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

# **ALUMINUM FOIL FROM CHINA**

This questionnaire must be received by the Commission by March 23, 2017

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning aluminum foil from China (Inv. Nos. 701-TA-570 and 731-TA-1346 (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

Address			
City	State	Zip Code	
Website			
Has your firm produce	ed aluminum foil (as defined on next pag	ge) at any time since January 1, 2014?	
NO (Sign th	ne certification below and promptly return <b>or</b>	nly this page of the questionnaire to the Commission)	
YES (Comp	lete all parts of the questionnaire, and return	the entire questionnaire to the Commission)	
-	re via the U.S. International Trade Cos://dropbox.usitc.gov/oinv/. (PIN: FO	Commission <i>Drop Box</i> by clicking on the OIL)	
	CERTIFICATIO	DN	
-	estionnaire and throughout this proceed	n, and its employees and contract personnel, to use	
ding or other proceeding nel (a) for developing or n, and evaluations relat lix 3; or (ii) by U.S. gover	is may be disclosed to and used: (i) by maintaining the records of this or a re ing to the programs, personnel, and	onse to this request for information and throughout the Commission, its employees and Offices, and concluded proceeding, or (b) in internal investigations, as operations of the Commission including under 5 the commission including	thi
f Authorized Official			trac ıdits J.S.C
	Title of Authorized Official		trac ıdits J.S.C
	Title of Authorized Official  Phone:	Date	trac ıdits J.S.C
re		Date  Email address	trac ıdits J.S.C

#### PART I.—GENERAL INFORMATION

**Background.** --This proceeding was instituted in response to a petition filed on March 9, 2017 by The Aluminum Association Trade Enforcement Working Group and its individual members. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at <a href="https://usitc.gov/investigations/title-7/2017/aluminum\_foil\_china/preliminary.htm">https://usitc.gov/investigations/title\_7/2017/aluminum\_foil\_china/preliminary.htm</a>.

Aluminum foil.—The merchandise covered by these investigations is aluminum foil having a thickness of 0.2 mm (0.00787 inches) or less, in reels exceeding 25 pounds, that is not backed, etched for use in capacitors, or cut to shape. Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

Aluminum foil is currently imported under statistical reporting numbers 7607.11.3000, 7607.11.6000, 7607.11.9030, 7607.11.9060, 7607.11.9090, and 7607.19.6000 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

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

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

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 aluminum foil 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.

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

I-1b. <u>TAA information release</u>.--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

Yes	No
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I-3.

I-4.

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

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

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> Additional discu	ussion on establishments co	nsolidated in this questi	onnaire:
tition supportD	oes your firm support or o	Oppose  Oppose	Take no position
China AD			
China CVD			

Firm name	Address	Extent of ownership (percent)

No Yes	List the following information.	
Firm name	Country	Affiliation
engaged in the product	•	ms, either domestic or foreign, th
engaged in the product	ion of aluminum foil?	Affiliation
engaged in the product	ion of aluminum foil?List the following information.	
engaged in the product	ion of aluminum foil?List the following information.	
engaged in the product	ion of aluminum foil?List the following information.	
engaged in the product	ion of aluminum foil?List the following information.	
engaged in the product	ion of aluminum foil?List the following information.	

# PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Justin Enck (202-205-3363, <u>Justin.enck@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 production of aluminum foil since January 1, 2014.

(chec	k as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other ( <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 aluminum foil, 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.

		Calendar years	
Item	2014	2015	2016
Overall production capacity			
Production of:			
Aluminum foil <sup>1</sup>	0	0	C
Other products <sup>2</sup>			
Total	0	0	C
<sup>1</sup> Data entered for production of Please identify these products		here once reported in	question II-7.

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

nd other products
produce other al products:
n capacity gree to which
garding the
the raw then returns
n(s) involved
1

II-5.	<u>Foreign</u>	trade zones			
	(a)	<u>Firm's FTZ operations</u> Does your firm produce aluminum foil in and/or admit aluminum foil into a foreign trade zone (FTZ)?			
		<b>"Foreign trade zone"</b> is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.			
		No YesDescribe the nature of your firms operations in FTZs and identify the specific FTZ site(s).			
	(b)	Other firms' FTZ operationsTo your knowledge, do any firms in the United States import aluminum foil into a foreign trade zone (FTZ) for use in distribution of aluminum foil and/or the production of downstream articles?			
		☐ No/Don't know ☐ YesIdentify the firms and the FTZs.			
II-6.	<u>Importer</u> Since January 1, 2014, has your firm imported aluminum foil?				
	mercha	ter" – The person or firm primarily liable for the payment of any duties on the ndise, or an authorized agent acting on his behalf. The importer may be the consignee, mporter of record.			
	☐ No	YesCOMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE			

- II-7. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of aluminum foil in its U.S. establishment(s) during the specified periods.
  - "Average production capacity" or "capacity" The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
  - "**Production**" All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.
  - "Commercial U.S. shipments" Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report <u>net values</u> (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.
  - "Internal consumption" Product consumed internally by your firm. Such transactions are valued at fair market value.
  - "Transfers to related firms" Shipments made to related domestic firms. Such transactions are valued at fair market value.
  - "Related firm" –A firm that your firm solely or jointly owns, manages, or otherwise controls.
  - "Export shipments" Shipments to destinations outside the United States, including shipments to related firms.
  - "Inventories" Finished goods inventory, not raw materials or work-in-progress.
  - "Small reels"—If your firm produces retail packages or other reels of aluminum foil weighing less than 25 pounds <u>from your own</u> production/rolling of aluminum foil that would otherwise match the specifications of "aluminum foil" considered to fall within the scope of these proceedings, please include these data as production of aluminum foil in this questionnaire (in question II-7) and then report the use/shipment of that production as internal consumption (in questions II-7, II-9, and III-9).

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

# II-7. Production, shipment, and inventory data.--Continued

Quantity (in short tons) and value (in \$1,000)				
		Calendar years		
ltem	2014	2015	2016	
Average production capacity <sup>1</sup> (quantity) (A)				
Beginning-of-period inventories (quantity) (B)				
Production (quantity) (C)				
U.S. shipments: Commercial shipments: Quantity (D)				
Value (E)				
Internal consumption: <sup>2</sup> Quantity (F)				
Value <sup>3</sup> (G)				
Transfers to related firms:  Quantity (H)				
Value³ (I)				
Export shipments: <sup>4</sup> Quantity (J)				
Value (K)				
End-of-period inventories (quantity) (L)				
<sup>1</sup> The production capacity 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 <sup>2</sup> If your firm further processes aluminum foil from the production reported in this table into small reels (i.e., those weighing less than 25 pounds), report the use/shipment of these products as internal consumption. <sup>3</sup> 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:				
<sup>4</sup> Identify your firm's principal export market	:s:			

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

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

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

Quantity (in short tons) and value (in \$1,000)				
	Calendar years			
Item	2014	2015	2016	
Channels of distribution: Commercial U.S. shipments: To distributors (quantity) (M)				
To consumer product end users (quantity) (N)				
To industrial end users (quantity) (O)				

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, and O) 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		
Reconciliation	2014	2015	2016
M + N +O – D = zero ("0"), if not			
revise.	0	0	0

II-9. <u>Monthly U.S. shipments.</u>—Report the quantities your firm's monthly U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of aluminum foil from January 2014 through December 2016

Quantity (in short tons)				
	Calendar years			
Month of shipment	2014	2015	2016	
January (P)				
February (Q)				
March (R)				
April (S)				
May (T)				
June (U)				
July (V)				
August (W)				
September (X)				
October (Y)				
November (Z)				
December (AA)				
Total (AB)	0	0	0	

<u>RECONCILIATION OF MONTLY SHIPMENTS</u>.--Generally, the data reported for the monthly U.S. shipments in a year (i.e., lines P through AA) should be equal U.S. shipments reported in question II-7 (i.e., lines D, F, and H) for that same year. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years		
Reconciliation	2014	2015	2016
AB - D - F - H = should equal zero ("0"),			
if not revise.	0	0	0

II-10. <u>U.S. shipments by thickness</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by thickness.

**Thin.**—Aluminum foil less than or equal to 0.0004 inch thickness.

**Standard**.—Aluminum foil greater than 0.0004 inch and less than or equal to 0.0007 inch thickness.

<u>Heavy duty</u>.—Aluminum foil greater than 0.0007 inch and less than or equal to 0.0010 inch thickness.

Extra heavy duty.—Aluminum foil greater than 0.0010 inch thickness.

Quantity (in short tons); value (\$1,000)				
	Calendar years			
Item	2014	2015	2016	
U.S. shipments.—				
Thin				
Quantity (AC)				
Value (AD)				
Standard				
Quantity (AE)				
Value (AF)				
Heavy duty				
Quantity (AG)				
Value (AH)				
Extra heavy duty				
Quantity (AI)				
Value (AJ)				

RECONCILIATION OF U.S. SHIPMENTS BY THICKNESS.— Please ensure that the quantities reported for U.S. shipments by thickness (i.e., lines P, R, T and V) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, and H in table II-7) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years		
Reconciliation	2014	2015	2016
Quantity reconciliation: AC + AE + AG +			
AI - D - F - H = should equal zero ("0")	0	0	0
Value reconciliation: AD + AF + AH + AJ			
- E - G - I = should equal zero ("0")	0	0	0

Explanation of trends:

II-11. **Employment data**.--Report your firm's employment-related data related to the production of aluminum foil and provide an explanation for any trends in these data.

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

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.

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

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

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

-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.	<ul> <li>PurchasesOther than direct imports, has your firm otherwise purchased aluminum foil since January 1, 2014?</li> <li>"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.</li> <li>"Direct import" – A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.</li> <li>No</li> <li>YesReport such purchases below and explain the reasons for your firms' purchases:</li> </ul>				
		(Quantity <i>in sh</i>	ort tons)		
		(Qualitity III 311	Calendar years		
	Item	2014	2015	2016	
All	other sources				
Purch produ	ases from domestic cers <sup>2</sup>				
Purch source	ases from other				
supplie	lease list the name of the ir ers differ by source, please lease list the name of the p	identify the source for eac	h listed supplier:	oduct. If your firm's import	

II-14.	Active Management of Inventory levels. — Does your firm actively seek to minimize its inventor
	levels of finished aluminum foil?

No	Yes	If yes, please describe how your firm manages its inventory levels and why.

II-15.	Other explanationsIf your firm would like to further explain a response to a question in Part II that did not provide a narrative box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

### PART III.--FINANCIAL INFORMATION

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

III-1.		mationPlease identify the responsible individual and the manner by which
	Commission s	taff may contact that individual regarding the confidential information submitted
	in part III.	
	Name	
	Title	
	Email	
	Telephone	
	Fax	
	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 aluminum foil:
	2.	Does your firm prepare profit/loss statements for aluminum foil:  Yes  No
	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) \_

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes aluminum foil, as well as specific statements and worksheets) used to compile these data.

US I	Producers'	Questionnaire –	Aluminum foil
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 sisBriefly describe younse and other income ar	s, if any, for COGS, SG&A, and

III-5. **Product listing**.--Please list the products your firm produced in the facilities in which your firm produced aluminum foil, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Aluminum foil	%
	%
	%
	%
	%

III-6.	production of aluminum foil fro	s (raw materials, labor, energy, or any seom any related suppliers (e.g., inclusive on the components within the same components within the components within th	f transactions between	
	YesContinue to question I	II-7. NoContinue to question II	I-9a.	
III-7.	Inputs from related suppliersPlease identify the inputs used in the production of aluminum foil that your firm purchases from related suppliers and that are reflected in table III-9a. For "Share of total COGS" please report this information by relevant input on the basis of your most recently completed fiscal year. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.			
	Input	Related supplier	Share of total COGS	
	Input valuation method used	(e.g., the related supplier's actual cost,	cost plus, FMV, etc.)	
III-8.	Inputs purchased from related suppliersPlease confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on aluminum foil) in a manner consistent with your firm's accounting books and records.  Yes			
	NoIn the space below, ple suppliers as reported	ase report the valuation basis of inputs p in table III-9a.	ourchased from related	

III-9a. Operations on aluminum foil.--Report the revenue and related cost information requested below on the aluminum foil operations of your firm's U.S. establishment(s). Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Jennifer Brinckhaus at (202) 205-3188 before completing this section of the questionnaire.

Quantity (in sho	rt tons) and value (in \$1,0	00)	
	Fiscal years ended		
Item	2014	2015	2016
Net sales quantities: <sup>2</sup>			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	C
Net sales values: <sup>2</sup> Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	C
Cost of goods sold (COGS): <sup>3</sup> Metal cost (billet, scrap, et cetera)			
Other raw materials			
Total raw materials	0	0	0
Direct labor			
Other factory costs			
Total COGS	0	0	C
Gross profit or (loss)	0	0	C
Selling, general, and administrative (SG&A) expenses:  Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	0	0	0
Other expenses and income: Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	C
Depreciation/amortization included above			

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

<sup>&</sup>lt;sup>2</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

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

II-9b.	quantities and val have been calcula return the correct	conciliationThe calculable line items from question III-9a (i.e., total net sales lues, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) ated from the data submitted in the other line items. Do the calculated fields t data according to your firm's financial records ignoring non-material may arise due to rounding?
	Yes No	If 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.e., 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.e., 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 period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a 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 question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a 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 question III-9a.

		Fiscal years ended	
	2014	2015	2016
<b>Nonrecurring item:</b> In this column please provide a brief description of each nonrecurring item and indicate the specific line item in table III-9a where the	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in table III-9a.		
nonrecurring item is classified.		Value (\$1,000)	
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
	<u>records of the company</u> If non-recurring items were reported in question 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 question III-9a.

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 aluminum foil. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for aluminum foil 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 question III-9a. 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	2014	2015	2016
Total assets (net) 1			
<sup>1</sup> Describe			

III-13. Capital expenditures and research and development expenses. -- Report your firm's capital expenditures and research and development expenses for aluminum foil. Provide data for your firm's three most recently completed fiscal years.

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

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

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

III-14.	Data consistency and reconciliationPlease 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.

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

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

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

Y	es/	No	If no, please explain.

III-15.	negativ	e effe	f imports on investmentSince January 1, 2014, has your firm experienced any actual effects on its return on investment or the scale of capital investments as a result of of aluminum foil from China?		
	☐ No		YesMy firm has experi	enced actual negative effects as follows:	
		(ch	neck as many as appropriate)	(please describe)	
			Cancellation, postponement, or rejection of expansion projects		
			Denial or rejection of investment proposal		
			Reduction in the size of capital investments		
			Return on specific investments negatively impacted		
			Other		

III-16.	Effects of imports on growth and developmentSince January 1, 2014, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of aluminum foil from China?			
	☐ No		YesMy firm has experi	enced actual negative effects as follows:
		(cł	neck as many as appropriate)	(please describe)
			Rejection of bank loans	
			Lowering of credit rating	
			Problem related to the issue of stocks or bonds	
			Ability to service debt	
			Other	

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ı	ר וו					1 ( ) [

aluminur	n foil from	s of importsDoes your firm anticipate any negative effects due to impor China?
No	Yes	If yes, my firm anticipates negative effects as follows:
		nt of Energy costs.—Does your firm actively manage its energy costs used lluminum foil?
No	Yes	If yes, please describe.
	_	nt of Aluminum costs.—Does your firm actively manage its metal costs (i. ng aluminum to roll) used in the production of aluminum foil?
	_	
the price	of acquiri	

#### PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Aimee Larsen (202-205-3179, <a href="mailto:aimee.larsen@usitc.gov">aimee.larsen@usitc.gov</a>).

IV-1. <u>Contact information</u>.--Please identify the individual that Commission staff may contact regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	
Fax	

#### **PRICE DATA**

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2014 of the following products produced by your firm.
  - <u>Product 1</u>.--Aluminum in the 1000 series, standard tempers, 0.00025-0.0003 inch thickness, width 30-70", matte/bright.
  - <u>Product 2</u>.-- Aluminum in the 1000 series, standard tempers, 0.00031-0.0005 inch thickness, width 30-70", matte/bright.
  - <u>Product 3</u>.--Aluminum in the 8000 series, standard tempers, 0.0004-0.0014 inch thickness, width 12-18", mill finish.
  - <u>Product 4.--</u> Aluminum in the 8000 series, standard tempers, 0.002-0.0039 inch thickness, width 11" to 31.375", mill finish.
  - <u>Product 5.--</u> Aluminum in the 8000 series, standard tempers, 0.004-0.0078 inch thickness, width 11" to 31.375", mill finish.
  - <u>Product 6</u>.--Aluminum in the 3000 series, standard tempers, 0.002-0.0033 inch thickness, width 0.5-2", mill finish.
  - <u>Product 7</u>.-- Aluminum in the 3000 series, standard tempers, 0.0034-0.0078 inch thickness, width 0.5-10", mill finish.

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> <u>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 2014-December 2016, did your firm produce and sell to unrelated U.S.
customers any of the above listed products (or any products that were competitive with these
products)?

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

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

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

	(Quantity in pounds, value in dollars)							
	Product 1		Product 2 Prod		Produ	ıct 3	Produ	ıct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
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								
October-								
December								

<sup>&</sup>lt;sup>1</sup> 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.

**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:		
Product 4:		

<sup>&</sup>lt;sup>2</sup> Pricing product definitions are provided on the first page of Part IV.

#### IV-2. **Price data.**—*Continued.*

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

		(Quantity in	pounds, value in d	lollars)		
	Produ	uct 5	Prod	luct 6	Product 7	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
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						
October-						
December						
<sup>1</sup> Net values ( <i>i.e.</i> , gr f.o.b. your firm's U.S. po <sup>2</sup> Pricing product de	int of shipment.			, prepaid freight, a	nd the value of reti	urned goods)
<b>Note</b> -If your firm's pro a description of your firm						product, prov
Product 5:						
Product 6:						
Product 7:						

<u>Pricing data methodology.</u>--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

U.S. Producers' Questionnaire - Aluminu	um foil
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IV-3. **Price setting.--**How does your firm determine the prices that it charges for sales of aluminum foil (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

IV-4. <u>Discount policy</u>.--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

# IV-5. Pricing terms.--

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

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 aluminum foil usually quoted *(check one)*?

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

IV-6. <u>Contract versus spot.</u>--Approximately what share of your firm's sales of its U.S.-produced aluminum foil in 2016 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

	Type of sale						
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Short-term contracts (multiple deliveries for less than 12 months)	<b>Spot sales</b> (for a single delivery)	Total (shoul sum to 100.0%	d o	
Share of 2016 sales	%	%	%	%	0.0	%	

IV-7. <u>Contract provisions.--</u>Please fill out the table regarding your firm's typical sales contracts for U.S.-produced aluminum foil (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, er pries	Both			
Meet or release	Yes			
provision	No			
Not applicable				

IV-8. <u>Lead times.</u>—What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced aluminum foil?

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

	IV-9.	Shipping	information
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(a)	What is the approximate percentage of the total cost of U.Sproduced aluminum for 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 aluminum foil that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-10. <u>Geographical shipments.</u>--In which U.S. geographic market area(s) has your firm sold its U.S.-produced aluminum foil since January 1, 2014 (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-11. <u>End uses.</u>--List the end uses of the aluminum foil that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by aluminum foil and other inputs?

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

				End use in v	which this	На		anges in the price of this substitute cted the price for aluminum foil?
Substitute			substitute is used		No	Yes	Explanation	
1.								
2.								
3.								
IV-1	13.	States (if kn	own) for alu	uminum foi	I has change	ed since ed these	Janua e char	States and outside of the United ary 1, 2014. Explain any trends and nges in demand.
		States (if kn	own) for alu	uminum foi	I has change	ed since	Janua e char uate no	ary 1, 2014. Explain any trends and
	Maı	States (if known describe the	own) for all principal f	uminum foi actors that No	I has chang have affect Overall	ed since ed these Fluctu with	Janua e char uate no	ary 1, 2014. Explain any trends and nges in demand.
in t	<b>Ma</b> ı	States (if known describe the	own) for all principal f	uminum foi actors that No	I has chang have affect Overall	ed since ed these Fluctu with	Janua e char uate no	ary 1, 2014. Explain any trends and nges in demand.
in t	<b>Mai</b> the U	States (if known describe the states)  rket  Jnited States  Jnited States	Overall increase	No change	Overall decrease	Fluctu with clear t	Janua e char uate no rend	ary 1, 2014. Explain any trends and nges in demand.

IV-15.	<b>Conditions</b>	of com	petition

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

Check all t	Check all that apply.		Please describe.
	No		Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)		
		r distinctive is of competition	
(b) If yes, have there been any changes aluminum foil since January 1, 2014			in the business cycles or conditions of competition for?
No	Yes	If yes, describe.	

IV-16. <u>Supply constraints.</u>—Has your firm refused, declined, or been unable to supply aluminum foil since January 1, 2014 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

U.S.	Producers'	Question	naire –	<b>Aluminum</b>	foil
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(a) How have aluminum foil raw material prices changed since January 1, 2014?

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

(b) Are your firm's selling price for aluminum foil indexed to raw material costs?

Type of sale	No	Yes	Please explain.
By contract			
Spot market			

IV-18. <u>Interchangeability.--</u>Is aluminum foil 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 identify the country-pair and ex		

IV-19. **Factors other than price.**--Are differences other than price (*e.g.*, quality, availability, transportation network, product range, technical support, *etc.*) between aluminum foil 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		
, , ,	factors other than price always of minum foil, identify the country aparted by such factors:	, ,

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

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

# IV-21. Competition from imports

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

Item	No	Yes
Reduce prices		
Roll back announced price increases		

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

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 <a href="http://usitc.gov/trade\_remedy/question.htm">http://usitc.gov/trade\_remedy/question.htm</a>. 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. <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> . (PIN: FOIL)

IV-22.	Other explanationsIf your firm would like to further explain a response to a question in Part
	IV that did not provide a narrative response box, please note the question number and the
	explanation in the space provided below. Please also use this space to highlight any issues your
	firm had in providing the data in this section, including but not limited to technical issues with
	the MS Word questionnaire.

# **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

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

https://usitc.gov/investigations/title 7/2017/aluminum foil 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: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: FOIL

• 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** <u>does not </u>**produce 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.