Rear farm tire, size 9.5-24, ply rating of 6, weight from 48 to 58 lbs., rim width 8 inches, wheel-mounted tire.

Front farm tire, size 9.5L-15, ply rating of 8, weight from 25 to 32 lbs., rim width 8 inches.

- <u>Product 7.--</u> Front farm tire, size 9.5L-15, ply rating of 8, weight from 25 to 32 lbs., rim width 8 inches, *unmounted, tire only*.
- <u>Product 8.--</u> Front farm tire, size 9.5L-15, ply rating of 8, weight from 25 to 32 lbs., rim width 8 inches, sold as part of a kit.
- <u>Product 9.--</u> Front farm tire, size 9.5L-15, ply rating of 8, weight from 25 to 32 lbs., rim width 8 inches, wheel-mounted tire.

Skid steer tire, size 10-16.5, ply rating of 10, weight from 55 to 85 lbs., rim width 8.25 inches.

- <u>Product 10.--</u> Skid steer tire, size 10-16.5, ply rating of 10, weight from 55 to 85 lbs., rim width 8.25 inches, unmounted, tire only.
- <u>Product 11.--</u> Skid steer tire, size 10-16.5, ply rating of 10, weight from 55 to 85 lbs., rim width 8.25 inches, sold as part of a kit.
- <u>Product 12.--</u> Skid steer tire, size 10-16.5, ply rating of 10, weight from 55 to 85 lbs., rim width 8.25 inches, wheel-mounted tire.

Please note that values should be <u>f.o.b.</u>, <u>U.S. point of shipment</u> and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (*i.e.*, should be net of all deductions for discounts or rebates).

During January 2012-September 2015, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data tables as appropriate.
NoSkip to question IV-3.

IV-2. Price data.--Report below the quarterly price data¹ for pricing products² produced and sold by your firm. For values, only report the value of the tire. Do not include the value of the kit or wheel on which the tire has been mounted. Please identify tire country(ies)-of-origin in each product's respective footnote.

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

	(Quar	ntity <i>in tires,</i> v	alue in dollars)			
<u>Irrigation pivot t</u>	ire, size 11.2-38, ply					
	Product 1 (tire only)		Product 2 (tires in kits) ³		Product 3 (wheel-mounted) ⁴	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2012: January-March						
April-June						
July-September						
October-December						
2013:						
January-March						
April-June						
July-September						
October-December						
2014:						
January-March						
April-June						
July-September						
October-December						
2015: January-March						
April-June						
July-September						
	re, size 9.5-24, ply ro	iting of 6, wei	ght from 48 to	58 lbs., rim wid	dth 8 inches.	
	Product 4 (tire only)		Product 5 (tires in kits) ⁵		Product 6 (wheel-mounted) ⁶	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2012:						
January-March						
April-June						
July-September						
October-December						
2013: January-March						
April-June						
July-September						
October-December						
2014:						
January-March						
April-June						
July-September						
October-December						
2015:						
January-March						
April-June						
July-September						

IV-2. <u>Price data</u>.--(continued).

		(Quantity in t	tires, value in dolla	ars)		
Front fari	m tire, size 9.5L-1	5, ply rating o	f 8, weight from 25	5 to 32 lbs., rim	width 8 inches.	
	Product 7	(tire only)	Product 8 (tire	es in kit kits) ⁷	Product 9 (whe	el-mounted) ⁸
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2012:						
January-March						
April-June						
July-September						
October-December						
2013:						
January-March						
April-June						
July-September						
October-December						
2014:						
January-March						
April-June						
July-September						
October-December						
2015:						
January-March						
April-June						
July-September						

IV-2. **Price data**.--(continued).

	Product 10	(tire only)	Product 11 (tires in kits) ⁹		Product 12 (wheel-mounted) ¹	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2012:						
January-March						
April-June						
July-September						
October-December						
2013:						
January-March						
April-June						
July-September						
October-December						
2014:						
January-March						
April-June						
July-September						
October-December						
2015:						
January-March						
April-June						
July-September						

NOTES:

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, 2, 3:

Product 4, 5, 6:

Product 7, 8, 9:

Product 10, 11, 12:

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

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

³ Product 2 country-of-origin of the tire:

⁴ Product 3 country-of-origin of the tire:

⁵ Product 5 country-of-origin of the tire:

⁶ Product 6 country-of-origin of the tire:

⁷ Product 8 country-of-origin of the tire:

⁸ Product 9 country-of-origin of the tire:

⁹ Product 11 country-of-origin of the tire:

¹⁰ Product 12 country-of-origin of the tire:

			ogyPlease rice data.	e describe t	the metho	od and the kinds of do	ocuments/records th	at were
the pre	eparatio lata. Th	on of the p e Commis	orice data, o ssion may a	as Commis. Iso request	sion staff that your	e keep all supporting may contact your firr company submit cop) used to compile the	n regarding question pies of the supporting	s on the
IV-3.	Cost s	share of t	ires in kits o	or wheel-m	ounted ti	ires		
(a) Question IV-2 above requested price data for <u>only</u> tires (whether sol part of a kit or as a wheel-mounted tire). Below, please provide the the tire normally accounts for in the sales price of kits and/or wheel-2015. (Please refer back to your firm's response in III-9b, footnote 3 wheel-mounted tires.)						vide the estimated sl or wheel-mounted ti	hare that res in	
					Percent of total price accounted for by the tire			
				Т	(percent)			
		Kits				%		
		Whee	l-mounted	tires				%
	(b)	vary by		how the ti		wheel-mounted tires unmounted tire only	· · · · · · · · · · · · · · · · · · ·	
			No	Yes		If yes, plea	ase describe.	
	Ву у	ear						
	By ti	re type						
IV-4.	Price setting How does your firm determine the prices that it charges for sales of OTR tires (check all that apply)? If your firm issues price lists, please submit sample pages of a recent list							
		nsaction by nsaction	Contracts	Set price lists	Other	If ot	her, describe	
	L							

IV-5.	Discount policy	Please indicate	and describe v	our firm's discount	policies (chec	k all that apply)

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

IV-6. Pricing terms.--

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

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 OTR tires usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point

IV-7. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of its U.S.-produced OTR tires in 2015 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)	Spot sales (for a single delivery)	Total (shoul sum t 100.0%	ld o
Share of 2015 sales	%	%	%	%	0.0	%

IV-8. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced OTR tires (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			
ana, or price	Both			
Meet or release	Yes			
provision	No			
Not applicable				

IV-9. <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 OTR tires?

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

IV-10.	Shipping	information

(a)	What is the approximate percentage of the total delivered cost of U.Sproduced OTR
	tires 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 OTR tires that are delivered

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 %

the following distances from its production facility.

IV-11. <u>Geographical shipments.--</u> In which U.S. geographic market area(s) has your firm sold its U.S.-produced OTR tires since January 1, 2012 (check all that apply)?

Geographic area	√ if applicable
NortheastCT, ME, MA, NH, NJ, NY, PA, RI, and VT.	
MidwestIL, 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-12. <u>End uses.--</u>List the end uses of the OTR tires that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by OTR tires and other inputs?

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

IV-13. **Substitutes.--** Can other products be substituted for OTR tires?

	☐ No	Yes	Please fill o	ut the tab	le.				
		End use in	End use in which this			Have changes in the price of this substitute affected the price for OTR tires?			
Substitute		substitut	e is used	No	Yes		Explanation		
1.									
2.									
3.									
ue-	scribe the princip	Overall	No	Overall	Flu	uctuate rith no clear	acmuna.		
Market	Туре	increase	change	decrease	e t	trend	Explanation and factors		
Within	Tires only								
the United	Kits								
States Wheel-mounted tires									
Outside	Tires only								
the United	Kits								
States	Wheel-mounte tires	d							

ı	ıc	Droducars'	Questionnaire	- OTP tires
ι	J.S.	Producers	Questionnaire	- OTR tires

	Of Illarketii	ig of OTK til	res since January 1,	2012:
	No	Yes If	yes, please describ	e and quantify if possible.
IV-16.	Conditions	of competi	<u>tion</u>	
		itions) and/		usiness cycles (other than general economy-wide of competition distinctive to OTR tires? If yes,
	Check all that apply.			Please describe.
		No		Skip to question IV-17.
			ness cycles (<i>e.g.</i> business)	
			er distinctive ns of competition	
	(b) If yes, have there been any changes OTR tires since January 1, 2012?			in the business cycles or conditions of competition for
	No	Yes	If yes, describe.	

IV-17.	Supply constraintsHas your firm refused, declined, or been unable to supply OTR tires since
	January 1, 2012 (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-18. Raw materials.--How have raw materials prices for tires and wheel-mounted tires changed since January 1, 2012?

Туре	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 OTR tires.
Tires only					
Wheel-mounted tires					

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V-19. <u>Interchangeability</u>.--Is OTR tires 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

	Tires only								
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									
		Kits							
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									
		Wheel-mounted tire	es						
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									

For any country-pair producing OTR tires that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:

IV-20. <u>Factors other than price</u>.--Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between OTR tires 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

	Tires only								
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									
		Kits							
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									
		Wheel-mounted tire	s						
Country-pair	China	India	Sri Lanka	Other countries					
United States									
China									
India									
Sri Lanka									

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

IV-21. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for OTR tires since January 1, 2012. Indicate the share of the quantity of your firm's total shipments of OTR tires that each of these customers accounted for in 2015.

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

IV-21. Competition from	om imports
-------------------------	------------

(a)	Lost revenueSince January 1, 2012: To avoid losing sales to competitors selling OTF
	tires from China, India, and/or Sri Lanka, did your firm:

	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>—Since January 1, 2012: Did your firm lose sales of OTR tires to imports of this product from China, India, and/or Sri Lanka?

No	Yes

(c) The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.

If your firm indicated "yes" to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at http://usitc.gov/trade_remedy/question.htm. Note that the Commission may contact the firms named to verify the allegations reported.

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

No—Please explain.
Yes—Please complete the worksheet and submit via the Commission dropbox. https://dropbox.usitc.gov/oinv/ . (PIN: LSLR)

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.

PART V.—OTR TIRES MOUNTED ON WHEELS OR TIRE ASSEMBLIES

Further information on this part of the questionnaire can be obtained from **Justin Enck (202-205-3363, Justin.enck@usitc.gov**). Supply all data requested on a <u>calendar-year</u> basis.

V-1.	wheels	<u>Tire mounting operations.</u> — For firms with operations that involve mounting OTR tires on wheels or tire assemblies, provide the following information with respect to your mounting operations only .		
	(a)	Source and extent of firm's capital and investment		
	(b)	Quantity and type of parts sourced in the United States		
	(c)	Describe your firm's value-added operations performed in the United States		
	(d)	Technical expertise involved in U.S. production activity		
	(e)	Any other cost activities in the United States directly leading to the production of OTR tires.		

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/certan_new_pneumatic_off_the_ro ad tires china/preliminary.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: https://dropbox.usitc.gov/oinv/ Pin: OTR2

• E-mail.—E-mail the MS Word questionnaire to Justin.enck@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 produce 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 you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.