

U.S. PRODUCERS' QUESTIONNAIRE

FRESH TOMATOES FROM MEXICO

This questionnaire must be received by the Commission by **December 3, 2018**
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 review of the suspended antidumping investigation concerning fresh tomatoes from Mexico (Inv. No. 731-TA-747 (Fourth Review)). 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 produced (grown and/or packaged) fresh tomatoes (as defined on the next page) in the United States at any time since January 1, 2012?

NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)

YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

Return questionnaire via the Commission *Drop Box* by clicking on the following link:

<https://dropbox.usitc.gov/oinv/> (PIN: FRESH)

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 or reviews 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.--On November 1, 1996, the Department of Commerce (“Commerce”) suspended an investigation on imports of fresh tomatoes from Mexico pursuant to a suspension agreement with growers and processors that accounted for substantially all imports of fresh tomatoes from Mexico. The suspension agreement was renegotiated three subsequent times, and the most recent suspension agreement was adopted on March 8, 2013. On February 1, 2018, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether termination of the suspended investigation would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the suspension agreement will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will terminate the suspension agreement. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2018/fresh_tomatoes_mexico/fourth_review_full.htm.

Fresh tomatoes is all fresh or chilled tomatoes (fresh tomatoes) which have Mexico as their origin, except for those tomatoes which are for processing. For purposes of this suspension agreement, processing is defined to include preserving by any commercial process, such as canning, dehydrating, drying, or the addition of chemical substances, or converting the tomato product into juices, sauces, or purees. Fresh tomatoes that are imported for cutting up, not further processing (e.g., tomatoes used in the preparation of fresh salsa or salad bars), are covered by this suspension agreement.

Commercially grown tomatoes, both for the fresh market and for processing, are classified as *Lycopersicon esculentum*. Important commercial varieties of fresh tomatoes include common round, cherry, grape, plum, greenhouse, and pear tomatoes, all of which are covered by this Suspension Agreement.

Tomatoes imported from Mexico covered by this suspension agreement are classified under the following subheading of the Harmonized Tariff Schedules of the United States (HTSUS), according to the season of importation: 0702.00. Although the HTSUS numbers are provided for convenience and customs purposes, the written description of the scope of this investigation is dispositive.

Reporting of information.--If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

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 of your 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 (19CFR § 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.

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

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

Farming/ growing establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
¹ Additional discussion on establishments consolidated in this questionnaire: <hr/>			

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

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

Packing/repacking establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
¹ Additional discussion on establishments consolidated in this questionnaire: _____			

I-3. **Position regarding continuation of suspension agreement.**--Does your firm support or oppose continuation of the following suspension agreement currently in place for fresh tomatoes?

Country	Support	Oppose	Take no position
Mexico	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **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-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing fresh tomatoes into the United States or that are engaged in exporting fresh tomatoes to the United States?

No Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production (growing and/or packing) of fresh tomatoes?

No Yes--List the following information.

Firm name	Country	Affiliation

I-7. **Business plan.**--In Parts II and IV of this questionnaire we request a copy of your company's business plan. Does your company or any related firm have a business plan or any internal documents that describe, discuss, or analyze expected market conditions for fresh tomatoes?

No	Yes	If yes, please provide the requested documents. If you are not providing the requested documents, please explain why not.
<input type="checkbox"/>	<input type="checkbox"/>	

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Amelia Shister** (202-205-2047, amelia.shister@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. **Nature of tomato production.**—Please identify the nature of your firm’s tomato production per the definitions below.

“US Grower” – Firm involved only in the growing of fresh tomatoes in the United States.

“Integrated US Grower/Packer” – Firm involved in the growing of fresh tomatoes in the United States and in the packing of fresh tomatoes in the United States. Packing operations may include tomatoes grown by the firm and tomatoes purchased and/or imported from other operations.

“US Packer/Repacker” – Firm involved only in the packing of fresh tomatoes in the United States. Tomatoes may be purchased from domestic farmers and/or imported.

Select one		Please answer the relevant questions outlined below.
<input type="checkbox"/>	US Grower	Please complete questions II-3a – II-11c and II-20 – II-28. Do not complete questions specifically related only to packing operations.
<input type="checkbox"/>	Integrated US Grower/Packer	Please complete all questions in this section
<input type="checkbox"/>	US Packer/Repacker	Please complete questions II-3a – II-3b and II-12a – II-28. Do not complete questions specifically related only to growing operations.

II-3a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of fresh tomatoes since January 1, 2012.

<i>Check as many as appropriate.</i>		<i>If checked, please describe; leave blank if not applicable.</i>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or production curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Weather-related events	
<input type="checkbox"/>	Other (e.g., technology)	

II -3b **Anticipated changes in operations.**--Does your firm anticipate any changes in in the character of its operations or organization relating to the production (i.e., growing and/or packing) of fresh tomatoes in the future?

		If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue. Include in your response a specific projection of your firm's capacity to produce fresh tomatoes (in pounds) for 2018 and 2019.
No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	

II-4. **Total acreage.**--Please report your farm's average acreage of tomato plants as well as acreage used for other crops in each specified crop year.

Item	Land (in acres)		
	2015	2016	2017
Average acreage: Dedicated to fresh tomatoes			
Dedicated to out-of-scope tomatoes			
Other products ¹			
Fallow			
Total land	0	0	0

¹ Please list in order of importance these other crops: _____.

II-5. **Growth cycle.**--Describe your firm/farm crop cycle for tomatoes (e.g., what months are peak production months/what months are low production months) and efforts you have made (e.g., plant management techniques employed) to even out the growth cycle and any impact these efforts have had on your production numbers.

II-6a. **Total tomato harvest.**--Please report your farm's in-scope tomato harvest by growth technique and tomato variety in each specified calendar year.

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
	Quantity (pounds)				
Tomato harvest:					
Field tomatoes:¹					
Round					
Plum/Roma					
Cherry					
Grape					
Other ²					
Total for field	0	0	0	0	0
Greenhouse tomatoes:³					
Round					
Plum/Roma					
Cherry					
Grape					
Other ⁴					
Total for greenhouse	0	0	0	0	0
Total tomato harvest	0	0	0	0	0
¹ "Field" refers to open-air field growth tomatoes as well as adapted environment field tomatoes. ² Please list in order of importance the other field tomato varieties your firm harvests for sale: . ³ "Greenhouse" refers tomatoes grown in an enclosed greenhouse or controlled environment. ⁴ Please list in order of importance the other tomato varieties your firm harvests for sale: .					

II-6b. **Drought impact.**--Did drought conditions in and/or wild fires impact your farm's overall tomato harvest any time since January 1, 2012?

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

II-6c. **Storm impact.**--Did Hurricane Irma, Hurricane Matthew, and/or other large rain-related natural disasters impact your farm's overall tomato harvest any time since January 1, 2012?

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

II-6d. **Freeze impact.**--Did a freeze impact your farm's overall tomato harvest any time since January 1, 2012?

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

II-7. **Growing constraints.**--Please describe the constraint(s) that set the limit(s) on your growing/harvesting capabilities for fresh tomatoes.

II-8. **Product shifting.**--Does your farm grow/harvest other products on the same land used to grow fresh tomatoes?

- No Yes-- (i.e., have produced other products or are able to produce other products).
Please identify other actual or potential products: _____ .

II-9. **Product shifting factors.**--Please describe the factors that affect your farm's ability to shift growing/harvesting capacity between fresh tomatoes and other products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

II-10a. **Channels of distribution: Shipment from the growing location.**--Report your firm's U.S. shipments of bulk/pre-packaged fresh tomatoes by channel of distribution in the specified periods.

Quantity (in pounds) and value (in dollars)					
Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
Tomatoes grown (quantity) (A) ¹	0	0	0	0	0
U.S. shipments:					
Commercial shipments, bulk, pre-packaged:					
Quantity (B)					
Value (C)					
Shipped to own packing facility:					
Quantity (D)					
Shipped on consignment to a packer:					
Quantity (E)					
Export shipments, bulk, pre-packaged: ²					
Quantity (F)					
Value (G)					
¹ The total amount of tomatoes grown will populate here once reported in question II-6a. ² Identify your firm's principal export markets: _____.					

RECONCILIATION OF SHIPMENTS AND PRODUCTION.--Generally, the shipment data in a period (i.e., lines B, D, E, and F) should be equal to the amount of tomatoes grown in that period (i.e., line A). 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., spoilage, theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar years			January-September	
	2015	2016	2017	2017	2018
A – B – D – E – F = 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-10b. **Channels of distribution: Consignors' final sales.**--Report your firm's U.S. shipments of any fresh tomatoes that your firm had consigned to related or unrelated packers in bulk form for packing and then sold in final packaged form into the market (by your firm) by channel of distribution in the specified periods.

Quantity (in pounds)					
Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
Channels of distribution: U.S. shipments— to packers/repackers					
to distributors, brokers, handlers					
to supermarket and grocery chains					
to food service providers					
to other end users ¹					
¹ Describe: .					

II-11a. **Grower employment data.**--Report your firm's employment-related data related to the growing of fresh tomatoes 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.

Account for all field labor employed even if not directly employed by the farm, seasonal, or within family employment. When accounting for family employment, report what the estimated wages what have been paid for such within family labor.

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.

Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
Employment data:					
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>hours</i>)					
Wages paid to PRWs (<i>dollars</i>)					

Explanation of trends:

II-11b. **Family employment.**--Do your employment data include work performed by grower's own family?

No	Yes	If yes, Please explain how this is accounted for in the above employment data.
<input type="checkbox"/>	<input type="checkbox"/>	

II-11c. **Seasonal employment.**--Do your employment data include work performed by seasonal workers? If yes, please describe the seasonal nature of your farm's employment and how that has impacted the data reported in question II-11a.

No	Yes	If yes, Please explain how this is accounted for in the above employment data.
<input type="checkbox"/>	<input type="checkbox"/>	

Questions Specific to packing operations: II-12a-II-19 – if your firm only conducts growing of tomatoes, please skip these questions and leave them completely blank.

II-12a. **Packing using same machinery.**--Please report your firm’s packing of products made on the same equipment, machinery, or employees as used to pack fresh tomatoes, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

“Overall production capacity” or “capacity” – The level of packing 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).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-7 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

“Packing” –All packing in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Item	Quantity (in pounds)				
	Calendar years			January-September	
	2015	2016	2017	2017	2018
Overall packing capacity¹					
Packing of:					
Fresh tomatoes ²	0	0	0	0	0
Out-of-scope production of other products ³					
Total production using same machinery or workers	0	0	0	0	0

¹ Data reported for capacity (first line) should be greater than data reported for total production (last line).
² Data entered for production of fresh tomatoes will populate here once reported in question II-16a.
³ Please identify these products: _____.

II-12b. **Operating parameters.**--The production capacity reported in II-12a is based on the following operating parameters:

Hours per week	Weeks per year

II-12c. **Capacity calculation.**--Please describe the methodology used to calculate overall production capacity reported in II-12a, and explain any changes in reported capacity.

II-12d. **Packing constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's packing capacity.

II-13. **Product shifting.**--

(i) Is your firm able to switch production (capacity) between fresh tomatoes and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products:
<input type="checkbox"/>	<input type="checkbox"/>	

(ii) Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

II-14. **Packing only operations.**--Since January 1, 2015, has your firm purchased or received on consignment bulk fresh tomatoes covered by the suspension agreement (either domestic or imported) and packaged or repackaged those fresh tomatoes for retail or wholesale distribution (i.e., for sales that still match the definition of fresh tomatoes)? If your firm both grows and packages its own fresh tomatoes do not respond to this question.

No	Yes	If yes — Please describe the nature and extent of the following items in relation to your firm's packing only operations <u>in the United States</u> .	
<input type="checkbox"/>	<input type="checkbox"/>	Capital investments	
		Technical expertise	
		Value added	
		Employment	
		Quantity, type and source of parts	
		Costs and activities	

II-15. **Packing only operations' complexity and importance.**--On a scale of 1 to 5, please provide your firm's subjective opinion as to the complexity, intensity, and importance of packing/repacking activities. 1 being minimally complex, intense or important; 5 being extremely complex, intense, and important.

1: Minimally complex, intense, and important	2	3	4	5: Extremely complex, intense, and important
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please describe the reason for your rating.				

II-16a. **Packing, shipment, and inventory data.**--Report your firm's packing capacity, US and export shipments, and inventories related to the packing of fresh tomatoes in its U.S. establishment(s) during the specified periods.

"Average packing capacity" or "capacity" – The level of packing 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).

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

"U.S. commercial shipments" – Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report 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.

"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-16a. **Packing, shipment, and inventory data.--Continued**

Quantity (in pounds) and value (in dollars)					
Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
Average packing capacity¹ <i>(quantity) (A)</i>					
Beginning-of-period inventories <i>(quantity) (B)</i>					
Packing (quantity) Own production/crop (C)					
Purchased U.S.-grown tomatoes (D)					
Consigned U.S.-grown tomatoes (E)					
Purchased or imported tomatoes from Mexico (F)					
Purchased or imported tomatoes from all other sources (G)					
Total packaged	0	0	0	0	0
U.S. shipments:					
Commercial shipments: <i>Quantity (H)</i>					
<i>Value (I)</i>					
Shipments returned to/or sold by consignors:² <i>Quantity (J)</i>					
<i>Value (K)</i>					
Internal consumption:³ <i>Quantity (L)</i>					
<i>Value (M)</i>					
Transfers to related firms:³ <i>Quantity (N)</i>					
<i>Value (O)</i>					
Export shipments:⁴ <i>Quantity (P)</i>					
<i>Value (Q)</i>					
End-of-period inventories <i>(quantity) (R)</i>					

Table notes on next page.

II-16a. Packing, shipment, and inventory data.—Continued

¹ The production capacity reported is based on operating _____ hours per week, _____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary). _____.

² These tomatoes can be physically returned to the consignor or sold by the consignor to an end customer from your packing facility. Report the value at fair market value (and not just the processing fee received).

³ Internal consumption and transfers to related firms must be valued at fair market value. Does your firm use a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.): _____ (however, provide the data above at fair market value).

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

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.—Generally, the data reported for the end-of-period inventories (i.e., line R) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., lines C, D, E, F, and G), less total shipments (i.e., lines H, J, L, N, and P). 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.

Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
B + C + D + E + F + G – H – J – L – N – P – R = 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-16b. Historical U.S. shipment data. --Report the quantity and value of your firm's U.S. shipments (including commercial U.S. shipments, internal consumption, and transfers, but not including exports) of fresh tomatoes produced in your U.S. establishment(s) during the specified periods.

Quantity (in pounds) Value (in dollars)			
Item	2012	2013	2014
U.S. shipments			
<i>Quantity</i>			
<i>Value</i>			

II-16c. **U.S. shipments by tomato variety.**--Please report your firm's U.S. shipments (i.e. inclusive of U.S. commercial shipments, internal consumption, and transfers to related firms). of fresh tomatoes by tomato variety in 2017.

Item	Quantity (in pounds)	
	2017	
	Open field or adapted	Greenhouse or controlled environment
U.S. shipments:		
Round		
Roma (plum)		
Grape		
Other ¹		
Total (S)		

¹ Please list in order of importance the other tomato varieties your firm ships for sale: _____.

RECONCILIATION OF VARIETALS.--Please ensure that the quantities reported for tomato varieties (line S) in 2017 equal the quantity reported for U.S. shipments (i.e., lines H, J, L, and N) in 2017. 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	2017
S – H – J – L – N = zero ("0"), if not revise.	0

II-17. **Channels of distribution.**--Report your firm's U.S. shipments by channel of distribution.

Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
	Quantity (pounds)				
Channels of distribution:					
U.S. shipments— to packers/repackers (T)					
to distributors, brokers, handlers (U)					
to supermarket and grocery chains (V)					
to food service providers (W)					
to other end users ¹ (X)					

¹ Describe: .

***RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines T, U, and V) in each time period equal the quantity reported for U.S. shipments (i.e., line H, J, L, and N) 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 year			January-September	
	2015	2016	2017	2017	2018
T + U + V + W + X – H – J – L – N = zero ("0"), if not revise.	0	0	0	0	0

II-18. **Shipment parameters.**— Report the time your firm takes to pack the product and the average window of opportunity before spoilage:

Time taken to pack	Average window of opportunity

II-19a. **Packer employment data.**--Report your firm's employment-related data related to the packing of fresh tomatoes 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.

Item	Calendar year			January-September	
	2015	2016	2017	2017	2018
Employment data:					
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>hours</i>)					
Wages paid to PRWs (<i>dollars</i>)					

Explanation of trends:

II-19b. **Family employment.**--Do your employment data include work performed by grower's own family?

No	Yes	If yes, Please explain how this is accounted for in the above employment data.
<input type="checkbox"/>	<input type="checkbox"/>	

II-19c. **Seasonal employment.**--Do your employment data include work performed by seasonal workers? If yes, please describe the seasonal nature of your farm's employment and how that has impacted the data reported in question II-19a.

No	Yes	If yes, Please explain how this is accounted for in the above employment data.
<input type="checkbox"/>	<input type="checkbox"/>	

II-20. **Transfers to related firms.**--If your firm reported transfers to related firms in questions II-10 and II-16a, 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-21. **Purchases.**-- Has your firm purchased fresh tomatoes produced in the United States or in other countries since January 1, 2012? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire).

"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.

"Import" –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes-- Report such purchases in the table below and explain the reasons for your firms' purchases:
<input type="checkbox"/>	<input type="checkbox"/>	

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

Quantity (in pounds), Value (in dollars)					
Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
Purchases from U.S. importers¹ of fresh tomatoes from—					
Mexico					
<i>Quantity</i>					
<i>Value</i>					
All other sources					
<i>Quantity</i>					
<i>Value</i>					
Purchases from domestic producers²					
<i>Quantity</i>					
<i>Value</i>					
Purchases from other sources²					
<i>Quantity</i>					
<i>Value</i>					

¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: _____.

² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: _____.

II-22. Capital investments by level of production.--

- (i) **Growing investment costs.**--Please describe and quantify the amount of capital investment needed to grow fresh tomatoes.

Value (in \$1,000)	
Description	

- (ii) **Packing investment costs.**--Please describe and quantify the amount of capital investments needed to package/repackage fresh tomatoes.

Value (in \$1,000)	
Description	

II-23. Toll production.--Since January 1, 2012, has your firm been involved in a toll agreement regarding the production of fresh tomatoes?

“Toll agreement”--Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes-- Please describe the toll arrangement(s) and name the firm(s) involved.
<input type="checkbox"/>	<input type="checkbox"/>	

II-24. Foreign trade zones.--

- (a) **Firm's FTZ operations.**--Does your firm produce fresh tomatoes in and/or admit fresh tomatoes 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).
<input type="checkbox"/>	<input type="checkbox"/>	

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

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

II-25. **Direct imports.**--Since January 1, 2012, has your firm imported fresh tomatoes?

“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	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-26. **Effect of suspension agreement.**--Describe the significance of the existing suspension agreement of the antidumping duty order covering imports of fresh tomatoes from Mexico in terms of its effect on your firm's production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the suspension agreement.

II-27. **Likely impact of revocation.**--Would your firm anticipate any changes in in the character of its operations or organization, including its production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of fresh tomatoes in the future if the suspension agreement of the antidumping duty investigation on fresh tomatoes from Mexico were to be revoked?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue. Include in your response a specific projection of your firm's capacity to produce fresh tomatoes (in pounds) for 2018 and 2019.
<input type="checkbox"/>	<input type="checkbox"/>	

II-28. **Other explanations:**--If your firm would like to explain further a response to a question in Part II for which a narrative 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.--FINANCIAL INFORMATION

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

III-2. **Accounting system.**-- Briefly describe your firm's financial accounting system.

A.1. When does your firm's fiscal year end (month and day)? _____

2. If you have growing operations, does your firm's fiscal year match its crop year?
 Yes No -- If no, when does your farm's crop year end (month and day)? _____

3. If your firm's fiscal year changed during the data-collection period, explain below:

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include fresh tomatoes:

2. Does your firm prepare profit/loss statements for fresh tomatoes:
 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,
 Monthly, quarterly, semi-annually, annually

4. Accounting basis: GAAP, cash, tax, or other comprehensive basis of accounting (specify) _____

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

III-3. **Cost accounting system.**-- Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

--

III-5a. **Product listing. — (GROWING OPERATIONS)** Please list any other primary products (e.g., tomatoes primarily for processing and/or other agricultural products) grown on your farm and provide the share of net sales accounted for by each of these products in your most recent fiscal year.

Products	Share of sales
Fresh tomatoes	%
	%
	%
	%
	%

III-5b. **Product listing. — (PACKING OPERATIONS)** Please list the products your firm produces in the facilities in which it produces fresh tomatoes, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Fresh tomatoes	%
	%
	%
	%
	%

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of fresh tomatoes from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

Yes--Continue to question III-7a. No--Continue to question III-9a.

III-7a. **Inputs from related suppliers.**--Please identify the inputs used in the production of fresh tomatoes 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 fiscal year. For "Input valuation" please describe the basis, as recorded in the 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 recorded in the firm's accounting books and records		

III-7b. **Inputs from related suppliers at cost.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7a, were reported in III-9a (financial results on fresh tomatoes) in a manner consistent with the firm's accounting books and records.

Yes	No	If no--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a:
<input type="checkbox"/>	<input type="checkbox"/>	

III-8a. **Cooperative firms.**--Is your firm a cooperative?

Yes	No	If yes— In question III-9a and/or III-9c, below, <u>do not report payments to owners as a cost.</u> The P&L statement below should reflect profitability prior to distribution to members. Also, <u>report the cost of the tomato crop received from owners at fair market value.</u>
<input type="checkbox"/>	<input type="checkbox"/>	

III-8b. **Consignment operations.**— Does your firm sell any tomatoes on consignment?

Yes	No	If yes— In question III-9a and/or III-9c below: <u>Net sales values</u> of consigned tomatoes should be reported at the fair market value of the tomatoes sold. <u>Raw materials</u> of consigned tomatoes should be reported as the fair market value for the bulk tomatoes that were packed.
<input type="checkbox"/>	<input type="checkbox"/>	

III-9a. **Operations on fresh tomatoes by GROWING and INTEGRATED GROWING/PACKING OPERATIONS.**--Report the revenue and related cost information requested below on the fresh tomatoes grown by your firm's U.S. establishments or grown and packed by your firm's U.S. establishment(s).¹ Do not include sales or cost information for tomatoes your company purchased and packed. Any data related to packing-only operations should be included in question III-9c.

GROWING and INTEGRATED GROWING/PACKING OPERATIONS

Item	Quantity (in pounds) and value (in dollars)				
	Fiscal years ended--			January-September	
	2015	2016	2017	2017	2018
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³					
Raw materials					
Direct labor costs					
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					
Government programs income or (expense) ⁴					
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.S. operations.
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.
⁴ Examples of programs include: crop insurance proceeds, federal crop disaster payments, CCC loans forfeited, and agricultural program payments.

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

III-9b. **Components of total raw material costs for GROWING and INTEGRATED GROWING/PACKING OPERATIONS.**--Provide a breakout of the components of total raw material cost as reported in question III-9a.

GROWING and INTEGRATED GROWING/PACKING OPERATIONS

Item	Fiscal years ended--			January-September	
	2015	2016	2017	2017	2018
	<i>Value (in dollars)</i>				
Cost of fresh tomatoes grown by your firm:					
Cost of seeds					
Fertilizer					
Pesticides and herbicides					
All other growing costs					
Total raw materials costs for fresh tomatoes grown by your firm	0	0	0	0	0
Cost of packaging materials					
Other raw material costs					
Total raw material costs ¹	0	0	0	0	0

¹ Total raw material costs in this schedule should match the total raw material costs reported in table III-9a.

III-9c. **Operations on fresh tomatoes for PACKING/REPACKING OPERATIONS.--** Report the revenue and related cost information requested below on the U.S. packing operations for fresh tomatoes not grown by your firm.¹ Inputs purchased from related suppliers should be consistent with and based on information in the firm's accounting books and records.

PACKING/REPACKING ONLY OPERATIONS

Item	Quantity (in pounds) and value (in dollars)				
	Fiscal years ended--			January-September	
	2015	2016	2017	2017	2018
Net sales quantities:²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values:²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS):³					
Raw materials:					
Purchases of U.S.-grown tomatoes					
Consigned U.S.-grown tomatoes					
Purchased or imported tomatoes from Mexico					
Purchased or imported tomatoes from all other countries					
Cost of packaging					
Other raw material costs					
Total raw material costs	0	0	0	0	0
Direct labor costs					
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.S. manufacturing operations.

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.

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

III-9d. **Financial data reconciliation.**--The calculable line items from question III-9a or III-9c (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 No--If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.

Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negative--instances 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-10a. **Nonrecurring items (charges and gains) included in the subject product financial results for Growers and Integrated Growers/Packers.**--For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

GROWERS and INTEGRATED GROWERS/PACKERS

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
	Value (<i>in dollars</i>)				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

Nonrecurring item: In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

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

PACKING/REPACKING ONLY OPERATIONS

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
	Value (<i>in dollars</i>)				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

Nonrecurring item: In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9c where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in questions III-10a or III-10b 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-10a and III-10b identify where these items are reported in questions III-9a and III-9c, respectively.

III-12a. **Asset values for GROWERS and INTEGRATED GROWERS/PACKERS.**— Report the historical value of the company's fixed assets for growing operations and packing operations associated with the production, warehousing, and sale of fresh tomatoes. Provide the total accumulated appreciation for all fixed assets (i.e., growing and packing operations). The firm's total net fixed assets will populate automatically. Lastly, provide the firms' non-fixed assets (e.g., current assets, non-tangible assets, etc.) associated with the production, warehousing, and sale of fresh tomatoes. If your firm does not maintain some or all of the specific asset information necessary to calculate the information requested in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's three most recently completed fiscal years.

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

GROWERS and INTEGRATED GROWERS/PACKERS

Item	Value (in dollars)		
	Fiscal years ended--		
	2015	2016	2017
Fixed Assets (historical value):			
Growing assets ¹			
Packing assets ¹			
Total, fixed assets (historical value)	0	0	0
Accumulated depreciation ²			
Total net fixed assets (book value) ³	0	0	0
Non-fixed assets ⁴			
Total assets (net)	0	0	0

¹ Indicate the average age of the fixed growing assets: _____ and the fixed packing assets: _____.

² Include all impairments and write-offs.

³ Describe the composition of the fixed asset pool and the reason for any noticeable changes over the period.

⁴ If applicable, report non-fixed assets net of any accumulated depreciation, amortizations, and/or impairments; and describe the major classes (by dollar value) of non-fixed assets reported above. _____

III-12b. **Asset values for PACKING/REPACKING-ONLY firms.**--Report the historical value of the company's fixed assets for packing operations associated with the production, warehousing, and sale of fresh tomatoes and the accumulated appreciation for the fixed assets. The firm's total net fixed assets will populate automatically. Lastly, provide the firms' non-fixed assets (e.g., current assets, non-tangible assets, etc.) associated with the production, warehousing, and sale of fresh tomatoes. If your firm does not maintain some or all of the specific asset information necessary to calculate the information requested 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-9c. Provide data as of the end of your firm's three most recently completed fiscal years.

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

PACKING/REPACKING-ONLY firms

Item	Value (in dollars)		
	Fiscal years ended--		
	2015	2016	2017
Fixed Assets (historical value) ¹			
Accumulated depreciation ²			
Net fixed assets (book value) ³	0	0	0
Non-fixed assets ⁴			
Total assets (net)	0	0	0
¹ Indicate the average age of these fixed assets. _____. ² Include all impairments and write-offs. ³ Describe the composition of the fixed asset pool and the reason for any noticeable changes over the period. ⁴ If applicable, report non-fixed assets net of any accumulated depreciation, amortizations, and/or impairments; and describe the major classes (by dollar value) of non-fixed assets reported above. _____			

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for fresh tomatoes. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in dollars)					
Item	Fiscal years ended--			January-September	
	2015	2016	2017	2017	2018
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-14. **Data consistency and reconciliation.**--Please indicate whether your firm's financial data for questions III-9a, 12, and 13 are based on a calendar year or your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year
<input type="checkbox"/>	<input type="checkbox"/>	

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-6 (including export shipments) as long as they are reported on the same calendar year basis.

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**-- Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported for total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. 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.*

Reconciliation	Full year data			Partial year periods	
	2015	2016	2017	2017	2018
Quantity: Trade data from question II-6 (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-6 (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-6?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative 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 IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from James Horne (202-205-2722, James.Horne@usitc.gov).

IV-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 IV.

Name	
Title	
Email	
Telephone	

IV-2. This question requests monthly quantity and value data for your firm's commercial shipments to unrelated U.S. customers of the following products produced by your firm.

Product 1. -- Open field or adapted environment Roma (plum) tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes

Product 2. -- Greenhouse Roma (plum) tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes

Product 3. -- Open field adapted round tomatoes, packed in 15-pound boxes, 85 percent or better US#1

Product 4. -- Greenhouse-grown round tomatoes, packed in 15-pound boxes, 85 percent or better US#1

Product 5. -- Open field or adapted environment grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better US#1

Product 6. -- Greenhouse-grown grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better US#1

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).

(a) During January 2015 -September 2018, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

IV-2d. **Share of subject and nonsubject foreign tomatoes.**--Report below the share of price data reported above in question IV-2c of foreign grown tomatoes by source.

Origin of tomatoes	Product 1	Product 2	Product 3	Product 4	Product 5	Product 6
Mexico						
Other countries ¹						
Total (each column should sum to 100.0%)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
¹ List countries						

IV-2e. **Price data checklist.**--Please check that the pricing data in question IV-2(b) has been correctly reported.

Is the price and quantity data reported above:	v if Yes
In actual dollars?	<input type="checkbox"/>
In actual 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 question II-4 in each year?	<input type="checkbox"/>

IV-2f. **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.

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of fresh tomatoes (*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"/>	

IV-4. **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"/>	

IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic fresh tomatoes usually quoted (*check one*)?

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

IV-6. **Bundling sales.**--Does your firm bundle sales of fresh tomatoes with other products?

No	Yes	Estimate share of your fresh tomatoes in 2017 that were sold in a bundle	If yes, describe other products that are typically in bundled sales
<input type="checkbox"/>	<input type="checkbox"/>		

IV-7. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced fresh tomatoes in 2017 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	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 2017 sales	%	%	%	%	0.0 %

IV-8. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced fresh tomatoes (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:

IV-9. **Lead times.**--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 fresh tomatoes?

Lead time (days)	Explanation

IV-10. **Shipping information.**--

- (a) What is the approximate percentage of the cost of U.S.-produced fresh tomatoes that is accounted for by U.S. inland transportation costs? _____ %
- (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 fresh tomatoes that are delivered the following distances from your firm's production facility.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 500 miles	%
501 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-11. **Geographical shipments.**-- In which U.S. geographic market area(s) has your firm sold its U.S.-produced fresh tomatoes since January 1, 2012 (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.	<input type="checkbox"/>

IV-12. **Substitutes.**--

(a) Have there been any changes in the number or types of products that can be substituted for fresh tomatoes since January 1, 2012? Do you anticipate any future changes?

Changes in substitutes	No	Yes	Explain
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Can tomatoes grown for processing be substituted for other fresh market tomatoes?

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

IV-13. **Availability of supply.**--Has the availability of fresh tomatoes in the U.S. market changed since January 1, 2012? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
Changes since January 1, 2012:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Mexico	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Mexico	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Demand trends.**-- Indicate how demand within the United States and outside of the United States (if known) for fresh tomatoes has changed since January 1, 2012, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Demand since January 1, 2012					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated future demand					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-15. **Product changes.**--Have there been any significant changes in the varieties, breeds, or marketing of fresh tomatoes since January 1, 2012? Do you anticipate any future changes?

Changes in product range, product mix, or marketing	No	Yes	Explain
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

IV-16. **Conditions of competition.**--

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

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question IV-17.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Seasonality	
<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 fresh tomatoes since January 1, 2012?

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

IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply fresh tomatoes since January 1, 2012 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

IV-18. **Raw materials.**--Indicate how the costs of growing fresh tomatoes have changed since January 1, 2012, and how you expect they will change in the future.

Raw materials prices	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 fresh tomatoes.
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-19. **Price comparisons.**--Please compare market prices of fresh tomatoes in U.S. and non-U.S. markets, if known. Provide specific information as to time periods and regions for any price comparisons.

--

IV-20. **Seasonal characteristics.**--Are there seasonal differences (such as availability, flavor, price, quality, ripeness, etc.) between fresh tomatoes from the U.S. and Mexico?

No	Yes	If yes, please explain the seasonal differences between fresh tomatoes from the U.S. and Mexico and report the months when these differences occur.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-21. **GMO raw materials.**--Has the increased prevalence and concertation of GMO raw material suppliers impacted the market or your firm's operations since January 1, 2012?

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

IV-22. **GMO vs non-GMO tomato variety.**— Has there been an increase in customer awareness of GMO vs non-GMO varieties and/or any shift in customer preference relating to GMO vs non-GMO products since January 1, 2012?

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

IV-23. **Market studies.**--Please provide as a separate attachment to this request any studies, surveys, etc. that you are aware of that quantify and/or otherwise discuss fresh tomatoes supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including Mexico, and (3) the world as a whole. Of particular interest is such data from 2012 to the present and forecasts for the future.

IV-24. **Export constraints.**--Describe how easily your firm can shift its sales of fresh tomatoes between the U.S. market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting fresh tomatoes between the U.S. and alternative country markets within a 12-month period.

IV-25. **Barriers to trade.**--Are your firm's exports of fresh tomatoes subject to any tariff or non-tariff barriers to trade in other countries?

No	Yes	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2012, or that are expected to occur in the future.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-26. **Interchangeability**--Is fresh tomatoes 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	Mexico	Other countries
United States		
Mexico		
For any country-pair producing fresh tomatoes 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:		

IV-27. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between fresh tomatoes 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	Mexico	Other countries
United States		
Mexico	X	
<p>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 purchases of Fresh Tomatoes, identify the country-pair and report the advantages or disadvantages imparted by such factors:</p>		

IV-28. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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/fresh_tomatoes_mexico/fourth_review_full.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:** FRESH

- **E-mail.**—E-mail the MS Word questionnaire to Amelia.Shister@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.

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.