

U.S. PRODUCERS' QUESTIONNAIRE

ALUMINUM FOIL FROM CHINA

This questionnaire must be received by the Commission by **December 15, 2018**
See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning aluminum foil from China (Inv. Nos. 701-TA-570 and 731-TA-1346 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm produced <u>aluminum foil, small reels of aluminum foil, or single-backed aluminum foil</u> (as defined on next page) at any time since January 1, 2014?</p> <p><input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)</p> <p>Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: FOIL)</p>

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone:

Fax:

Email address

PART I.--GENERAL INFORMATION

Background. --This proceeding was instituted in response to a petition filed on March 9, 2017 by The Aluminum Association Trade Enforcement Working Group and its individual members. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://usitc.gov/investigations/701731/2017/aluminum_foil_china/final.htm.

Aluminum foil.-- The merchandise covered by this investigation is aluminum foil having a thickness of 0.2 mm or less, in reels exceeding 25 pounds, regardless of width. Aluminum foil is made from an aluminum alloy that contains more than 92 percent aluminum. Aluminum foil may be made to ASTM specification ASTM B479, but can also be made to other specifications. Regardless of specification, however, all aluminum foil meeting the scope description is included in the scope.

Excluded from the scope of this investigation is aluminum foil that is backed with paper, paperboard, plastics, or similar backing materials on only one side of the aluminum foil, as well as etched capacitor foil and aluminum foil that is cut to shape.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above. The products under investigation are currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7607.11.3000, 7607.11.6000, 7607.11.9030, 7607.11.9060, 7607.11.9090, and 7607.19.6000. Further, merchandise that falls within the scope of this proceeding may also be entered into the United States under HTSUS subheadings 7606.11.3060, 7606.11.6000, 7606.12.3045, 7606.12.3055, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this proceeding is dispositive.

Ultra-thin. -- Aluminum foil less than 0.000315 inch (8 microns) thickness.

Thin. -- Aluminum foil greater than or equal to 0.000315 inch (8 microns) and less than 0.00039 inch (10 microns) thickness.

Standard. -- Aluminum foil greater than or equal to 0.00039 inch (10 microns) and less than or equal to 0.001 inch (25 microns) thickness.

Heavy. -- Aluminum foil greater than 0.001 inch (25 microns) thickness and less than 0.00177 inch (45 microns) thickness.

Extra heavy. -- Aluminum foil greater than or equal to 0.00177 inch (45 microns) thickness.

Certain fin stock aluminum foil.--Certain fin stock is defined as flat-rolled aluminum of greater than or equal to 45 microns (0.045 mm; 0.00177 inches) and less than or equal to 200 microns (0.2 mm, 0.00787 inches) in thickness, containing 1 percent or more, by weight, of manganese.

Other in-scope fin stock aluminum foil.--Any other types of fin stock your firm sells to U.S. customers that meets the definition of "aluminum foil" but not "certain fin stock" (e.g., fin stock made from 1000 and 7000 series alloys).

Single-backed aluminum foil.-- aluminum foil that is backed with paper, paperboard, plastics, or similar backing materials on only one side of the aluminum foil.

Small reels of aluminum foil.—Aluminum foil in reels weighing 25 pounds, or less.

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

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

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

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

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

Hours	Dollars

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

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

I-1b. **TAA information release.**--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

I-2. **Establishments covered.**--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.**

"Establishment"--Each facility of a firm involved in the production of aluminum foil, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

I-3. **Petition support.**--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
China AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information.

Firm name	Address	Extent of ownership (percent)

PART II.--TRADE AND RELATED INFORMATION

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

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

Name	
Title	
Email	
Telephone	
Fax	

- II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of aluminum foil since January 1, 2014.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe; leave blank if not applicable)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns or production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	other (e.g., technology)	

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

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

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

Item	Quantity (in short tons)				
	Calendar years			January-September	
	2014	2015	2016	2016	2017
Overall production capacity					
Production of:					
Aluminum foil ¹	0	0	0	0	0
Aluminum sheet and plate products					
Other products ²					
Total	0	0	0	0	0
¹ Data entered for production of aluminum foil will populate here once reported in question II-7. ² Please identify these products: _____.					

II-3b. **Operating parameters.**--The production capacity reported in II-3a is based on operating _____ hours per week, _____ weeks per year.

II-3c. **Capacity calculation.**--Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.

II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

II-3e. **Product shifting.**—

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

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

_____.

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

--

II-3f. **Type of Annealing Furnace.**-- Please check the box corresponding to the type of annealing furnace your firm uses to produce aluminum foil.

Electric
 Gas/Diesel/Other petroleum

II-3g. **Maximum width.**-- Please report the maximum width of your firm's finishing foil mill (in inches):

II-3h. **Separator/Slitter.**—Does your firm produce aluminum foil using a positive air-pressure chamber separator/slitter?

No Yes

II-4. **Tolling.**--Since January 1, 2014, has your firm been involved in a toll agreement regarding the production of aluminum foil?

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

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

II-5. Foreign trade zones.--

- (a) **Firm's FTZ operations.**--Does your firm produce aluminum foil in and/or admit aluminum foil into a foreign trade zone (FTZ)?

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

No	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

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

II-6. Importer.--Since January 1, 2014, has your firm imported aluminum foil?

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

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

- II-7. **Production, shipment, and inventory data**--Report your firm's production capacity, production, shipments, and inventories related to the production of aluminum foil 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 net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

"Internal consumption" – Product consumed internally by your firm to produce small reels, aluminum foil backed on one side, or other downstream aluminum foil products. Such transactions are valued at fair market value.

For example, regarding "small reels" (retail packages or other reels of aluminum foil weighing 25 pounds or less), your firms' U.S. production of aluminum foil considered to fall within the scope of these proceedings (i.e., in reels weighing more than 25 pounds) that is used to produce small reels (weighing less than 25 pounds) should be reported as follows: 1) report the "aluminum foil" (in reels weighing more than 25 pounds) that was used to produce the small reels as U.S. production of aluminum foil in this questionnaire (in questions II-3a and II-7) and 2) report the use/shipment of that production as internal consumption (in questions II-7, II-9, and III-9).

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

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

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

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

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

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

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption: ²					
Quantity (F)					
Value ² (G)					
Transfers to related firms: ²					
Quantity (H)					
Value ² (I)					
Export shipments: ³					
Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

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

² Internal consumption and transfers to related firms must be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____.

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line 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

Reconciliation	Calendar years			January-September	
	2014	2015	2016	2016	2017
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0

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

II-8. **Channels of distribution**--Report your firm's U.S. shipments by channel of distribution in the specified periods.

"Consumer Packaging /Converter"--Shipments to end users in the business of packaging foods, cosmetics, pharmaceuticals and to other chemical products; these end users are otherwise known as converters in the industry.

"Household use/spoolers"-- Shipment to end users for eventual retail sale as aluminum foil used for short-term wrapping, mostly in households, catering and food and floristry retail businesses after further processing into small reels (e.g., in the context of internal consumption).

"Industrial applications"-- Shipments to end users in the business of using the foil in thermal insulation, cables, and electronics, among other industrial end uses.

Item	Quantity (in short tons)				
	Calendar years			January-September	
	2014	2015	2016	2016	2017
Channels of distribution:					
U.S. shipments:					
To distributors (M)					
To consumer packaging/ converter (quantity) (N)					
To household use/spoolers (quantity) (O)					
To industrial applications (quantity) (P)					

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

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

II-9a. **U.S. shipments by thickness.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of aluminum foil produced by your firm.

Ultra-thin. -- Aluminum foil less than 0.000315 inch (8 microns) thickness.

Thin. -- Aluminum foil greater than or equal to 0.000315 inch (8 microns) and less than 0.00039 inch (10 microns) thickness.

Standard. -- Aluminum foil greater than or equal to 0.00039 inch (10 microns) and less than or equal to 0.001 inch (25 microns) thickness.

Heavy. -- Aluminum foil greater than 0.001 inch (25 microns) thickness and less than 0.00177 inch (45 microns) thickness.

Extra heavy. -- Aluminum foil greater than or equal to 0.00177 inch (45 microns) thickness.

Quantity (in short tons); value (\$1,000)					
Item	Calendar year			January – September	
	2014	2015	2016	2016	2017
U.S. shipments.—					
Ultra-thin					
Quantity (Q)					
Value (R)					
Thin					
Quantity (S)					
Value (T)					
Standard					
Quantity (U)					
Value (V)					
Heavy					
Quantity (W)					
Value (X)					
Extra-heavy					
Quantity (Y)					
Value (Z)					

RECONCILIATION OF U.S. SHIPMENTS BY THICKNESS.— Please ensure that the data reported for U.S. shipments by thickness (i.e., lines Q through Z) in each time period equal the data reported for U.S. shipments (i.e., lines D through I) in table II-7 in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar years			January - September	
	2014	2015	2016	2016	2017
Quantity: Q + S + U + W + Y – D – F – H = should equal zero ("0")	0	0	0	0	0
Value: R + T + V + X + Z – E – G – I = should equal zero ("0")	0	0	0	0	0

II-9b. **Changes in U.S. shipments by thickness.**--Since January 1, 2014, has your firm increased or decreased its production and/or shipments of specific thickness categories? And if so why?

Category	No	Yes	Explanation
Ultra-thin	<input type="checkbox"/>	<input type="checkbox"/>	
Thin	<input type="checkbox"/>	<input type="checkbox"/>	
Standard	<input type="checkbox"/>	<input type="checkbox"/>	
Heavy	<input type="checkbox"/>	<input type="checkbox"/>	
Extra-heavy	<input type="checkbox"/>	<input type="checkbox"/>	

II-10. **Aluminum foil by product type.**--Report your firms' U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) for each period.

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
U.S. shipments:					
Certain fin stock (from part V):¹					
Quantity ² (AA)	0	0	0	0	0
Value ² (AB)	0	0	0	0	0
Other in-scope fin stock:³					
Quantity (AC)					
Value (AD)					
All other non-fin stock aluminum foil products:					
With a manganese content similar to that provided for certain fin stock:⁴					
Quantity (AE)					
Value (AF)					
Without a manganese content similar to that provided for certain fin stock:⁵					
Quantity (AG)					
Value (AH)					

¹ Defined on page 2.

² These data will be populated by data reported in part V of this questionnaire.

³ Any other types of fin stock your firm sells to U.S. customers that meets the definition of "aluminum foil" but not "certain fin stock" (e.g., fin stock made from 1000 and 7000 series alloys). Please describe these products and compare and contrast them to "certain fin stock":

⁴ Please describe these high manganese content non-fin stock products and compare and contrast them to the fin stocks reported above.

⁵ Please describe these low manganese content non-fin stock products and compare and contrast them to the fin stocks reported above.

RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.— Please ensure that the data reported for U.S. shipments by product type (i.e., lines AA through AH) in each time period equal the data reported for U.S. shipments (i.e., lines D through I) in table II-7 in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar years			January - September	
	2014	2015	2016	2016	2017
Quantity: AA + AC + AE + AG – D – F – H = should equal zero ("0")	0	0	0	0	0
Value: AB + AD + AF + AH – E – G – I = should equal zero ("0")	0	0	0	0	0

II-11. **Employment data.**--Report your firm's employment-related data related to the production of aluminum foil and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

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

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

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

Explanation of trends:

II-12. **Related firms.**--If your firm reported transfers to related firms in question II-7, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-13. **Purchases.**--Other than direct imports, has your firm otherwise purchased aluminum foil since January 1, 2014?

“Purchase” – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

“Direct import” –A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.

No Yes--Report such purchases below and explain the reasons for your firms' purchases:

(Quantity in short tons)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Purchases from U.S. importers¹ of aluminum foil from-- China					
All other sources					
Purchases from domestic producers²					
Purchases from other sources²					
¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: _____. ² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: _____.					

II-14. **Captive production use.**—Please report your firm’s internal consumption and/or transfers to related firms in 2016 by disposition.

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

RECONCILIATION OF INTERNAL CONSUMPTION AND TRANSFERS.—The sum of the data reported above should be equal to the 2016 data reported for internal consumption and transfers in question II-7 for 2016. If the calculated fields below return values other than zero (i.e., “0”), the data reported must be revised prior to submission to the Commission.

Reconciliation	Internal consumption 2016 (short tons)	Transfers to related firms 2016 (short tons)
Data in this question minus data in question II-7.	0	0

II-15. **Double sided aluminum foil.**--Has your firm produced any aluminum foil that has been backed with paper, paperboard, plastics, or similar backing materials on both sides of the foil at any time since January 1, 2014?

- No Yes--Report such the following data related to your firm's production and U.S. shipments of this merchandise (such data should be reported as part of commercial U.S. shipments in II-7 using the same valuation basis)

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Production (quantity)					
U.S. shipments:					
Quantity					
Value					

II-16. **Ultra-thin aluminum foil.**--Has your firm produced any ultra-thin aluminum foil at any time since January 1, 2014?

- No Yes--Report such the following data related to your firm's production and U.S. shipments of this merchandise (such data should be reported as part of commercial U.S. shipments in II-7 using the same valuation basis)

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Production (quantity)					
U.S. shipments: <i>Quantity</i>					
<i>Value</i>					

II-17. **Other explanations.**--If your firm would like to further explain a response to a question in Part II that did not provide a narrative box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--FINANCIAL INFORMATION

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

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

Name	
Title	
Email	
Telephone	
Fax	

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

A. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed during the data-collection period, explain below:

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

2. Does your firm prepare profit/loss statements for aluminum foil:
 Yes No

3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 Audited, unaudited, annual reports, 10Ks, 10 Qs,
 Monthly, quarterly, semi-annually, annually

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

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

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

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

--

III-5. **Product listing.**--Please list the products your firm produced in the facilities in which your firm produced aluminum foil, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Aluminum foil	%
	%
	%
	%
	%

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

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

III-7. **Inputs from related suppliers.**--Please identify the inputs used in the production of aluminum foil that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input on the basis of your most recently completed fiscal year. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS
Input valuation method (e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate FMV, etc.)		

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

Yes

No--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in table III-9a.

--

III-9a. **Operations on aluminum foil.**--Report the revenue and related cost information requested below on the aluminum foil operations of your firm's U.S. establishment(s).¹ 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 short tons) and value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					
¹ Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u> . ² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire. ³ COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u> .					

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

III-9b. Operations on aluminum foil – U.S. commercial sales and exports only (“open market sales”).-

-Report the revenue and related cost information requested below on the aluminum foil operations of your firm’s U.S. establishment(s).¹ Include both domestic and export commercial sales of aluminum foil, but do not report resales of purchased aluminum foil. 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 in chronological order from left to right and for the specified interim periods.

Quantity (in short tons) and value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Net sales quantities: ²					
Commercial sales quantities from III-9a	0	0	0	0	0
Net sales values: ²					
Commercial sales values from III-9a	0	0	0	0	0
Cost of goods sold (COGS): ³					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					
¹ Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u> . ² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire. ³ COGS (whether for domestic or export sales) should include <u>costs associated with commercial sales</u> .					

III-9c. **Financial data reconciliation.**--The calculable line items from question III-9a and III-9b (i.e., total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

Yes No--If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.

Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negative--instances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive, expenses or reversals are negative).

If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-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 \$1,000*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

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

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in 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. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of aluminum foil. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for aluminum foil 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 net assets after any accumulated depreciation and allowances deducted.

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

Value (in \$1,000)			
Item	Fiscal years ended--		
	2014	2015	2016
Total assets (net) ¹			
¹ Describe _____			

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

Value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Capital expenditures ¹					
Research and development expenses ²					
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.					
² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.					

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

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

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

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.*

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

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

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

III-15. **Effects of imports on investment.**--Since January 1, 2014, 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 aluminum foil from China?

- No Yes--My firm has experienced actual negative effects as follows:

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

III-16. **Effects of imports on growth and development.**--Since January 1, 2014, 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 aluminum foil from China?

No Yes--My firm has experienced actual negative effects as follows:

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

III-17. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of aluminum foil from China?

No	Yes	If yes, my firm anticipates negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Active management of energy costs.**—Does your firm actively manage its energy costs used in the production of aluminum foil?

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

III-19. **Active management of aluminum costs.**—Does your firm actively manage its metal costs (i.e., the price of acquiring aluminum to roll) used in the production of aluminum foil?

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

III-20. **Other explanations.**--If your firm would like to further explain a response to a question in Part III that did not provide a narrative box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

PART IV.-- PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Craig Thomsen (202-205-3226, craig.thomsen@usitc.gov).

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

Name	
Title	
Email	
Telephone	
Fax	

PRICE DATA

IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2014 of the following products produced by your firm.

Product 1.--Aluminum in the 1000 series, standard tempers, 0.00025 inch to less than 0.000315 inch thickness, width 30-70", matte/bright.

Product 2.--Aluminum in the 1000 series, standard tempers, 0.000315-0.0005 inch thickness, inclusive, width 30-70", matte/bright.

Product 3.--Aluminum in the 8000 series, standard tempers, 0.00039-0.001 inch thickness, width 12-18", mill finish.

Product 4.--Aluminum in the 8000 series, standard tempers, 0.002-0.0039 inch thickness, width 11" to 31.375", mill finish.

Product 5.--Aluminum in the 8000 series, standard tempers, 0.004-0.0078 inch thickness, width 11" to 31.375", mill finish.

Product 6.--Aluminum in the 3000 series, standard tempers, 0.002-0.0033 inch thickness, width 0.5-2", mill finish.

Product 7.-- Aluminum in the 3000 series, standard tempers, 0.0034-0.0078 inch thickness, width 0.5-10", mill finish.

Product 8.-- Aluminum certain fin stock, 65 to 110 microns (0.00256 to 0.00433 inches) thick, 15 to 100 mm (0.59 to 3.94 inches) wide, and containing 1.2 to 2.0 percent, by weight, of manganese.

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

IV-2a. During January 2014-September 2017, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

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

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

(Quantity in pounds, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2015:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2016:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2017:								
Jan-Mar								
Apr-Jun								
Jul-Sep								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

IV-2b. **Price data.**—*Continued.*

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

(Quantity in pounds, value in dollars)								
Period of shipment	Product 5		Product 6		Product 7		Product 8	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2015:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2016:								
Jan-Mar								
Apr-Jun								
Jul-Sep								
Oct-Dec								
2017:								
Jan-Mar								
Apr-Jun								
Jul-Sep								

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

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

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

Product 5:

Product 6:

Product 7:

Product 8:

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

Is the price data reported above:	√ if Yes
In actual dollars (<i>not</i> \$1,000)	<input type="checkbox"/>
In pounds (<i>not</i> short tons)?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have returns credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Equal to or less than reported commercial shipments in question II-7 in each year?	<input type="checkbox"/>

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

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

Please note: If your response to any question relates to certain fin stock aluminum foil, or differs with respect to certain fin stock aluminum foil compared with aluminum foil other than certain fin stock, please note this in your response to that question, or in your response to question IV-22.

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

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

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

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

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) On what basis are your firm's prices of domestic aluminum foil usually quoted (*check one*)?

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

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced aluminum foil in 2016 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

	Type of sale				Total (should sum to 100.0%)
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Short-term contracts (multiple deliveries for less than 12 months)	Spot sales (for a single delivery)	
Share of 2016 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced aluminum foil (or check "not applicable" if your firm does not sell on a long-term, short-term and/or annual contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Meet or release provision	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV-8. **Lead times.**--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 aluminum foil?

Source	Share of 2016 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9. **Shipping information.**--

- (a) What is the approximate percentage of the total delivered cost of U.S.-produced aluminum foil that is accounted for by U.S. inland transportation costs? _____ percent
- (b) Who generally arranges the transportation to your firm's customers' locations?
 Your firm Purchaser (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of aluminum foil 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. **Geographical shipments.**-- In which U.S. geographic market area(s) has your firm sold its U.S.-produced aluminum foil since January 1, 2014 (check all that apply)?

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

IV-11. **End uses.**--List the top end uses of the aluminum foil that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by aluminum foil and other inputs (such as labor, energy, and other raw materials)?

End use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	Aluminum foil	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **Substitutes.**--Can other products be substituted for aluminum foil?

No Yes--Please fill out the table.

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

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

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of aluminum foil since January 1, 2014?

No	Yes	If yes, please describe the changes, the supplier(s) making the changes, and quantify if possible.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-15. **Conditions of competition.**--

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

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

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

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

IV-16. **Supply constraints.**--Has your firm refused, declined, or been unable to supply aluminum foil since January 1, 2014 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, etc.)?

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

IV-17. **Raw materials.**--

(a) How have aluminum foil raw material prices changed since January 1, 2014?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for aluminum foil.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Are your firm's selling price for aluminum foil indexed to raw material costs?

Type of sale	No	Yes	Please explain.
By contract	<input type="checkbox"/>	<input type="checkbox"/>	
Spot market	<input type="checkbox"/>	<input type="checkbox"/>	

IV-18. **Interchangeability.**--Is aluminum foil produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

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

IV-19. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between aluminum foil 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	China	Armenia	Germany	Russia	Other countries
United States					
China	X				
Armenia	X	X			
Germany	X	X	X		
Russia	X	X	X	X	
or any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's purchases of aluminum foil, identify the country-pair and report the advantages or disadvantages imparted by such factors:					

IV-20. **Customer identification.**-- List the names and contact information for your firm's 5 largest U.S. customers for certain fin stock and other aluminum foil since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of aluminum foil that each of these customers accounted for in 2016.

Aluminum foil other than certain fin stock

	Customer's name	City	State	Share of 2016 sales (%)
1				
2				
3				
4				
5				

Certain fin stock aluminum foil

	Customer's name	City	State	Share of 2016 sales (%)
1				
2				
3				
4				
5				

IV-21. **Competition from imports**

- (a) **Lost revenue**.--Since January 1, 2014: To avoid losing sales to competitors selling aluminum foil from China, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales**.--Since January 1, 2014: Did your firm lose sales of aluminum foil to imports of this product from China?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- IV-22. **Other explanations**.--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

PART V.--ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from **Justin Enck** (202-205-3363), justin.enck@usitc.gov) and/or Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@usitc.gov).

V-1. **Comparability of certain types of aluminum foils**--For each of the following indicate whether the products being compared are:

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

Note.-- Please limit comparison of small reels of aluminum foil to larger reels of aluminum foil with otherwise similar properties.

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

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses</i> :				

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

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>interchangeability</i> :				

V-1. **Comparability of certain types of aluminum foils** --Continued

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

(c) **Common manufacturing facilities, production processes, and production employees.**-

-Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities, production processes, and production employees</u> :				

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

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :				

V-1. **Comparability of certain types of aluminum foils** --Continued

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

(e) **Customer and producer perceptions**--Perceptions as to the differences and/or similarities.

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and product perceptions</u> :				

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

Product-pair	Certain fin stock aluminum foil	Aluminum foil backed on only one side	Small reels of aluminum foil weighing 25 pounds or less	Ultra-thin aluminum foil
All other aluminum foil				
Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :				

V-2. **Production using same machinery.**--Please report your firm's production of products made on the same equipment and machinery used to produce in-scope fin-stock aluminum foil, and the combined production capacity on this shared equipment and machinery in the periods indicated.

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

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

Quantity (in short tons)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Overall production capacity					
Production of:					
Certain fin stock aluminum foil ¹	0	0	0	0	0
Other in-scope aluminum foil					
In-scope products on certain fin stock machinery	0	0	0	0	0
Out-of-scope products.--					
Out-of-scope fin stock aluminum foil or sheet					
Other aluminum sheet and plate products					
Other products ²					
Out-of-scope products on certain fin stock machinery	0	0	0	0	0
Total	0	0	0	0	0
¹ Data entered for production of certain fin stock aluminum foil will populate here once reported in question V-3. ² Please identify these products: _____.					

V-3. **Production, shipment, and inventory data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of certain fin stock aluminum foil in its U.S. establishment(s) during the specified periods.

CERTAIN FIN STOCK ALUMINUM FOIL

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average production capacity¹ (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 (G)					
Transfers to related firms:²					
quantity (H)					
value (I)					
Export shipments:³					
quantity (J)					
value (K)					
End-of-period inventories (quantity) (L)					

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

² Internal consumption and transfers to related firms should be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____.

V-3. **Production, shipment, and inventory data.**--Continued

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--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.

Reconciliation item	Calendar year			January-September	
	2014	2015	2016	2016	2017
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

V-4. **Channels of distribution.**-- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of certain fin stock aluminum foil by channel of distribution.

CERTAIN FIN STOCK ALUMINUM FOIL

"Consumer Packaging /Converter"--Shipments to end users in the business of packaging foods, cosmetics, pharmaceuticals and to other chemical products; these end users are otherwise known as converters in the industry.

"Household use/spoolers"-- Shipment to end users for eventual retail sale as aluminum foil used for short-term wrapping, mostly in households, catering and food and floristry retail businesses after further processing into small reels (e.g., in the context of internal consumption).

"Industrial applications"-- Shipments to end users in the business of using the foil in thermal insulation, cables, and electronics, among other industrial end uses.

Quantity (in short tons)					
Item	Calendar years			January-September	
	2014	2015	2016	2016	2017
Channels of distribution:					
U.S. shipments:					
To distributors (M)					
To consumer packaging/ converter (<i>quantity</i>) (N)					
To household use/spoolers (<i>quantity</i>) (O)					
To industrial applications (<i>quantity</i>) (P)					

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

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

V-5. **Employment data.**--Report your firm's employment-related data related to the domestic (U.S.) production of certain fin stock aluminum foil and provide an explanation for any trends in these data.

"Production 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 domestic (U.S.) production operations. Do not report employment data for production occurring outside of the United States or employment data for U.S. sales of products manufactured outside the United States.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

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

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

CERTAIN FIN STOCK ALUMINUM FOIL

Employment data	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>1,000 hours</i>)					
Wages paid to PRWs (<i>\$1,000</i>)					

Explanation of trends:

V-6. **Operations on certain fin stock.**-- Report the revenue and related cost information requested below on the certain fin stock aluminum foil operations of your firm's U.S. establishment(s).¹ 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. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact **Jennifer Brinckhaus** (202-205-3188, Jennifer.brinckhaus@usitc.gov). before completing this section of the questionnaire.

CERTAIN FIN STOCK ALUMINUM FOIL

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

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

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

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

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for total shipments in V-3 the quantities and values reported total net sales in V-6 in each time period unless the financial data from part V-6 are reported on a fiscal year basis, in which case only the interim periods must reconcile.*

Reconciliation	Full year data			Partial year periods	
	2014	2015	2016	2016	2017
Quantity: Trade data from question V-3 (lines D, F, H, and J) less financial total net sales quantity data from question V-6, = zero ("0").	0	0	0	0	0
Value: Trade data from question V-3 (lines E, G, I, and K) less financial total net sales value data from question V-6, = zero ("0").	0	0	0	0	0

V-7. **Asset values.**--As applicable, report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of in-scope certain fin stock aluminum foil. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets related to operations on certain fin stock 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 table V-6. Provide data as of the end of your firm's three most recently completed fiscal years. (Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted. As reported in this table, total assets should be allocated if they are also related to the operations of other products.) In the note to table V-7, please provide a brief explanation if there were any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

CERTAIN FIN STOCK ALUMINUM FOIL

Value (in \$1,000)			
	Fiscal years ended--		
	2014	2015	2016
Total assets (net) ¹			
¹ Describe _____			

V-8. **Capital expenditures and R&D expenses.**--Report your firm's capital expenditures and R&D expenses for in-scope certain fin stock aluminum foil. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods. The manner in which capital expenditures and R&D expenses are assigned to operations on certain fin stock should be consistent with the manner in which capital expenditures and R&D expenses were assigned to operations on aluminum foil (III-13).

CERTAIN FIN STOCK ALUMINUM FOIL

Value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Capital expenditures ¹					
R&D expenses ²					
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on certain fin stock: _____ ² Please describe the nature, focus, and significance of your firm's R&D expenses related to operations on certain fin stock: _____					

V-9. **Production, shipment, and inventory data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of small reel aluminum foil in its U.S. establishment(s) during the specified periods.

SMALL REEL ALUMINUM FOIL

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average production capacity¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) – Using firm's own production of aluminum foil (C)					
Using purchases of domestically produced aluminum foil (D)					
Using imports of aluminum foil from subject sources (E)					
Using imports of aluminum foil from nonsubject sources (F)					
Total production (G)	0	0	0	0	0
U.S. shipments:					
Commercial shipments:					
quantity (H)					
value (I)					
Internal consumption:²					
quantity (J)					
value (K)					
Transfers to related firms:²					
quantity (L)					
value (M)					
Export shipments:³					
quantity (N)					
value (O)					
End-of-period inventories (quantity) (P)					

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

² Internal consumption and transfers to related firms should be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____.

V-9. **Production, shipment, and inventory data.**--Continued

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

Reconciliation item	Calendar year			January-September	
	2014	2015	2016	2016	2017
B + G – H – J – L – N – P = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

V-10. **Channels of distribution**-- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of small reel aluminum foil by channel of distribution.

SMALL REEL ALUMINUM FOIL

"Consumer Packaging /Converter"--Shipments to end users in the business of packaging foods, cosmetics, pharmaceuticals and to other chemical products; these end users are otherwise known as converters in the industry.

"Household use/spoolers"-- Shipment to end users for eventual retail sale as aluminum foil used for short-term wrapping, mostly in households, catering and food and floristry retail businesses.

"Industrial applications"-- Shipments to end users in the business of using the foil in thermal insulation, cables, and electronics, among other industrial end uses.

Item	Quantity (in short tons)				
	Calendar years			January-September	
	2014	2015	2016	2016	2017
Channels of distribution:					
U.S. shipments:					
To distributors (Q)					
To consumer packaging/ converter (quantity) (R)					
To household use/spoolers (quantity) (S)					
To industrial applications (quantity) (T)					

RECONCILIATION OF CHANNELS--Please ensure that the quantities reported for channels of distribution (i.e., lines Q through T) in each time period equal the quantity reported for U.S. shipments (i.e., lines H, J, and L) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar years			January-September	
	2014	2015	2016	2016	2017
Q + R + S + T – H – J – L = zero ("0"), if not revise.	0	0	0	0	0

V-11. **Employment data.**--Report your firm's employment-related data related to the domestic (U.S.) production of small reel aluminum foil and provide an explanation for any trends in these data.

"Production 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 domestic (U.S.) production operations. Do not report employment data for production occurring outside of the United States or employment data for U.S. sales of products manufactured outside the United States.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

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

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

SMALL REEL ALUMINUM FOIL

Employment data	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>1,000 hours</i>)					
Wages paid to PRWs (<i>\$1,000</i>)					

Explanation of trends:

V-12. **Operations on small reels.**-- Report the revenue and related cost information requested below on small reel aluminum foil operations of your firm's U.S. establishment(s).¹ Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value.

SMALL REEL ALUMINUM FOIL

Item	Quantity (in short tons) and value (in \$1,000)				
	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³					
Cost of foil -- Internally produced or purchases of domestically produced (domestic)					
Cost of foil -- Imports or purchases of imports from subject sources (subject)					
Cost of foil -- Imports or purchases of imports from non subject sources (nonsubject)					
Total cost of foil	0	0	0	0	0
Other raw materials					
Total raw materials	0	0	0	0	0
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					

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

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

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

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in V-9 the quantities and values reported total net sales in V-12 in each time period unless the financial data from part V-12 are reported on a fiscal year basis, in which case only the interim periods must reconcile.

Reconciliation	Full year data			Partial year periods	
	2014	2015	2016	2016	2017
Quantity: Trade data from question V-9 (lines H, J, L, and N) less financial total net sales quantity data from question V-12, = zero ("0").	0	0	0	0	0
Value: Trade data from question V-9 (lines I, K, M, and O) less financial total net sales value data from question V-12, = zero ("0").	0	0	0	0	0

V-13. **Asset values.**--As applicable, report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of small reel aluminum foil. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets related to operations on small reels 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 table V-6. Provide data as of the end of your firm's three most recently completed fiscal years. (Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted. As reported in this table, total assets should be allocated if they are also related to the operations of other products.) In the note to table V-7, please provide a brief explanation if there were any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

SMALL REEL ALUMINUM FOIL

Value (in \$1,000)			
	Fiscal years ended--		
	2014	2015	2016
Total assets (net) ¹			
¹ Describe _____			

V-14. **Capital expenditures and R&D expenses.**--Report your firm's capital expenditures and R&D expenses for small reel aluminum foil. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods. The manner in which capital expenditures and R&D expenses are assigned to operations on small reels should be consistent with the manner in which capital expenditures and R&D expenses were assigned to operations on aluminum foil (III-13).

SMALL REEL ALUMINUM FOIL

Value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Capital expenditures ¹					
R&D expenses ²					
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on small reels: _____ ² Please describe the nature, focus, and significance of your firm's R&D expenses related to operations on small reels: _____					

V-15. **Production, shipment, and inventory data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of single sided aluminum foil in its U.S. establishment(s) during the specified periods.

SINGLE-BACKED ALUMINUM FOIL

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average production capacity¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) – Using firm's own production of aluminum foil (C)					
Using purchases of domestically produced aluminum foil (D)					
Using imports of aluminum foil from subject sources (E)					
Using imports of aluminum foil from nonsubject sources (F)					
Total production (G)	0	0	0	0	0
U.S. shipments:					
Commercial shipments:					
quantity (H)					
value (I)					
Internal consumption:²					
quantity (J)					
value (K)					
Transfers to related firms:²					
quantity (L)					
value (M)					
Export shipments:³					
quantity (N)					
value (O)					
End-of-period inventories (quantity) (P)					

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

² Internal consumption and transfers to related firms should be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: _____.

V-15. **Production, shipment, and inventory data.**--*Continued*

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

Reconciliation item	Calendar year			January-September	
	2014	2015	2016	2016	2017
B + G – H – J – L – N – P = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

V-16. **Channels of distribution**-- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of single-backed aluminum foil by channel of distribution.

SINGLE-BACKED ALUMINUM FOIL

"Consumer Packaging /Converter"--Shipments to end users in the business of packaging foods, cosmetics, pharmaceuticals and to other chemical products; these end users are otherwise known as converters in the industry.

"Household use/spoolers"-- Shipment to end users for eventual retail sale as aluminum foil used for short-term wrapping, mostly in households, catering and food and floristry retail businesses.

"Industrial applications"-- Shipments to end users in the business of using the foil in thermal insulation, cables, and electronics, among other industrial end uses.

Item	Quantity (in short tons)				
	Calendar years			January-September	
	2014	2015	2016	2016	2017
Channels of distribution:					
U.S. shipments:					
To distributors (Q)					
To consumer packaging/ converter (quantity) (R)					
To household use/spoolers (quantity) (S)					
To industrial applications (quantity) (T)					

RECONCILIATION OF CHANNELS--Please ensure that the quantities reported for channels of distribution (i.e., lines Q through T) in each time period equal the quantity reported for U.S. shipments (i.e., lines H, J, and L) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar years			January-September	
	2014	2015	2016	2016	2017
Q + R + S + T – H – J – L = zero ("0"), if not revise.	0	0	0	0	0

V-17. **Employment data.**--Report your firm's employment-related data related to the domestic (U.S.) production of single-backed aluminum foil and provide an explanation for any trends in these data.

"Production 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 domestic (U.S.) production operations. Do not report employment data for production occurring outside of the United States or employment data for U.S. sales of products manufactured outside the United States.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

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

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

SINGLE-BACKED ALUMINUM FOIL

Employment data	Calendar year			January-September	
	2014	2015	2016	2016	2017
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (<i>1,000 hours</i>)					
Wages paid to PRWs (<i>\$1,000</i>)					

Explanation of trends:

V-18. **Operations on single-backed aluminum foil.**-- Report the revenue and related cost information requested below on single-backed aluminum foil operations of your firm's U.S. establishment(s).¹ Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value.

SINGLE-BACKED ALUMINUM FOIL

Quantity (in short tons) and value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³					
Cost of foil -- Internally produced or purchases of domestically produced (domestic)					
Cost of foil – Imports or purchases of imports from subject sources (subject)					
Cost of foil – Imports or purchases of imports from non subject sources (nonsubject)					
Total cost of foil	0	0	0	0	0
Other raw materials					
Total raw materials	0	0	0	0	0
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					

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

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

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

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in V-15 the quantities and values reported total net sales in V-18 in each time period unless the financial data from part V-18 are reported on a fiscal year basis, in which case only the interim periods must reconcile.

Reconciliation	Full year data			Partial year periods	
	2014	2015	2016	2016	2017
Quantity: Trade data from question V-15 (lines H, J, L, and N) less financial total net sales quantity data from question V-18, = zero ("0").	0	0	0	0	0
Value: Trade data from question V-15 (lines I, K, M, and O) less financial total net sales value data from question V-18, = zero ("0").	0	0	0	0	0

V-19. **Asset values.**--As applicable, report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of single-backed aluminum foil. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets related to operations on single-backed aluminum foil 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 table V-6. Provide data as of the end of your firm's three most recently completed fiscal years. (Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted. As reported in this table, total assets should be allocated if they are also related to the operations of other products.) In the note to table V-7, please provide a brief explanation if there were any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

SINGLE-BACKED ALUMINUM FOIL

Value (in \$1,000)			
	Fiscal years ended--		
	2014	2015	2016
Total assets (net) ¹			
¹ Describe _____			

V-20. **Capital expenditures and R&D expenses.**--Report your firm's capital expenditures and R&D expenses for single-backed aluminum foil. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods. The manner in which capital expenditures and R&D expenses are assigned to operations on small reels should be consistent with the manner in which capital expenditures and R&D expenses were assigned to operations on aluminum foil (III-13).

SINGLE-BACKED ALUMINUM FOIL

Value (in \$1,000)					
Item	Fiscal years ended--			January-September	
	2014	2015	2016	2016	2017
Capital expenditures ¹					
R&D expenses ²					
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on single-backed aluminum foil: _____ ² Please describe the nature, focus, and significance of your firm's R&D expenses related to operations on single-backed aluminum foil: _____					

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://usitc.gov/investigations/701731/2017/aluminum_foil_china/final.htm.

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

- **Upload via Secure Drop Box.**—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission’s secure upload facility:

Web address: <https://dropbox.usitc.gov/oinv/> **Pin:** **FOIL**

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

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

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