U.S. PRODUCERS' QUESTIONNAIRE

POLYETHYLENE TEREPHTHALATE (PET) SHEET

This questionnaire must be received by the Commission by <u>July 23, 2019</u>

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping duty investigations concerning polyethylene terephthalate (PET) sheet from Korea, Mexico, and Oman (Inv. Nos. 731-TA-1455-1457 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____

Address		
City	State	Zip Code
Website		
Has your fir	m produced PET sheet (as defined on next page) at a	nny time since January 1, 2016?
☐ 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	ne entire questionnaire to the Commission)
	estionnaire via the U.S. International Trade Cor ink: https://dropbox.usitc.gov/oinv/ . (PIN: PET	
	CERTIFICATION	
knowledge and belief means of this certific information provided the Commission on the	and understand that the information submitted is ation I also grant consent for the Commission, on this questionnaire and throughout this proceedic same or similar merchandise.	estionnaire is complete and correct to the best of my subject to audit and verification by the Commission. By and its employees and contract personnel, to use the ing in any other import-injury proceedings conducted by
proceeding or other p personnel (a) for deve reviews, and evaluati Appendix 3; or (ii) by U	roceedings may be disclosed to and used: (i) by the eloping or maintaining the records of this or a relations relating to the programs, personnel, and o	se to this request for information and throughout this the Commission, its employees and Offices, and contract ated proceeding, or (b) in internal investigations, audits, perations of the Commission including under 5 U.S.C. I, solely for cybersecurity purposes. I understand that all
 Name of Authorized O	fficial Title of Authorized Official	Date
 Signature	Phone	Email address

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to petitions filed on July 9, 2019, by Advanced Extrusion, Inc., Rogers, Minnesota; Ex-Tech Plastics, Inc., Richmond, Illinois; and Multi-Plastics Extrusions, Inc., Hazleton, Pennsylvania. 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 dumping. Questionnaires and other information pertinent to this proceeding are available at

https://www.usitc.gov/investigations/701731/2019/polyethylene_terephthalate_pet_sheet_korea_mex_ico/preliminary.htm.

<u>PET sheet</u> covered by these investigations is raw, pretreated, or primed polyethylene terephthalate sheet, whether extruded or coextruded, in thicknesses of equal to or greater than 7 mil (0.007 inches or 177.8 μ m) and not exceeding 45 mil (0.045 inches or 1143 μ m) ("PET sheet"). The scope includes all PET sheet whether made from prime (virgin) inputs or recycled inputs, as well as any blends thereof. The scope includes all PET sheet meeting the above specifications regardless of color, surface treatment, coating, lamination, or other surface finish.

PET sheet is currently imported under statistical reporting number 3920.62.0090 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

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

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

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

provide on your production and imports of PET sheet and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

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

Hours	Dollars

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

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

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

Yes	No
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I-2. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. Firms operating more than one establishment should combine the data for all establishments into a single report.

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

Establishments covered ¹	City, State	Zip (5 digit)	Description	
1				
2				
3				
4				
5				
6				
¹ Additional discussion on establishments consolidated in this questionnaire:				

I-3.	Petitioner statusIs your firm a petitioner in this proceeding or a member firm of the
	petitioning entity?

No	Yes

I-4. **Petition support**.--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
Korea			
Mexico			
Oman			

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OwnershipIs you	<u>Ownership</u> Is your firm owned, in whole or in part, by any other firm?					
□ No □	☐ No ☐ YesList the following information, relating to the ultimate parent/owner.					
Firm name	Country	Extent of ownership (percent)				
-	gaged in importing PET sheet from Ko at are engaged in exporting PET sheet YesList the following information.	from Korea, Mexico, and/or Oman to				
Firm name	Country	Affiliation				
	Does your firm have any related firn duction of PET sheet? YesList the following information.	ns, either domestic or foreign, that are				
Firm name	Country	Affiliation				

PART II.--TRADE AND RELATED INFORMATION

Telephone

Further information on this part of the questionnaire can be obtained from Kristina Lara (202-205-3386, Kristina.Lara@usitc.gov). Supply all data requested on a calendar-year basis.

II-1.		ationPlease identify the responsible aff may contact that individual regardin	individual and the manner by which ng the confidential information submitted
	Name		
	Title		
	Email		

II-2. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of PET sheet since January 1, 2016.

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

II-3a. <u>Production using same machinery.</u>--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce PET sheet, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

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

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.

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

Quantity (in pounds)						
		Calendar years		January-March		
ltem	2016	2017	2018	2018	2019	
Overall production capacity ¹						
Production of: PET sheet ²	0	0	0	0	0	
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).

II-3b. Operating parameters.--The production capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

² Data entered for production of PET sheet will populate here once reported in question II-7.

³ Please identify these products: _____.

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II-3c.			aPlease describe the methodology used to calculate overall production II-3a, and explain any changes in reported capacity.					
II-3d.		on constrai on capacity	intsPlease describe the constraint(s) that set the limit(s) on your firm's .					
II-4.	Product s	shifting.—						
		(a) Is your firm able to switch production (capacity) between PET sheet 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.					
	b	etween pr	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which es enhance or constrain such shifts.					
II-5.		Tolling Since January 1, 2016, has your firm been involved in a toll agreement regarding the production of PET sheet?						
	materials	and the se	Agreement between two firms whereby the first firm furnishes the raw econd firm uses the raw materials to produce a product that it then returns a charge for processing costs, overhead, etc.					
	No	Yes	If yesPlease describe the toll arrangement(s) and name the firm(s) involved.					

II-6.	Foreign	trade	zones

(a) <u>Firm's FTZ operations</u>.--Does your firm produce PET sheet in and/or admit PET sheet 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 designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

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

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

No	Yes	If yesIdentify the firms and the FTZs.

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

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

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

Quantity (<i>in pounds</i>) and	value (in actual	dollars)		
	Calendar years			January	y-March
Item	2016	2017	2018	2018	2019
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption: ² Quantity (F)					
Value ² (G)					
Transfers to related firms: ² Quantity (H)					
Value² (I)					
Export shipments: ³ Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					
¹ The production capacity reported is based methodology used to calculate production cap ² Internal consumption and transfers to relatibasis for valuing these transactions in your receive data provided above in this table should be ³ Identify your firm's principal export market	acity, and explated firms must ords, please speed based on fair i	in any changes ir be valued at fair l ecify that basis (e	n reported capa market value. I	city f your firm use	s a different

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

		Calendar years		January-March	
Reconciliation	2016	2017	2018	2018	2019
B + C - D - F - H - J - L = should equal					
zero ("0") or provide an explanation.1	0	0	0	0	0

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

II-8. <u>Channels of distribution</u>.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in pounds)							
		Calendar years	January-March				
Item	2016	2017	2018	2018	2019		
Channels of distribution: U.S. shipments: To distributors (M)							
To end users (N)							

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, 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.

		Calendar years			January-March	
Reconciliation	2016	2017	2018	2018	2019	
M + N – D - F- H = zero ("0"), if not						
revise.	0	0	0	0	0	

Explanation of trends:

II-9. <u>Employment data</u>.--Report your firm's employment-related data related to the production of PET sheet 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 March periods, calculate similarly and divide by 3.

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

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

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

	Calendar years		January-March		
Item	2016	2017	2018	2018	2019
Average number of PRWs (number)					
Hours worked by PRWs (actual hours)					
Wages paid to PRWs (actual dollars)					

0.	Related firmsIf your firm reported transfers to related firms in question II-7, please identify the firm(s) and 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.
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II-11.	PurchasesHas your firm purchased PET sheet produced in the United States or in other countries since January 1, 2016? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire).									
						orporate entity ly imported th	y such as anot ne product.	her U.S.		
	"Import" - record.	–A transac	ction to buy	from a foreig	gn supplier w	here your firr	n is the impor	ter of		
	No	Yes	-	f yesReport such purchases in the table below and explain the reasons or your firms' purchases.						
	<i>Note</i> : 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)					
				(Calendar yea	rs	January	_/ -March		
	li	tem		2016	2017	2018	2018	2019		
	ises from U eet from— a	•	ters ¹ of							
Mex	ico									
Oma	ın									
All o	ther source	es								
Purcha	ses from d	lomestic p	oroducers ²							
Purcha	ses from o	ther sour	ces ²							
supplie	rs differ by s	source, plea	ase identify tl	he source for	each listed sup	oplier:	luct. If your firm			

II-12. <u>Imports.</u>--Since January 1, 2016, has your firm imported PET sheet?

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

II-13.	Other explanationsIf your firm would like to further explain 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

Addre	ss questions on t	this part of the questionnaire to Emily Kim (202-205-1800, emily.kim@usitc.gov).
III-1.		nationPlease identify the responsible individual and the manner by which aff may contact that individual regarding the confidential information submitted
	Name	
	Title	
	Email	
	Telephone	
III-2.	Accounting sy	stemBriefly describe your firm's financial accounting system.
	Α.	When does your firm's fiscal year end (month and day)? If your firm's fiscal year changed during the data-collection period, explain below:
	B.1.	Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include PET sheet:
	2.	Does your firm prepare profit/loss statements for PET sheet? Yes No
	3.4.	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, 10Qs, Monthly, quarterly, semi-annually, annually Accounting basis: GAAP, cash, tax, or other comprehensive
	Note: / used in regard submit	As requested in Part I of this questionnaire, please keep all supporting documents/records the preparation of the financial data, as Commission staff may contact your firm ing questions on the financial data. The Commission may also request that your company copies of the supporting documents/records (financial statements, including internal and-loss statements for the division or product group that includes PET sheet, as well as

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

specific statements and worksheets) used to compile these data.

Allocation basis Briefly describe your firm's allocation basis, interest expense and other income and expenses.	
	f any, for COGS, SG&A, and
Product listingPlease list the products your firm produced in produced PET sheet, and provide the share of net sales account firm's most recent fiscal year.	-
Products	Share of sales
PET sheet	%
	%
	%
	%
	%
any services) used in the production of PET sheet from any rela transactions between related firms, divisions and/or other com company)?	ponents within the same
YesContinue to question III-7 NoContinue t	o question III-9a.
Inputs from related suppliers detailedPlease identify the inp sheet that your firm purchases from related suppliers and that For "Share of total COGS" please report this information by rele	are reflected in question III-9a. evant input on the basis of your use describe the basis, as echase cost from the related
most recently completed fiscal year. For "Input valuation" plea recorded in your company's own accounting system, of the pur supplier; e.g., the related supplier's actual cost, cost plus, nego approximate fair market value.	tiated transfer price to
recorded in your company's own accounting system, of the pur supplier; e.g., the related supplier's actual cost, cost plus, nego	tiated transfer price to Share of total COGS
recorded in your company's own accounting system, of the pur supplier; e.g., the related supplier's actual cost, cost plus, nego approximate fair market value.	
recorded in your company's own accounting system, of the pur supplier; e.g., the related supplier's actual cost, cost plus, nego approximate fair market value.	

III-8. <u>Inputs purchased from related suppliers.</u>--Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on PET sheet) in a manner consistent with your firm's accounting books and records.

Yes	If noIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.

III-9a. Operations on PET sheet.--Report the revenue and related cost information requested below on the PET sheet operations of your firm's U.S. establishment(s). Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Quantity	(in pounds) and va	-	iiars)		
	Fiscal years ended			January-March	
Item	2016	2017	2018	2018	2019
Net sales quantities: ² Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	(
Net sales values: ² Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	(
Cost of goods sold (COGS): ³ Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	(
Gross profit or (loss)	0	0	0	0	(
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	(
Depreciation/amortization included above					

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

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

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

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

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III-9b.	Financial data reconciliation The calculable line items from question III-9a (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 noIf the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise. Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negativeinstances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive, expenses or reversals are negative). If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-9c. Raw materials.--Please report the share of total raw material costs in 2018 (reported in III-9a) for the following raw material inputs:

Input		Share of total raw material costs (percent)
Virgin (prime) DET chine/pollets	Purchased domestically	
Virgin (prime) PET chips/pellets	Imported	
Denvelod DET chins /flakes	Purchased domestically	
Recycled PET chips/flakes	Imported	
Additives/coatings used in extrusio		
Other material inputs ¹		
Total (should sum to 100 percen	0.0	

¹ Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs that they account for:

III-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-9a, 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 actual dollars*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

		Fiscal years ended			January-March	
Item	2016	2017	2018	2018	2019	
	Value (actual dollars)					
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-11.	Classification of identified nonrecurring items (charges and gains) in the accounting books and
	<u>records of the company</u> If non-recurring items were reported in question III-10 above, please
	identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9a.

III-12. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of PET sheet. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for PET sheet in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's three most recently completed fiscal years.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted.

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

Value (in actual dollars)					
		Fiscal years ended			
Item	2016 2017 2018				
Total assets (net) 1					
¹ Describe	¹ Describe				

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

Value (in actual dollars)						
Fiscal years ended January-March					-March	
ltem	2016	2017	2018	2018	2019	
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.

 $^{^{\}rm 2}$ Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.

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U.S.	Producers	Questionna	ire — PE I	sneet	ıPreliminarv

III-14.	Data consistency and reconciliationPlease indicate whether your firm's financial data for
	questions III-9a, 12, and 13 are based on a calendar year or on your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported 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.

	Fi	scal years ended	January-March		
Reconciliation	2016	2017	2018	2018	2019
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

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

Yes	No	If no, please explain.

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. <u>Effects of imports on investment</u>.--Since January 1, 2016, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of PET sheet from Korea, Mexico, and/or Oman?

No	Yes					
		If yes, my firm has experie	yes, my firm has experienced actual negative effects as follows.			
	(checi	k as many as appropriate)	(please describe)			
		Cancellation, postponement, or rejection of expansion projects				
		Denial or rejection of investment proposal				
		Reduction in the size of capital investments				
		Return on specific investments negatively impacted				
		Other				

III-16.	Effects of imports on growth and developmentSince January 1, 2016, has your firm
	experienced any actual negative effects on its growth, ability to raise capital, or existing
	development and production efforts (including efforts to develop a derivative or more advanced
	version of the product) as a result of imports of PET sheet from Korea, Mexico, and/or Oman?

No	Yes				
		If yes, my firm has experienced actual negative effects as follows.			
	(chec	ck as many as appropriate)	(please describe)		
		Rejection of bank loans			
		Lowering of credit rating			
		Problem related to the issue of stocks or bonds			
		Ability to service debt			
		Other			

U.S. Producers' Questionnaire – PET sheet (Prelimin	nary)
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III-17.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports of
	PET sheet from Korea, Mexico, and/or Oman?

No	Yes	If yes, my firm anticipates negative effects as follows.

III-18.	Other explanationsIf 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 Amelia Preece (202-201-3250, amelia.preece@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

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

All products exclude (1) PET sheet produced from PET-G inputs, which is defined as PET produced by replacing a portion of the raw material input monoethylene glycol (MEG) with one of five glycol modifiers: cyclohexanedimethanol (CHDM), diethylene glycol (DEG), neopentyl glycol (NPG), isosorbide, or spiro glycol; and (2) crystalline PET sheet.

- **Product 1.**—PET sheet, single layer, thickness of 0.012"-0.030", clear/transparent, 20-53" roll width, standard roll diameter, with silicon coating, without anti-static or anti-fog coating.
- **Product 2.-**-PET sheet, single layer, thickness of 0.031"-0.045", clear/transparent, 20-53" roll width, standard roll diameter, with silicon coating, without anti-static or anti-fog coating.
- **Product 3.--**PET sheet, single layer, thickness of 0.012"-0.030", black, 20-53" roll width, standard roll diameter, with silicon coating, without anti-static or anti-fog coating.
- **Product 4.--**PET sheet, three-layer coextruded, thickness of 0.012"-0.030", clear/transparent, 20-53" roll width, standard roll diameter, with silicon coating, without anti-static or anti-fog coating.

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

IV-2a. During January 2016-March 2019, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

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

Report data in *pounds* and *actual dollars*.

(Quantity <i>in pounds,</i> value <i>in dollars</i>)								
Product 1		Product 2		Product 3		Product 4		
Period of shipment	Quantity	Value	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:			1					
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.

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

Product 1:

Product 2:

Product 3:

Product 4:

Note.—All products exclude (1) PET sheet produced from PET-G inputs, which is defined as PET produced by replacing a portion of the raw material input monoethylene glycol (MEG) with one of five glycol modifiers: cyclohexanedimethanol (CHDM), diethylene glycol (DEG), neopentyl glycol (NPG), isosorbide, or spiro glycol; and (2) crystalline PET sheet.

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

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

√ if Yes

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

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

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IV-3. <u>Price setting.</u>—How does your firm determine the prices that it charges for sales of PET sheet (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

IV-5. <u>Pricing terms.--</u>On what basis are your firm's prices of domestic PET sheet usually quoted *(check one)*?

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

IV-6. <u>Contract versus spot.</u>--Approximately what share of your firm's sales of its U.S.-produced PET sheet in 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

		Туре о	f sale			
ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	Total (should sum to 100.0%)
Share of 2018 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced PET sheet (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	ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
3.1.5/ 5.1 p.1.55	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicable				
¹ Please identify the indexes used:				

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

Source	Share of 2018 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

Your firm Purchaser (check one)

IV-9.	Shipp	oing information
	(a)	What is the approximate percentage of the cost of U.Sproduced PET sheet that is accounted for by U.S. inland transportation costs? percent
	(b)	Who generally arranges the transportation to your firm's customers' locations?

(c) Indicate the approximate percentage of your firm's sales of PET sheet that are delivered the following distances from its production facility.

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

IV-10. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold its U.S.-produced PET sheet since January 1, 2016 (check all that apply)?

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

IV-11. <u>End uses.</u>--List the end uses of the PET sheet that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by PET sheet and other inputs?

		t of end use product ted for by	Total	
End use product	PET sheet	Other innuts	(should sum to 100.0% across)	
End-use product	PET SHEEL	Other inputs	100.0% across)	
	%	%	0.0 %	
	%	%	0.0 %	
	%	%	0.0 %	

			End use in v	which this	На		anges in the price fected the price f	e of this substitute or PET sheet?
	Substitute		substitute		No	Yes	Expl	lanation
1.								
2.								
3.	States (if kr	nown) for P	ET sheet has	s changed si	ince Jan	uary 1	States and outside 1, 2016. Explain an ages in demand.	
3.	States (if kr	nown) for P	ET sheet has	s changed si	ince Jan ed these	uary 1 e char		
3. IV-13.	States (if ki describe th	nown) for P e principal Overall	ET sheet has factors that	s changed si have affect Overall	ince Jan ed these Fluctu with	uary 1 e char uate no	1, 2016. Explain annges in demand.	ny trends and
3. IV-13.	States (if ki describe th	nown) for P	ET sheet has factors that	s changed si have affect	ince Jan ed these Fluctu	uary 1 e char uate no	1, 2016. Explain annges in demand.	
3. IV-13. Mark	States (if ki describe th	Overall increase	ET sheet has factors that	s changed si have affect Overall	ince Jan ed these Fluctu with	uary 1 e char uate no	1, 2016. Explain annges in demand.	ny trends and

IV-15. Conditions of competition

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

Check all that apply.			Please describe.		
	No		Skip to question IV-16.		
		ness cycles (e.g. business)			
		r distinctive is of competition			
	the closu	i's bankruptcy and re of the Apple Γ resin facility in			
(b) If yes, have there been any changes in the business cycles or conditions of competition for PET sheet since January 1, 2016?					
No	Yes	If yes, describe.			
		•	d, declined, or been unable to supply PET sheet since customers on allocation or "controlled order entry,"		

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

No	Yes	If yes, please describe.

ı	I\/_17	Raw	materials.—
ı	IV-1/.	Kaw	materials.—

a) How have PET sheet 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 have affected your firm's selling prices for PET sheet.

b) Have the recent orders on PET resin had an impact on the raw material costs of pet resin?

No	Yes	If yes, please describe.

c) Have the recent orders on PET resin had an impact on the raw material prices of pet sheet?

No	Yes	If yes, please describe.

IV-18. <u>Interchangeability.--</u>Is PET sheet produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

Country-pair	Korea	Mexico	Oman	Other countries
United States				
Korea				
Mexico				
Oman				

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

IV-19. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between PET sheet produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	Korea	Mexico	Oman	Other countries
United States				
Korea				
Mexico				
Oman				

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

IV-20. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for PET sheet since January 1, 2016. Indicate the share of the quantity of your firm's total shipments of PET sheet that each of these customers accounted for in 2018.

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

1V-Z1. Competition nominiports.	IV-21.	Competition	from	imports.
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(a)	Lost revenue Since January 1, 2016: To avoid losing sales to competitors selling PET
	sheet from Korea, Mexico, and/or Oman, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>--Since January 1, 2016: Did your firm lose sales of PET sheet to imports of this product from Korea, Mexico, and/or Oman?

No	Yes		

(c) The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.

If your firm indicated "yes" to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at http://usitc.gov/trade_remedy/question.htm. Note that the Commission may contact the firms named to verify the allegations reported.

Is your firm submitting the lost sales/lost revenues worksheet?

No—Please explain.
Yes—Please complete the worksheet and submit via the Commission dropbox. https://dropbox.usitc.gov/oinv/ . (PIN: PETS)

IV-22. Other explanations.--If your firm would like to further explain a response to a question in Part IV 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.

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/701731/2019/polyethylene_terephthalate_pet_s heet_korea_mexico/preliminary.htm.

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

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

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

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

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

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