

U.S. IMPORTERS' QUESTIONNAIRE

STEEL TRAILER WHEELS FROM CHINA

This questionnaire must be received by the Commission by **May 23, 2019**
See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning steel trailer wheels ("trailer wheels") from China (Inv. Nos. 701-TA-609 and 731-TA-1421 (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	_____
Address	_____
City	_____ State _____ Zip Code _____
Website	_____
Has your firm imported trailer wheels (as defined on next page) from any country at any time since January 1, 2016?	
<input type="checkbox"/> NO	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)
Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: https://dropbox.usitc.gov/oinv/ . (PIN: TRAIL)	

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on August 8, 2018, by Dexstar Wheel, Elkhart, Indiana. 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/701731/2018/steel_trailer_wheels_china/final.htm.

Trailer wheels covered by these investigations are certain on-the-road steel wheels, discs, and rims for tubeless tires with a nominal wheel diameter of 12 inches to 16.5 inches, regardless of width. Certain on-the-road steel wheels with a nominal wheel diameter of 12 inches to 16.5 inches within the scope are generally for road and highway trailers and other towable equipment, including, inter alia, utility trailers, cargo trailers, horse trailers, boat trailers, recreational trailers, and towable mobile homes. The standard widths of certain on-the-road steel wheels are 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches, but all certain on-the-road steel wheels, regardless of width, are covered by the scope.

The scope includes rims and discs for certain on-the-road steel wheels, whether imported as an assembly, unassembled, or separately. The scope includes certain on-the-road steel wheels regardless of steel composition, whether clad or not clad, whether finished or not finished, and whether coated or uncoated. The scope also includes certain on-the-road steel wheels with discs in either a “hub-piloted” or “stud-piloted” mounting configuration, though the stud-piloted configuration is most common in the size range covered.

All on-the-road wheels sold in the United States must meet Standard 110 or 120 of the National Highway Traffic Safety Administration's (NHTSA) Federal Motor Vehicle Safety Standards, which requires a rim marking, such as the “DOT” symbol, indicating compliance with applicable motor vehicle standards. See 49 CFR 571.110 and 571.120. The scope includes certain on-the-road steel wheels imported with or without NHTSA's required markings.

Certain on-the-road steel wheels imported as an assembly with a tire mounted on the wheel and/or with a valve stem or rims imported as an assembly with a tire mounted on the rim and/or with a valve stem are included in the scope of this investigation. However, if the steel wheels or rims are imported as an assembly with a tire mounted on the wheel or rim and/or with a valve stem attached, the tire and/or valve stem is not covered by the scope.

The scope includes rims, discs, and wheels that have been further processed in a third country, including, but not limited to, the painting of wheels from China and the welding and painting of rims and discs from China to form a steel wheel, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in China.

Excluded from this scope are the following:

- (1) Steel wheels for use with tube-type tires; such tires use multi piece rims, which are two-piece and three-piece assemblies and require the use of an inner tube;
- (2) aluminum wheels;
- (3) certain on-the-road steel wheels that are coated entirely with chrome;
- (4) steel wheels that do not meet Standard 110 or 120 of the NHTSA's requirements other than the rim marking requirements found in 49 CFR 571.110S4.4.2 and 571.120S5.2;
- (5) steel wheels that meet the following specifications: steel wheels with a nominal wheel diameter ranging from 15 inches to 16.5 inches, with a rim width of 8 inches or greater, and a wheel backspacing ranging from 3.75 inches to 5.5 inches; and
- (6) steel wheels with wire spokes.

Certain on-the-road steel wheels subject to this investigation are properly classifiable under the following category of the Harmonized Tariff Schedule of the United States (HTSUS): 8716.90.5035 which covers the exact product covered by the scope whether entered as an assembled wheel or in components. Certain on-the-road steel wheels entered with a tire mounted on them may be entered under HTSUS 8716.90.5059 (Trailers and semi-trailers; other vehicles, not mechanically propelled, parts, wheels, other, wheels with other tires) (a category that will be broader than what is covered by the scope). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.

Chrome-coated steel trailer wheels.--Steel trailer wheels which have been coated in chrome but otherwise meet the dimensions of in-scope trailer wheels (see above scope definition).

Non-galvanized wheels.--Trailer wheels that match the scope definition of trailer wheels, but have not been galvanized.

Galvanized wheels.--Trailer wheels that match the scope definition of trailer wheels, and which have been galvanized.

Galvanization is the process of applying a protective zinc coating to the trailer wheel to prevent corrosion.

Importer.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing trailer wheels (as defined above) into the United States from a foreign manufacturer or through its selling agent.

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.

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

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

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Jordan Harriman (202-205-2610, jordan.harriman@usitc.gov).

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade_remedy/question.htm) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is *optional*. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

- I-2. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol.

“Establishment”--Each facility of a firm involved in the importation of trailer wheels, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

No Yes--List the following information

Firm name	Address	Extent of ownership (percent)

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

No Yes--List the following information.

Firm name	Country	Affiliation

I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of trailer wheels?

No Yes--List the following information.

Firm name	Country	Affiliation

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

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-7. **Consignee.**--If your firm is an importer of record of trailer wheels but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters trailer wheels into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports trailer wheels under the TIB (temporary importation under bond) program.

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

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

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

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

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

No	Yes	If yes, Yes--Please specify.
<input type="checkbox"/>	<input type="checkbox"/>	

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Jordan Harriman (202-205-2610, Jordan.harriman@usitc.gov). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information.**--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	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of trailer wheels since January 1, 2016.

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

II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of trailer wheels for delivery after **March 31, 2019**?

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

No	Yes	If yes, fill out the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Apr-Jun 2019	Jul-Sept 2019	Oct-Dec 2019	Jan-Mar 2020
	Quantity (in pounds)			
China				
All other sources				

II-3b. **Imports in the 12 month period preceding the petition.**--Has your firm imported trailer wheels from any source between August 1, 2017 and July 31, 2018? (i.e., the last five months in 2017 and first seven months in 2018 combined) Please provide data for non-galvanized and galvanized wheels separately.

No	Yes	If yes, report the quantity of such import below by source.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in pounds)	
Source	August 2017 through July 2018
U.S. imports: <u>Non-galvanized</u> trailer wheels.-- China	
All other sources	
U.S. imports: <u>Galvanized</u> trailer wheels.-- China	
All other sources	

II-4. **Reasons for importing if producer.**--If your firm also produces trailer wheels in the United States, please indicate the reasons for importing this product. If your firm’s reasons differ by source, please elaborate.

II-5. **Out-of-scope attachments added domestically.**--Does your firm add in the United States out-of-scope wheel components (e.g., tires or valve-stems) to imported trailer wheels prior to re-sale and/or internal consumption?

No	Yes	If yes, please describe the nature and extent of these operations
<input type="checkbox"/>	<input type="checkbox"/>	

If your firm indicated "yes" that it processes its imports of trailer wheels domestically in the United States by adding out-of-scope attachments, the nature of those attachments will affect your responses to questions II-8a and II-9a. For attachments of trailer wheels with either tire and/or valve stems *only*, your firm should report shipments of those imports as "U.S. commercial shipments" in rows D and E in questions II-8a and II-9a. In reporting the quantity and value of such shipments, you should exclude the portion of the quantity and value accounted for by the tire and/or valve stem (i.e., report only the quantity and value of the wheel itself).

For attachments beyond tire and/or valve stems (e.g., mounting the wheel on an axle or installation onto a vehicle or trailer), your firm should report shipments of those imports as "internal consumption" in questions II-8a and II-9a. In reporting the quantity and value of such internal consumption, you should exclude the portion of the quantity and value accounted for by any out-of-scope attachments (i.e., report only the quantity and value of the wheel itself).

II-6. **Imports with out-of-scope attachments at the time of importation.**--Does your firm import trailer wheels with out-of-scope attachments (e.g., tires or valve stems) at the time of importation?

No	Yes	If yes, please describe
<input type="checkbox"/>	<input type="checkbox"/>	

If your firm, indicated "yes" that it imports trailer wheels (as defined on page 2) with a tire already mounted on the wheel and/or with a valve stem attached, information on those imports should still be reported below in II-8a and II-9a; however, in reporting the quantity and value of such imports, you should exclude the portion of the quantity and value accounted for by the tire and/or valve stem (i.e., report only the quantity and value of the wheel itself).

If your firm simply re-sells its imports of trailer wheels with out-of-scope attachments (e.g., tires and/or valve stems), you should report those shipments of imports as "commercial U.S. shipments" in rows D and E in questions II-8a and II-9a. In reporting the quantity and value of such shipments, you should exclude the portion of the quantity and value accounted for by the tire and/or valve stem (i.e., report only the quantity and value of the wheel itself). If your firm incorporates its imports of trailer wheels with out-of-scope attachments into further downstream products (e.g., by mounting the wheel on an axle or installing the wheel on to a vehicle or trailer), your firm should report shipments of those imports as "internal consumption" in questions II-8a and II-9a.

II-7. **Assembling in-scope parts into In-scope whole trailer wheels.**--Does your firm import in-scope wheel parts (e.g., rims, center discs, or other parts as identified in the definition of trailer wheel on page 2) and assemble these parts into whole trailer wheels prior to re-sale or use?

“In-scope whole trailer wheels” – A fully assembled trailer wheel consisting of, generally, a rim and a center disc, but with no further attachments (e.g., a tire and/or valve stem).

“In-scope wheel parts” – The main components of a whole trailer wheel (generally, a rim and a center disc or other parts as identified in the definition of trailer wheel on page 2).

No	Yes	If yes—Please describe the nature and extent of the following items in relation to your firm's processing of in-scope parts into in-scope whole trailer wheels conducted <u>in the United States</u>. Do not include in the discussion below information relating to out-of-scope attachments (e.g., attaching tires and/or valve stems), or any further downstream manufacturing past assembly of the trailer wheel itself.	
<input type="checkbox"/>	<input type="checkbox"/>	Capital investments	
		Technical expertise	
		Value added	
		Employment	
		Quantity, type and source of parts	
		Costs and activities	

Definitions

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

“Import quantities” –Quantities reported should be net of returns.

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

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

“Internal consumption” – Product consumed internally by your firm. Such transactions are valued at fair market value. **If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed.** Please report commercial shipments of such trailer wheels with a tire and/or valve stem attached in rows D and E below (however, report only the quantity and value of the wheel itself and exclude the portion of the weight and value of the attached tire and/or valve stem).

“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.

“Original Equipment Manufacturer (OEM)” – Manufacturer of trailers or mobile homes.

“Assembler” –Firm which further modifies trailer wheels (e.g., by attaching a tire and/or valve stem) for sale to OEMs.

“Aftermarket” --Distributors, retailers, and/or online sellers of trailer wheels for repairs, replacements, or other non-original equipment uses.

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-8a. **U.S. imports from China.**—Report your firm’s imports and your firm’s shipments and inventories of trailer wheels imported from China by your firm during the specified periods.

China

Quantity (in pounds), value (in dollars)					
Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Beginning-of-period inventories (quantity) (A)					
Imports under HTS number 8716.90.5035^{1,2}					
<i>Quantity (B)</i>					
<i>Value (C)</i>					
Imports under other HTS numbers:^{1,2}					
<i>Quantity (D)</i>					
<i>Value (E)</i>					
U.S. shipments:²					
Commercial shipments:					
<i>Quantity (F)</i>					
<i>Value (G)</i>					
Internal consumption:³					
<i>Quantity (H)</i>					
<i>Value³ (I)</i>					
Transfers to related firms:³					
<i>Quantity (J)</i>					
<i>Value³ (K)</i>					
Export shipments:⁴					
<i>Quantity (L)</i>					
<i>Value (M)</i>					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____. Identify “other HTS numbers” reported in rows D and E here: _____.

² Report only the weight and value of the trailer wheel itself and exclude the portion of the weight and value accounted for by any attached tires and/or valve stems.

³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed.

⁴ Identify your firm’s principal export markets: _____.

II-8a. **U.S. imports from China.–Continued**

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--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 A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar years			January-March	
	2016	2017	2018	2018	2019
A + B + D – F – H – J – L - N = 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: _____					

II-8b. **Channels of distribution: China.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution

China

Quantity (in pounds) and value (in dollars)					
Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Channels of distribution:					
Non-Galvanized Wheels:					
U.S. shipments:					
To OEMs/assemblers					
Quantity (O)					
Value (P)					
To the aftermarket					
Quantity (Q)					
Value (R)					
Galvanized Wheels:					
U.S. shipments:					
To OEMs/assemblers					
Quantity (S)					
Value (T)					
To the aftermarket					
Quantity (U)					
Value (V)					

***RECONCILIATION OF CHANNELS.**--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 U.S. shipments (i.e., lines D through H) 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.*

Reconciliation item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity: O + Q + S + U - F - H - J = zero ("0"), if not revise.	0	0	0	0	0
Value: P + R + T + V - G - I - K = zero ("0"), if not revise.	0	0	0	0	0

II-8c. **U.S. imports by product type: China.**--Report your firm's imports from China for the product types described below during the specified periods.

China

Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
U.S. imports.--					
Rims:					
<i>Quantity (W) in units</i>					
<i>Weight (X) in pounds</i>					
<i>Value (Y) in dollars</i>					
Center discs:					
<i>Quantity (Z) in units</i>					
<i>Weight (AA) in pounds</i>					
<i>Value (AB) in dollars</i>					
Whole trailer wheels without tires/valve stems:					
<i>Quantity (AC) in units</i>					
<i>Weight (AD) in pounds</i>					
<i>Value (AE) in dollars</i>					
Whole trailer wheels with tires/valve stems:¹					
<i>Quantity (AF) in units</i>					
<i>Weight (AG) in pounds</i>					
<i>Value (AH) in dollars²</i>					
Other in-scope products:³					
<i>Quantity (AI) in units</i>					
<i>Weight (AJ) in pounds</i>					
<i>Value (AK) in dollars</i>					
¹ Report only the quantity and value of the wheel itself and exclude the portion of the weight and value of the attached tire and/or valve stem. ² Please explain the methodology your firm used to calculate the value of the trailer wheels only from the combined value of the wheels with tires and/or valve stems attached: . ³ Please describe these other in-scope products: .					

RECONCILIATION OF IMPORTS BY PRODUCT TYPE.--Please ensure that the quantity in weight and values reported for product type imports in this question equal the quantity and value reported for U.S. imports (i.e., lines B and C) in each time period in question II-8a. 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	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity: X + AA + AD + AG + AJ - B - D = zero ("0"), if not revise.	0	0	0	0	0
Value: Y + AB + AE + AH + AK - C - E = zero ("0"), if not revise.	0	0	0	0	0

II-8d. **Monthly U.S. imports: China.**—Report your firm’s monthly U.S. imports of steel wheels from China during the specified periods:

China

Month	U.S. Imports from China
	Quantity (in pounds)
2018.--	
January (AL)	
February (AM)	
March (AN)	
April (AO)	
May (AP)	
June (AQ)	
July (AR)	
August (AS)	
September (AT)	
October (AU)	
November (AV)	
December (AW)	
2019.--	
January (AX)	
February (AY)	
March (AZ)	

Month	Calendar year 2018	Jan-Mar 2018	Jan-Mar 2019
Aggregation of monthly imports	0	0	0

***RECONCILIATION OF IMPORTS.**--Please ensure that the total imports reported for full year 2018, and for the two partial periods (e.g., January to September 2018 and 2019) reported in question II-8a matches the monthly data reported here. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.*

Reconciliation for	Calendar year 2018	Jan-Mar 2018	Jan-Mar 2019
Aggregated monthly data minus U.S. imports from China by quantity (II-8a, rows B and D), revise if not returning zero ("0")	0	0	0
Aggregated monthly data minus U.S. imports from China by value (II-8a, rows C and E), revise if not returning zero ("0")	0	0	0

II-8e. **Imports by wheel dimension: China.**-- Please provide your firm's share of imports of trailer wheels from China by the specified wheel dimensions in 2018.

China

Wheel dimension (wheel diameter x width)	Share of 2018 imports (percent)
12" x 4.0"	
13" x 4.5"	
13" x 5.5"	
14" x 5.5"	
14" x 6.0"	
15" x 5.0"	
15" x 6.0"	
16" x 6.0"	
Other wheel dimensions ¹	
Total (should sum to 100 percent)	0.0
¹ Please describe these other wheel dimensions: .	

II-8f. **Imports by additional attributes: China.**-- Please indicate the share (by percent in pounds) that each attribute contributed to the total amount of trailer wheels imported from China by your firm in each respective category in 2018. (Each of the three categories should separately sum to 100 percent.)

i. **Steel used in production**

Attribute	Share of 2018 U.S. imports (percent)
Carbon hot-rolled steel	
High strength low alloy ("HSLA") hot-rolled steel	
Other steels (describe:)	
Total (should sum to 100 percent)	0.0

II-8f. **Production by additional attributes: China.**--Continued

ii. **Piloting**

Attribute	Share of 2018 U.S. imports (percent)
Hub-piloted	
Stud-piloted <i>with</i> ITR (improved torque retention) technology	
Stud-piloted <i>without</i> ITR technology	
Other (describe:)	
Total (should sum to 100 percent)	0.0

iii. **Coatings**

Attribute	Share of 2018 U.S. imports (percent)
Cationic electro-deposited grey primer base paint coat ("e-coat") ONLY (i.e., e-coat is the only coat applied with no further coating)	
Polyester powder paint	
Hot-dipped galvanized	
Other coatings (describe:)	
No coating	
Total (should sum to 100 percent)	0.0

iv. Please use the space provided below to explain any issues your firm had in providing the data in this question (e.g., returning sums other than 100 percent).

II-8g. **Shifting of supply from China.** Since the petition was filed in August 2018, have any of your suppliers of trailer wheels in China shifted your supply from a facility in China to one in another country?

No	Yes	If yes—Please identify all Chinese suppliers that shifted your supply to a third country, the date the shift occurred, and the country or countries your supply was moved to:
<input type="checkbox"/>	<input type="checkbox"/>	

II-9a. **Imports from all other sources.**—Report your firm’s imports and your firm’s shipments and inventories of trailer wheels imported from **all other sources** by your firm during the specified periods. .

All other sources

(list sources: _____)

Quantity (in pounds), value (in dollars)					
Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Beginning-of-period inventories (quantity) (A)					
Imports under HTS number 8716.90.5035^{1,2}					
Quantity (B)					
Value (C)					
Imports under other HTS numbers:^{1,2}					
Quantity (D)					
Value (E)					
U.S. shipments:²					
Commercial shipments:					
Quantity (F)					
Value (G)					
Internal consumption:³					
Quantity (H)					
Value ³ (I)					
Transfers to related firms:³					
Quantity (J)					
Value ³ (K)					
Export shipments:⁴					
Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____. Identify “other HTS numbers” reported in rows D and E here: _____.

² Report only the weight and value of the trailer wheel itself and exclude the portion of the weight and value accounted for by any attached tires and/or valve stems.

³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed.

⁴ Identify your firm’s principal export markets: _____.

II-9a. **U.S. imports from all other sources.**–*Continued*

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--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 A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar years			January-March	
	2016	2017	2018	2018	2019
A + B + D – F – H – J – L - N = 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: _____.					

II-9b. **Channels of distribution: All other sources.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution

All other sources

Quantity (in pounds) and value (in dollars)					
Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Channels of distribution:					
Non-Galvanized Wheels:					
U.S. shipments:					
To OEMs/assemblers					
Quantity (O)					
Value (P)					
To the aftermarket					
Quantity (Q)					
Value (R)					
Galvanized Wheels:					
U.S. shipments:					
To OEMs/assemblers					
Quantity (S)					
Value (T)					
To the aftermarket					
Quantity (U)					
Value (V)					

***RECONCILIATION OF CHANNELS.**--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 U.S. shipments (i.e., lines D through H) 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.*

Reconciliation item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity: O + Q + S + U - F - H - J = zero ("0"), if not revise.	0	0	0	0	0
Value: P + R + T + V - G - I - K = zero ("0"), if not revise.	0	0	0	0	0

II-9c. **U.S. imports by product type: All other sources.**--Report your firm's imports from all other sources for the product types described below during the specified periods.

All other sources

Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
U.S. imports.--					
Rims:					
Quantity (W) in units					
Weight (X) in pounds					
Value (Y) in dollars					
Center discs:					
Quantity (Z) in units					
Weight (AA) in pounds					
Value (AB) in dollars					
Whole trailer wheels without tires/valve stems:					
Quantity (AC) in units					
Weight (AD) in pounds					
Value (AE) in dollars					
Whole trailer wheels with tires/valve stems:¹					
Quantity (AF) in units					
Weight (AG) in pounds					
Value (AH) in dollars ²					
Other in-scope products:³					
Quantity (AI) in units					
Weight (AJ) in pounds					
Value (AK) in dollars					
¹ Report only the quantity and value of the wheel itself and exclude the portion of the weight and value of the attached tire and/or valve stem. ² Please explain the methodology your firm used to calculate the value of the trailer wheels only from the combined value of the wheels with tires and/or valve stems attached: ³ Please describe these other in-scope products:					

RECONCILIATION OF IMPORTS BY PRODUCT TYPE.--Please ensure that the quantity in weight and values reported for product type imports in this question equal the quantity and value reported for U.S. imports (i.e., lines B and C) in each time period in question II-8a. 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	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity: X + AA + AD + AG + AJ - B - D = zero ("0"), if not revise.	0	0	0	0	0
Value: Y + AB + AE + AH + AK - C - E = zero ("0"), if not revise.	0	0	0	0	0

II-9d. **Imports by wheel dimension: All other sources.**--Please provide your firm's share of imports of trailer wheels from all other sources by the specified wheel dimensions in 2018.

All other sources

Wheel dimension (wheel diameter x width)	Share of 2018 imports (percent)
12" x 4.0"	
13" x 4.5"	
13" x 5.5"	
14" x 5.5"	
14" x 6.0"	
15" x 5.0"	
15" x 6.0"	
16" x 6.0"	
Other wheel dimensions ¹	
Total (should sum to 100 percent)	0.0
¹ Please describe these other wheel dimensions: .	

II-9e. **Imports by additional attributes: All other sources.**--Please indicate the share (by percent in pounds) that each attribute contributed to the total amount of trailer wheels imported from all other sources by your firm in each respective category in 2018. (Each of the three categories should separately sum to 100 percent.)

i. **Steel used in production**

Attribute	Share of 2018 U.S. shipments (percent)
Carbon hot-rolled steel	
High strength low alloy ("HSLA") hot-rolled steel	
Other steels (describe:)	
Total (should sum to 100 percent)	0.0

II-9e. **Production by additional attributes: All other sources.**--Continued

ii. **Piloting**

Attribute	Share of 2018 U.S. shipments (percent)
Hub-piloted	
Stud-piloted <i>with</i> ITR (improved torque retention) technology	
Stud-piloted <i>without</i> ITR technology	
Other (describe:)	
Total (should sum to 100 percent)	0.0

iii. **Coatings**

Attribute	Share (percent)
Cationic electro-deposited grey primer base paint coat ("e-coat") ONLY (i.e., e-coat is the only coat applied with no further coating)	
Polyester powder paint	
Hot-dipped galvanized	
Other coatings (describe:)	
No coating	
Total (should sum to 100 percent)	0.0

iv. Please use the space provided below to explain any issues your firm had in providing the data in this question (e.g., returning sums other than 100 percent).

II-10 **Out-of-scope imports of chrome-coated trailer wheels.**--Did your firm import chrome-coated steel trailer wheels (as defined on page 3) at any point in 2016-2018?

No	Yes	If yes-- Complete the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Item	Quantity (<i>in pounds</i>) and value (<i>in dollars</i>)				
	Calendar year			January-March	
	2016	2017	2018	2018	2019
U.S. imports: China.— Entered in under HTS statistical reporting number 8716.90.5035.-- <i>Quantity</i>					
<i>Value</i>					
Entered in under other HTS statistical reporting numbers.¹⁻⁻ <i>Quantity</i>					
<i>Value</i>					
U.S. imports: All other sources.— Entered in under HTS statistical reporting number 8716.90.5035.-- <i>Quantity</i>					
<i>Value</i>					
Entered in under other HTS statistical reporting numbers.¹⁻⁻ <i>Quantity</i>					
<i>Value</i>					
¹ Please provide the HTS numbers used: .					

II-11. **Comparability of non-galvanized trailer wheels to galvanized trailer wheels.**--For each of the following, indicate whether non-galvanized trailer wheels and galvanized trailer wheels 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.

- F: fully comparable or the same, *i.e.*, have no differentiation between them;
- M: mostly comparable or similar;
- S: somewhat comparable or similar;
- N: never or not-at-all comparable or similar; or
- O: no familiarity with products.

Note.--This product comparison question is being asked in multiple questionnaire types (U.S. producers' and U.S. importers' questionnaires). If your firm is completing more than one of these questionnaire types in relation to this proceeding, please respond to the alternative product comparisons question in only **one questionnaire type**. In general, your firm should make these comparisons in the questionnaire type that is most relevant to your firm's role in the market.

(a) **Physical Characteristics and End Uses.**--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses</i> :
<u>Non-galvanized trailer wheels vs galvanized trailer wheels</u>		

II-11. **Comparability of non-galvanized trailer wheels to galvanized trailer wheels.**-- *Continued*

(b) **Interchangeability.**--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
<u>Non-galvanized trailer wheels vs galvanized trailer wheels</u>		

(c) **Manufacturing facilities, production processes, and production employees.**--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities, production processes, and production employees</u> :
<u>Non-galvanized trailer wheels vs galvanized trailer wheels</u>		

(d) **Channels of distribution.**--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesaler/distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
<u>Non-galvanized trailer wheels vs galvanized trailer wheels</u>		

II-11. **Comparability of non-galvanized trailer wheels to galvanized trailer wheels.**-- *Continued*

(e) **Customer and producer perceptions.**--Perceptions as to the differences and/or similarities in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and product perceptions</u> :
<u>Non-galvanized trailer wheels vs galvanized trailer wheels</u>		

(f) **Price.**--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
Non-galvanized trailer wheels vs galvanized trailer wheels		

II-12. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Andrew Knipe (202-205-2390, andrew.knipe@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2016 of the following products your firm imported from China:

Product 1.--12 inches by 4 inches steel wheels, coated with polyester powder paint

Product 2.--13 inches by 4.5 inches steel wheels, coated with polyester powder paint

Product 3.--15 inches by 5 inches steel wheels, coated with polyester powder paint

Product 4.--16 inches by 6 inches steel wheels, coated with polyester powder paint

Product 5.--15 inches by 5 inches steel wheels, galvanized

Please note that values should be f.o.b., U.S. point of shipment 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). Please report sales of trailer wheels that are unmounted only. Trailer wheels that are assembled with a tire mounted should not be included.

During January 2016-March 2019, did your firm import from China and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	Yes. --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	No. --Skip to question III-3.

III-2a. **Price data: OEM/assemblers.**--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm to unaffiliated OEM/assemblers.

Please report sales of trailer wheels that are unmounted only. Trailer wheels that are assembled with a tire mounted, including imports that your firm attached a tire and/or a valve prior to resale, should NOT be included.

China (price data)

To unaffiliated OEM/assemblers

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

<i>(Quantity in wheels, value in dollars)</i>						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2016:						
January-March						
April-June						
July-September						
October-December						
2017:						
January-March						
April-June						
July-September						
October-December						
2018:						
January-March						
April-June						
July-September						
October-December						
2019:						
January-March						

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

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

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

Product 1:

Product 2:

Product 3:

III-2a. Price data: OEM/assemblers.--Continued

China (price data)

To unaffiliated OEM/assemblers

<i>(Quantity in wheels, value in dollars)</i>				
Period of shipment	Product 4		Product 5	
	Quantity	Value	Quantity	Value
2016:				
January-March				
April-June				
July-September				
October-December				
2017:				
January-March				
April-June				
July-September				
October-December				
2018:				
January-March				
April-June				
July-September				
October-December				
2019:				
January-March				

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

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

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

Product 4:

Product 5:

III-2b. **Price data: Aftermarket/distributors.**--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm to unaffiliated aftermarket/distributors.

Please report sales of trailer wheels that are unmounted only. Trailer wheels that are assembled with a tire mounted, including imports that your firm attached a tire and/or a valve prior to resale, should NOT be included.

China (price data)

To unaffiliated aftermarket/distributors

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

<i>(Quantity in wheels, value in dollars)</i>						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2016:						
January-March						
April-June						
July-September						
October-December						
2017:						
January-March						
April-June						
July-September						
October-December						
2018:						
January-March						
April-June						
July-September						
October-December						
2019:						
January-March						

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

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

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

Product 1:

Product 2:

Product 3:

III-2b. Price data: Aftermarket/distributors.--Continued

China (price data)

To unaffiliated aftermarket/distributors

<i>(Quantity in wheels, value in dollars)</i>				
Period of shipment	Product 4		Product 5	
	Quantity	Value	Quantity	Value
2016:				
January-March				
April-June				
July-September				
October-December				
2017:				
January-March				
April-June				
July-September				
October-December				
2018:				
January-March				
April-June				
July-September				
October-December				
2019:				
January-March				

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

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

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

Product 4:

Product 5:

III-2c. **Price data checklist.**--Please check that the pricing data in questions III-2(a) and III-2(b) has been correctly reported.

Is the price data reported above:	√ if Yes
Value data in actual dollars (not \$1,000)?	<input type="checkbox"/>
Quantity data in number of units (not pounds)?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have returns credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Less than reported commercial shipments in II-8a in each year?	<input type="checkbox"/>

III-2d. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

III-3a. **Import purchase costs.**--Did your firm import any of the above listed products for internal consumption, assembly, or resale in your firm's or a related firm's retail locations since January 1, 2016?

<input type="checkbox"/>	Yes. --Please complete the following table as appropriate.
<input type="checkbox"/>	No. --Skip to question III-4.

III-3b. **Purchase costs data.**--Report below the purchase cost data¹ for pricing products² imported from China and used by your own firm or sold at retail. These are imports that your firm does NOT resell in unmounted form, except at your own retail establishments.

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

China (purchase cost data)

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

(Quantity in wheels, value in dollars)						
Period of importation	Product 1		Product 2		Product 3	
	Quantity	Landed, duty-paid (LDP) value ¹	Quantity	Landed, duty-paid (LDP) value ¹	Quantity	Landed, duty-paid (LDP) value ¹
2016:						
January-March						
April-June						
July-September						
October-December						
2017:						
January-March						
April-June						
July-September						
October-December						
2018:						
January-March						
April-June						
July-September						
October-December						
2019:						
January-March						

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

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

Product 1:

Product 2:

Product 3:

III-3b. Purchase costs data.--Continued

China (purchase cost data)

(Quantity in wheels, value in dollars)				
Period of importation	Product 4		Product 5	
	Quantity	Landed, duty-paid (LDP) value ¹	Quantity	Landed, duty-paid (LDP) value ¹
2016:				
January-March				
April-June				
July-September				
October-December				
2017:				
January-March				
April-June				
July-September				
October-December				
2018:				
January-March				
April-June				
July-September				
October-December				
2019:				
January-March				

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

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

Product 4:

Product 5:

III-3c. **Inland transportation costs for your firm's direct imports of trailer wheels for internal use, assembly, or retail sale.--**

If your firm reported import purchases costs above (question III-3a) what is the approximate percentage of the total cost of the trailer wheels that you directly imported from China that is accounted for by U.S. inland transportation costs from the port of importation to your distribution network, retail store(s), or manufacturing plant(s)? _____%

III-3d. **Additional costs for your firm's direct imports of trailer wheels for your firm's internal use, assembly, or retail sale.--**

- (i) If your firm reported direct import purchase costs above (question III-3a), please identify the factors (**other than** U.S. inland transportation costs or costs already included in landed duty paid values) that add to your cost of importing directly since January 1, 2016. Estimate the share of the cost of the landed duty-paid value, and explain the specific costs associated with each category.

Factors	Estimated share of landed duty-paid value (percent)	Explanation
Logistical or supply chain management costs (<u>not</u> already included in LDP value)		
Warehousing/inventory carrying costs (<u>not</u> already included in LDP value)		
Insurance costs (<u>not</u> already included in LDP value)		
Other, please identify ()		

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

U.S. importers	U.S. producers	Both	Neither
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-3d. **Additional costs for your firm's direct imports of trailer wheels for your firm's internal use, assembly, or retail sale.--Continued**

- (iii) (a) Briefly identify the benefits of directly importing trailer wheels instead of purchasing trailer wheels from a U.S. importer or from a U.S. producer.

(b) Please provide the estimated margin saved by having directly imported trailer wheels instead of purchasing from a U.S. importer. _____ percent of landed duty-paid value.

(c) Explain any variation in the margin saved since January 1, 2016.

III-3e. **Did your firm purchase trailer wheels from a U.S. producer?**

- No Yes--Please complete the U.S. purchaser's questionnaire.

Please respond to the remainder of part III with respect to trailer wheels, of any type, as defined on pages 2-3. If your response varies by type of trailer wheel, such as galvanized vs. non-galvanized, please indicate in the narrative section of the question or at question III-24.

III-4. **Price setting.**--How does your firm determine the prices that it charges for sales of trailer wheels (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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-5. **Discount policy.**--Please indicate and describe your firm's discount policies (check all that apply).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-6. **Pricing terms.**--On what basis are your firm's prices of imported trailer wheels from China usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

III-7. **Contract versus spot.**--Approximately what share of your firm's sales of trailer wheels imported from China in 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

Item	Type of sale				Total (should sum to 100.0%)
	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)	Spot sales (for a single delivery)	
Share of 2018 sales	%	%	%	%	0.0 %

III-8. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced trailer wheels (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term 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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used:				

III-9. **Lead times.**--What is your firm's share of sales of trailer wheels imported from China 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 trailer wheels?

Source	Share of 2018 sales	Lead time (average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

III-10. **Shipping information.--**

- (a) What is the approximate percentage of the cost of trailer wheels imported from China that is accounted for by U.S. inland transportation costs? _____ percent.
- (b) Who generally arranges the transportation to your firm's customers' locations?
 Your firm Purchaser *(check one)*
- (c) When your firm sells trailer wheels imported from China, from where is it shipped?
 Point of importation Storage facility *(check one)*
- (d) Indicate the approximate percentage of your firm's sales of trailer wheels imported from China that are delivered the following distances from your firm's U.S. point of shipment.

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

III-11. **Geographical shipments.--**In which U.S. geographic market area(s) has your firm sold trailer wheels imported from China since January 1, 2016 (check all that apply)?

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

III-12. **End uses.**--List the end uses of the trailer wheels that your firm imports. For each end-use product, what percentage of the total cost is accounted for by trailer wheels vs. other inputs?

End-use product	Share of total cost of end-use product accounted for by		Total (should sum to 100.0% across)
	Trailer wheels (unmounted)	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

III-13. **Substitutes.**--Can other products be substituted for trailer wheels?

No Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for trailer wheels?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

III-14. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for trailer wheels has changed since January 1, 2016. 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 U.S.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the U.S.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of trailer wheels since January 1, 2016?

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

III-16. **Conditions of competition.**--

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

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question III-16.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for trailer wheels since January 1, 2016?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

III-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply trailer wheels since January 1, 2016 (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 provide timely product delivery, etc.)?

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Impact of the section 301 investigation.**--This question concerns the section 301 investigation and tariffs that have been proposed and implemented by the United States in response to Chinese trade practices.

- (a) Did the announcement in March 2018 and subsequent implementation of tariff remedies in the section 301 investigation impact, or do you anticipate that it will impact, your firm's trailer wheels business and/or the U.S. trailer wheels market as a whole?

Yes— Please fill out table below and answer part (b)	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item	Description
Impact on your firm ¹	
Impact on overall U.S. market ¹	
¹ Please identify the magnitude and timing of any effects, and compare your firm's operations/overall market before and after the announcement of the section 301 measures.	

- (b) Please indicate the impact of the announcement and subsequent implementation of remedies in the section 301 investigation and tariff actions regarding trailer wheels.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Overall demand for trailer wheels in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for trailer wheels in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Raw materials.**--How have trailer wheels' raw material prices changed since January 1, 2016?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes, including the section 232 steel tariffs imposed in March 2018, have affected your firm's selling prices for trailer wheels.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-20. **Assessment of specific impacts of the section 232 investigation.**--Please indicate the impact of the announcement and subsequent implementation of remedies in the section 232 investigation and tariff tariffs on imported steel products.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Cost of raw materials used to produce trailer wheels in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall demand for trailer wheels in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for trailer wheels in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **Interchangeability.**--Are trailer wheels 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 O 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

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

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

III-22. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between trailer wheels 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 O 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

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

Country pair	China	Other countries
United States		
China	X	
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of trailer wheels, identify the country-pair and report the advantages or disadvantages imparted by such factors:		

III-23. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for trailer wheels since January 1, 2016. Indicate the share of the quantity of your firm's total shipments of trailer wheels that each of these customers accounted for in 2018.

	Customer's name	City	State	Share of 2018 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

III-24. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, 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.

--

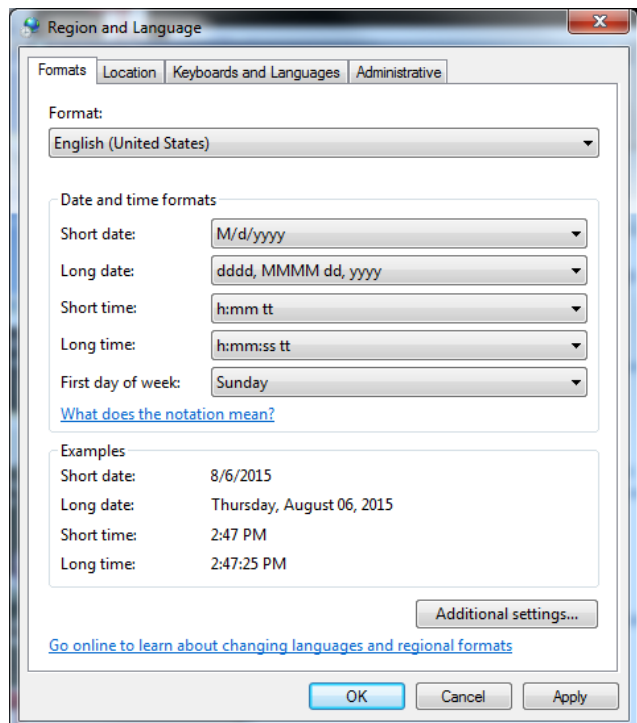
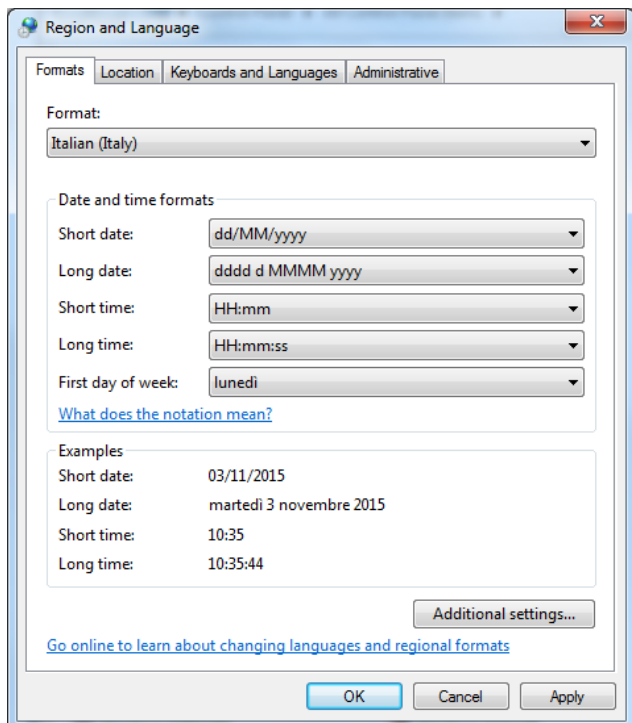
Correcting Valid number error messages.--If you are completing a Commission questionnaire in a country that uses periods (“.”) to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). The US International Trade Commission’s questionnaires are set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system’s number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer’s number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g. “Italian (Italy)”) to “English (United States)” (see screen shots below)

When you do this the number “twelve million dollars and thirty five cents” would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the questionnaire. When you finish reporting the data then you can close the questionnaire and switch back to Italy settings.



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/701731/2018/steel_trailer_wheels_china/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.

- **Upload via Secure Drop Box.**—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:** TRAIL

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

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

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