



**GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on April 30, 2019, by Hirsh Industries LLC, Des Moines, Iowa. 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. U.S. producers of freestanding vertical metal file cabinets have provided the USITC with allegations about sales or revenue that they have lost due to competition from imports of vertical metal file cabinets from China. One or more domestic producer(s) have named your firm in such an allegation.

**Vertical metal file cabinets "VMFCs"** covered by these investigations are freestanding vertical metal file cabinets containing extendable file storage elements, having a width of 25 inches or less<sup>1</sup>, and having a height that is greater than its width ("vertical metal file cabinets").

The subject vertical metal file cabinets have bodies made of carbon and/or alloy steel and or other metals, regardless of whether painted, powder coated, galvanized or otherwise coated for corrosion protection or aesthetic appearance. The subject vertical metal file cabinets must have two to five extendable elements for file storage (e.g., file drawers) of a height that permits hanging files of either letter (8.5" x 11") or legal (8.5" x 14") sized documents.

An "extendable element" is defined as a movable load-bearing storage component including, but not limited to, drawers and filing frames. Extendable elements typically have suspension systems, consisting of glide blocks or ball bearing glides, to facilitate opening and closing.

The subject vertical metal file cabinets typically come in models with two, three, four, or five file drawers. The inclusion of an additional non-file-sized extendable storage element, not sized for storage files (e.g., a box or pencil drawer), does not remove an otherwise in-scope product from the scope. The inclusion of an integrated storage area that is 6" or less in height that is not extendable, (i.e., a cubby), also does not remove a subject vertical metal file cabinet from the scope. Accessories packaged with a subject vertical file cabinet, such as separate printer stands or shelf kits that sit on top of the in-scope vertical file cabinet are not considered integrated storage.

"Freestanding" means the unit has a solid top rather than an open top and is not designed to be attached to, be hung from or to support a desktop or other work surface. The ability to anchor a vertical file cabinet to a wall for stability or to prevent it from tipping over does not exclude the unit from the scope.

Subject vertical file cabinets may have different handle styles including plastic, metal, recessed or otherwise integrated handles. The addition of mobility elements such as casters or wheels, a dolly or other mobility elements does not remove the product from the scope. Packaging a subject vertical metal file cabinet with other accessories, including, but not limited to, locks, leveling glides, caster kits, drawer

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<sup>1</sup> Vertical file cabinets are defined by the Business and Institutional Furniture Manufacturers Association ("BIFMA") X5.9 testing standard as having a depth greater than its width and all imported vertical metal filing cabinets currently meet this standard. To prevent circumvention of the scope, petitioners have set a width limitation. Because the narrowest lateral file sold in the market is over 29 inches wide, petitioners have set the maximum width for an in-scope vertical file at 25 inches.

accessories (e.g., including but not limited to follower wires, follower blocks, file compressors, hanger rails, pencil trays, and hanging file folders), printer stand, shelf kit and magnetic hooks, also does not remove the product from the scope.

Excluded from the scope are vertical file cabinets with bodies made of plastic, wood, or other non-metallic substances.

Also excluded from the scope are lateral file cabinets. Lateral file cabinets typically have a body that is more than 25 inches wide and have a width that is greater than the body depth.

Also excluded from the scope are pedestal file cabinets. Pedestal file cabinets are metal file cabinets with body depths that are greater than or equal to their width, are under 31" in height, and have the following characteristics: (1) an open top or the means for the cabinet to be attached to or hung from a desktop or other work surface (i.e., not freestanding); or (2) freestanding file cabinets that have: (a) at least a 90 percent drawer extension for all extendable storage elements; (b) a central locking system; (c) a minimum weight density of 9.5 lbs/cubic foot; and (d) casters or leveling glides. A "central locking system" locks all drawers in a unit.

Also excluded from the scope are fire proof or fire resistant file cabinets that meet Underwriters Laboratories ("UL") fire protection standard 72, class 350, which covers the test procedures applicable to fire-resistant equipment intend to protect paper records.

The merchandise subject to the investigation is classified in the Harmonized Tariff Schedule of the United States ("HTSUS") subheading 9403.10.00 (statistical reporting number 9403.10.0020). While HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of the investigation is dispositive; decisions on classification are within the authority of Customs.

**Reporting of information.**-- If information is not readily available from your records, provide carefully prepared estimates.

**Confidentiality.**--The data furnished in response to this survey 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.

**Release of information.**--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit

**Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

**Firms operating more than one establishment should combine the data for all establishments into a single response.**

**PURCHASE INFORMATION**

- Purchases and imports.**--Report separately your firm’s domestic purchases and imports of vertical metal file cabinets.

**“Purchase”** – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

**“Import”** – Purchase directly from a foreign supplier and your firm is the importer of record.

Item	2016	2017	2018
	Quantity (in number of units)		
<b>Purchases of VMFCs produced in—</b> United States			
China			
All other countries <sup>1</sup>			
Sources unknown <sup>2</sup>			
Total purchases	0	0	0
<b>Imports of VMFCs from—</b> China			
All other countries <sup>1</sup>			
Total imports <sup>3</sup>	0	0	0

<sup>1</sup> Please identify these countries:

<sup>2</sup> Please indicate the firm(s) from which you purchased this merchandise:

<sup>3</sup> If your firm imported vertical metal file cabinets at any time since January 1, 2016, please also complete and return a U.S. importers' questionnaire in this proceeding. It can be downloaded at:

[https://www.usitc.gov/sites/default/files/documents/us\\_importers\\_questionnaire-original.pdf](https://www.usitc.gov/sites/default/files/documents/us_importers_questionnaire-original.pdf)

2. **Changes in purchasing patterns.**--Please indicate how the shares of your firm's purchases of VMFCs from different sources have changed since January 1, 2016.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other sources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

3. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase VMFCs.

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions:	

4. **Purchasing subject imports rather than domestic products.--**

(a) Since January 2016, did your firm import and/or purchase imports of VMFCs from China instead of purchasing U.S.-produced VMFCs?

<b>Source</b>	<b>Yes (also respond to parts (b) and (c))</b>	<b>No (If "No", skip to next question)</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?

<b>Source</b>	<b>Yes</b>	<b>No</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(c) If you responded "Yes" to part (a), was price a primary reason for importing and/or purchasing imports from China rather than domestic product?

<b>Source</b>	<b>Yes</b>	<b>If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2016 (in number of units)</b>	<b>No</b>	<b>If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product</b>
China	<input type="checkbox"/>		<input type="checkbox"/>	

5. **U.S. producers and import competition.**—

(a) Since January 1, 2016, in connection with a sale or offer to sell VMFCs to your firm, did U.S. producers reduce their prices of domestically produced vertical metal file cabinets in order to compete with lower-priced imports of VMFCs from the subject countries?

<b>Source</b>	<b>Yes (also respond to question part (b))</b>	<b>No (If “No”, skip to next question)</b>	<b>Don’t know</b>
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) If your firm responded “yes”, please provide an estimate of the reduction in U.S. producers’ prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

<b>Source</b>	<b>Estimated reduction in U.S. prices (percent)</b>	<b>Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors</b>
China	%	

6. **Other explanations**--Please provide any additional comments in this box.

**OMB INFORMATION**

- 7. **OMB statistics.**--Please report the actual number of hours required and the cost to your firm of completing this survey.

Hours	Dollars

The questions in this survey 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 survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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

## HOW TO FILE YOUR SURVEY RESPONSE

***Please do not attempt to modify the format or permissions of the survey document.***

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey 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 survey 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:** FILE

- **E-mail.**—E-mail the MS Word survey to [pamela.davis@usitc.gov](mailto:pamela.davis@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 did not purchase this product,** please fill out page 1, print, sign, and submit a scanned copy to the Commission.