U.S. IMPORTERS' QUESTIONNAIRE

CERTAIN BIAXIAL INTEGRAL GEOGRID PRODUCTS FROM CHINA

This questionnaire must be received by the Commission by <u>October 26, 2016</u> See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping duty investigations concerning certain biaxial integral geogrid products ("biaxial integral geogrids") from China (Inv. Nos. 701-TA-554 and 731-TA-1309 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of fir	firm	
Address		
City	State Zip Code	
Website		
•	rm imported <u>biaxial integral geogrids</u> (as defined on next page) or <u>triaxial integral geogrids</u> (as ge) from any country at any time since January 1, 2013?	defined
	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)	
YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)	
Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: GRID)		

CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. bBy means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.

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

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

PART I.—<u>GENERAL INFORMATION</u>

Background.--This proceeding was instituted in response to a petition filed on January 13, 2016, by Tensar Corporation, Morrow, Georgia. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at

https://usitc.gov/investigations/701731/2016/certain_biaxial_integral_geogrid_products_china/final.ht m_0

IN-SCOPE MERCHANDISE

Biaxial integral geogrid covered by these investigations are a polymer grid or mesh material (whether or not finished, slit, cut-to-length, attached to woven or non-woven fabric or sheet material, or packaged) in which four-sided openings in the form of squares, rectangles, rhomboids, diamonds, or other four-sided figures predominate. The products covered have integral strands that have been stretched to induce molecular orientation into the material (as evidenced by the strands being thinner in width toward the middle between the junctions than at the junctions themselves) constituting the sides of the openings and integral junctions where the strands intersect. The scope includes products in which four-sided figures predominate whether or not they also contain additional strands intersecting the four-sided figures and whether or not the inside corners of the four-sided figures are rounded off or not sharp angles. As used herein, the term "integral" refers to strands and junctions that are homogenous with each other. The products covered have a tensile strength of greater than 5 kilonewtons per meter ("kN/m") according to American Society for Testing and Materials ("ASTM") Standard Test Method D6637/D6637M in any direction and average overall flexural stiffness of more than 100,000 milligram-centimeter according to the ASTM D7748/D7748M Standard Test Method for Flexural Rigidity of Geogrids, Geotextiles and Related Products, or other equivalent test method standards.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise further processed in a third country, including by trimming, slitting, coating, cutting, punching holes, stretching, attaching to woven or nonwoven fabric or sheet material, or any other finishing, packaging, or other further processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the biaxial integral geogrid.

The products subject to the scope are currently classified in the Harmonized Tariff Schedule of the United States ("HTSUS") under the following subheading: 3926.90.9995. Subject merchandise may also enter under subheadings 3920.20.0050 and 3925.90.0000. The HTSUS subheadings set forth above are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.

OUT-OF-SCOPE MERCHANDISE

<u>Triaxial integral geogrid</u> are a polymer grid or mesh material (whether or not finished, slit, cut-tolength, attached to woven or non-woven fabric or sheet material, or packaged) in which three-sided openings in the form of triangles predominate. Triaxial integral geogrids have integral strands that have been stretched to induce molecular orientation into the material (as evidenced by the strands being

thinner in width toward the middle between the junctions than at the junctions themselves) constituting the sides of the openings and integral junctions where the strands intersect. As referenced previously, the term "integral" refers to strands and junctions that are homogenous with each other. Triaxial integral geogrids are oriented in three directions and further directions can be added. Triaxial integral geogrids have a tensile strength of greater than 200 kilonewtons per meter ("kN/m") according to American Society for Testing and Materials ("ASTM") Standard Test Method D6637 in any direction and average overall flexural stiffness of more than 500,000 milligram-centimeter according to the ASTM D7748 Standard Test Method for Flexural Rigidity of Geogrids, Geotextiles and Related Products, or other equivalent test method standards.

Since the Commission defined the domestic like product as encompassing both in-scope biaxial integral geogrids and out-of-scope triaxial integral geogrids in its preliminary determination as to injury, this questionnaire in the final phase of these investigations seeks information on both product groups.

<u>Geogrids</u>.--For the purposes of this questionnaire, the term "geogrids" when referenced by itself refers to both biaxial integral geogrids and triaxial integral geogrids, but excludes any other type of geogrid not included in the definitions for biaxial and triaxial geogrids.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing biaxial integral geogrids (as defined above) into the United States from a foreign manufacturer or through its selling agent.

<u>Reporting of information</u>.-- If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

Confidentiality.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

Verification.-- The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

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.

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 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-2. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>importation</u> of biaxial integral geogrids, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

I-3. **Ownership**.--Is your firm owned, in whole or in part, by any other firm?

No

Yes--List the following information

Firm name	Address	Extent of ownership (<i>percent</i>)

I-4. **<u>Related importers/exporters</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in importing biaxial integral geogrids from China into the United States or that are engaged in exporting biaxial integral geogrids from China to the United States?

No No

Yes--List the following information.

Firm name	Address	Affiliation

I-5. **<u>Related producers</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of biaxial integral geogrids?

🗌 No	YesList the following information.
------	------------------------------------

Firm name	Address	Affiliation

I-6. **Importing operations**.--Please indicate the nature of your firm's importing operations on biaxial integral geogrids. More than one answer may be applicable.

Importer of record	Takes title to the	Consignee of the	Customs broker or
	imported product(s)	imported products(s)	freight forwarder

I-7. <u>**Consignee**</u>.--If your firm is an importer of record of biaxial integral geogrids but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. **<u>FTZ, TIB, or bonded warehouses</u>**.--Please indicate whether your firm enters biaxial integral geogrids into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports biaxial integral geogrids under the TIB (temporary importation under bond) program.

"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, as well as other savings. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

"Bonded warehouse" is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

"Temporary Importation under Bond ("TIB") program" is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States(HTS).

	No	Yes
Foreign trade zones		
Bonded warehouses		
Temporary importation under bond		

I-9. **Third-country trade activities**.--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No Yes–Please specify.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Hangyul Chang (202-205-3062, <u>hangyul.chang@usitc.gov</u>). **Supply all data requested on a** <u>calendar-year</u> basis.

II-1. <u>Contact information</u>.-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

Name	
Title	
Email	
Telephone	
Fax	

II-2. <u>Changes in operations</u>.--Please indicate whether your firm has experienced any of the following changes in relation to the importation of geogrids since January 1, 2013.

(cheo	ck as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	Office/warehouse openings	
	Office/warehouse closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or importation curtailments	
	Revised labor agreements	
	Other (<i>e.g.,</i> technology)	

II-3. <u>Arranged imports</u>.--Has your firm imported or arranged for the importation of geogrids for delivery after **September 30, 2016**?

"Arranged imports" are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

No Yes–Fill out the table below.

Quantity (in square yards)									
Period/Source	Oct-Dec 2016	Jan-Mar 2017	Apr-Jun-2017	Jul-Sept 2017					
U.S. imports of biaxial integral geogrids									
China									
Other sources									
U.S. imports of triaxial integral geogrids									
China									
Other sources									

II-4. <u>**Reasons for importing if producer**</u>.--If your firm also produces biaxial integral geogrids in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

Definitions

"Imports" –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty) or consignee (i.e., to which the merchandise was first delivered).

"Import quantities" -Quantities reported should be net of returns.

"Import values"—Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

"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 net values (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-5. **IMPORTS FROM CHINA**.–Report your firm's imports and your firm's shipments and inventories of biaxial integral geogrids imported from China by your firm during the specified periods.

CHINA – BIAXIAL INTEGRAL GEOGRIDS

Quantity (in square yards), value (in \$1,000)							
		Calendar years	January-September				
Item	2013	2014	2015	2015	2016		
Beginning-of-period inventories (quantity) (A)							
Imports: ¹ Quantity (B)							
Value (C)							
U.S. shipments: Commercial shipments: Quantity (D)							
Value (E)							
Internal consumption/ company transfers: Quantity (F)							
Value ² (G)							
Export shipments: ³ Quantity (H)							
Value (I)							
End-of-period inventories (quantity) (J)							
Channels of distribution: Commercial U.S. shipments: To distributors (quantity) (K)							
To end users/contractors (quantity) (L)							

¹ Please identify the foreign producers, if known: _____.

² Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____

II-5. IMPORTS FROM CHINA.-Continued

CHINA – BIAXIAL INTEGRAL GEOGRIDS

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, and H). 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	2013	2014	2015	2015	2016	
A + B - D - F - H - J = should equal zero						
("0") or provide an explanation. ¹	0	0	0	0	0	
1 European strang if the product of finder of			/			

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

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

		Calendar years	1	January-S	eptember
Reconciliation item	2013	2014	2015	2015	2016
K + L - D = zero ("0"), if not revise.	0	0	0	0	0

II-6. MONTHLY IMPORTS AND INVENTORIES FROM CHINA.—Report your firm's monthly U.S. imports and end-of-period inventories of biaxial integral geogrids from China during the specified periods.

CHINA-BIAXIAL

	Quantity (in square yards)								
Month	Monthly U.S. imports	U.S. inventories at end of the listed month							
2015									
January 2015									
February 2015									
March 2015									
April 2015									
May 2015									
June 2015									
July 2015									
August 2015									
September 2015									
October 2015									
November 2015									
December 2015									
2016									
January 2016									
February 2016									
March 2016									
April 2016									
May 2016									
June 2016									
July 2016									
August 2016									
September 2016									

<u>RECONCILIATION OF IMPORTS AND INVENTORIES</u>.-- Please ensure that the total imports reported for full year 2015, and for the two partial periods (e.g., January to September 2015, and January to September 2015) reported in previous question II-5 matches the monthly data reported here. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation for	Full year 2015	Jan-Sept 2015	Jan-Sept 2016
U.S. imports from China (II-5),			
revise if not returning zero ("0")	0	0	0
	Full year 2015	Jan-Sept 2015	Jan-Sept n 2016
Reconciliation for	Ending Dec 31 2015	Ending Sept 30 2015	Ending Sept 30 2015
End of period inventories of	0	0	0

imports from China (II-5)

NOTE .-- REVISE DATA IF NOT RETURNING ZEROES.

II-7. IMPORTS FROM CHINA.-Report your firm's imports and your firm's shipments and inventories of triaxial integral geogrids imported from China by your firm during the specified periods.

CHINA – TRIAXIAL INTEGRAL GEOGRIDS

Qu	antity (<i>in squa</i>	re yards), value	e (in \$1,000)		
		Calendar years		January-September	
Item	2013	2014	2015	2015	2016
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption/ company transfers: Quantity (F) Value ² (G)					
Export shipments: ³ Quantity (H)					
Value (I)					
End-of-period inventories (quantity) (J)					
Channels of distribution: Commercial U.S. shipments: To distributors (quantity) (K)					
To end users/contractors (quantity) (L)					

² Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

.

³ Identify your firm's principal export markets:

II-7. IMPORTS FROM CHINA.-Continued

CHINA – TRIAXIAL INTEGRAL GEOGRIDS

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, and H). 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	2013	2014	2015	2015	2016	
A + B - D - F - H - J = should equal zero						
("0") or provide an explanation. ¹	0	0	0	0	0	

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

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

		Calendar years	1	January-S	eptember
Reconciliation item	2013	2014	2015	2015	2016
K + L - D = zero ("0"), if not revise.	0	0	0	0	0

)

II-8. **IMPORTS FROM ALL OTHER SOURCES (AOS)**.–Report your firm's imports and your firm's shipments and inventories of biaxial integral geogrids imported from all other sources (AOS) combined by your firm during the specified periods.

AOS – BIAXIAL INTEGRAL GEOGRIDS

(list sources: _____

Qu	antity (<i>in squa</i>	re yards), value	e (in \$1,000)		
		Calendar years	January-September		
Item	2013	2014	2015	2015	2016
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption/ company transfers: Quantity (F)					
Value ² (G)					
Export shipments: ³ Quantity (H)					
Value (I)					
End-of-period inventories (quantity) (J)					
Channels of distribution: Commercial U.S. shipments:					
To distributors (<i>quantity</i>) (K) To end users/contractors (<i>quantity</i>) (L)					

¹ Please identify the foreign producers, if known: _____.

² Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: ______.

II-8. IMPORTS FROM ALL OTHER SOURCES.-Continued

AOS – BIAXIAL INTEGRAL GEOGRIDS

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, and H). 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	2013	2014	2015	2015	2016
A + B - D - F - H - J = should equal zero					
("0") or provide an explanation. ¹	0	0	0	0	0

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

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

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

II-9. **IMPORTS FROM ALL OTHER SOURCES (AOS)**.—Report your firm's imports and your firm's shipments and inventories of triaxial integral geogrids imported from all other sources (AOS) combined by your firm during the specified periods.

AOS- TRIAXIAL INTEGRAL GEOGRIDS

(list sources: _____

Qua	antity (<i>in squa</i>	re yards), value	e (in \$1,000)		
		Calendar years	January-September		
Item	2013	2014	2015	2015	2016
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption/ company transfers: Quantity (F) Value ² (G)					
Export shipments: ³ Quantity (H)					
Value (I)					
End-of-period inventories (quantity) (J)					
Channels of distribution: Commercial U.S. shipments: To distributors (quantity) (K)					
To end users/contractors (quantity) (L)					

¹ Please identify the foreign producers, if known: _____.

² Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____.

II-9. IMPORTS FROM ALL OTHER SOURCES.-Continued

AOS – TRIAXIAL INTEGRAL GEOGRIDS

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, and H). 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-Septe		
Reconciliation	2013	2014	2015	2015	2016
A + B - D - F - H - J = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0

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

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

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

II-10. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part II that did not provide a narrative 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 III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, <u>cindy.cohen@usitc.gov</u>).

III-1. <u>Contact information</u>.-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	
Fax	

PRICE DATA

- III-2. <u>Sales price data</u>.--This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2013 of the following products your firm imported from China :
 - <u>Product 1</u>.—Biaxial integral geogrid, made from polypropylene, commonly known as "Type 1" or "BX 1100," with a minimum rib thickness of 0.03 inches, and an ultimate tensile strength of 850 lb/ft in the longitudinal direction (also known as "machine direction" or "MD Value") and 1,300 lb/ft in the transverse direction (also known as "cross machine direction" or "XMD Value").
 - <u>Product 2</u>.—Biaxial integral geogrid, made from polypropylene, commonly known as "Type 2" or "BX 1200", with a minimum rib thickness of 0.05 inches, and an ultimate tensile strength of 1,310 lb/ft for the MD Value, and 1,970 lb/ft for the XMD Value.
 - <u>Product 3.</u>— A four-sided biaxial integral geogrid, made from polypropylene, commonly known as "SX2020, BX2020" with a minimum rib thickness of 0.045 inches, and a balanced ultimate tensile strength of 1,370 lb/ft in both the longitudinal direction (also known as "machine direction" or "MD Value") and transverse direction (also known as "cross machine direction" or "XMD Value").

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

During January 2013-September 2016, did your firm import from China and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question III-3.

III-2. <u>Sales price data</u>.--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

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

	Product 1						
	Sales to di	stributors	Sales to end users/contractors				
	Quantity	Value	Quantity	Value			
Period of shipment	(sq yds)	(dollars)	(sq yds)	(dollars)			
2013:							
January-March							
April-June							
July-September							
October-December							
2014:							
January-March							
April-June							
July-September							
October-December							
2015:							
January-March							
April-June							
July-September							
October-December							
2016:							
January-March							
April-June							
July-September							

¹ Net values (*i.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 III.

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:

III-2. Sales price data.--Continued

China

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

	Product 2						
	Sales to di	istributors	Sales to end users/contractors				
Period of shipment	Quantity (sq yds)	Value (dollars)	Quantity (sq yds)	Value (dollars)			
2013:							
January-March							
April-June							
July-September							
October-December							
2014:							
January-March							
April-June							
July-September							
October-December							
2015: January-March							
April-June							
July-September							
October-December							
2016:							
January-March							
April-June							
July-September							

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

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 2:

III-2. Sales price data.--Continued

China

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

	Product 3						
	Sales to di	istributors	Sales to end users/contractors				
Period of shipment	Quantity (sq yds)	Value (dollars)	Quantity (sq yds)	Value (dollars)			
2013:							
January-March							
April-June							
July-September							
October-December							
2014:							
January-March							
April-June							
July-September							
October-December							
2015: January-March							
April-June							
July-September							
October-December							
2016:							
January-March							
April-June							
July-September							

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

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 3:

- III-3(a). <u>Imports for private labeling</u>.--This question requests quarterly quantity and value data for your firm's direct imports <u>for sale under your firm's private label</u> since January 1, 2013 of the following products:
 - <u>Product 1</u>.—Biaxial integral geogrid, made from polypropylene, commonly known as "Type 1" or "BX 1100," with a minimum rib thickness of 0.03 inches, and an ultimate tensile strength of 850 lb/ft in the longitudinal direction (also known as "machine direction" or "MD Value") and 1,300 lb/ft in the transverse direction (also known as "cross machine direction" or "XMD Value").
 - <u>Product 2</u>.—Biaxial integral geogrid, made from polypropylene, commonly known as "Type 2" or "BX 1200", with a minimum rib thickness of 0.05 inches, and an ultimate tensile strength of 1,310 lb/ft for the MD Value, and 1,970 lb/ft for the XMD Value.
 - <u>Product 3.</u>— A four-sided biaxial integral geogrid, made from polypropylene, commonly known as "SX2020, BX2020" with a minimum rib thickness of 0.045 inches, and a balanced ultimate tensile strength of 1,370 lb/ft in both the longitudinal direction (also known as "machine direction" or "MD Value") and transverse direction (also known as "cross machine direction" or "XMD Value").

During January 2013-September 2016, <u>did your firm import from China to sell under your firm's</u> <u>private label</u> any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the pricing tables III-3(b) and question III-3(c) as appropriate.
NoSkip to question III-4.

III-3 (b). <u>Imports for private labeling.</u>--Report below the quarterly landed duty-paid cost data for pricing products¹ imported from China.

China

Please note that values should be <u>landed</u>, <u>duty-paid</u> and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

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

	Pro	oduct 1	Pro	duct 2	Product 3	
	Quantity (sq yds)	Landed duty- paid value (dollars)	Quantity (sq yds)	Landed duty- paid value (dollars)	Quantity (sq yds)	Landed duty- paid value (dollars)
2013:						
January-March						
April-June						
July-September						
October-December						
2014:						
January-March						
April-June						
July-September						
October-December						
2015: January-March						
April-June						
July-September						
October-December						
2016: January-March						
April-June						
July-September						

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

III-3 (c). Additional costs for your firm's direct imports of biaxial integral geogrids.

 Please identify the factors that added to your cost of importing directly since January 1, 2013, estimate the share of the cost of the landed duty-paid value, and explain the specific costs associated with each category.

Factors	Estimated share of landed duty paid value (%)	Explanation
Logistical or supply chain costs		
Warehousing costs		
Insurance costs		
Currency conversion costs		
Other:		
Other:		

(ii) To which source(s) does your firm compare costs in determining your additional transaction costs to directly import?

U.S. importers	U.S. producers	Both	Neither

- (iii) Briefly identify the benefits of purchasing biaxial integral geogrids directly from China instead of purchasing from a U.S. importer or U.S. producer.
- (iv) Please provide the estimated margin saved by having purchased biaxial integral geogrids directly from China instead of purchasing from a U.S. importer. _____ percent of landed duty-paid value.
- (v) Explain any variation in the margin saved since January 1, 2013.
- (vi) What is the approximate percentage of the total cost of biaxial integral geogrids you directly imported from China that is accounted for by U.S. inland transportation or other logistics costs from the port of importation to your distribution network? percent.

(vii) Did your firm	purchase biaxial integral geogrids from a U.S. producer?
🗌 No	Yes—Please complete the U.S. purchasers questionnaire.

III-4. **Pricing data methodology.**—Please describe the method and the kinds of documents/records that were used to compile your price data.

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

Some questions in the rest of this section ask about geogrids in general (i.e., both biaxial and triaxial integral geogrids combined). If your answer to any question referring to geogrids in the rest of this section differs between biaxial and triaxial integral geogrids, please explain.

III-5. **Price setting.--** How does your firm determine the prices that it charges for sales of biaxial integral geogrids (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe

III-6. **Discount policy.--** Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discount	No discount policy	Other	Describe

III-7. Pricing terms.--

(a) What are your firm's typical sales terms for biaxial integral geogrids imported from China?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)

(b) On what basis are your firm's prices of imported biaxial integral geogrids from China usually quoted *(check one)*?

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

III-8. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of biaxial integral geogrids imported from China 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)	Tota l (shoul sum t 100.0%	ld o
Share of 2015 sales	%	%	%	%	0.0	%

III-9. <u>Contract provisions</u>.— Please fill out the table regarding your firm's typical sales contracts for biaxial integral geogrids from China (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	ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Meet or release	Yes			
provision	No			
Not applicable				

III-10. Lead times.--What is your firm's share of sales of biaxial integral geogrids imported from China 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 biaxial integral geogrids?

Source	Share of 2015 sales	Lead time (days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

III-11. Shipping information.—

- (a) What is the approximate percentage of the total delivered cost of biaxial integral geogrids imported from China 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) When your firm sells biaxial integral geogrids imported from China, from where is it shipped? Point of importation Storage facility (check one)
- (d) Indicate the approximate percentage of your firm's sales of biaxial integral geogrids imported from China that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

III-12. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold biaxial integral geogrids imported from subject countries since January 1, 2013 (check all that apply)?

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

III-13. <u>End uses</u>.--List the end uses of the biaxial integral geogrids that your firm imports from China. For each end-use product, what percentage of the <u>total cost</u> is accounted for by biaxial integral geogrids and other inputs?

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

III-14. Substitutes.-- Can other products be substituted for geogrids?

No No

Yes--Please fill out the table.

		End use in which this	Have changes in the price of this substitute affected the price for geogrids?		
	Substitute	substitute is used		Yes	Explanation
1.					
2.					
3.					

III-15. <u>Demand trends</u>.-- Indicate how demand within the United States and outside of the United States (if known) for geogrids has changed since January 1, 2013. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States					
Outside the United States					

III-16. **Product changes.--**Have there been any significant changes in the product range, product mix or marketing of geogrids since January 1, 2013?

No	Yes	If yes, please describe.

III-17. Conditions of competition.-

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

Check all that apply.		Please describe.
	No	Skip to question III-18.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

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

No	Yes	If yes, describe.

III-18. <u>Supply constraints.--</u>Has your firm refused, declined, or been unable to supply geogrids since January 1, 2013 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

III-19. Raw materials.-- How have geogrid raw material prices changed since January 1, 2013?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for biaxial integral geogrids.

III-20. <u>Interchangeability</u>.--Are biaxial integral geogrids produced in the United States and in other countries interchangeable (*i.e.*, can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

- A = the products from a specified country-pair are *always* interchangeable
- F = the products are *frequently* interchangeable
- S = the products are *sometimes* interchangeable
- N = the products are *never* interchangeable
- 0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Other countries		
United States				
China				
For any country-pair producing biaxial integral geogrids that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:				

III-21. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between biaxial integral geogrids produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Other countries				
United States						
China						
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant						

factor in your firm's sales of biaxial integral geogrids, identify the country-pair and report the advantages or disadvantages imparted by such factors:

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

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

III-23. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part III that did not provide a narrative 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 IV.-- ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from Hangyul Chang (202-205-3062, <u>hangyul.chang@usitc.gov</u>).

- IV-1. Comparability of biaxial integral geogrids vs triaxial integral geogrids.--For each of the following indicate whether biaxial integral geogrids (subject to these investigations) and triaxial integral geogrids (a related product) are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.
 - (a) <u>Characteristics and Uses</u>.-- The differences and similarities in the physical characteristics and end uses between biaxial integral geogrids and triaxial integral geogrids.

	Mostly	Somewhat	Not at all	
Fully comparable	comparable	comparable	comparable	NA/no familiarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *characteristics and uses*:

(b) <u>Interchangeability</u>.--The ability to substitute biaxial integral geogrids and triaxial integral geogrids in the same application.

Fully interchangeable	Mostly interchangeable	Somewhat interchangeable	Not at all interchangeable	NA/no familiarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *interchangeability*:

IV-1. Comparability of biaxial integral geogrids vs triaxial integral geogrids.--Continued

(c) <u>Manufacturing facilities, production processes, and production employees</u>.-- Whether biaxial integral geogrids and triaxial integral geogrids are manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

		Somewhat the	Not at all the	
Fully the same	Mostly the same	same	same	NA/no familiarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *manufacturing processes*:

(d) <u>**Channels of distribution**</u>.-- Channels of distribution/market situation through which biaxial integral geogrids and triaxial integral geogrids are sold (i.e., sold direct to end users, through distributors, etc.).

	Mostly	Somewhat	Not at all	
Fully comparable	comparable	comparable	comparable	NA/no familiarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *channels of distribution*:

IV-1. Comparability of biaxial integral geogrids vs triaxial integral geogrids.--Continued

(e) <u>**Customer and producer perceptions**</u>.--Perceptions as to the differences and/or similarities in biaxial integral geogrids and triaxial integral geogrids in the market (*e.g.*, sales/marketing practices).

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
Fully comparable	comparable	comparable	comparable	NA/110 Tarrinarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *customer and producer perceptions*:

(f) **Price**.--Whether prices are comparable or differ between biaxial integral geogrids and triaxial integral geogrids.

	Mostly	Somewhat	Not at all	
Fully comparable	comparable	comparable	comparable	NA/no familiarity

Please provide a narrative discussion for the comparability ratings you provided in terms of their *prices*:

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: <u>https://usitc.gov/investigations/701731/2016/certain_biaxial_integral_geogrid_products_china/final.ht</u> <u>m_0</u>

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: GRID

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

If your firm <u>did not</u> **import this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

Parties to this proceeding.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission's Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (*see* 19 CFR § 207.7). Service of the questionnaire must be made in paper form.