

U.S. PRODUCERS' QUESTIONNAIRE

SODIUM GLUCONATE, GLUCONIC ACID, AND DERIVATIVE PRODUCTS FROM CHINA

This questionnaire must be received by the Commission by **August 6, 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 duty and antidumping investigations concerning sodium gluconate, gluconic acid, and derivative products ("GNA products") from China (Inv. Nos. 701-TA-590 and 731-TA-1397 (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)).

| |
|---|
| Name of firm _____ |
| Address _____ |
| City _____ State _____ Zip Code _____ |
| Website _____ |
| Has your firm produced GNA products (as defined on next page) at any time since January 1, 2015? |
| <input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission) |
| <input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission) |
| Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: GNAP) |

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:

Email address

PART I.—GENERAL INFORMATION

Background. -- This proceeding was instituted in response to a petition filed on November 30, 2017, by PMP Fermentation Products, Inc., Peoria, Illinois. 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://www.usitc.gov/investigations/701731/2017/sodium_gluconate_gluconic_acid_and_derivative/final.htm.

GNA products covered by these investigations are defined as all grades of sodium gluconate, liquid gluconate, and gluconic acid, regardless of physical form (including, but not limited to substrates; solutions; dry granular form or powders, regardless of particle size; or as a slurry). The scope also includes sodium gluconate, liquid gluconate, and gluconic acid that has been blended or is in solution with other product(s) where the resulting mix contains 35 percent or more of sodium gluconate, liquid gluconate, and/or gluconic acid (including glucono delta lactone, in essence dry gluconic acid, commonly referred to as GDL) by dry weight. Sodium gluconate has a molecular formula of $\text{NaC}_6\text{H}_{11}\text{O}_7$; gluconic acid has a molecular formula of $\text{C}_6\text{H}_{12}\text{O}_7$; liquid gluconate is a blend of gluconic acid and sodium gluconate in an aqueous solution; and GDL has a molecular formula of $\text{C}_6\text{H}_{10}\text{O}_6$. Sodium gluconate has a Chemical Abstract Service (CAS) registry number of 527-07-1, and can also be called "sodium salt of gluconic acid" and/or sodium 2, 3, 4, 5, 6-pentahydroxy-hexanoate. Liquid gluconate has CAS registry numbers of 527-07-1, 526-95-4, and 7732-18-5, and can also be called 2, 3, 4, 5, 6-Pentahydroxycaproic acid-hexanoate. Gluconic acid has a CAS registry number of 526-95-4, and can also be called 2, 3, 4, 5, 6-Pentahydroxycaproic Acid. GDL has a CAS registry number of 90-80-2, and can also be called D-Glucono-1,5-lactone. The merchandise covered by the scope of this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings 2918.16.1000, 2918.16.5010, and 2932.20.5020. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the merchandise is dispositive.

GNA products are currently imported under statistical reporting numbers 2918.16.10 and 2918.16.50 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

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

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade_remedy/question.htm) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is *optional*. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

I-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 GNA products, 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"/> |

PART II.--TRADE AND RELATED INFORMATION

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

| | |
|-----------|--|
| Name | |
| Title | |
| Email | |
| Telephone | |

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of GNA products since January 1, 2015.

| <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 using the same equipment, machinery, or employees as used to produce GNA products, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

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

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

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

| Quantity (in 1,000 dry pounds) | | | | | |
|--|-----------------------|-------------|-------------|---------------------|-------------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Overall production capacity | | | | | |
| Production of: | | | | | |
| GNA products ¹ | 0 | 0 | 0 | 0 | 0 |
| Other products ² | | | | | |
| Total | 0 | 0 | 0 | 0 | 0 |
| ¹ Data entered for production of GNA products 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 GNA products 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-4. **Tolling.**--Since January 1, 2015, has your firm been involved in a toll agreement regarding the production of GNA products?

"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 GNA products in and/or admit GNA products 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 firm’s 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 GNA products into a foreign trade zone (FTZ) for use in distribution of GNA products 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, 2015, has your firm imported GNA products?

“**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 GNA products 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. Such transactions are valued at fair market value.

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

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

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

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

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

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

| Quantity (in 1,000 dry pounds) and value (in \$1,000) | | | | | |
|--|----------------|------|------|--------------|------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| 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 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-June | |
|---|----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| 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 (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) in the specified periods by channel of distribution.

| Quantity (in 1,000 dry pounds) | | | | | |
|----------------------------------|----------------|------|------|--------------|------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Channels of distribution: | | | | | |
| U.S. shipments: | | | | | |
| To distributors (M) | | | | | |
| To end users (N) | | | | | |

***RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., 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-June | |
|--|----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| M + N - D - F - H = zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |

II-9. **U.S. shipments by product type.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of GNA products by product type.

| Quantity (in 1,000 dry pounds) and value (in \$1,000) | | | | | |
|--|-----------------------|-------------|-------------|---------------------|-------------|
| Product type | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| U.S. shipments of.-- Sodium gluconate Quantity (O) | | | | | |
| Value (P) | | | | | |
| Gluconic acid Quantity (Q) | | | | | |
| Value (R) | | | | | |
| GDL Quantity (S) | | | | | |
| Value (T) | | | | | |
| Liquid gluconate Quantity (U) | | | | | |
| Value (V) | | | | | |
| Blends ¹ Quantity (W) | | | | | |
| Value (X) | | | | | |
| ¹ Describe the reported blends:_____. | | | | | |

RECONCILIATION OF U.S. SHIPMENTS.--Please ensure that the quantities and values reported for US shipments by product type (i.e., lines O through X) in each period equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in each period in question II-7. 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-June | |
|---|-----------------------|-------------|-------------|---------------------|-------------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Quantity: O + Q + S + U + W - D - F - H = zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |
| Value: P + R + T + V + X - E - G - I = zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |

II-10. **Employment data.**--Report your firm's employment-related data related to the production of GNA products 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 6.

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

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

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

| Item | Calendar years | | | January-June | |
|---|----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| 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-11. **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-12. **Purchases.**--Other than direct imports, has your firm otherwise purchased GNA products since January 1, 2015?

“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 1,000 dry pounds) | | | | | |
|--|-----------------------|-------------|-------------|---------------------|-------------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Purchases from U.S. importers¹ of GNA products 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-13. **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 David Boyland (202-708-4725, david.boyland@usitc.gov).

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

| | |
|-----------|--|
| Name | |
| Title | |
| Email | |
| Telephone | |

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

A. 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:

Note.--Please note, that we are requesting that firms report their financial data on a calendar year basis.

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

2. Does your firm prepare profit/loss statements for GNA products:
 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, 10Qs,
 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 GNA products, 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 GNA products, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

| Products | Share of sales |
|--------------|----------------|
| GNA products | % |
| | % |
| | % |
| | % |
| | % |

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of GNA products 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 GNA products that your firm purchases from related suppliers and that are reflected in question III-9c. 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 as recorded in the firm's accounting books and records | | |
| | | |

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-9c (financial results on GNA products) 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-9c.

III-9a. **By-products.**—Does your firm have any by-product sales revenue associated with its GNA products operations? If yes, identify the by-product(s) in the space below, and complete table III-9b. If no, please continue to question III-9c.

Yes No

| |
|--|
| |
|--|

III-9b. **By-product revenue.**--Report your firm's total by-product sales revenue, net of relevant processing costs, associated with the GNA products operations of your U.S. establishment(s). Provide data for the three most recently completed fiscal years, and for the specified interim periods. **Note: the data provided below will appear in question III-9c as a reduction to COGS.**

| Value (in \$1,000) | | | | | |
|--|----------------|------|------|--------------|------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| By-product sales revenue ¹ | | | | | |
| ¹ Please describe how your firm classifies these by-product revenues in the normal course of business (e.g., included in net sales values, as a reduction to COGS, included in "all other income"). _____ | | | | | |

III-9c. **Operations on GNA products.**--Report the revenue and related cost information requested below on the GNA products 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 calendar years, and for the specified interim periods.

| Quantity (in 1,000 dry pounds) and value (in \$1,000) | | | | | |
|--|----------------|------|------|--------------|------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Net sales quantities: ² | | | | | |
| Commercial sales ("CS") | | | | | |
| Internal consumption ("IC") | | | | | |
| Transfers to related firms ("Transfers") | | | | | |
| Total net sales quantities | 0 | 0 | 0 | 0 | 0 |
| Net sales values: ² | | | | | |
| Commercial sales | | | | | |
| Internal consumption | | | | | |
| Transfers to related firms | | | | | |
| Total net sales values | 0 | 0 | 0 | 0 | 0 |
| Cost of goods sold (COGS): ³ | | | | | |
| Raw materials | | | | | |
| Direct labor | | | | | |
| Other factory costs | | | | | |
| Less: by-product revenue | 0 | 0 | 0 | 0 | 0 |
| 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-9d. **Raw materials for GNA products.**--Please indicate the share of total raw material costs reported in III-9c in 2017 for the following raw material inputs:

| Products | Share of 2017 total raw material costs (percent) |
|---|---|
| Liquid corn syrup | % |
| Other ¹ | % |
| Total (should sum to 100 percent) | 0.0 % |
| ¹ Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the 2016 total raw material costs that they account for: | |
| | - |

III-9e. **GNA products variable and fixed costs.**--For the total COGS and SG&A expenses reported in table III-9c, please report the portion of those costs that were variable vs fixed.

| Item | Calendar years | | | January-June | |
|---------------------------------------|--------------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| | Value (in \$1,000) | | | | |
| Cost of goods sold (COGS): | | | | | |
| Fixed ¹ | | | | | |
| Variable ² | | | | | |
| Total COGS (before by-product offset) | 0 | 0 | 0 | 0 | 0 |
| SG&A: | | | | | |
| Fixed ³ | | | | | |
| Variable ⁴ | | | | | |
| Total SG&A | 0 | 0 | 0 | 0 | 0 |

Please specify the primary variable costs/expenses reflected in the data reported in each of the lines above and the extent to which such costs changed significantly during the period examined.

¹ Fixed COGS: _____

² Variable COGS: _____

³ Fixed S&GA: _____

⁴ Variable S&GA: _____

RECONCILIATION OF OPERATING COSTS.--Please ensure that the value of total COGS in this question (i.e., in III-9e) equal the value reported for total COGS in the main financial data table (i.e., in III-9c) in each period. Likewise, please ensure that the value of total SG&A expense in this question (i.e., in III-9e) equal the value reported for total SG&A expense in the main financial data table (i.e., in III-9c) in each 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-June | |
|---|----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| COGS: data in III-9c minus data in III-9e, should equal zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |
| SG&A: data in III-9c minus data in III-9e, should equal zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |

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

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

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

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

III-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-9c, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9c line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9c; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9c should be reported in the schedule below. Note: The Commission’s objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9c.

| Item | Calendar years | | | January-June | |
|---------------------|-----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| | Value (\$1,000) | | | | |
| Nonrecurring item 1 | | | | | |
| Nonrecurring item 2 | | | | | |
| Nonrecurring item 3 | | | | | |
| Nonrecurring item 4 | | | | | |
| Nonrecurring item 5 | | | | | |
| Nonrecurring item 6 | | | | | |
| Nonrecurring item 7 | | | | | |

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

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

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in 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-9c.

| |
|--|
| |
|--|

III-12. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of GNA products. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for GNA products in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9c. Provide data as of the end of your firm's three most recently completed calendar 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 | Calendar years | | |
| | 2015 | 2016 | 2017 |
| 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 GNA products. Provide data for your firm's three most recently completed calendar years, and for the specified interim periods.

| Value (in \$1,000) | | | | | |
|--|----------------|------|------|--------------|------|
| Item | Calendar years | | | January-June | |
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Capital expenditures ¹ | | | | | |
| Research and development expenses ² | | | | | |
| ¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product. | | | | | |
| ² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product. | | | | | |

III-14. **Data consistency and reconciliation.**--Please confirm that your firm's financial data for questions III-9c, 12, and 13 are based on a calendar 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 for total net sales in part III of this questionnaire in each time period. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.*

| Reconciliation | Full year data | | | Partial year periods | |
|--|----------------|------|------|----------------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9c, = 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-9c, = zero ("0"). | 0 | 0 | 0 | 0 | 0 |

Do these data in question III-9c 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, 2015, 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 GNA products 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, 2015, 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 GNA products 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 GNA products from China?

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

III-18. **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 Fernando Gracia (202-205 2747, Fernando.Gracia@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 | |

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, 2015 of the following products produced by your firm.

Product 1.--Sodium gluconate in 50 lb. to 60 lb. bag or kilogram equivalent (i.e., 25 or 30 kg/bag).

Product 2.--Sodium gluconate in 2,000 lb. to 2,500 lb. bag or kilogram equivalent (i.e., 1,000 or 1,250 kg/bag).

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, including those after the sale occurred).

IV-2 (a). During January 2015-June 2018, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

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

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

| (Quantity in dry pounds, value in dollars) | | | | |
|--|---|-------|---|-------|
| Period of shipment | Product 1 Sodium gluconate in 50 lb. to 60 lb. bag | | Product 2 Sodium gluconate in 2,000 lb. to 2,500 lb. bag | |
| | Quantity | Value | Quantity | Value |
| 2015: | | | | |
| January-March | | | | |
| April-June | | | | |
| July-September | | | | |
| October-December | | | | |
| 2016: | | | | |
| January-March | | | | |
| April-June | | | | |
| July-September | | | | |
| October-December | | | | |
| 2017: | | | | |
| January-March | | | | |
| April-June | | | | |
| July-September | | | | |
| October-December | | | | |
| 2018: | | | | |
| January-March | | | | |
| April-June | | | | |

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:

IV-2 (c). **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 (not \$1,000)? | <input type="checkbox"/> |
| In actual dry pounds (not 1,000 dry pounds)? | <input type="checkbox"/> |
| F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)? | <input type="checkbox"/> |
| Net of all discounts and rebates? | <input type="checkbox"/> |
| Have returns credited to the quarter in which the sale occurred? | <input type="checkbox"/> |
| Less than reported commercial shipments in question II-7 in each year? | <input type="checkbox"/> |

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

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

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of GNA products (*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-4. **Rebates.**—

(a) Does your company provide rebates to customers who were NOT the company that issued the purchase order and to whom you issued the invoice?

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

(b) In what form(s) are discounts and rebates provided to your customers?

| | | | |
|--------------------------|--------------------------|--------------------------|--|
| Cash | Account/credit | Other | If rebates and discounts are provided, please describe how they are calculated. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

(c) Which types of customers receive rebates and discounts?

| |
|--|
| |
|--|

(d) For your sales of U.S.-produced GNA products, report the average rebate/discount granted from invoice price in each specified period.

| Item | Calendar years | | | January-June | |
|-----------------------------------|----------------|------|------|--------------|------|
| | 2015 | 2016 | 2017 | 2017 | 2018 |
| Average rebate/discount (percent) | | | | | |

(e) Where are the rebates accounted for in your books and records?

| |
|--|
| |
|--|

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

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

| 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 GNA products 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 GNA products in 2017 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 2017 sales | % | % | % | % | 0.0 % |

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced GNA products (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 | No. of days | | 365 | |
| Price renegotiation (during contract period) | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fixed quantity and/or price | Quantity | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Price | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Both | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Meet or release provision | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <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 share of your firm's sales is 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 GNA products?

| Source | Share of 2017 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 cost of U.S.-produced GNA products 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 GNA products 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 GNA products since January 1, 2015 (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 end uses of the GNA products that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by GNA products and other inputs?

| End-use product | Share of total cost of end-use product accounted for by | | Total (should sum to 100.0% across) |
|------------------------|--|---------------------|--|
| | GNA products | Other inputs | |
| | % | % | 0.0 % |
| | % | % | 0.0 % |
| | % | % | 0.0 % |

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

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 GNA products? | | |
|------------|---|---|--------------------------|-------------|
| | | 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 GNA products has changed since January 1, 2015. 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 GNA products since January 1, 2015?

| No | Yes | If yes, please describe and quantify if possible. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

IV-15. Conditions of competition.--

(a) Is the GNA products market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to GNA products? 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 GNA products since January 1, 2015?

| 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 GNA products since January 1, 2015 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

IV-17. **Product quality issues.**--Have any of your customers returned GNA products or canceled orders due to quality issues such as product impurities or caking issues, since January 1, 2015?

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

IV-18. **Raw materials.**--How have GNA products raw material prices changed since January 1, 2015?

| 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 GNA products. |
|--------------------------|--------------------------|--------------------------|-------------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

IV-19. **Interchangeability.**--Are GNA products produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

| Country-pair | China | Other countries |
|---|-------|-----------------|
| United States | | |
| China | | |
| For any country-pair producing GNA products 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-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between GNA products 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 | Other countries |
|--|-------|-----------------|
| United States | | |
| China | | |
| For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of GNA products, identify the country-pair and report the advantages or disadvantages imparted by such factors: | | |

IV-21. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for GNA products since January 1, 2015. Indicate the share of the quantity of your firm's total shipments of GNA products that each of these customers accounted for in 2017.

| | Customer's name | City | State | Share of 2017 sales (%) |
|----|-----------------|------|-------|-------------------------|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| 10 | | | | |

IV-22. Competition from imports.--

(a) **Lost revenue.**--Since January 1, 2015: To avoid losing sales to competitors selling GNA products 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, 2015: Did your firm lose sales of GNA products to imports of this product from China?

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

IV-23. Other explanations.--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

https://www.usitc.gov/investigations/701731/2018/sodium_gluconate_gluconic_acid_and_derivative/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:** **GNAP**

- **E-mail.**—E-mail the MS Word 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 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.