U.S. PRODUCERS' QUESTIONNAIRE

ACETONE FROM BELGIUM, KOREA, SAUDI ARABIA, SINGAPORE, SOUTH AFRICA, AND SPAIN

This questionnaire must be received by the Commission by <u>March 6, 2019</u> 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 antidumping investigations concerning acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and Spain (Inv. Nos. 731-TA-1435-1440 (Preliminary)). 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 firmAddress				
			Zip Code	
Website _				
Has your fi	rm produced acetone (as define	d on next page) at an	y time since January 1, 2016?	
	(Sign the certification below a	nd 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)			
Return qu	estionnaire via the U.S. Inte	rnational Trade Cor	nmission <i>Drop Box</i> by clicking on the	

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	

Email address

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on February 19, 2019, by AdvanSix Inc., Parsippany, New Jersey, Altivia Petrochemicals, LLC, Haverhill, Ohio, and Olin Corporation, Clayton, Missouri. 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 dumping. Questionnaires and other information pertinent to this proceeding are available at:

https://www.usitc.gov/investigations/701731/2019/acetone_belgium_korea_saudi_arabia_singapore_s outh/preliminary.htm

<u>Acetone</u> covered by these investigations is acetone of all grades of liquid or aqueous acetone. Acetone is also known under the International Union of Pure and Applied Chemistry ("IUPAC") name propan-2-one. In addition to the IUPAC name, acetone is also referred to as ß-ketopropane (or "beta-ketopropane"), ketone propane, methyl ketone, dimethyl ketone, DMK, dimethyl carbonyl, propanone, 2-propanone, dimethyl formaldehyde, pyroacetic acid, pyroacetic ether, and pyroactic spirit. Acetone is an isomer of the chemical formula C3H6O, with a specific molecular formula of CH3COCH3 or (CH3)2CO.

The scope includes acetone that is combined or mixed with other products, including, but not limited to, benzene, diethyl ether, methanol, chloroform, and ethanol. For such combined products, only the acetone component is covered by the scope of these investigations. Acetone that has been combined with other products is included within the scope, regardless of whether the combining occurs in third countries.

Acetone that is otherwise subject to these investigations is not excluded when commingled with acetone from sources not subject to these investigations. Only the subject merchandise component of such commingled products is covered by the scope of these investigations. The Chemical Abstracts Service ("CAS") registry number for acetone is 67-64-1.

The merchandise covered by these investigations is currently classifiable under Harmonized Tariff Schedule of the United States ("HTSUS") subheadings 2914.11.1000 and 2914.11.5000. Although these HTSUS subheadings and CAS registry number are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.

<u>**Reporting of information.</u></u>--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.</u>**

<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.

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.

<u>Release of information</u>.--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

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 acetone 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 <u>optional</u>. 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. <u>TAA information release</u>.--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?

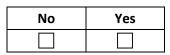


I-2. **Establishments covered**.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of acetone, 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. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?



I-4. **Petition support**.--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
Belgium			
Korea			
Saudi Arabia			
Singapore			
South Africa			
Spain			

I-5. **Ownership**.--Is your firm owned, in whole or in part, by any other firm?

No

Yes--List the following information.

Firm name	Address	Extent of ownership (<i>percent</i>)

I-6. **<u>Related importers/exporters</u>.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and Spain into the United States or that are engaged in exporting acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and Spain to the United States?

No Yes--List the following information.

Country	Affiliation
	Country

I-7. **<u>Related producers</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of acetone?

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🗌 No
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Yes--List the following information.

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Abu B. Kanu** (202-202-2597, <u>abu.kanu@usitc.gov</u>). **Supply all data requested on a** <u>calendar-year</u> basis.

II-1. <u>Contact information</u>.--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 acetone since January 1, 2016.

(check 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)	

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 acetone, 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 mercandhise, 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 short tons)				
	Calendar years			
Item	2016 2017 2018			
Overall production capacity ¹				
Production of: Acetone ²	0	0	0	
Co- or by-products of acetone production (e.g., phenol)				
Other, alternative products ³				
Total production using same machinery or workers	0	0	0	
¹ Data reported for capacity (first line) should be greater than data reported for total production (last line).				

² Data entered for production of acetone will populate here once reported in question II-7. ³ Please identify these products:_____.

II-3b. **Operating parameters.--**The production capacity reported in II-3a is based on the following operating paramaters:

Hours per week	Weeks per year		

- II-3c. <u>Capacity calculation</u>.--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 acetone and other products using the same equipment and/or labor?

No	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.

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

II-3f. **Production process**.--Please indicate the production process your firm uses to produce acetone.

Process	Check one
Cumene process	
IPA dehydration process	
Fischer-Tropsch synthesis process	
Other process ¹	
¹ Describe the process your firm uses:	

II-4. **Tolling**.--Since January 1, 2016, has your firm been involved in a toll agreement regarding the production of acetone?

"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.

II-5. Foreign trade zones.--

(a) <u>Firm's FTZ operations</u>.--Does your firm produce acetone in and/or admit acetone 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	If yes Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.

II-6. Importer.--Since January 1, 2016, has your firm imported acetone?

"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	
		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 acetone 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 <u>net values</u> (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 short tons) and value		
		Calendar years	
Item	2016	2017	2018
Average production capacity ¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity) (C)			
U.S. shipments: Commercial shipments: <i>Quantity</i> (D)			
Value (E)			
Internal consumption: ² Quantity (F)			
Value ² (G)			
Transfers to related firms: ² <i>Quantity</i> (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 the methodology used to calculate production ca ² Internal consumption and transfers to related basis for valuing these transactions in your record the data provided above in this table should be b ³ Identify your firm's principal export markets:	pacity, and explain any d firms must be valued a ds, please specify that b ased on fair market valu	changes in reported capa at fair market value. If yc asis (e.g., cost, cost plus,	acity our firm uses a different

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-ofperiod 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.

	Calendar years		
Reconciliation	2016	2017	2018
B + C - D - F - H - J - L = should equal			
zero ("0"). If not, provide an explanation. ¹	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. <u>Channels of distribution</u>.--Report your firm's U.S. shipments (i.e., commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in short tons)					
	Calendar years				
Item	2016	2017	2018		
Channels of distribution:					
U.S. shipments:					
To distributors (M)					
To end users (N)					

<u>RECONCILIATION OF CHANNELS</u>.--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 question II-7 in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years		
Reconciliation	2016	2017	2018
M + N - D - F - H = zero ("0"). If not,			
revise.	0	0	0

II-9. **US shipments by grade**.--Report your firm's U.S. shipments (i.e., commercial U.S. shipments, internal consumption, and transfers to related firms) by grade.

Quantity (<i>in short tons</i>) and value (<i>in \$1,000</i>)					
	Calendar years				
Item	2016	2017	2018		
U.S. shipments: Standard / technical grade: Quantity (O)					
Value (P)					
Specialty grades (e.g., low water, NF grade): Quantity (Q)					
Value (R)					

<u>RECONCILIATION OF SHIPMENTS</u>.--Please ensure that the quantity and value reported for US shipments by grade (i.e., lines O through R) in each time period equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in question II-7 in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

	Calendar years		
Reconciliation	2016	2017	2018
Quantity: $O + Q - D - F - H = zero$			
("0"). If not, revise.	0	0	0
Value: $P + R - E - G - I = zero ("0"). If$			
not, revise.	0	0	0

II-10. <u>Employment data</u>.--Report your firm's employment-related data related to the production of acetone 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.

"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.

	Calendar years		
Item	2016	2017	2018
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

Explanation of trends:

II-11. <u>Related firms</u>.--If your firm reported transfers to related firms in question II-7, please identify the firm(s) and 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. <u>Purchases</u>.--Has your firm purchased acetone produced in the United States or in other countries since January 1, 2016? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire).

"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.

"Import" –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes Report such purchases in the table below and explain the reasons for your firms' purchases.

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

	Quantity in shor	t tons)		
	Calendar years			
Item	2016	2017	2018	
Purchases from U.S. importers ¹ of acetone from— Belgium				
Korea				
Saudi Arabia				
Singapore				
South Africa				
Spain				
All other sources				
Purchases from domestic producers ²				
Purchases from other sources ²				
¹ Please list the name of the importer(s suppliers differ by source, please identify th ² Please list the name of the producer(s	ne source for each	listed supplier:		

II-12. Imports.--Since January 1, 2016, has your firm imported acetone?

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-13. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, 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 Samuel Varela-Molina (202-205-3429, <u>Samuel.VarelaMolina@usitc.gov</u>).

III-1. <u>Contact information</u>.--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. <u>Accounting system</u>.--Briefly describe your firm's financial accounting system.
 - A. When does your firm's fiscal year end (month and day)? _______
 If your firm's fiscal year changed during the data-collection period, explain below:
 - B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include acetone:
 - 2. Does your firm prepare profit/loss statements for acetone: Yes No
 - 3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 - Audited, unaudited, annual reports, 10Ks, 10 Qs,
 Monthly, quarterly, semi-annually, annually
 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 acetone, as well as specific statements and worksheets) used to compile these data.

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

- III-4. <u>Allocation basis</u>.--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 acetone, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Acetone	%
	%
	%
	%
	%

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

YesContinue to question III-7	NoContinue to question III-9a.

III-7. Inputs from related suppliers detailed.--Please identify the inputs used in the production of acetone that your firm purchases from related suppliers and that are reflected in question III-9d. 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-9d (financial results on acetone) in a manner consistent with your firm's accounting books and records.

Yes	No	If noIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9d.

III-9a. **Co-products or by-products**.--Does your firm's production process for acetone result in the production of additional chemicals that are commercially sold?

No Treat		Treatment	Yes	If yesPlease identify the co-products or by-products.
	_	Co-products		
		By-products		

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

Value (in \$1,000)						
	Fiscal years ended					
ltem 2016 2017 2018						
By-product sales revenue ¹	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. **Co-product cost allocations.-**-If your firm reported co-product(s) in III-9a, please describe the major shared costs between acetone and its co-product(s), and describe how those costs are apportioned between acetone and the co-product(s).

III-9d. Operations on Acetone.--Report the revenue and related cost information requested below on the acetone operations of your firm's U.S. establishment(s).¹ Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Samuel Varela-Molina at (202) 205-3429 before completing this section of the questionnaire.

Quantity (in short t	ons) and value (in \$1,000)		
	Fiscal years ended		
Item	2016	2017	2018
Net sales quantities: ² Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ² Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS): ³ Raw materials			
Direct labor			
Other factory costs			
Less: By-product revenue (from III-9b)	0	0	0
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative (SG&A) expenses: Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	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
Depreciation/amortization included above			
1 Include only cales (whether demostic or expert) and costs r	alated to your LLC manufa		

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 costs associated with CS, IC, and Transfers.

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

III-9e. <u>Financial data reconciliation</u>.--The calculable line items from question III-9d (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	Νο	If 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 negativeinstances 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-9f. **Raw materials**.--Please report the share of total raw material costs in 2018 (reported in III-9d) for the following raw material inputs based on type of production process:

		Procureme	ent method
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm
Production using Cumene process			
Benzene			
Propylene			
Soda ash			
Other material inputs ¹			
Production using IPA process Isopropyl alcohol			
Other material inputs ¹			
Production using other processes ² Propylene			
Other material inputs 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 total raw material costs that they account for: ² Please indicate the production process used: 			

III-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual period for which financial results are reported in question III-9d, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9d 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-9d; i.e., if an aggregate nonrecurring item has been allocated to question III-9d, only the allocated value amount included in question III-9d 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-9d.

	Fiscal years ended		
	2016	2017	2018
Item		Value (<i>\$1,000</i>)	
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-9d 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. <u>Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company</u>.--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-9d.
- III-12. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of Acetone. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for acetone 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-9d. Provide data as of the end of your firm's three most recently completed fiscal years.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted.

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

Value (<i>in \$1,000</i>)			
	Fiscal years ended		
Item	2016	2017	2018
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 acetone. Provide data for your firm's three most recently completed fiscal years periods.

Value (<i>in \$1,000</i>)					
	Fiscal years ended				
Item	2016	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 indicate whether your firm's financial data for questions III-9d, 12, and 13 are based on a calendar year or on your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9d 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.

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--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.

	Fiscal years ended		
Reconciliation	2016	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- 9d, = zero ("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-9d, = zero ("0").	0	0	0

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

Yes	No	If no, please explain.

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. <u>Effects of imports on investment</u>.--Since January 1, 2016, 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 acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and/or Spain?

No	Yes	
		If yes, my firm has experienced actual negative effects as follows.

(check as many as appropriate)		(please describe)
	Cancellation, postponement, or rejection of expansion projects	
	Denial or rejection of investment proposal	
	Reduction in the size of capital investments	
	Return on specific investments negatively impacted	
	Other	

III-16. <u>Effects of imports on growth and development</u>.--Since January 1, 2016, 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 acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and/or Spain?

No	Yes	
		If yes, my firm has experienced actual negative effects as follows.

(check	as many as appropriate)	(please describe)
	Rejection of bank loans	
	Lowering of credit rating	
	Problem related to the issue of stocks or bonds	
	Ability to service debt	
	Other	

III-17. <u>Anticipated effects of imports</u>.--Does your firm anticipate any negative effects due to imports of acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and/or Spain?

No	Yes	If yes, my firm anticipates negative effects as follows.

III-18. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, 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 Cindy Cohen (202-205-3230, <u>cindy.cohen@usitc.gov</u>).

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, 2016 of the following products produced by your firm.

Product 1.--Standard grade acetone, sold in bulk to distributors, spot/short-term contract sales.

Product 2.--Standard grade acetone, sold in bulk to distributors, annual/long-term contract sales.

Product 3.--Standard grade acetone, sold in bulk to end users, spot/short-term contract sales.

Product 4.--Standard grade acetone, sold in bulk to end users, annual/long-term contract sales.

For purposes of these pricing products, "bulk" shipments are full-barge, railcar, or tanker truck containers. "Short-term contracts" are less than 12 months in duration, and "annual/long-term" contracts are for 12 months or longer.

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

IV-2a. During January 2016-December 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)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question IV-3.

your firm.

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

(Quantity in short tons, value in dollars)								
	Product 1		Product 2		Product 3		Prod	uct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2016:								
January-March								
April-June								
July-September								
October-December								
2017: January-March								
April-June								
July-September								
October-December								
2018: January-March								
April-June								
July-September								
October-December								
 ¹ Net values (i.e., gross firm's U.S. point of shipmer ² Pricing product defin NoteIf your firm's product of your firm's product. Also 	nt. itions are provid t does not exac	ded on the firs tly meet the p	t page of Part IV	/. itions but is co	mpetitive with t			
Product 1:								
Product 2:								
Product 3:								
Product 4:								

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

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

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

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

IV-3. **Price setting.--**How does your firm determine the prices that it charges for sales of acetone (*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

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

Quantity discount	No discount policy	Other	Describe

IV-5. **Pricing terms.--**On what basis are your firm's prices of domestic acetone usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point

IV-6. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of its U.S.-produced acetone in 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	Type of sale					
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)	Spot sales (for a single delivery)	Tota (shoul sum t 100.09	d o
Share of 2018 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions</u>.

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

Typical sales contract provisions	ltem	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	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicab	le			
¹ Please identify th	e indexes us	ed:		

(b) Has the discount or multiplier from published prices for acetone changed since January 1, 2016?

No	Yes	If yes, please describe the changes.

IV-8. <u>Lead times</u>.--What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced acetone?

Source	Share of 2018 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 acetone 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 acetone 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. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold its U.S.produced acetone since January 1, 2016 (check all that apply)?

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

IV-11. <u>End uses</u>.--List the end uses of the acetone that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by acetone and other inputs?

	Share of total cost account	Total	
			(should sum to
End-use product	Acetone	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **<u>Substitutes</u>.--**Can other products be substituted for acetone?

🗌 No

Yes--Please fill out the table.

		End use in which this substitute is used		Have changes in the price of this substitute affected the price for acetone?			
	Substitute			Yes	Explanation		
1.							
2.							
3.							

IV-13. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for acetone has changed since January 1, 2016. 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					
Outside the United States					

IV-14. **Product changes.--**Have there been any significant changes in the product range, product mix, or marketing of acetone since January 1, 2016?

No	Yes	If yes, please describe and quantify if possible.

IV-15. Conditions of competition.--

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

Check all that apply.		Please describe.
	No	Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for acetone since January 1, 2016?

No	Yes	If yes, describe.

IV-16. Supply constraints.--Has your firm refused, declined, or been unable to supply acetone since January 1, 2016 (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.

IV-17. **<u>Raw materials</u>.--**How have acetone raw material prices changed since January 1, 2016?

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 acetone.

IV-18. **Interchangeability.--**Is acetone 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	Belgium	Korea	Saudi Arabia	Singapore	South Africa	Spain	Other countries
United States							
Belgium							
Korea		$\left \right\rangle$					
Saudi Arabia		$\left \right>$	\ge				
Singapore		$\left \right\rangle$	\ge	$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$			
South Africa	\searrow	\ge	\ge	\ge	\ge		
Spain		\mathbf{X}	\mathbf{i}	$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$		\ge	
For any country- country-pair and							entify the

IV-19. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between acetone 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	Belgium	Korea	Saudi Arabia	Singapore	South Africa	Spain	Other countries
United States							
Belgium							
Korea	\searrow	\ge					
Saudi Arabia		\ge	\ge				
Singapore	$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$	\mathbf{i}	\mathbf{i}	\succ			
South Africa	$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$	$\mathbf{\mathbf{X}}$	\ge	$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$	\ge		
Spain		\mathbf{X}	\ge	\ge	\ge	>	
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 acetone, identify the country-pair and report the advantages or disadvantages imparted by such factors:							

IV-20. <u>**Customer identification.**</u>--List the names and contact information for your firm's 10 largest U.S. customers for acetone since January 1, 2016. Indicate the share of the quantity of your firm's total shipments of acetone that each of these customers accounted for in 2018.

(customer's name	Contact person	Email	Telephone	City	State	Share of 2018 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

IV-21. Competition from imports.--

(a) <u>Lost revenue</u>.--Since January 1, 2016: To avoid losing sales to competitors selling acetone from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and/or Spain, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales</u>.--Since January 1, 2016: Did your firm lose sales of acetone to imports of this product from Belgium, Korea, Saudi Arabia, Singapore, South Africa, and/or Spain?

No	Yes

(c) The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.

If your firm indicated "yes" to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at <u>http://usitc.gov/trade_remedy/question.htm</u>. Note that the Commission may contact the firms named to verify the allegations reported.

Is your firm submitting the lost sales/lost revenues worksheet?

No—Please explain.
Yes—Please complete the worksheet and submit via the Commission dropbox. <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: ACET)

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

PART V.--ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from Abu Kanu (202-205-2597, <u>abu.kanu@usitc.gov</u>).

- V-1. **Comparability of types of acetone.-**-For each of the following indicate whether listed products are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.
 - F: fully comparable or the same, *i.e.*, have no differentiation between them;
 - M: mostly comparable or similar;
 - S: somewhat comparable or similar;
 - N: never or not-at-all comparable or similar; or
 - 0: no familiarity with products.
 - (a) **Physical Characteristics and End Uses**.--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses</i> :
In-scope <u>Standard/technical</u> grade acetone vs in-scope Specialty grades of acetone		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
In-scope <u>Standard/technical grade</u> <u>acetone</u> vs in-scope <u>Specialty</u> grades of acetone		

V-1. <u>Comparability of types of acetone.</u>--Continued

- F: fully comparable or the same, *i.e.*, have no differentiation between them;
- M: mostly comparable or similar;
- S: somewhat comparable or similar;
- N: never or not-at-all comparable or similar; or
- 0: no familiarity with products.
- (c) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities</u> , production processes, and <u>production employees</u> :
In-scope <u>Standard/technical grade</u> <u>acetone</u> vs in-scope <u>Specialty</u> grades of acetone		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
In-scope <u>Standard/technical grade</u> <u>acetone</u> vs in-scope <u>Specialty</u> grades of acetone		

V-1. Comparability of types of acetone.--Continued

- F: fully comparable or the same, *i.e.*, have no differentiation between them;
- M: mostly comparable or similar;
- S: somewhat comparable or similar;
- N: never or not-at-all comparable or similar; or
- 0: no familiarity with products.
- (e) <u>**Customer and producer perceptions**</u>.--Perceptions as to the differences and/or similarities in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and product perceptions</u> :
In-scope <u>Standard/technical grade</u> <u>acetone vs in-scope</u> <u>Specialty</u> grades of acetone		

(f) <u>Price</u>.--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
In-scope <u>Standard/technical grade</u> <u>acetone</u> vs in-scope <u>Specialty</u> grades of acetone		

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/701731/2019/acetone_belgium_korea_saudi_arabia_singapore_s_outh/preliminary.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: ACET

• E-mail.—E-mail the MS Word questionnaire to <u>abu.kanu@usitc.gov</u>; 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>does not</u> 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.