U.S. PRODUCERS' QUESTIONNAIRE

CARBON AND CERTAIN ALLOY STEEL WIRE ROD ("WIRE ROD") FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY, THE UNITED ARAB EMIRATES, UKRAINE, AND THE UNITED KINGDOM

This questionnaire must be received by the Commission by October 13, 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 duty investigations and antidumping duty investigations concerning wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom (Inv. Nos. 701-TA-573-574 and 731-TA-1349-1358 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm

City		_ State	Zip Cod	e		
Website						
Has your firm produced	d wire rod (as defined on ne	ext page) at any	time since Ja	nuary 1, 201	4?	
NO (Sign the	e certification below and prom	ptly return only	this page of the	questionnaire	to the Comr	nission)
Return questionnaire	te all parts of the questionnair e via the U.S. Internation ://dropbox.usitc.gov/oin	nal Trade Con	mission <i>Dro</i>			ne
	CEF	RTIFICATION				
dge and belief and under of this certification I als ition provided in this ques	erein supplied in responso stand that the information o grant consent for the C stionnaire and throughout	n submitted is Commission, a	subject to au nd its emplo	dit and verif yees and co	ication by t ntract pers	he Commissi connel, to us
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PART I.—GENERAL INFORMATION

Background.—This proceeding was instituted in response to a petition filed on March 28, 2017, by Charter Steel, Saukville, Wisconsin; Gerdau Ameristeel US Inc., Tampa, Florida; Keystone Consolidated Industries, Inc., Peoria, Illinois; and Nucor Corporation, Charlotte, North Carolina. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2017/carbon and certain alloy steel wire rod belarus/final.htm.

<u>Wire rod.</u>-- Certain hot-rolled products of carbon steel and alloy steel, in coils, of approximately round cross section, less than 19.00 mm in actual solid cross-sectional diameter. Specifically excluded are steel products possessing the above-noted physical characteristics and meeting the Harmonized Tariff Schedule of the United States (HTSUS) definitions for (a) stainless steel; (b) tool steel; (c) high-nickel steel; (d) ball bearing steel; or (e) concrete reinforcing bars and rods. Also excluded are free cutting steel (also known as free machining steel) products (i.e., products that contain by weight one more of the following elements: 0.1 percent or more of lead, 0.05 percent or more of bismuth, 0.08 percent or more of sulfur, more than 0.04 percent of phosphorous, more than 0.05 percent of selenium, or more than 0.01 percent of tellurium). All products meeting the physical description of subject merchandise that are not specifically excluded are included in this scope.

The products under investigation are currently classifiable under subheadings 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035 of the HTSUS. Products entered under subheadings 7213.99.0090 and 7227.90.6090 of the HTSUS also may be included in this scope if they meet the physical description of subject merchandise above. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this proceeding is dispositive.

<u>Grade 1080 and higher tire cord and tire bead wire rod</u>.--Wire rod, Grade 1080 and higher for tire cord and tire bead wire rod production, with 0.8 percent and higher carbon content, measuring 5.0 mm or more but not more than 6.5 mm in cross-sectional diameter, low manganese content in the range of 0.25 - 0.6 percent, and having no inclusions greater than 20 microns.

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.

Yes

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

No

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

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

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

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

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

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
1	:		

Additional discussion on establishments consolidated in this questionnaire: ______.

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

Country	Support	Oppose	Take no position
Belarus (antidumping)			
Italy (antidumping)			
Italy (countervailing duty)			
Korea (antidumping)			
Russia (antidumping)			
South Africa (antidumping)			
Spain (antidumping)			
Turkey (antidumping)			
Turkey (countervailing duty)			
UAE (antidumping)			
Ukraine (antidumping)			
United Kingdom (antidumping)			
OwnershipIs your firm owned, in whole or in part, by any other firm?			

OwnershipIs your firm owned, in whole or in part, by any other firm?			
□ No □ Yes	sList the following information.		
Firm name	Address	Extent of ownership (percent)	

e United States?
Affiliation
mestic or foreign, that are
Affiliation
<u> </u>

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Justin Enck (202-205-3363, justin.enck@usitc.gov). Supply all data requested on a <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 wire rod since January 1, 2014.

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

II-3a. **Production using same machinery.--**Please report your firm's production of products made on the same equipment and machinery used to produce wire rod, and the combined production capacity on this shared equipment and machinery in the periods indicated.

"Overall production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

"**Production**" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Quantity (in short tons)						
	С	alendar year	January-September			
Item	2014	2015	2016	2016	2017	
Overall production capacity						
Total in-scope production ¹	0	0	0	0	0	
Production of out-of-scope						
merchandise:						
Rebar						
Rounds						
Merchant bar						
Other products ²						
Total production	0	0	0	0	0	

¹ These data will populate from question II-7.

² Please identify these products: _____.

per w	ating parametersThe production capacity reported in II-3a is based on operating however, however, weeks per year. Report any date-specific periods when the establishments were perating (i.e., not actually producing product) at the reported parameters.
	city calculationPlease describe the methodology used to calculate overall production city reported in II-3a, and explain any changes in reported capacity.
	uction constraintsPlease describe the constraint(s) that set the limit(s) on your firm's
prod	uction capacity.
Prod	
	ıct shifting.—
(i)	uct shifting.— Is your firm able to switch production (capacity) between wire rod and other products us the same equipment and/or labor?
(i)	Is your firm able to switch production (capacity) between wire rod and other products us
(i) (ii)	Is your firm able to switch production (capacity) between wire rod and other products us the same equipment and/or labor? No Yes (i.e., have produced other products or are able to produce other

-3f.	f. <u>Product shifting:</u> .—							
		•	able to switch production (capacity) between Grade 1080 and higher tire cord and wire rod and other wire rod products using the same equipment and/or					
		☐ No [Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:					
		between pr	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which rs enhance or constrain such shifts.					
-4.		-Since Janua ion of wire i	ary 1, 2014, has your firm been involved in a toll agreement regarding the rod?					
	materia	ls and the se	Agreement between two firms whereby the first firm furnishes the raw econd firm uses the raw materials to produce a product that it then returns a charge for processing costs, overhead, etc.					
	No	Yes	If yes Please describe the toll arrangement(s) and name the firm(s) involved.					

II-5.	Foreign	trade	zones

(a) <u>Firm's FTZ operations</u>.--Does your firm produce wire rod in and/or admit wire rod into a foreign trade zone (FTZ)?

"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

(b) Other firms' FTZ operations.--To your knowledge, do any firms in the United States import wire rod into a foreign trade zone (FTZ) for use in distribution of wire rod and/or the production of downstream articles?

No	Yes	If yesIdentify the firms and the FTZs.

II-6. <u>Importer</u>.--Since January 1, 2014, has your firm imported wire rod?

"Importer" – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf. The importer may be the consignee, or the importer of record.

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

- II-7. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of wire rod in its U.S. establishment(s) during the specified periods.
 - "Average production capacity" or "capacity" The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
 - "**Production**" All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.
 - "Commercial U.S. shipments" Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report <u>net values</u> (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.
 - "Internal consumption" Product consumed internally by your firm. Such transactions are valued at fair market value.
 - "Transfers to related firms" Shipments made to related domestic firms. Such transactions are valued at fair market value.
 - "Related firm" –A firm that your firm solely or jointly owns, manages, or otherwise controls.
 - "Export shipments" Shipments to destinations outside the United States, including shipments to related firms.
 - "Inventories" Finished goods inventory, not raw materials or work-in-progress.

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

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

Quantity	(in short tons)	and value (in \$	\$1,000)		
		Calendar years	3	January-S	eptember
Item	2014	2015	2016	2016	2017
Average production capacity ¹ (quantity)					
(A)					
Beginning-of-period inventories					
(quantity) (B)					
Production (quantity) (C)					
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption: ²					
Quantity (F)					
Value² (G)					
Transfers to related firms: ²					
Quantity (H)					
Value² (I)					
Export shipments: ³					
Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					
¹ The production capacity reported is based					describe the
methodology used to calculate production capa					
² Internal consumption and transfers to relat					
uses a different basis for valuing these transact			.g., cost, cost p	lus, etc.) and pr	ovide value
data using that basis for each of the periods no		<u></u> ·			
³ 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			January-September		
Reconciliation	2014	2015	2016	2016	2017	
B + C - D - F - H - J - L = should equal zero ("0") or provide an explanation.1	0	0	0	0	0	
zero (0) or provide an explanation.	U	U	U	U	U	

¹ 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	January-September				
Item	2014	2015	2016	2016	2017		
Channels of distribution:							
Commercial U.S. shipments:							
To distributors (<i>quantity</i>) (M)							
To end users (quantity) (N)							

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

		Calendar years		January-September		
Reconciliation	2014	2015	2016	2016	2017	
M + N - D = zero ("0"), if not revise.	0	0	0	0	0	

II-9. **Production by type.**--Report your firm's production of wire rod by type for the specified periods.

	Quantity (in s	hort tons)				
		Calendar year	s	January-September		
Item	2014	2015	2016	2016	2017	
Production of in-scope merchandise: Low/medium-low carbon industrial/standard quality wire rod (O)						
High/medium-high carbon industrial/standard quality wire rod (P)						
All grades of tire cord and tire bead quality wire rod ¹ (Q)						
Welding quality wire rod (R)						
Suspension spring wire rod (S)						
Cold heading quality (CHQ) wire rod (T)						
Other specialty carbon and alloy quality wire rod (U)						
Total	0	0	0	0		
¹ Include all grades of tire cord and bead -	not limited	to grade 1080	or higher.	'	<u>'</u>	

<u>RECONCILIATION OF PRODUCTION</u>.--Please ensure that the quantities reported for production (i.e., lines P through U) in each time period equal the quantity reported for production (i.e., line C) in each time period in question II-7. 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-September	
Reconciliation	2014	2015	2016	2016	2017
O + P + Q + R + S + T + U - C = zero					
("0"), if not revise.	0	0	0	0	0

II-10. <u>U.S. shipments by type</u>.--Report your firm's U.S. shipments (including U.S. commercial shipments, internal consumption, and transfers), by type, related to the production of wire rod in your U.S. establishment(s) during calendar year 2016.

	U.S. shipments in 2016		
	Commercial shipments	Internal consumption	Transfers
ltem	Q	uantity (in short t	ons)
U.S. shipments Low/medium-low carbon industrial/standard quality wire rod (AI)			
High/medium-high carbon industrial/standard quality wire rod (AJ)			
All grades of tire cord and tire bead quality wire rod 1 1 (AK)			
Welding quality wire rod (AL)			
Suspension spring wire rod (AM)			
Cold heading quality (CHQ) wire rod (AN)			
Other specialty carbon and alloy quality wire rod (AO)			
All other wire rod shipments (AP)			
Total (AQ)	0	0	0
¹ Include all grades of tire cord and bead – not lir	nited to grade 108	0 or higher.	

<u>RECONCILIATION OF U.S. SHIPMENTS.</u>--Please ensure that the quantities reported for U.S. shipments (i.e., lines AI through AP) in 2016 in this question equal their equivalent item in the previous questions (i.e., line D for commercial U.S. shipments, line F for internal consumption, and line H for transfers to related firms) in in 2016. 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.

	U	J.S. shipments in 2	016
	Commercial shipments	Internal consumption	Transfers
Item Reconciliation	Q	uantity (in short t	ons)
AB + AC + AD + AE + AF + AG + AH + AI - D/F/H = zero ("0"), if not revise.	0	0	0

Explanation of trends:

II-11. **Employment data**.--Report your firm's employment-related data related to the production of wire rod 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. For the January to September periods, calculate similarly and divide by 9.

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3).

"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			January-September	
Item	2014	2015	2016	2016	2017
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

II-12.	Related firms.—If 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. <u>Purchases</u> Other than a January 1, 2014?	<u>Purchases</u> Other than direct imports, has your firm otherwise purchased wire rod since January 1, 2014?					
	"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.					
"Direct import" –A trans record or consignee.	"Direct import" —A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.					
☐ No ☐ Yes	No ☐ YesReport such purchases below and explain the reasons for your firms' purchases:					
	(Quanti	ty in short tor	ıs)			
	Ţ	Calendar years	-	January-	September	
Item	2014	2015	2016	2016	2017	
Purchases from U.S. importers ¹ of wire rod from Belarus						
Italy						
Korea						
Russia						
South Africa						
Spain						
Turkey						
	Ukraine					
United Arab Emirates						
United Kingdom						
Canada						
All other sources						
Purchases from domestic producers ²						
Purchases from other sources ³						
¹ Please list the name of the im suppliers differ by source, please ic	lentify the sourc	e for each listed	l supplier:	<u>_</u> .		

³ Please list the name of the firm(s) from which your firm purchased this product: _____.

II-14. Captive production use.--Please report your firm's internal consumption and/or transfers to related firms in 2016 by disposition. Identify below the form of the product your firm internally consumes or transfers to a related firm (not the form of the product following its processing by an affiliate).

Products	Internal consumption 2016 (short tons)	Transfers to related firms 2016 (short tons)		
Sold as wire rod	N/A			
Unusable/not further processed ¹				
Processed into other products ²				
Total	0	0		
 Please describe these products: Please identify the top-5 products wire rod was processed into by your firm, rank ordered by larger to smaller quantity: 				

RECONCILIATION OF INTERNAL CONSUMPTION AND TRANSFERS.—The sum of the data reported above should be equal to the 2016 data reported for internal consumption and transfers in question II-7 for 2016. 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	Internal consumption 2016 (short tons)	Transfers to related firms 2016 (short tons)	
Data in this question minus data in			
question II-7.	0	0	

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 Joanna Lo (202-205-1888, joanna.lo@usitc.gov).

Name	
Title	
Email	
Telephone	
Fax	
Accounting sys	stemBriefly describe your firm's financial accounting system.
A.	When does your firm's fiscal year end (month and day)?
	If your firm's fiscal year changed during the data-collection period, explain below:
	NotePlease note that we are requesting that firms report their financial of
	on a calendar year basis.
B.1.	Describe the lowest level of operations (e.g., plant, division, company-wide which financial statements are prepared that include wire rod:
2.	Does your firm prepare profit/loss statements for wire rod: 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, ☐ annuallyAccounting basis: ☐ GAAP, ☐ cash, ☐ tax, or ☐ other compreherbasis of accounting (specify)
Note: As requested in Part I of this questionnaire, please keep all supporting documents/recused in the preparation of the financial data, as Commission staff may contact your firm	
submit	ing questions on the financial data. The Commission may also request that your com copies of the supporting documents/records (financial statements, including interna and-loss statements for the division or product group that includes wire rod, as well a
	statements and worksheets) used to compile these data.
submit profit-a	copies of the supporting documents/records (financial statements, including inte and-loss statements for the division or product group that includes wire rod, as we

U.S. Pr	oducers' Questionnaire - Wire Rod	Page
III-4a.	Allocation basisBriefly describe your firm's a interest expense and other income and expense	· · · · · · · · · · · · · · · · · · ·
III-4b.	Allocation changesPlease describe how char than wire rod by your firm have impacted the costs, and SG&A expenses to wire rod. Please to facilities in which your firm produced wire rod.	take into account products not only from the
III-5.		irm produced in the facilities in which your firm et sales accounted for by these products in you
	Products	Share of sales
	wire rod	%
		%
		%
		%
		%
II-6.	Does your firm purchase inputs (raw materials production of wire rod from any related suppli related firms, divisions and/or other components)	ers (e.g., inclusive of transactions between nts within the same company)?
	YesContinue to question III-7.	oContinue to question III-9a.

III-7.	Inputs from related suppliers Please identify the inputs used in the production of wire rod that
	your firm purchases from related suppliers and that are reflected in question III-9a. For "Share
	of total COGS" please report this information by relevant input on the basis of your most
	recently completed calendar 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 as r	ecorded in the firm's accounting books	and records

n total wire rod) in a manner consistent with your firm's accounting books and records.
Yes
NoIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.

III-9a. Overall operations on wire rod.--Report the revenue and related cost information requested below on the wire rod operations of your firm's U.S. establishment(s). Do not report resales of purchased wire rod. Note that internal consumption and transfers to related firms must be valued at fair market value. Provide data for your firm's three most recent calendar years and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Joanna Lo (202-205-1888, joanna.lo@usitc.gov) before completing this section of the questionnaire.

Quantity (in short tons) and value (in \$1,000)							
	C	Calendar years		January-Se	ptember		
ltem	2014	2015	2016	2016	2017		
Net sales quantities: ² Commercial sales ("CS")							
Internal consumption ("IC")							
Transfers to related firms ("Transfers")							
Total net sales quantities	0	0	0	0	(
Net sales values: ² Commercial sales							
Internal consumption							
Transfers to related firms							
Total net sales values	0	0	0	0	(
Cost of goods sold (COGS): ³ Raw materials							
Direct labor							
Other factory costs							
Total COGS	0	0	0	0	C		
Gross profit or (loss)	0	0	0	0	(
Selling, general, and administrative (SG&A) expenses: Selling expenses							
General and administrative expenses							
Total SG&A expenses	0	0	0	0	0		
Operating income (loss)	0	0	0	0	0		
Other expenses and income: Interest expense							
All other expense items							
All other income items							
Net income or (loss) before income taxes	0	0	0	0	C		
Depreciation/amortization included above							

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

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

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

³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

III-9b. <u>Open market operations on wire rod</u>.--Report the revenue and related cost information requested below on the wire rod operations of your U.S. establishment(s). Include both domestic and export commercial sales of the wire rod your firm produced, but do not include internal consumption or transfers to related firms. Provide data for your firm's three most recently completed calendar years and for the specified interim periods.

Quantity	(in short tons)	and value (in \$1	L,000)		
	C	alendar years	January-September		
Item	2014	2015	2016	2016	2017
Commercial sales quantities from III-9a	0	0	0	0	0
Commercial sales values from III-9a	0	0	0	0	0
Cost of goods sold (COGS): ³ Raw material costs					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					

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

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

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

³ COGS (whether for domestic or export sales) should include <u>costs associated with CS.</u>

III-9c.	Allocation of other factory cost as a ratio of total COGS.—If you reported higher other factory costs as a ratio of total COGS for open market sales than those costs as a ratio of total COGS for overall market sales, please explain why other factory costs is a higher percentage in open market sales. In your explanation, please also explain any large fluctuations in reported other factory costs for both markets.
III-10.	<u>Financial data reconciliation</u> The calculable line items from questions III-9a and III-9b (i.e., total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?
	Yes NoIf the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.
	Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.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-11. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-9a or III-9b, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a or III-9b line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), as reflected in questions III-9a or III-9b; i.e., if an aggregate nonrecurring item has been allocated to question III-9a or III-9b, only the allocated value amount included in question III-9a or III-9b should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a or III-9b.

·	Calendar years			January-September	
	2014	2015	2016	2016	2017
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in question III-9a or III-9b where the nonrecurring item is classified.	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in question III-9a or III-9b.				
1. , classified as			Value (\$1,000)		
2. , classified as					
3. , classified as					
4. , classified as					
5. , classified as					
6. , classified as					
7. , classified as					

<u>records of the company</u> If non-recurring items were reported in question III-11 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-11 identify where these items
are reported in question III-9a or III-9b.

III-13. <u>Asset values</u>.--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of wire rod. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for wire rod 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 calendar 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>)							
	Calendar years						
Item	2014	2015	2016				
Total assets (net) 1							
¹ Describe							

III-14. Capital expenditures and research and development expenses. --Report your firm's capital expenditures and research and development expenses for wire rod. Provide data for your firm's three most recently completed calendar years and for the specified interim periods.

Value (<i>in \$1,000</i>)							
		Calendar years	5	January-September			
Item	2014	2015	2016	2016	2017		
Capital expenditures ¹							
Research and development expenses ²							

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product. _____

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

III-15.	Data consisten	cy and reconciliationPlease indicate whether your firm's financial data for
questio	ons III-9a, III-9b,	13, and 14 are based on a calendar years.
	Yes	□No
		e quantities and values reported in question III-9a should reconcile with the data estion II-7 (including export shipments) as long as they are reported on the same pasis.

<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. 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.

	Calendar year			January - September		
Reconciliation	2014	2015	2016	2016	2017	
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0	
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0	

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

Yes	No	If no, please explain.

If your responses to any of the items in questions III-16, III-17, and III-18 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

negative effects on i imports of wire rod to United Arab Emirate No (check of the character)		e effe s of w	ects on its return on investment or the	y 1, 2014, has your firm experienced any actual ne scale of capital investments as a result of ussia, South Africa, Spain, Turkey, Ukraine,				
	☐ No	YesMy firm has experienced actual negative effects as follows:						
			(check as many as appropriate)	(please describe)				
			Cancellation, postponement, or rejection of expansion projects					
			Denial or rejection of investment proposal					
			Reduction in the size of capital investments					
			Return on specific investments negatively impacted					
			Imports of grade 1080 or higher tire cord quality wire rod and tire bead quality wire rod					
			Other					

II-17.	experie develor version	enced pmen of th	any actual negative effects on its gr t and production efforts (including e	Since January 1, 2014, has your firm owth, ability to raise capital, or existing fforts to develop a derivative or more advanced wire rod from Belarus, Italy, Korea, Russia, South ates, and the United Kingdom?				
	☐ No	YesMy firm has experienced actual negative effects as follows:						
			(check 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					
			Return on specific investments negatively impacted					
			Imports of grade 1080 or higher tire cord quality wire rod and tire bead quality wire rod					
			Other					

III-18.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports of
	wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab
	Emirates, and the United Kingdom? Include all anticipated negative affects listed in questions III-
	16 and III-17.

No Ye	s If	f yes, my firm anticipates negative effects as follows:

III-19.	Other explanationsIf your firm would like to further explain a response to a question in Part III that did not provide a narrative box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Emily Burke (202-205-3191, Emily.Burke@usitc.gov).

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

Name	
Title	
Email	
Telephone	

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>.--Industrial quality wire rod, grade C1006, 5.5 mm (7/32 inch) through 12 mm (15/32 inch) in diameter, for hangers, chain link fencing, collated nails and staples, grates, and other formed products (in green condition, e.g., NOT cleaned, coated, etc.).
- <u>Product 2.--Industrial quality wire rod, grade C1008 through C1010, 5.5 mm (7/32 inch) through 12 mm (15/32 inch) in diameter, for hangers, chain link fencing, collated nails and staples, grates, and other formed products (in green condition, e.g., NOT cleaned, coated, etc.).</u>
- **Product 3.--**Mesh quality wire rod, grades C1006 through C1015, 5.5 mm (7/32 inch) through 14 mm (9/16 inch) in diameter, for the manufacturing of concrete reinforcement products such as wire for A-82 applications (in green condition, e.g., NOT cleaned, coated, etc.).
- <u>Product 4.</u>--Grades C1050 through C1070, 5.5 mm (7/32 inch) through 6.5 mm (1/4 inch) in diameter, for spring applications excluding valve spring (in green condition, e.g., NOT cleaned, coated, etc.).
- <u>Product 5.</u>--Industrial quality wire, grades C1060 through 1065, 5.5mm (7/32 inch) through 17.5 mm (11/16 inch) in diameter, for spring wire rod used in upholstery and mechanical applications, as well as oil-tempered spring applications.
- <u>Product 6.--</u> Suspension spring steel wire rod, grade SAE 9254, 5.5 millimeters (7/32 inch) through 21 millimeters (53/64 inch) in diameter, for use in the production of automotive and railway coil and suspension springs.

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

•	g January 2014-September 2017, did your firm produce and sell to unrelated U.S. mers any of the above listed products (or any products that were competitive with these cts)?
	YesPlease complete the following pricing data tables as appropriate.
	NoSkip to question IV-3.

IV-2(a). <u>Price data</u>.--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

	(Quantity in short tons, value in dollars)					
	Product 1		Product 2		Product 3	
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						
2017:						
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.

NoteIf your firm's pro-	duct does not exactly meet the	e product specifications but	is competitive with th	ne specified product,	provide a description
of your firm's product. A	Also, please explain any anoma	alies in your firm's reported	pricing data.		

of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.	
Product 1:	
Product 2:	
Product 3:	

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

IV-2(a). Price data.--Report below the quarterly price data for pricing products produced and sold by your firm.

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

	(Quantity in short tons, value in dollars)						
	Product 4		Product 5		Product 6		
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							
2017:							
January-March							
April-June							
July-September							

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

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

NoteIf 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 4:						
Product 5:						
Product 6:						

IV-2(b).	b). Pricing data methodologyPlease describe the method and the kinds of documents/records that were used to compile your price data.									
the prep price do docume	paration of the ata. The Commi ents/records (su	price data, as ssion may also uch as sales jou	Commissi request t	on staff r that your	e keep all supporting documents/records used in nay contact your firm regarding questions on the company submit copies of the supporting used to compile these data.					
IV-3.	Price setting (a) How does your firm determine the prices that it charges for sales of wire rod (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					
	(b) How d	oes your firm	take into	account s	crap prices when setting prices for wire rod?					
	(b) How d	oes your firm Separate surcharge	take into	1	crap prices when setting prices for wire rod? er, describe. If separate surcharge, describe how your surcharge mechanism works.					
	Included in	Separate		1	er, describe. If separate surcharge, describe how					
IV-4.	Included in cost	Separate surcharge	Other	If other	er, describe. If separate surcharge, describe how					
IV-4.	Included in cost	Separate surcharge yPlease indi Annual total	Other	If other	er, describe. If separate surcharge, describe how your surcharge mechanism works.					
IV-4.	Included in cost Discount police Quantity	Separate surcharge YPlease indi Annual total volume	Other cate and o	If other	er, describe. If separate surcharge, describe how your surcharge mechanism works. Your firm's discount policies (check all that apply).					

IV-5. **Pricing terms.--**

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

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 wire rod 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 wire rod 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)	Spot sales (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 wire rod (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			
ama, or proce	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 vs. 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 wire rod?

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 0	Shinning	information	
IV-9.	Snipping	information	-

(a)	What is the approximate percentage of the total delivered cost of U.Sproduced wire rod 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 wire rod 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 wire rod 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. End uses.--

(a) List the end uses of the wire rod that your firm manufactures and sells commercially. For each end-use product, what percentage of the <u>total cost</u> is accounted for by wire rod vs. other inputs?

	Share of total cost account	Total	
End use product (commercial sales)	Wire rod	Other inputs	(should sum to 100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

(b) List the top three end uses of the wire rod that your firm manufactures and transfers to related firms and or consumes internally. For each end-use product, what percentage of the <u>total cost</u> is accounted for by wire rod vs. other inputs?

End use product (internal consumption	Share of total cost account	Total		
or transferred to a related firm)	Wire rod	Other inputs	(should sum to 100.0% across)	
	%	%	0.0 %	
	%	%	0.0 %	
	%	%	0.0 %	

	☐ No	YesPlease fill out	the tak	ole.	
		End use in which this	На		nanges in the price of this substitute ffected the price for wire rod?
	Substitute	substitute is used	No	Yes	Explanation
1.					
2.					
3.					

IV-12. **Substitutes.--**Can other products be substituted for wire rod?

IV-13.	Demand trendsIndicate how demand within the United States and outside of the United
	States (if known) for wire rod has changed since January 1, 2014. Explain any trends and
	describe the principal factors that have affected these changes in demand.

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

IV-14. <u>Product changes.</u>—Have there been any significant changes in the product range, product mix, or marketing of wire rod since January 1, 2014?

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

IV-15. Conditions of competition

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

Check all th	at apply.	Please describe.
	No	Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for wire rod since January 1, 2014?

No	Yes	If yes, describe.

IV-16. <u>Supply constraints.--</u>Has your firm refused, declined, or been unable to supply wire rod 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, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

IV.	-17	Raw	mate	rials
1 V	- 1 / .	I Va vv	IIIate	1 Iais

(a) How have prices for raw materials used to produce wire rod 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 wire rod.

(b) Are your firm's sales of wire rod indexed to raw material costs?

No	Please explain, identifying the particular index or indices, and how frequently prices are adjusted based on the index or indices.

IV-18. **Surcharges.--**Does your firm employ a surcharge for wire rod?

		If yes, please describe the surcharge formula applied for spot sales and contract sales and whether the formula has changed since 2014.								
No	Yes	Spot sales	Contract							

IV-19. <u>Interchangeability.--</u>Is wire rod 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	Belarus	Italy	Korea	Russia	South Africa	Spain	Turkey	Ukraine	UAE	UK	Canada	Other countries
United States												
Belarus												
Italy		\times										
Korea		\times	\times									
Russia		\times	\times	X								
South Africa		\times	\times	\times	\times							
Spain		\times	\times	\times	\times	\times						
Turkey		\times	\times	\times	\times	\times	\times					
Ukraine		\times	\times	\times	\times	\times	\times	\times				
UAE	\times	\times	\times	\times	\times	\times	\times		X			
UK		\times	>	>					\times	\times		
Canada		\times	>	>	>	>	>		\times	>	>	

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

IV-20. <u>Factors other than price.</u>--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between wire rod 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	Belarus	Italy	Korea	Russia	South Africa	Spain	Turkey	Ukraine	UAE	UK	Canada	Other countries
United States												
Belarus	\times											
Italy		\times										
Korea	\times	\times	\times									
Russia	\times	\times	\times	\times								
South Africa	X	X	X	X	X							
Spain		\times				\times						
Turkey		\times	$\overline{}$			\times	\times					
Ukraine	\times	\times	\times	\times	X	\times		\times				
UAE		\times				\times			\times			
UK		\times	>						\times	\times		
Canada	\nearrow	\times	\times	\nearrow	\times		\times		\times	\times	><	

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

IV-21. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for wire rod since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of wire rod that each of these customers accounted for in 2016.

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

IV-22. Competition from imports

(a) <u>Lost revenue</u>.--Since January 1, 2014: To avoid losing sales to competitors selling wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, UAE, Ukraine, and/or United Kingdom, 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 wire rod to imports of this product from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, UAE, Ukraine, and/or United Kingdom?

No	Yes

IV-23.	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.

PART V.—<u>ALTERNATIVE PRODUCT INFORMATION (Grade 1080 and higher tire cord and tire bead wire</u> rod)

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

The Commission is requesting information on the comparability of wire rod, Grade 1080 and higher tire cord and tire bead wire rod production, with 0.8 percent and higher carbon content, measuring 5.0 mm or more but not more than 6.5 mm in cross-sectional diameter, low manganese content in the range of 0.25 - 0.6 percent, and having no inclusions greater than 20 microns ("Grade 1080 and higher tire cord and tire bead wire rod") and all other in-scope wire rod. All producers need to respond to question V-1a-f, even if they do not produce both Grade 1080 and higher tire cord and tire bead wire rod and all other in-scope wire rod.

- V-1. Comparability of Grade 1080 and higher tire cord and tire bead wire rod vs. all other in-scope wire rod.--For each of the following indicate whether Grade 1080 and higher tire cord and tire bead wire rod and all other in-scope wire rod 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 for Grade 1080 and higher tire cord and tire bead wire rod versus all other inscope wire rod.

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

Please provide a narrative discussion for the characteristics and uses:	he comparability rating	s you provided in terms of the
		

		substitute Grade 108 re rod the same appl	•	ord and tire
Fully	Mostly	Somewhat	Not at all	NA/ı
interchangeable	interchangeable	interchangeable	interchangeable	familia
their <u>interchangea</u>		on processes and pr	aduction amployee	os Whathe
(c) Manufacturing Grade 1080 an manufactured	g facilities, production	on processes, and produced tire bead wire rodes, from the same input	and all other in-sco	pe wire rod
(c) Manufacturing Grade 1080 an manufactured equipment, an	g facilities, production of the same facilities dusing the same em	d tire bead wire rod s, from the same input aployees. Somewhat the	and all other in-scouts, on the same m	ope wire roo achinery an
(c) Manufacturing Grade 1080 an manufactured	g facilities, production of the same facilities and the same facilities in the same facilities and the	d tire bead wire rod s, from the same inpo aployees.	and all other in-sco uts, on the same m	pe wire roc

1080 and highe	er tire cord and tire I	ls of distribution/ma bead wire rod and a igh distributors, etc.	ll other in-scope wi	•	
Fully comparable	Mostly Somewhat Not at all comparable comparable comparable				
channels of distribu	<u>ıtion</u> :				
		<u>ns</u> Perceptions as			
in Grade 1080 a		and tire bead wire r g practices).	od versus all other		
in Grade 1080 a	and higher tire cord e.g., sales/marketin Mostly	and tire bead wire r g practices). Somewhat	od versus all other Not at all	in-scope wire	
in Grade 1080 a in the market (a	and higher tire cord e.g., sales/marketing Mostly comparable	and tire bead wire r g practices). Somewhat comparable	Not at all comparable	NA/no fami	
in Grade 1080 a in the market (a Fully comparable Please provide a na customer and production of the customer and productio	Mostly comparable corrative discussion foucer perceptions:	and tire bead wire r g practices). Somewhat	Not at all comparable ratings you provide	NA/no fami	
in Grade 1080 a in the market (a Fully comparable Please provide a na customer and production of the customer and productio	Mostly comparable corrative discussion foucer perceptions:	and tire bead wire reg practices). Somewhat comparable or the comparability apparable or differ fo	Not at all comparable ratings you provide	NA/no fami	

V-2. **Production, shipment, and inventory data of Grade 1080 and higher tire cord and tire bead wire rod.**--Report your firm's production capacity, production, shipments, and inventories related to the production of Grade 1080 and higher tire cord and tire bead wire rod in its U.S. establishment(s) during the specified periods.

"Average production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

"**Production**" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

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

"Internal consumption" – Product consumed internally by your firm. Such transactions are valued at fair market value.

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

"Related firm" –A firm that your firm solely or jointly owns, manages, or otherwise controls.

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

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

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

V-2. <u>Production, shipment, and inventory data of Grade 1080 and higher tire cord and tire bead wire rod.--Continued</u>

Quantity	(in short tons)	and value (in \$	\$1,000)		
		Calendar years	}	January-S	eptember
ltem	2014	2015	2016	2016	2017
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption: ² Quantity (F)					
Value ² (G)					
Transfers to related firms: ² Quantity (H)					
Value² (I)					
Export shipments: ³ Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					
¹ The production capacity reported is based methodology used to calculate production capacity internal consumption and transfers to relatives a different basis for valuing these transact data using that basis for each of the periods no identify your firm's principal export market	acity, and explai ed firms must b ions, please spe ted above:	n any changes ir e valued at fair i cify that basis (e	n reported capa market value. Ii	city In the event that	t your firm

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

	Calendar years			January-S	eptember
Reconciliation	2014 2015 2016			2016	2017
B + C - D - F - H - J - L = 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:_____.

V-3. Channels of distribution of Grade 1080 and higher tire cord and tire bead wire rod.--Report your firm's commercial U.S. shipments by channel of distribution.

Quantity (in short tons) and value (in \$1,000)							
		Calendar years	January-September				
Item	2014	2014 2015 2016			2017		
Channels of distribution: Commercial U.S. shipments: To distributors (quantity) (M)							
To end users (quantity) (N)							

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

	Calendar years			January-S	eptember
Reconciliation	2014 2015 2016			2016	2017
M + N - D = zero ("0"), if not revise.	0	0	0	0	0

V-4. <u>Employment data of Grade 1080 and higher tire cord and tire bead wire rod</u>.--Report your firm's employment-related data related to the production of Grade 1080 and higher tire cord and tire bead wire rod.--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. For the January to September periods, calculate similarly and divide by 9.

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

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

	Calendar years			January-September	
Item	2014	2015	2016	2016	2017
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

Explanation of trends:			

V-5a. Overall operations on Grade 1080 and higher tire cord and tire bead wire rod.--Report the revenue and related cost information requested below on the Grade 1080 and higher tire cord and tire bead wire rod operations of your firm's U.S. establishment(s). Do not report resales of purchased Grade 1080 and higher tire cord and tire bead wire rod. Note that internal consumption and transfers to related firms must be valued at fair market value. Provide data for your firm's three most recent calendar years, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Joanna Lo at (202-205-1888, joanna.lo@usitc.gov) before completing this section of the questionnaire.

Quantity (in short tons) and value (in \$1,000)						
	C	alendar years		January-Sep	otember	
Item	2014	2015	2016	2016	2017	
Net sales quantities: ² Commercial sales ("CS")						
Internal consumption ("IC")						
Transfers to related firms ("Transfers")						
Total net sales quantities	0	0	0	0	(
Net sales values: ² Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	(
Cost of goods sold (COGS): ³ Raw materials						
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	(
Gross profit or (loss)	0	0	0	0	(
Selling, general, and administrative (SG&A) expenses: Selling expenses						
General and administrative expenses						
Total SG&A expenses	0	0	0	0	0	
Operating income (loss)	0	0	0	0	0	
Other expenses and income: Interest expense						
All other expense items						
All other income items						
Net income or (loss) before income taxes	0	0	0	0	(
Depreciation/amortization included above	1					

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

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

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

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

V-5b. Open market operations on Grade 1080 and higher tire cord and tire bead wire rod.--Report the revenue and related cost information requested below on the open market Grade 1080 and higher tire cord and tire bead wire rod operations of your U.S. establishment(s). Include both domestic and export commercial sales of the Grade 1080 and higher tire cord and tire bead wire rod your firm produced, but do not include internal consumption or transfers to related firms. Provide data for your firm's three most recently completed calendar years.

Quantit	y (in short tons)	and value (in s	\$1,000)		
	Calendar years			January-September	
Item	2014	2015	2016	2016	2017
Commercial sales quantities from III-9a	0	0	0	0	0
Commercial sales values from III-9a	0	0	0	0	0
Cost of goods sold (COGS): ³ Raw material costs					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					

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

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

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

³ COGS (whether for domestic or export sales) should include costs associated with CS.

V-6. Asset values.--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of Grade 1080 and higher tire cord and tire bead wire rod. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for Grade 1080 and higher tire cord and tire bead wire rod 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 V-6a. Provide data as of the end of your firm's three most recently completed calendar 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>)						
	Calendar years					
ltem	2014	2015	2016			
Total assets (net) 1						
Describe						

V-7. Capital expenditures and research and development expenses.—Report your firm's capital expenditures and research and development expenses for Grade 1080 and higher tire cord and tire bead wire rod. Provide data for your firm's three most recently completed calendar years, and for the specified interim periods.

Value (<i>in \$1,000</i>)							
	Calendar years January-Septembe						
Item	2014	2015	2016	2016	2017		
Capital expenditures ¹							
Research and development expenses ²							

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on Grade 1080 and higher tire cord and tire bead wire rod. _____

² Please describe the nature, focus, and significance of your firm's R&D expenses related to Grade 1080 and higher tire cord and tire bead wire rod. _____

<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. 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			Partial year periods	
Reconciliation	2014	2015	2016	2016	2017
Quantity: Trade data from part V-2 less financial data from part V-6a, = zero ("0") except as noted above.	0	0	0	0	0
Value: Trade data from V-6a less financial data from part III, = zero ("0") except as noted above.	0	0	0	0	0

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

https://www.usitc.gov/investigations/701731/2017/carbon_and_certain_alloy_steell wire rod belarus/final.htm

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

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

Web address: https://dropbox.usitc.gov/oinv/ Pin: WR10

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

If your firm does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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