Next Page

OMB Control Number: 0694-0120

Expiration Date: September 30, 2020

Section 232 Investigation into Imports of Electrical Steel and Transformer-Related Products



SCOPE OF ASSESSMENT

The U.S. Department of Commerce, Bureau of Industry and Security (BIS), Office of Technology Evaluation (OTE), is conducting a survey of the U.S. grain-oriented electrical steel (GOES) industry and related transformer parts sector. Specifically, this survey is intended for companies that import, distribute, or produce laminations for stacked cores for incorporation into transformers, stacked and wound cores for incorporation into transformers, electrical transformers, and transformer regulators markets. The survey results will be used to support an ongoing investigation on the effect of imports of GOES and select downstream GOES products on the U.S. national security initiated under Section 232 of the Trade Expansion Act of 1962, as amended.

The principal goal of this survey is to assist the U.S. Department of Commerce in determining whether electrical steel and transformer-related products are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. Information collected will include facilities and production data, capacity utilization, mergers and acquisitions, joint ventures, customers, sales and demand data, employment information, conditions of domestic and global competition, research and development, and other factors. The resulting data will provide the U.S. Department of Commerce detailed steel industry information that is otherwise not publicly available and needed to effectively conduct this Section 232 investigation.

RESPONSE TO THIS SURVEY IS REQUIRED BY LAW

A response to this survey is required by law (50 U.S.C. Sec. 4555). Failure to respond can result in a maximum fine of \$10,000, imprisonment of up to one year, or both. Information furnished herewith is deemed confidential and will not be published or disclosed except in accordance with Section 705 of the Defense Production Act of 1950, as amended (50 U.S.C. Sec. 4555). Section 705 prohibits the publication or disclosure of this information unless the President determines that its withholding is contrary to the national defense. Information will not be shared with any non-government entity, other than in aggregate form. The information will be protected pursuant to the appropriate exemptions from disclosure under the Freedom of Information Act (FOIA), should it be the subject of a FOIA request.

Notwithstanding any other provision of law, no person is required to respond to nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB Control Number.

BURDEN ESTIMATE AND REQUEST FOR COMMENT

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information to BIS Information Collection Officer, Room 6883, Bureau of Industry and Security, U.S. Department of Commerce, Washington, D.C. 20230, and to the Office of Management and Budget, Paperwork Reduction Project (OMB Control No. 0694-0120), Washington, D.C. 20503.

BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act

Previo	us Page Next Page
	Table of Contents
1	<u>Cover Page</u>
Ш	<u>Table of Contents</u>
III	General Instructions
IV	<u>Definitions</u>
1	Organization Information
2	Facility Information
3	U.S. Production, Inputs, and Costs
4	<u>Suppliers/Imports</u>
5	<u>Customers/Exports</u>
6	<u>Financials</u>
7	<u>Employment</u>
8	National Defense Support
9	<u>Critical Infrastructure Support</u>
10	<u>Competition and Trade</u>
11	COVID-19 Impacts
12	<u>Certification</u>
	BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act

Previous Page **Next Page General Instructions** Your organization is required to complete this survey of the U.S. electrical steel and transformer-related products industry, which can be downloaded from the BIS website: http://www.bis.doc.gov/XXX If you are unable to download the survey document, at your request, BIS survey support staff will e-mail the Excel survey template directly to you. For your convenience, a PDF version of the survey and required drop-down content is available on the BIS website to aid internal data collection. DO NOT SUBMIT the PDF version of the survey as your response to BIS. Should this occur, your organization will be required to resubmit the survey in the requested Excel format. Respond to every question. Surveys that are not fully completed will be returned for completion. Use the comment boxes to provide any information to supplement responses provided in the survey form. Make sure to record a complete answer in the space provided, even if the space does not appear to expand to fit all of the information. DO NOT CUT AND PASTE RESPONSES WITHIN THIS SURVEY OR PASTE IN RESPONSES FROM OUTSIDE THE SURVEY. Survey inputs should be completed by typing in responses or by using a drop-down menu. The use of cut and paste can corrupt the survey template. If your survey response is corrupted as a result of cut and paste response, your survey will be rejected and your organization must immediately resubmit the survey. Do not disclose any USG classified information in this survey form. C. Upon completion of the survey, final review, and certification, transmit the survey document via e-mail to: D. ESproducts232@bis.doc.gov Questions related to the survey should be directed to BIS survey support staff at ESProducts232@bis.doc.gov E-mail is the preferred method of contact. You may speak with a member of the BIS survey support staff by calling (202) 482-4952. For questions related to the overall scope of this Section 232 Investigation, contact ESProducts232@bis.doc.gov or: Matthew Borman, Deputy Assistant Secretary of Commerce, Export Administration Acting Director, Office of Technology Evaluation, BIS, Room 1093 U.S. Department of Commerce 1401 Constitution Avenue, NW Washington, DC 20230 DO NOT submit completed surveys to Mr. Borman's postal or personal e-mail address. All surveys must be submitted electronically to: ESProducts232@bis.doc.gov BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act

<u>Previous Page</u>	Next Page Definitions
Term	Definition
Applied Research	A systematic study to gain knowledge or understanding necessary to determine the means by which a recognized and specific need may be met. This activity includes work leading to the production of useful materials, devices, and systems or methods, including design, development, and improvement of prototypes and new processes.
Authorizing Official	An executive officer of the organization or business unit or another individual who has the authority to execute this survey on behalf of the organization.
Basic Research	A systematic, scientific study directed toward greater knowledge or understanding of the fundamental aspects of phenomena and of observable facts.
Capital Expenditures	Investments made by an organization in buildings, equipment, property, and systems where the expense is depreciated. This does not include expenditures for consumable materials, other operating expenses, and salaries associated with normal business operations.
Cores (Stacked)	Layers of laminations of electrical steel that have been stacked together to form a transformer core, typically used in larger distribution and power transformers. The stacked cores relevant to this investigation are classified under HTSUS 8594.90.9638
Cores (Wound)	A transformer core that is comprised of a continuous length of electrical steel wound around a mandrel multiple times, which is then heat treated to relieve internal stresses. Wound cores are often used in smaller distribution transformers that step down the voltage. Wound cores relevant to this investigation are classified under HTSUS 8504.90.9642.
Customer	Any organization (external or internal entity) for which your organization manufactures/processes any product comprised of, or containing, steel in any form.
Defense-related Activities	Any product or service that your organization produces that is ultimately used by the U.S. Government for defense purposes, whether by the armed services, the Department of Defense, or any other U.S. Government entity.
Development	The design, simulation, and testing of a prototype, including experimental software or hardware systems, to validate technological feasibility or concept of operation in order to reduce technological risk, or provide test systems prior to production approval.
Electrical Steel	Electrical steel, also called lamination steel, silicon electrical steel, or transformer steel is specialty steel tailored to produce certain magnetic properties, such as small hysteresis area and high permeability.
Exports	Shipments to destinations outside the United States.
Facility	A building or the minimum complex of buildings or parts of buildings that conduct steel production, in which an organization operates to serve a particular function, producing revenue, and incurring costs for the company. A facility may produce an item of tangible or intangible property or may perform a service. It may encompass a floor or group of floors within a building, a single building, or a group of buildings or structures. Often, a facility is a group of related locations at which organization employees work, together constituting a profit-and-loss center for the company, and it may be identified by a unique DUNS number.
Full Time Equivalent (FTE) Employees	Employees who work for 40 hours in a normal work week. Convert part-time employees into "full time equivalents" by taking their work hours as a fraction of 40 hours.
Global Headquarters	A location that serves as the organization's hub of worldwide operations with all global branches or divisions reporting to it.
Grain-Oriented Electrical Steel (GOES)	Also called Cold Rolled Grain Oriented Steel (CRGO),a flat-rolled alloy steel product which has is specially processed so that optimal properties are developed in the rolling direction; containing by weight at least 0.6 percent but not more than 6 percent of silicon (typically 3.2%), not more than 0.08 percent of carbon, not more than 1.0 percent of aluminum, and no other element in an amount that would give the steel the characteristics of another alloy steel, in coils or in straight lengths. GOES is typically available in thicknesses of 0.23 mm, 0.27mm, 0.30mm, and 0.35mm (called M3, M4, M5 and M6, respectively). The lower the thickness, the better the quality of material in terms of core losses (eddy current loss and hysteresis loss). GOES that is relevant to this investigation is currently classifiable under subheadings 7225.11.0000, 7226.11.1000, 7226.11.9030, and 7226.11.9060 of the Harmonized Tariff Schedule of the United States (HTSUS).

_	Definitions
Term	Definition
Harmonized Tariff Schedule (HTS)	A 10-digit numbering system that classifies a good based on its name, use, and/or the material used in its construction. The number provides Customs and Border Protection (CBP) with a standardized method of tracking all merchandise imported into the United States and sets out the tariff rates and statistical categories.
Import Value	Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).
Inventory	The goods or materials an organization holds for its own use or for the ultimate goal of sale.
Laminations	Flat rolled products, not in coils, made from electrical steel, that have been cut to a shape and undergone punching, coating, or other operations for their use as part of a transformer and are classified under HTSUS 8504.90.9634
Non-Oriented Electrical Steel (NOES)	Also called Cold Rolled Non-Grain Oriented Steel (CRNGO), is electrical steel typically with a silicon level of 2 – 3.5% and have similar magnetic properties in all directions of the plane of the sheet. NOES is principally used for motors, generators, alternator, ballasts and small transformers. NOES is covered by HTSUS Codes 7225.19.0000, 7226.19.1000, and 7226.19.9000.
Non-U.S. Facility	A facility that is physically located outside of the United States.
Organization	A company, firm, laboratory, or other entity that owns or controls one or more U.S. establishment or facility capable of designing and/or manufacturing steel products.
Product/Process Development	Conceptualization and development of steel product or steel production techniques prior to the production of the product for customers (i.e., utilities, governmental agencies etc.).
Production	The process of transforming inputs (raw materials, semi-finished goods, subassemblies, ideas, information, knowledge) into goods or services.
Research & Development	Basic and applied research in the engineering sciences, as well as design and development of prototype products and processes. Efforts that an organization conducts towards innovating, introducing and/or improving products and processes.
Sales	All reported and unreported sales of steel, including sales to end-users, producers, financial entities, intermediaries, traders, distributors, et al.
Supplier	An entity from which your organization obtains inputs, which may be goods or services. A supplier may be another organization with which you have a contractual relationship, or it may be another facility owned by the same parent organization.
Transformer	An electrical apparatus that transfers electrical energy from one electrical circuit to another without any direct electrical connection by the electromagnetic induction of an alternating electrical current between two or more magnetically coupled coils or windings. Transformers are used to either increase (step-up) or decrease (step-down) the voltage of an alternating electrical current within the circuitry of electrical equipment or systems. The magnetic circuit where the voltage is transformed form the core of the transformer, and is often made from grain oriented electrical steel. Transformers are classified according to their power handling capacity and type of insulation in HTSUS categories 8504.21, 8504.22, 8504.23, 8504.31, 8504.32, 8504.33 and 8504.34. For purposes of this investigation, dry transformers with a power handling capacity of less than or equal to 1KVA are excluded from the subject product scope.
Voltage Regulator	A device designed to automatically regulate distribution line voltages within a desired range. These products are classified within HTSUS 9032.89.4000. (Note: This HTSUS classification includes products other than voltage regulators not subject to this investigation)
United States	The "United States" or "U.S." includes the 50 states, Puerto Rico, the District of Columbia, Guam, the Trust Territories, and the U.S. Virgin Islands.
	BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act

Pre	<u>vious Page</u>					Next Page
		1. Organ	nization Information			
	Provide the following information for your	organization				
	Organization Name					
	Street Address					
	City					
١,	State					
A.	ZIP Code					
	Country of Global Headquarters					
	U.S. Point of Contact Name					
	U.S. Point of Contact Email					
	U.S. Point of Contact Phone					
	Is this organization owned, in whole or in pa	art, by any private or government entity? Ir	ndicate Yes/No, then identify	the entities below, if applicab	ole. List entities	
	with at least 5% ownership.					
				Global Headquarters	Global Headquarters	
	Entity Name	Global Headquarters Street Address	Global Headquarters City	State/Province	Country	Ownership %
				,	,	
В.						
C.	At the global headquarters level, identify the manufacture and/or distribute any of the survival of the surviv	ubject products listed below. ubject Products A		ber of U.S. Facilities	Number of Non-U.	
	Other	(Specify)				
	Comments:	BUSINESS CONFIDENTIAL - Per S	Section 705(d) of the Defense	Production Act	,	

vious Page Next Page											
				2. Facility In	formation						
			tes, including facilities on standby or idled, involved in			tacked or wound), transf	ormers, or voltage regulators				
oduction activities. Facilities perform	ning multiple functions sl	nould be counted just o	once for the total number, but each function should be	listed separately belo	ow.						
	-hard in NOTE COTE In-	:+: (-+ \	(-t			- ! !-!					
			res (stacked or wound), transformers, or voltage regu provides multiple functions under "Scope of Activity,"								
(angle on personal response) and			,								
						Operating Status	I .	Future	Operating Status		
						Start Date of					
Facility Name	City	State	Scope of Activity	Product Capability	Operating Status	Standby/Idle or	Reason for Satndby/Idle or Shutdown	Expected Change 2020-2023	Explain		
A						Shutdown	Silutuowii				
1			NOES	Manufacture	Operating			Expansion			
2			GOES	Distribute	Idle/Standby			Upgrade			
3			Laminations (Stacked)	Both	Shutdown			Starting Operations			
4			Cores (Wound)					Restarting Operations			
5			Cores (Stacked)		<u> </u>		_	Standby/Idle			
6 7			Liquid-Dielectric Transformer Under 650KVA Liquid -DielectricTransformer 650-10000KVA		\overline{T}			Significant Modernization Closure			
8			Liquid-DielectricTransformer 050-10000KVA Liquid-DielectricTransformer Over 10000KVA	\				None			
9	1		Dry-Type/Other Transformer 1-16KVA		1						
10			Dry-Type/Other Transformer 16-500KVA								
11	<u> </u>		Dry-Type/Other Transformer Over 500KVA	<u></u>	Survey res	sponses wi	II be				
12	1		Voltage Regulators								
14					restricted t		uons in —				
15					dropdown	lists					
16					aropaomi	11010					
17											
18 19											
20											
21											
22											
23											
24 25											
26											
27											
28											
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30											
32											
33											
34											
35											
36 37	1			1							
38	1										
39											
40											
41 42	1			-							
43											
44											
45					•						
If any of your U.S. facilities are	scheduled to have a										
1 change in operating status in th											
explain the circumstances of th											
If any of your U.S. facilities are	scheduled to onen or										
2 may open in the 2020-2023 per											
circumstances of this action.											
Comments:											
			<u> </u>								
			BUSINESS CONFIL	DENTIAL - Per Section	705(d) of the Defense Pro	duction Act					

rev	ious Page								Next Page
				3a. U.S. Produ	ction				
	tify the quantity of each subject product produced annuall are used for measurements.	ly at each of your organi	zation's U.S. facilities	for the 2016 to 2019 p	eriod, and record the a	innual capacity, utiliz	zation rate, and average ma	rginal cost per unit at th	e facility. Identify which
Ī				NOES					
	Select 'Not Applicable' if the category of products is not elevant to your organization								
	Units:								
۷.	Facility Information	2015	2016	2017	2018	2019	Facility Annual Capacity for Product	Capacity Utilization Rate Required to Remain Profitable	Average Marginal Cost per Unit
	Facility Name								
	Facility Name								
ŀ	Facility Name								
ŀ	Facility Name								
+	Facility Name			GOES					
	Select 'Not Applicable' if the category of products is not relevant to your organization			0013					
	Units:								
s	Facility Information	2015	2016	2017	2018	2019	Facility Annual Capacity for Product	Capacity Utilization Rate Required to Remain Profitable	Average Marginal Cost per Unit
ŀ	Facility Name								
ŀ	Facility Name Facility Name								
ŀ	Facility Name								
	Facility Name								
	Select 'Not Applicable' if the category of products below is not relevant to your organization.			Laminations (Stacked)				
L	Units:								
	Average percent frequency for which production ncorporates GOES versus non-GOES subsitutes								
	Facility Information	2015	2016	2017	2018	2019	Facility Annual Capacity for Product	Capacity Utilization Rate Required to Remain Profitable	Average Marginal Cost per Unit
L	Facility Name								
ŀ	Facility Name								
ŀ	Facility Name								
ŀ	Facility Name								
	Facility Name			Cores (Stac	-kad)				
5	Select 'Not Applicable' if the category of products is not			Cores (Stat					
	relevant to your organization								
	Units:								gories to be
	Average percent frequency for which production ncorporates GOES versus non-GOES subsitutes						included Cores (Wo	d in this sec	tion:
	Facility Information	2015	2016	2017	2018	2019	Facility Liquid-Die	electric Trans	former Under 65
F	Facility Name								former 650-1000 -
F	Facility Name Facility Name						- ├ Liquid-Di€	electric Trans	former Over 1000
F	Facility Name						Drv-Tvpe	Other Transf	ormer 1-16KVA
	Facility Name								ormer 16-500KV
			For ROCIS Up	load – OMB CN	- I 0694-0120 - re	ference		Other Transf	ormer 16-500kv. Former Over 500k

Pre	2					Next Page
Гол	r U.S. operations, provide the U.S. sales and export sales do		roduction (Continued	<u> </u>	ets Dosard É in Thousan	de USD, o. g. \$12,000,00
	urvey input of \$12	ata for the 2015 to 20	119 period for your org	gamzation's subject produc	ts. Record \$ III Thousand	us 03D, e.g. \$12,000.00
			NOES			
	Select 'Not Applicable' if the category of products is not relevant to your organization					
	Units:					
	U.S. and Export Sales	2015	2016	2017	2018	2019
1	U.S. Sales (Specified Unit) U.S. Sales (\$)					
	Average U.S. Sales Price per Unit (\$)					
	Export Sales (Specified Unit)					
	Export Sales (\$)					
	Average Export Sales Price per Unit (\$)					
	Percentage of Total 2019 Sales Attributable to Product					
			GOES			
	Select 'Not Applicable' if the category of products is not relevant to your organization					
	Units:					
	U.S. and Export Sales	2015	2016	2017	2018	2019
2	U.S. Sales (Specified Unit) U.S. Sales (\$)					
	Average U.S. Sales Price per Unit (\$)					
	Export Sales (Specified Unit)					
	Export Sales (\$)					
	Average Export Sales Price per Unit (\$)					
	Percentage of Total 2019 Sales Attributable to Product					
			minations (Stacked)			
	Select 'Not Applicable' if the category of products is not relevant to your organization	Lai	minations (Stacked)			
	Units:					
	U.S. and Export Sales	2015	2016	2017	2018	2019
3	U.S. Sales (Specified Unit)					
	U.S. Sales (\$) Average U.S. Sales Price per Unit (\$)					
	Export Sales (Specified Unit)					
	Export Sales (\$)					
	Average Export Sales Price per Unit (\$)					
	Percentage of Total 2019 Sales Attributable to Product					
_			Cores (Stacked)			
	Select 'Not Applicable' if the category of products is not relevant to your organization		Cores (Stacked)			
	Units:					
	U.S. and Export Sales	2015	2016	2017	2018	2019
4	U.S. Sales (Specified Unit) U.S. Sales (\$)					
	Average U.S. Sales Price per Unit (\$)					
	Export Sales (Specified Unit)		Oth	er product cate	gories to be in	cluded in
	Export Sales (\$)			section:	gonoc to be in	ioiaada iii
	Average Export Sales Price per Unit (\$)					
	Percentage of Total 2019 Sales Attributable to Product			es (Wound)		
				id-Dielectric Trans		
			Liqu	id-Dielectric Trans	former 650-1000	OKVA
			Liqu	id-Dielectric Trans	former Over 100	00KVA
			Dry-	Type/Other Transf	former 1-16KVA	
				Type/Other Transf		
	Fc	r ROCIS Unload -		Type/Other Transi		
	10			age Regulators	STITICE OVER 300	124/3
			voit	age neguiators		

Previous Page		2. Budada da la			Next Page							
		3c. Production Inputs and Co	osts									
Answer the following questions related to your organization's manuf	acturing inputs.											
How has your organization's usage of GOES relative to substitutes changed since 2015?	Use more GOES; Use more substitutes; No Change; NA	Explain										
For the following transformer categories, indicate whether,	on average, GOES is required or preferred, or	if subsitutes are preferred, then exp	lain.									
Transformer Type	GOES Sourcing Decision	E	xplain									
A. Liquid-Dielectric Transformer Under 650KVA	GOES Required											
B. Liquid-Dielectric Transformer 650KVA-10000KVA	GOES Preferred											
C. Liquid-Dielectric Transformer Over 10000	Substitute Preferred											
D. Dry-Type/Other Transformer Under 1-16KVA												
E. Dry-Type/Other Transformer Over 16-500KVA												
F. Dry-Type/Other Transformer Over 500KVA												
or each subject product listed below, record the percentage of total manufacturing cost associated with the listed inputs.												
Subject Product	Average Percentage Cost of Grain-Oriented Electrical Steel per Unit	Average Percentage Cost of GOES Substitute Per Unit	Average Percentage Cost of Laminations (Stacked)	Average Percentage Cost of Cores (Stacked)	Average Percentage Cost of Cores (Wound)							
1 Laminations (Stacked)												
2 Cores (Stacked) 3 Cores (Wound)	-	•										
4 Liquid-Dielectric Transformer Under 650KVA		Survey reco	onses will be									
5 Liquid-Dielectric Transformer 650KVA-10000KVA												
B. 6 Liquid-Dielectric Transformer Over 10000	ļ	restricted to	these options									
7 Dry-Type/Other Transformer 1-16KVA 8 Dry-Type/Other Transformer 16-500KVA		in dropdowr										
9 Dry-Type/Other Transformer Over 500KVA		III diopaowi	1 11313									
10 Voltage Regulators												
Answer the following questions related to your organization's operat	ting costs.	/	\									
Average Total 2019 Labor Costs as a Percentage of Total Facilty Operating Cost:		Do labor costs make it difficult for your organization to remain competitive? Explain:										
C. Average Total 2019 Cybersecurity Costs as a Percentage of Total Facility Operating costs:		Do cybersecurity costs make it difficult for your organization to remain competitive? Explain:										
Have input costs for transformers (i.e. costs of GOES, laminations, cores, labor, etc.) increased since 2018?		Explain:										
For each of the subject products listed below, identify and explain w on standard or technical quality differences between available suppl factor in sourcing decisions. Indicate the top country from which you	liers. Also indicate whether it is necessary or	a preference that your organization b										
Subject Product	Has your organization experienced any shortages in supply of critical materials related to the manufacture of the subject products?	Explain	Is it necessary or a preference that your organization base input sourcing or supplier decisions on standard or technical quality differences between suppliers?	Indicate the top country from which your organization sources this product	Explain							
1 GOES	Ongoing		Necessary									
2 Laminations (Stacked)	Past		Preference									
3 Cores (Stacked) 4 Cores (Wound)	Future Expected		Sometimes Necessary Standard/Quality Not the Top Factor									
5 Liquid-Dielectric Transformer Under 650KVA												
D. 6 Liquid-Dielectric Transformer 650KVA-10000KVA		·										
7 Liquid-Dielectric Transformer Over 10000 8 Dry-Type/Other Transformer Under 1-16KVA												
9 Dry-Type/Other Transformer Under 1-16KVA												
10 Dry-Type/Other Transformer Over 500KVA												
11 Voltage Regulators			J									
Comments:												
	BUSINESS CON	FIDENTIAL - Per Section 705(d) of the	Defense Production Act									

						4. Suppliers/Imports											
		ct purchased (purchases incl liers by average volume ov			ion from 2015-2019, state the supplier, quantity purch	ased, and total value of those	purchases. Ind	icate	whether th	ne supplier is rel	ated to your ore	ganization, and	the country of ori	gin of the su	ibject product. The	suppliers liste	ed should be
your or	gamzation's top 10 supp	niers by average volume ov	er tile 2013-2019 periot	1.		NOES											
Identify	your organization's tot	al number of suppliers for N	IOFS. Where necessary.														
input 0.		ar number of suppliers for it	ocs. where necessary,														
							2	015		20	16	2	017		2018	2	019
	Supplier Name	Supplier Country	Is the Supplier a	Country of Fabrication	End-Use	Top Factor Influecing	2	015		20		2	017		2010		013
			Related Party?	,		Purchase from Supplier	Volume	Val	ue (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
1					Laminations	Price											
2					Cores	Quality			C			انسدوو	l la a	\neg			
A 3					Liquid-Dielectric Transformer Under 650KVA Liquid-Dielectric Transformer 650-10000KVA	Delivery Sole Source		+	Sur	vey re	spons	es wii	ı be	-			
5					Liquid-Dielectric Transformer Over 10000KVA	Relationship			rest	tricted	to the	se ont	tions in				
6					Dry-Type/Other Transformer 1-16KVA	Technical Specification						oc opi		-			
8					Dry-Type/Other Transformer 16-500KVA Dry-Type/Other Transformer Over 500KVA	Other		+	dro	pdown	lists			-			
9					Voltage Regulators	\leftarrow											
10					Other	COFC											
						GOES											
		al number of suppliers for G	OES. Where necessary,														
input 0.																	
			Is the Supplier a			Top Factor Influecing	2	015		20	16	2	017		2018	2	019
	Supplier	Supplier Headquarters	Related Party?	Country of Fabrication	End-Use	Purchase from Supplier	Volume	Val	ue (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
1																	
2																	
B 4																	
5																	
6																	
8																	
9																	
10						to a time time a (Charles al)											
						Laminations (Stacked)											
Identify	your organization's tot	al number of suppliers for La	aminations (Stacked).														
Where	necessary, input 0.																
							2	015		20	16	2	017		2018	2	019
			Is the Supplier a		.	Top Factor Influecing		013		20	110	2	017		2016		015
	Supplier	Supplier Headquarters	Related Party?	Country of Fabrication	End-Use	Purchase from Supplier	Volume	Val	ue (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
1																	
2																	
С 3																	
5																	
6																	
7																	
8																	
10																	
						Cores (Stacked)						<u>'</u>			•		
Identify	your organization's tot	al number of suppliers for C	ores (Stacked). Where														
	ary, input 0.																
			le the Cumplier o			To a Footon Inflormation	2	015		20	16		1	1			
	Supplier	Supplier Headquarters	Is the Supplier a Related Party?	Country of Fabrication	End-Use	Top Factor Influecing Purchase from Supplier	Volume	Val	ue (\$USD)	Volume	_{val} Oth	er pro	auct ca	itego	ories to on:	be	0)
1			,								incl	i bahu	n this s	ectio	nn:		-
2														CCIIC	JI 1.		
3											Core	s (Wou	ınd)				F
D 4 5								+						ncfo	rmer Un	10r 650	IKV/A
6																	
7 8								-			Liqu	ıd-Diele	etcric Tra	anstoi	mer 650)-10000	JKVA 📙
9								L			l iau	id-Diele	octric Tra	ansfo	rmer Ove	r 1000	η Κνα
10			-	1													
											Dry-	Type/O	ther Tra	nstor	mer 1-1	6KVA	
											Drv-	Type/O	ther Tra	nsfor	mer 16-	500KV4	\
					For ROCIS Upload -	- OMB CN 0694-	0120 - re	fere	ence								
					Tarita di Capitala			٥.,			Dry-	rype/O	itner Tra	nstor	mer Ove	r 500K	VΑ
											Volta	age Reg	gulators				
											1 2 0	~~~ .,~ &	50.00.0.0				

				NOE	S								
	Identify your organ	nization's total number	of customers for NOES. Where necessary, input 0.										
					2015	20	16	20)17	2	018	2	2019
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product	Volume	Value (\$U	SD) Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
			Liquid-Dielectric Transformer Under 650KVA										
!			Liquid-Dielectric Transformer 650-10000KVA Liquid-Dielectric Transformer Over 10000KVA			Survey re	cnonco	e will k	20				
			Dry-Type/Other Transformer 1-16KVA										
;			Dry-Type/Other Transformer 16-500KVA		lr	estricted	to thes	e optic	ns in				
,			Dry-Type/Other Transformer Over 500KVA							-			
3			Voltage Regulators Other		+ C	Iropdown	IISTS						
)						-	1	I	1				
0													
				GOE	S								
	Identify your organ	nization's total number	of customers for GOES. Where necessary, input 0.										
					2015	20	16	20)17	2	018	2	2019
Customer Name	Country Destination	Is the customer a	Primary End Use of Product										
Customer Nume	Country Destination	related party?	Timary End Osc of Froduct	Volume	Value (\$U	SD) Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
!													
1													
 													
,													
3													
)													
0				Laminations	(Stacked)								
				Lammations	(Stackea)								
	1												
	identify your organization	s total number of custo	mers for Laminations (Stacked). Where necessary, input	0.									
	identify your organization	s total number of custo	ners for Laminations (Stacked). Where necessary, input	0.									
					2015	20	16	20	017	2	018		2019
Customer Name	Country Destination	Is the customer a related party?	mers for Laminations (Stacked). Where necessary, input Primary End Use of Product		2015 Value (\$U		16 Value (\$USD)	20 Volume	017 Value (\$USD)	2 Volume	018 Value (\$USD)	Volume	2019 Value (\$USD)
-		Is the customer a											
Customer Name		Is the customer a											
!		Is the customer a											
		Is the customer a											
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Is the customer a											
		Is the customer a											
		Is the customer a											
3		Is the customer a											
1		Is the customer a		Volume	Value (\$U								
3		Is the customer a			Value (\$U								
3	Country Destination	Is the customer a related party?		Volume	Value (\$U				Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
3	Country Destination	Is the customer a related party?	Primary End Use of Product	Volume	Value (\$U			Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U	(SD) Volume		Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)
3	Country Destination	Is the customer a related party?	Primary End Use of Product	Volume Cores (Sta	Value (\$U:	SD) Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	Value (\$USD)	Volume	
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe including	r prod	uct cat this se	Volume	Value (\$USD)
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe includence Cores	r prod ded in (Woun	uct catthis send)	egorie ection:	value (\$USD)
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe includence Cores	r prod ded in (Woun	uct catthis send)	egorie ection:	Value (\$USD)
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe include Cores	r prod ded in (Woun	uct catthis send)	egoricection:	value (\$USD)
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe included Cores Liquided Liquided	r prod ded in (Woun I-Dielec	uct cat this se id) ctric Tran	egorie ection:	es to be er Under (er 650-10
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe included Cores Liquided Liquided	r prod ded in (Woun I-Dielec	uct cat this se id) ctric Tran	egorie ection:	es to be er Under (er 650-10
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe include Cores Liquid Liquid Liquid	r prod ded in (Woun I-Dielect I-Dielect	uct cat this se ad) ctric Tran cric Tran ctric Tran	egorie ection: asformen	es to be er Under over 10
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe included Cores Liquided Liquided Dry-Tv	r prod ded in (Woun I-Dielect I-Dielectype/Otl	uct cat this se ad) etric Tran cric Tran her Tran	egorie ection: asforma asforma sforma sforma	es to be er Under our 650-10 er Over 10 er 1-16KV
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U)	SD) Volume	Value (\$USD)	Volume	Othe included Cores Liquided Liquided Dry-Tv	r prod ded in (Woun I-Dielect I-Dielectype/Otl	uct cat this se ad) etric Tran cric Tran her Tran	egorie ection: asforma asforma sforma sforma	es to be er Under our 650-10 er Over 10 er 1-16KV
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product stomers for Cores (Stacked). Where necessary, input 0. Primary End Use of Product	Volume Cores (Sta	Value (\$U:	SD) Volume 20 Volume	Value (\$USD) 16 Value (\$USD)	Volume	Othe included Cores Liquided Liquided Dry-Ty	r prod ded in (Woun I-Dielec I-Dielec ype/Otl	uct cat this se ad) etric Tran etric Tran her Tran	egorie ection: asforma asforma sforma sforma	es to be er Under over 10 er 1-16KV er 16-5001
Customer Name	Country Destination	Is the customer a related party?	Primary End Use of Product Stomers for Cores (Stacked). Where necessary, input 0.	Volume Cores (Sta	Value (\$U:	SD) Volume 20 Volume	Value (\$USD) 16 Value (\$USD)	Volume	Othe included Liquided Liquided Liquided Dry-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty-Ty	r prod ded in (Woun I-Dielec I-Dielec ype/Otl	uct cat this se ad) ctric Tran ctric Tran her Tran her Tran	egorie ection: asforma asforma sforma sforma	es to be er Under our 650-10 er Over 10 er 1-16KV

ovio	de the following financial line items for your location for t	the last five years belo	ow.						
ourc	e of Income Statement Items:								
epoi	ting Schedule:								
ncom	ne Statement (Select Line Items)	Record \$ in Thousands, e.g. \$12,000.00 = survey input of \$12							
		2015	2016	2017	2018	2019			
	Net Sales (and other revenue)								
1	Defense-Related Sales Percentage								
2	Non-U.S. Sales Percentage								
•	Cost of Sales / Cost of Goods Sold								
	Depreciation and Amortization								
	Total Operating Income (Loss)								
	Earnings Before Interest and Taxes								
	Net Income								
ourc	e of Balance Statement Items:								
epoi	ting Schedule:								
alan	ce Sheet (Select Line Items)	Reco	rd \$ in Thousand	s, e.g. \$1 <mark>2,000</mark> .00	= survey input of	\$12			
		2015	2016	2017	2018	2019			
	Cash								
	Inventories								
	Current Assets								
	Total Assets								
	Current Liabilities								
	Total Liabilities								
	Retained Earnings								
	Total Owner's Equity								
ourc	e of Other Items:								
epoi	ting Schedule:								
ther	Select Items	Reco	ord \$ in Thousand	s, e.g. \$12,000.00	= survey input of	\$12			
		2015	2016	2017	2018	2019			
	Research & Development (R&D) Expenditure								
1	Defense-Related R&D Percentage								
	Capital Expenditure (CapEx)								
1	Defense-Related CapEx Percentage								
	Comment:								

<u>Prev</u>	<u>vious Page</u>					Next Page								
			7. Employment											
Reco	ord the total number of full time equivalent (FTE) employees and contractors for th	ne 2015 to 2019 period for U.S.	facilities that produce subject	ct products.									
		2015	2016	2017	2018	2019								
	FTE Employees													
Α	FTE Contractors													
	Production/Engineering FTE Employees or													
	Contractors													
Ider	entify the key workforce issues your organization has experienced or anticipates in the next five years.													
	Issue	Primary Occupation Affected	Timeframe		Explain									
	Attracting Workers to Location	Production/Engineering	Ongoing, Expected to Continue											
	Employee Turnover	Both	Past Only (Resolved)	0		7								
В	Finding Experienced Workers	Other	Expected In Future		Survey responses will be									
	Finding Qualified Workers	None	No or Not Applicable	I	restricted to these options in									
	Finding U.S. Citizens			dropdown lis	its									
	Significant Portion of Workforce Retiring			_										
	Other (specify)													
С	Has your organization's employment been impacted as a result of the trade remedies import by the 2018 Section 232 Steel investigation?	osed	Explain:											
D	If you resumed operations at an idled or shutdo facility, do you reasonably anticipate being able hire or rehire workers? What would the hiring timeline be?		Explain:											
	Comments:				_									
		BUSINESS CONFIDENTIA	ΔL - Per Section 705(d) of the D	Defense Production Act										

Previous Page 8 National Defense Support						<u>Next Page</u>				
Α	Did your organization directly or indirectly supply any subject products for U.S. defense systems or installations between 2015 and 2020 YTD? If no proceed to next tab. If yes, complete									
	Fr	From the list of U.S. Government agencies below, select those whose systems you supported between 2015 and 2020 YTD.								
В	U.S. Air Force			U.S. Coast Guard		Department of Energy				
	B U.S. Army			U.S. Intelligence Community (such as CIA, NGA, NRO, NSA)		Other	(Specify)			
	U.S. Marine Corps			Missile Defense Agency (MDA)		Other	(Specify)			
	U.S. Navy		Defense Logistics Agency		Other	(Specify)				
	Indicate which subject products your organization directly or indirectly prodefense support. Specify the primary Department of Defense Acquisition C Product Defense Sup		•	AT) Major Defense Acquisition Prog						
		· ·		Attributable to Defense Sales						
	1	NOES	Direct							
	3	GOES Laminations (Stacked)	Indirect Both							
	4	Cores (Stacked)	None None	Survey responses	will be					
С	-	5 Cores (Wound) Unknown		restricted to these						
	6	Liquid-Dielectric Transformer Under 650KVA		dropdown lists						
	7	Liquid-Dielectric Transformer 650-10000KVA								
	8	Liquid-Dielectric Transformer Over 10000KVA								
	9	Dry-Type/Other Transformer 1-16KVA								
	10	Dry-Type/Other Transformer 16-500KVA								
	11	Dry-Type/Other Transformer Over 500KVA								
	12	Voltage Regulators								
D	rate (DP	any of your organization's subject-related contracts d under the Defense Priorities & Allocations System AS)? Further information about DPAS can be found e: https://www.dcma.mil/DPAS/		If yes, specify the nature and product of the DPAS rating:						
		Comments:								
	BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act									

9. Critical Infrastructure 9. Critical Infrastructure From the list of Critical Infrastructure Sectors below, indicate whether your organization provides subject products that support that sector, then select the primary product for which your organization supports each sector. Identify your organization's primary customer associated with the sector and product support for each sector supported. In-depth definitions of each sector may be found at: https://www.dhs.gov/cisa/critical-infrastructure-sectors							
Critical Infrastructure Sector Sector Support		Primary Product Support		Primary Customer Associated with Sector/Product Support	Explain		
Chemical Sector	Yes	NOES					
Commercial Facilites Sector	No	GOES					
Communications Sector	No Support	Laminations (Stacked)					
Critical Manufacturing Sector		Cores (Wound)					
Dams Sector		Cores (Stacked)					
A Defense Industrial Base Sector	^	Liquid-Dielectric Transformer Under 650KVA					
Emergency Services Sector		Liquid-Dielectric Transformer 6	50-10000KVA				
Energy Sector		Liquid-Dielectric Transformer O	ver 10000KVA				
Financial Services Sector		Dry-Type/Other Transformer 1-16KVA					
Food and Agriculture Sector		Dry-Type/Other Transformer	16-500KVA				
Government and Facilities Sector		Dry-Type/Other Transformer (Over 500KVA				
Healthcare and Public Health Sector		Voltage Regulators					
Information Technology Sector			<i>/</i> `				
Nuclear Reactors, Materials, and Waste Sector	Survoy roc	ponses will be	٦/				
Transportation Systems Sector			7				
Waste and Wastewater Systems Sector		restricted to these options in					
Comments:	dropdown	lists					
	В	USINESS CONFIDENTIAL - Per Section	705(d) of the Defe	ense Production Act			

Pre	Previous Page Next Page						
	10. Competition and Trade						
		om 2009 to 2019, indicate whether import competition has affected your U.S. subject-product related operations, sales, employment, planned expansions, etc. with respect to eproduction of any type of subject product. Indicate Yes/No and explain.					
		Item Yes/No			Explain		
	1	Manufacturing Operations					
Α	2	Sales					
	3	Employment					
	4	Planned Expa	nsions				
	5	Other:					
		s your organiz		effects on its busine	ess due to future imports of subject products into the United States from the listed countries below? Indicate		
			Country	Yes/No	Explain		
	1	Mexico					
	2	Canada					
	3	Other:					
В	4	Other:					
	5	Other:					
	6	Other:					
	7	Other:					
	8	Other:					
	9	Other:					
	10	Other:					
		Describe the	top five most significant challe	enges to the compe	titive position of your organization in the U.S. subject product market.		
		1					
		2					
	1	3					
		4					
		5					
C.		Describe the	top five most significant challe	enges to the compe	titive position of your organization in the non-U.S. subject product market.		
		1					
		2					
	2	3					
		4					
		5					
	Co	mments:					
	CO	millents.					
	BUSINESS CONFIDENTIAL - Per Section 705(d) of the Defense Production Act						

Previous Page								Next Page	
	11. COVID-19 Impacts								
	Identify any impacts or actions result	dentify any impacts or actions resulting from the COVID-19 pandemic at your location, ranking the top three most significant impacts and top three most important actions (1 being the most							
	mportant issue; 2 being the next most important issue, etc.):								
	Impacts Experienced		-Yes/No-	Rank	Actions Taken		Short Term/	Rank	
				Top 3	Actions taken	5 Taken	Long Term	Top 3	
	Increased cost of materials				Reduce workforce				
	Inability to access work location				Increase online/remote work capa	abilities			
	Inability to fulfill contracts				Seek government assistance				
	Reduced sales				Delay or reject new contracts				
Α.	Foreign supplier manufacturing delays				Begin to produce pandemic-related products				
Λ.	Domestic supplier manufacturing delays				Increase use of domestic suppliers				
	Increased demand				Reduce use of suppliers located in				
	Transportation-based disruptions				Reduce use of suppliers located or	utside the U.S. and China			
	Financing difficulties				Increase inventories				
	Labor shortages				Increase supplier redundancy				
	Other	(specify here)			Other				
	Identify any USG actions that would have best mitigated COVID-19								
	impacts to this location:								
	mpacta to this isolation.								
Comments:									
		RUSINESS CO	NEIDENTIAI -	Per Section	705(d) of the Defense Production <i>A</i>	Act			
		DOSINESS CO	MIDENTIAL -	. c. section	osta, or the Bereilse Froduction F	106			

<u>Previous Page</u>						
	12. Certification					
The undersigned certifies that the information herein supplied in response to this questionnaire is complete and correct to the best of his/her						
knowledge. It is a criminal offense to willfully m	ake a false statement or representation to any department or agency of the United States Government					
as to any matter within its jurisdiction (18 U.S.C.	1001 (1984 & SUPP. 1197)).					
Once your organization has completed this surv	ey, save a copy and submit it via email to ESProducts232@bis.doc.gov. Be sure to retain your survey for					
your records and to facilitate any necessary edit						
your records and to racintate any necessary ear	5 of clarifications.					
Organization Name						
Organization's Internet Address						
Name of Authorizing Official						
Title of Authorizing Official						
E-mail Address						
Phone Number and Extension						
Date Certified						
In the box below, provide any additional comme	ents or any other information you wish to include regarding this survey assessment.					
How many hours did it take to complete this sur	vey?					
BUSINESS	CONFIDENTIAL - Per Section 705(d) of the Defense Production Act					