FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

POLYTETRAFLUOROETHYLENE RESIN ("PTFE RESIN") FROM CHINA AND INDIA

This questionnaire must be received by the Commission by April 23, 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 investigations concerning polytetrafluoroethylene resin ("PTFE resin") from China and India (Inv. Nos. 701-TA-588 and 731-TA-1392-1393 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII.

	m	i
Address		i
Website	-	i
Has your firm p	produced or exported PTFE resin (as defined on next page) at any time since January 1, 2015?	i
☐ NO	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)	
YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)	
Data reported	ed in this questionnaire relate to (Check one):	
	China India	
•	stionnaire via the Commission <i>Drop Box</i> by clicking on the following link: bbox.usitc.gov/oinv/. (PIN: PTFE)	
hat the inform	CERTIFICATION mation herein supplied in response to this questionnaire is complete and correct to the best	of m
e and belief and this certification provided in this side of the sales		sion. B use the octed b out thi contrac audits 5 U.S.C
e and belief and this certification provided in this side of the sales	mation herein supplied in response to this questionnaire is complete and correct to the best and understand that the information submitted is subject to audit and verification by the Commission I also grant consent for the Commission, and its employees and contract personnel, to a this questionnaire and throughout this proceeding in any other import-injury proceedings conductance or similar merchandise. Inowledge that information submitted in response to this request for information and through occeedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and coping or maintaining the records of this or a related proceeding, or (b) in internal investigations, and relating to the programs, personnel, and operations of the Commission including under the S. government employees and contract personnel, solely for cybersecurity purposes. I understand sign appropriate nondisclosure agreements.	sion. B use the octed b out thi contrac audits 5 U.S.C
e and belief an this certification provided in this certification on the salersigned, ackning or other process of for developed and evaluation as or (ii) by U.S. ersonnel will signs.	mation herein supplied in response to this questionnaire is complete and correct to the best and understand that the information submitted is subject to audit and verification by the Commission I also grant consent for the Commission, and its employees and contract personnel, to a this questionnaire and throughout this proceeding in any other import-injury proceedings conductance or similar merchandise. Inowledge that information submitted in response to this request for information and through occeedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and coping or maintaining the records of this or a related proceeding, or (b) in internal investigations, and relating to the programs, personnel, and operations of the Commission including under the S. government employees and contract personnel, solely for cybersecurity purposes. I understand sign appropriate nondisclosure agreements.	sion. By use the ucted by out this contract audits 5 U.S.C
e and belief an this certification provided in this certification on the salersigned, ackning or other process of for developed and evaluation as or (ii) by U.S. ersonnel will signs.	mation herein supplied in response to this questionnaire is complete and correct to the best and understand that the information submitted is subject to audit and verification by the Commistion I also grant consent for the Commission, and its employees and contract personnel, to a this questionnaire and throughout this proceeding in any other import-injury proceedings conductance or similar merchandise. In owledge that information submitted in response to this request for information and throughouse decedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and coping or maintaining the records of this or a related proceeding, or (b) in internal investigations, and relating to the programs, personnel, and operations of the Commission including under the sign appropriate nondisclosure agreements. Title of Authorized Official Date	sion. B use the octed b out thi contrac audits 5 U.S.C

PART I.—GENERAL INFORMATION

Background. -- This proceeding was instituted in response to petitions filed on September 28, 2017, by The Chemours Company FC LLC, Wilmington, Delaware. Countervailing and 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/701731/2018/polytetrafluoroethylene_ptfe_resin_china_and_india/fina_l.htm.

<u>PTFE resin</u> covered by these investigations is polytetrafluoroethylene (PTFE) resin, including but not limited to granular, dispersion, or coagulated dispersion (also known as fine powder). PTFE is covered by the scope of this investigation whether filled or unfilled, whether or not modified, and whether or not containing co-polymer additives, pigments, or other materials. Also included is PTFE wet raw polymer. The chemical formula for PTFE is C2F4, and the Chemical Abstracts Service Registry number is 9002-84-0.

PTFE further processed into micropowder, having particle size typically ranging from 1 to 25 microns, and a melt-flow rate no less than 0.1 gram/10 minutes, is excluded from the scope of this investigation.

PTFE is classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheadings 3904.61.0010 and 3904.61.0090. Subject merchandise may also be classified under HTSUS subheading 3904.69.5000. Although the HTSUS subheadings and CAS Number are provided for convenience and Customs purposes, the written description of the scope is dispositive.

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

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

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

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

similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

<u>Valid number error messages.</u>--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Robert Casanova (202-708-2719, robert.casanova@usitc.gov).

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 20 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

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

of PTFE res	in, including eparate fron	facility of a firm in auxiliary facilities o n) such facilities. Fir ne the data for all e	perated in congrms operating r	junction with	(whether or no e establishmen	ot .
		es your firm or any oduce PTFE resin in	•	•	. ,	o produce,
☐ No	☐ Yes-	Please name the f ensure that they		• • •	•	
			-	-		

☐ No	YesPlease name the firm(s) below and ensure that they complete the
	Commission's importer questionnaire.
<u> </u>	

I-5. <u>U.S. importers</u>.--Please provide the names, street addresses (not P.O. boxes), contacts, telephone numbers, and e-mail addresses of the <u>FIVE</u> largest U.S. importers of your firm's PTFE resin in 2017.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2017 U.S. exports (%)
1					
2					
3					
4					
5					

PART II.--TRADE AND RELATED INFORMATION

Telephone

Fax

Further information on this part of the questionnaire can be obtained from Robert Casanova (202-708-2719, robert.casanova@usitc.gov). Supply all data requested on a calendar-year basis.

II-1.	Contact informationPlease 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					
	Fmail		1			

II-2. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of PTFE resin since January 1, 2015.

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

		s in operationsDoes your firm anticipate any changes in the character of ganization (as noted above) relating to the production of PTFE resin in the
No		Yes—Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue. Include in the response a specific projection of your firm's capacity to produce PTFE resin (in 1,000 pounds in dry weight) for 2018 and 2019.
Production	on using sa	me machinery.—
` '	•	irm produce products other than PTFE resin on the same equipment and as PTFE resin (any form)? Please explain.
No	Yes	If yes Please explain
		irm produce granular PTFE resin on the same equipment and machinery as r PTFE resin?
No	Yes	If yes Please explain
		I irm produce granular PTFE resin on the same equipment and machinery as PTFE resin?
No	Yes	If yes Please explain
	oes your f owder PTF	irm produce dispersion PTFE on the same equipment and machinery as fine E resin ?
No	Yes	If yes Please explain
		·

I-4b.		ting parametersThe production capacity reported in II-4a is based on operating hours eek, weeks per year.					
l-4c.	-	<u>Capacity calculation</u> Please describe the methodology used to calculate overall production capacity reported in II-4a, and explain any changes in reported capacity.					
I-4d.		action constraintsPlease describe the constraint(s) that set the limit(s) on your firm's ction capacity.					
l-4e.	<u>Produ</u>	ct shifting.—					
	(i).	Is your firm able to switch production (capacity) between PTFE resin 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.					
-5.		of salesWhat percentage of your firm's total sales in its most recent fiscal year was sented by sales of PTFE resin? percent.					
-6.	produ	ction of PTFE resin in the country specified on the certification page accounted for by your production in 2017 percent.					
I-7.	the Ur	sestimated share of country's exportsPlease estimate the percentage of total exports to nited States of PTFE from the country specified on the certification page accounted for by irm's exports in 2017 percent.					

II-8.	<u>Third country trade actions</u> Is the PTFE resin exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?				
	No	YesList the products(s), countries affected, and the date of such findings/remedies/proceedings.			

II-9. <u>Trade data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of PTFE resin in your establishment(s) in China and India during the specified periods. Do not include resales of PTFE resin that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-11.

<u>Do not submit data by manufacturing facility if they are in the same country.</u> If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response.

<u>Do not submit data on multiple countries combined</u>. The establishments reported here should all be located in the country of the firm's address reported on the certification page. Multinational companies with production in multiple subject countries should submit separate foreign producer questionnaire responses for each subject country.

"Average production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. 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 establishment(s) in China and India, including production consumed internally within your firm.

"Shipments"--Shipments of products produced in your establishment(s) in China and India. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within China and India.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in China and India, including product consumed internally by your firm.

"Export shipments"--Shipments to destinations outstide of the country indicacted on page 1 (China and India), including shipments to related firms.

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

II-9a. Trade data: Granular PTFE.

Granular PTFE

Quantity (in 1,000 pounds in dry weight)					
	Actual experience		Projections ¹ Calendar year		
	Calendar year				
Item	2015	2016	2017	2018	2019
Average production capacity ² (A)					
Beginning-of-period inventories (B)					
Production (C)					
Home market shipments: Internal consumption/ transfers (D)					
Commercial shipments (E)					
Exports to the United States (F)					
Exports to all other markets ³ (G)					
Total exports (H) (should equal F+G)	0	0	0	0	0
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0
End-of-period inventories (J)					
¹ Please explain the basis for your firr ² The production capacity reported is describe the methodology used to calcul ³ Identify principal other export mark	based on operatate production o	ting hours			

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.</u>—Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Actual experience			Projections	
	Calendar year			Calenda	ar year
Item	2015	2016	2017	2018	2019
B + C - D - E - F - G - J = should equal zero ("0") or provide an					
explanation. ¹	0	0	0	0	0

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

II-9b. Trade data: Fine powder PTFE.

Fine Powder PTFE

Quantity (in 1,000 pounds in dry weight)					
	Actual experience Calendar year		Projections ¹ Calendar year		
ltem	2015	2016	2017	2018	2019
Average production capacity ² (A)					
Beginning-of-period inventories (B)					
Production (C)					
Home market shipments: Internal consumption/ transfers (D)					
Commercial shipments (E)					
Exports to the United States (F)					
Exports to all other markets ³ (G)					
Total exports (H) (should equal F+G)	0	0	0	0	0
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0
End-of-period inventories (J)					
¹ Please explain the basis for your fir ² The production capacity reported is describe the methodology used to calcu	s based on opera late production o	ting hour			

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Actual experience		Projections		
	Calendar year		Calendar year		
Item	2015	2016	2017	2018	2019
B + C - D - E - F - G - J = 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-9c. Trade data: Dispersion PTFE.

Dispersion PTFE

Quantity (in 1,000 pounds in dry weight)					
Actual experience		9	Projections ¹ Calendar year		
	Calendar year				
ltem	2015	2016	2017	2018	2019
Average production capacity ² (A)					
Beginning-of-period inventories (B)					
Production (C)					
Home market shipments: Internal consumption/ transfers (D)					
Commercial shipments (E)					
Exports to the United States (F)					
Exports to all other markets ³ (G)					
Total exports (H) (should equal F+G)	0	0	0	0	0
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0
End-of-period inventories (J)					
¹ Please explain the basis for your firm ² The production capacity reported is describe the methodology used to calcular Identify principal other export mark	based on opera late production o	ting hours			

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Actual experience		Projections		
	Calendar year		Calendar year		
Item	2015	2016	2017	2018	2019
B + C - D - E - F - G - J = 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-10. Exports to the United States not produced by your firm.--Report your firm's exports to the United States of PTFE resin that was produced in China and India but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-9.

jections odar year	
ıdar vear	
Calendar year	
2019	

II-11.	Other explanationsIf 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.

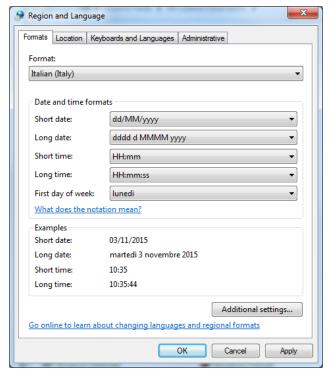
Correcting Valid number error messages. --If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form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

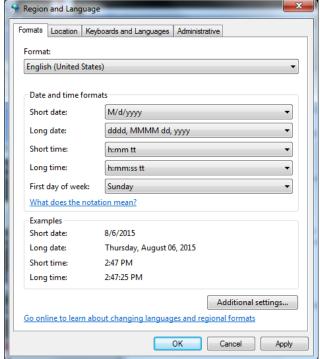
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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

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

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





HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://usitc.gov/investigations/701731/2018/polytetrafluoroethylene_ptfe_resin_chin a and india/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.

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

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

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

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

<u>Parties to this proceeding</u>.—If your firm is a party to this proceeding, you are 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.