

## FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

### CRYSTALLINE SILICON PHOTOVOLTAIC CELLS (WHETHER OR NOT PARTIALLY OR FULLY ASSEMBLED INTO OTHER PRODUCTS)

This questionnaire must be received by the Commission by **October 4, 2019**

*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 investigation No. TA-201-75 (Monitoring), Crystalline Silicon Photovoltaic ("CSPV") Cells (Whether or Not Partially or Fully Assembled Into Other Products)("CSPV Products"): Monitoring Developments in the Domestic Industry, under section 204 of the Trade Act of 1974 (19 U.S.C. § 2254). The information requested in the questionnaire is needed to supplement data available to the Commission from other sources and is requested under the authority of section 204 of the Tariff Act of 1974.

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

Website \_\_\_\_\_

Has your firm produced or exported CSPV products as defined on the next five pages in or from **any country** at any time since January 1, 2016?

**NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)

**YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

Data reported in this questionnaire relate to a firm located in (Check only one country):

- Canada    China    Germany    India    Indonesia    Japan    Korea  
 Malaysia    Mexico    Philippines    Singapore    Taiwan    Thailand    Turkey  
 Vietnam    Other: \_\_\_\_\_ (please list country)

Return questionnaire via the Commission *Drop Box* by clicking on the following link:

<https://dropbox.usitc.gov/oinv/>. (PIN: **CSPV**)

#### 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 investigations, reviews, or general fact finding investigations 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 investigation or other proceeding 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

\_\_\_\_\_  
Phone: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Email address

**PART I.--GENERAL INFORMATION**

**Background.** On January 23, 2018, the President, pursuant to section 203 of the Trade Act of 1974, issued Proclamation 9693, imposing a safeguard measure on imports of CSPV products, in the form of (a) a tariff-rate quota on imports of CSPV (or “solar”) cells not partially or fully assembled into other products and (b) an increase in duties on imports of CSPV modules. The proclamation was published in the Federal Register on January 25, 2018 (83 Fed. Reg. 3541). The measure took effect on February 7, 2018, for a period of four years, or through February 7, 2022. Section 204(a) of the Act requires the Commission to submit a report to the President and Congress on its monitoring of industry developments at the midpoint of the initial period of relief, including the progress and specific efforts made by workers and firms in the domestic industry to make a positive adjustment to import competition. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/title\\_7/2019/crystalline\\_silicon\\_photovoltaic\\_cells\\_whether\\_or/safeguard.htm](https://www.usitc.gov/investigations/title_7/2019/crystalline_silicon_photovoltaic_cells_whether_or/safeguard.htm)

**Crystalline Silicon Photovoltaic (“CSPV”) Cells (Whether or Not Partially or Fully Assembled Into Other Products) (“CSPV products”).**--The articles covered by the investigation are crystalline silicon photovoltaic cells, whether or not partially or fully assembled into other products, including, but not limited to, modules, laminates, panels and building-integrated materials.

The investigation covers crystalline silicon photovoltaic cells of a thickness equal to or greater than 20 micrometers, having a p/n junction (or variant thereof) formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell.

Included in the scope of the investigation are photovoltaic cells that contain crystalline silicon in addition to other photovoltaic materials. This includes, but is not limited to, passivated emitter rear contact (“PERC”) cells, heterojunction with intrinsic thin-layer (“HIT”) cells, and other so-called “hybrid” cells.

Articles under consideration may be described at the time of importation as components for final finished products that are assembled after importation, including, but not limited to, modules, laminates, panels, and building-integrated materials.

Excluded from the investigation are CSPV cells, whether or not partially or fully assembled into other products, if the CSPV cells were manufactured in the United States.

Also excluded from the investigation are thin film photovoltaic products produced from amorphous silicon (“a-Si”), cadmium telluride (“CdTe”), or copper indium gallium selenide (“CIGS”).

Also excluded from the scope of the investigation are CSPV cells, not exceeding 10,000mm<sup>2</sup> in surface area, that are permanently integrated into a consumer good whose function is other than power generation and that consumes the electricity generated by the integrated CSPV cell. Where more than one CSPV cell is permanently integrated into a consumer good, the surface area for purposes of this exclusion shall be the total combined surface area of all CSPV cells that are integrated into the consumer good.

For Customs purposes, the CSPV cells covered by the investigation are provided for under Harmonized Tariff Schedule of the United States (“HTSUS”) subheading 8541.40.60. Inverters or batteries with CSPV cells attached can be imported under HTSUS subheadings 8501.61.00 and 8507.20.80, respectively. In addition, CSPV cells covered by the investigation may also be classifiable as DC generators of subheadings 8501.31.80 and 8501.32.60, when such generators are imported with CSPV cells attached. While HTSUS provisions are provided for convenience, the written description of the scope is dispositive.<sup>1</sup>

**Included in the overall data collection in this questionnaire are certain excluded items (i.e., “low wattage” modules) listed in the Presidential Proclamation (83 Fed. Reg. 3541, January 25, 2018) and other excluded items listed in the September 19, 2018 and June 13, 2019 Federal Register notices (83 Fed. Reg. 47393 and 84 Fed. Reg. 27684), although certain data concerning these items are requested separately (see listings and definitions below for “bifacial,” “flexible fiberglass,” “light directing film,” “Modules incorporating rear contact cells with tin-coated solid copper fingers,” “Rear contact cells with tin-coated solid copper fingers,” and “low wattage”).**

Presidential Proclamation 9693 excluded the following “low wattage” products from application of the safeguard measure, which took effect on February 7, 2018 (83 Fed. Reg. 3541, January 25, 2018):

- 10 to 60 watt, inclusive, rectangular solar panels, where the panels have the following characteristics: (A) Length of 250 mm or more but not over 482 mm or width of 400 mm or more but not over 635 mm, and (B) surface area of 1000 cm<sup>2</sup> or more but not over 3,061 cm<sup>2</sup>, provided that no such panel with those characteristics shall contain an internal battery or external computer peripheral ports at the time of entry.
- 1 watt solar panels incorporated into nightlights that use rechargeable batteries and have the following dimensions: 58 mm or more but not over 64 mm by 126 mm or more but not over 140 mm.
- 2 watt solar panels incorporated into daylight dimmers that may use rechargeable batteries, such panels with the following dimensions: 75 mm or more but not over 82 mm by 139 mm or more but not over 143 mm.
- Off-grid and portable CSPV panels, whether in a foldable case or in rigid form containing a glass cover, where the panels have the following characteristics: (a) A total power output of 100 watts or less per panel; (b) a maximum surface area of 8,000 cm<sup>2</sup> per panel; (c) does not include a built-in inverter; and where the panels have glass covers, such panels must be in individual retail packaging (in this context, retail packaging typically includes graphics, the product name, its description and/or features, and foam for transport).
- 3.19 watt or less solar panels, each with length of 75 mm or more but not over 266 mm and width of 46 mm or more but not over 127 mm, with surface area of 338 cm<sup>2</sup> or less, with one black wire and one red wire (each of type 22 AWG or 24 AWG) not more than 206 mm in length when measured from panel edge, provided that no such panel shall contain an internal battery or external computer peripheral ports.
- 27.1 watt or less solar panels, each with surface area less than 3,000 cm<sup>2</sup> and coated across the entire surface with a polyurethane doming resin, the foregoing joined to a battery charging and maintaining unit, such unit which is an acrylonitrile butadiene styrene (ABS) box that incorporates a light emitting diode (LED) by coated wires that include a connector to permit the incorporation of an extension cable.

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<sup>1</sup> CSPV products covered by the scope are currently subject to tariff-rate quotas under a safeguard measure imposed effective February 7, 2018, under subheadings 9903.45.21 and 9903.45.22 (CSPV cells) and 9903.45.25 (CSPV modules) and related legal notes.

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CSPV Products (Monitoring)

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The following additional CSPV products entered, or withdrawn from a warehouse for consumption, on or after 12:01 a.m., EST, on September 19, 2018 are also excluded from the safeguard measure (83 Fed. Reg. 47393, September 19, 2018):

- off-grid, 45 watt or less solar panels, each with length not exceeding 950 mm and width of 100 mm or more but not over 255 mm, with a surface area of 2,500 cm<sup>2</sup> or less, with a pressure-laminated tempered glass cover at the time of entry but not a frame, electrical cables or connectors, or an internal battery.
- 4 watt or less solar panels, each with a length or diameter of 70 mm or more but not over 235 mm, with a surface area not exceeding 539 cm<sup>2</sup>, and not exceeding 16 volts, provided that no such panel with these characteristics shall contain an internal battery or external computer peripheral ports at the time of entry.
- solar panels with a maximum rated power of equal to or less than 60 watts, having the following characteristics, provided that no such panel with those characteristics shall contain an internal battery or external computer peripheral ports at the time of entry: (A) Length of not more than 482 mm and width of not more than 635 mm or (B) a total surface area not exceeding 3,061 cm<sup>2</sup>.
- flexible and semi-flexible off-grid solar panels designed for use with motor vehicles and boats, where the panels range in rated wattage from 10 to 120 watts, inclusive.
- frameless solar panels in a color other than black or blue with a total power output of 90 watts or less where the panels have a uniform surface without visible solar cells or busbars.
- solar cells with a maximum rated power between 3.4 and 6.7 watts, inclusive, having the following characteristics: (A) A cell surface area between 154 cm<sup>2</sup> and 260 cm<sup>2</sup>, inclusive, (B) no visible busbars or gridlines on the front of the cell, and (C) more than 100 interdigitated fingers of tin-coated solid copper adhered to the back of the cell, with the copper portion of the metal fingers having a thickness of greater than 0.01 mm.
- solar panels with a maximum rated power between 320 and 500 watts, inclusive, having the following characteristics: (A) Length between 1,556 mm and 2,070 mm inclusive, and width between 1,014 mm and 1,075 mm, inclusive, (B) where the solar cells comprising the panel have no visible busbars or gridlines on the front of the cells, and (C) the solar cells comprising the panel have more than 100 interdigitated fingers of tin-coated solid copper adhered to the back of the cells, with the copper portion of the metal fingers having thickness greater than 0.01 mm.
- modules incorporating only CSPV cells that are products of the United States and not incorporating any CSPV cells that are the product of any other country.

The following additional CSPV products entered, or withdrawn from a warehouse for consumption, on or after 12:01 a.m., EST, on June 13, 2019 are also excluded from the safeguard measure (84 Fed. Reg. 27684, June 13 19, 2019):

- bifacial solar panels that absorb light and generate electricity on each side of the panel and that consist of only bifacial solar cells that absorb light and generate electricity on each side of the cells.
- flexible fiberglass solar panels without glass components other than fiberglass, such panels having power outputs ranging from 250 to 900 watts.
- solar panels consisting of solar cells arranged in rows that are laminated in the panel and that are separated by more than 10 mm, with an optical film spanning the gaps between all rows that is designed to direct sunlight onto the solar cells, and not including panels that lack said optical film or only have a white or other backing layer that absorbs or scatters sunlight.

**CSPV cell.**--A crystalline silicon photovoltaic ("CSPV") cell converts sunlight to electricity and is the basic element of a module. The investigation covers CSPV cells of a thickness equal to or greater than 20 micrometers, having a p/n junction (or variant thereof) formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or

addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell. Included are photovoltaic cells that contain crystalline silicon in addition to other photovoltaic materials. This includes, but is not limited to, passivated emitter rear contact (“PERC”) cells, heterojunction with intrinsic thin-layer (“HIT”) cells, and other so-called “hybrid” cells.

***CSPV module.***--A joined group of CSPV cells, regardless of the number of cells or the shape of the joined group, that are capable of generating electricity. The term “**module**” is frequently used interchangeably with the term “**panel**.” A “**lamine**” is a module that does not have a frame.

***CSPV products = CSPV cells + CSPV modules***

***Building Integrated Materials.***--Materials integrated into the building envelope, such as the façade or roof, containing CSPV cells. These building integrated materials replace conventional construction materials, such as glass or roof shingles, taking over the function that conventional materials would otherwise perform while also producing electricity.

***Bifacial.***--Bifacial modules that absorb light and generate electricity on each side of the module and that consist of only bifacial cells that absorb light and generate electricity on each side of the cells.

***Flexible fiberglass.***--Flexible fiberglass modules without glass components other than fiberglass, such modules having power outputs ranging from 250 to 900 watts.

***Light directing film.***--Modules consisting of cells arranged in rows that are laminated in the module and that are separated by more than 10 mm, with an optical film spanning the gaps between all rows that is designed to direct sunlight onto the cells, and not including modules that lack said optical film or only have a white or other backing layer that absorbs or scatters sunlight.

***Rear contact cells with tin-coated solid copper fingers.***--Cells with a maximum rated power between 3.4 and 6.7 watts, inclusive, having the following characteristics: (A) A cell surface area between 154 cm<sup>2</sup> and 260 cm<sup>2</sup>, inclusive, (B) no visible busbars or gridlines on the front of the cell, and (C) more than 100 interdigitated fingers of tin-coated solid copper adhered to the back of the cell, with the copper portion of the metal fingers having a thickness of greater than 0.01 mm.

***Modules incorporating rear contact cells with tin-coated solid copper fingers.***--Modules with a maximum rated power between 320 and 500 watts, inclusive, having the following characteristics: (A) Length between 1,556 mm and 2,070 mm inclusive, and width between 1,014 mm and 1,075 mm, inclusive, (B) where the cells comprising the module have no visible busbars or gridlines on the front of the cells, and (C) the cells comprising the module have more than 100 interdigitated fingers of tin-coated solid copper adhered to the back of the cells, with the copper portion of the metal fingers having thickness greater than 0.01 mm.

**Low wattage.**—Modules meeting one of the following eleven definitions:

- (1) 10 to 60 watt, inclusive, rectangular modules, where the modules have the following characteristics: (A) length of 250 mm or more but not over 482 mm or width of 400 mm or more but not over 635 mm, and (B) surface area of 1000 cm<sup>2</sup> or more but not over 3,061 cm<sup>2</sup>), provided that no such module with those characteristics shall contain an internal battery or external computer peripheral ports at the time of entry; or
- (2) 1 watt modules incorporated into nightlights that use rechargeable batteries and have the following dimensions: 58 mm or more but not over 64 mm by 126 mm or more but not over 140 mm;
- (3) 2 watt modules incorporated into daylight dimmers, that may use rechargeable batteries, such modules with the following dimensions: 75 mm or more but not over 82 mm by 139 mm or more but not over 143 mm;
- (4) Off-grid and portable CSPV modules, whether in a foldable case or in rigid form containing a glass cover, where the modules have the following characteristics: (A) a total power output of 100 watts or less per module; (B) a maximum surface area of 8,000 cm<sup>2</sup> per module; (C) do not include a built-in inverter; (D) where the modules have glass covers, such modules must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features, and foam for transport);
- (5) 3.19 watt or less modules, each with length of 75 mm or more but not over 266 mm and width of 46 mm or more but not over 127 mm, with surface area of 338 cm<sup>2</sup> or less, with one black wire and one red wire (each of type 22 AWG or 24 AWG) not more than 206 mm in length when measured from module edge, provided that no such module shall contain an internal battery or external computer peripheral ports;
- (6) 27.1 watt or less modules, each with surface area less than 3,000 cm<sup>2</sup> and coated across the entire surface with a polyurethane doming resin, the foregoing joined to a battery charging and maintaining unit, such unit which is an acrylonitrile butadiene styrene (“ABS”) box that incorporates a light emitting diode (“LED”) by coated wires that include a connector to permit the incorporation of an extension cable.
- (7) Off-grid, 45 watt or less modules, each with length not exceeding 950 mm and width of 100 mm or more but not over 255 mm, with a surface area of 2,500 cm<sup>2</sup> or less, with a pressure-laminated tempered glass cover at the time of entry but not a frame, electrical cables or connectors, or an internal battery; or
- (8) 4 watt or less modules, each with a length or diameter of 70 mm or more but not over 235 mm, with a surface area not exceeding 539 cm<sup>2</sup>, and not exceeding 16 volts, provided that no such module with these characteristics shall contain an internal battery or external computer peripheral ports at the time of entry; or
- (9) Modules with a maximum rated power of equal to or less than 60 watts, having the following characteristics, provided that no such module with those characteristics shall contain an internal battery or external computer peripheral ports at the time of entry: (A) Length of not more than 482 mm and width of not more than 635 mm or (B) a total surface area not exceeding 3,061 cm<sup>2</sup>;
- (10) Flexible and semi-flexible off-grid modules designed for use with motor vehicles and boats, where the modules range in rated wattage from 10 to 120 watts, inclusive; or
- (11) Frameless modules in a color other than black or blue with a total power output of 90 watts or less where the modules have a uniform surface without visible cells or busbars.

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**All Other Developing Countries.**--For the purposes of this questionnaire, the following countries are considered "**All Other Developing Countries**" for which data are not otherwise collected separately herein: Afghanistan, Albania, Algeria, Angola, Armenia, Azerbaijan, Belize, Benin, Bhutan, Bolivia, Bosnia and Herzegovina, Botswana, Brazil, Burkina Faso, Burma, Burundi, Cambodia, Cameroon, Cape Verde, Central African Republic, Chad, Comoros, Congo (Brazzaville), Congo (Kinshasa), Côte d'Ivoire, Djibouti, Dominica, Ecuador, Egypt, Eritrea, Ethiopia, Fiji, Gabon, The Gambia, Georgia, Ghana, Grenada, Guinea, Guinea-Bissau, Guyana, Haiti, Iraq, Jamaica, Jordan, Kazakhstan, Kenya, Kiribati, Kosovo, Kyrgyzstan, Lebanon, Lesotho, Liberia, Macedonia, Madagascar, Malawi, Maldives, Mali, Mauritania, Mauritius, Moldova, Mongolia, Montenegro, Mozambique, Namibia, Nepal, Niger, Nigeria, Pakistan, Papua New Guinea, Paraguay, Rwanda, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Sao Tomé and Príncipe, Senegal, Serbia, Sierra Leone, Solomon Island, Somalia, South Africa, South Sudan, Sri Lanka, Suriname, Swaziland [Eswatini], Tanzania, Timor-Leste, Togo, Tonga, Tunisia, Tuvalu, Uganda, Ukraine, Uzbekistan, Vanuatu, Yemen (Republic of), Zambia and Zimbabwe.

**All Other Developed Countries.**—For purposes of this questionnaire, the following countries are considered "**All Other Developed Countries**" for which data are not otherwise collected separately herein: Australia, Austria, Bahamas, Bahrain, Bangladesh, Belarus, Belgium, Brunei, Chile, Croatia, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Greece, Hong Kong, Hungary, Iceland, Iran, Ireland, Israel, Italy, Kuwait, Latvia, Lithuania, Luxembourg, Macau, Malta, Netherlands, New Zealand, Norway, Oman, Poland, Portugal, Qatar, San Marino, Saudi Arabia, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, United Arab Emirates, United Kingdom, and Uruguay.

**All Other Countries.**—For purposes of this questionnaire, "**All Other Countries**" are countries that are not separately listed herein for data collection and are not included in the listing of "All Other Developing Countries" and "All Other Developed Countries" defined above.

**Reporting of information.**--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, purchaser and/or foreign producer questionnaire), you need to respond only once 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 CFR §§ 206.17(a)(1) and 206.52(c)). 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 confidential business 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 Trade Act of 1974 (19 U.S.C. § 2252(i)) and sections 206.17 and 206.52 of the Commission's Rules of Practice and Procedure (19 CFR §§ 206.17(a)(1) and 206.52(c)). 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.

**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](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.

**Valid number error messages.**--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue are provided at the end of this questionnaire and are available upon request from **Mary Messer (202-205-3193, [Mary.Messer@usitc.gov](mailto:Mary.Messer@usitc.gov))**.



**Foreign Producers'/Exporters' Questionnaire –  
CSPV Products (Monitoring)**

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 20 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

I-2. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

**“Establishment”** – Each facility of a firm in a country involved in the production or export of CSPV cells (whether or not partially or fully assembled into other products), including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities. Firms operating more than one establishment in a country should combine the data for all establishments into a single report. Multinational firms with establishments in more than one country should submit a separate questionnaire response for each country.

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I-3. **Stock symbol information.**-- If your firm or any of the entities reported in question I-2 are publicly traded in the United States, please specify the stock exchange and trading symbol (including American Depository Receipts, if applicable): \_\_\_\_\_.

I-4. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm: \_\_\_\_\_  
Lead attorney(s): \_\_\_\_\_.

**“Related firm”** – A firm that your firm solely or jointly owns, manages, or otherwise controls, including for example, parent companies, subsidiaries owned by the same parent company, and other affiliates.

- I-5. **Related producers.**--Does your firm or any related firm produce, have the capability to produce, or have any plans to produce CSPV cells or to assemble (partially or fully) CSPV cells into other products in the United States or other countries?

<b>No</b>	<b>Yes</b>	If yes, name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission’s producer questionnaire
<input type="checkbox"/>	<input type="checkbox"/>	

- I-6. **Related U.S. importers.**--Does your firm or any related firm import or have any plans to import CSPV cells (whether or not partially or fully assembled into other products) into the United States?

<b>No</b>	<b>Yes</b>	If yes, name the firm(s) below and ensure that they complete the Commission’s importer questionnaire.
<input type="checkbox"/>	<input type="checkbox"/>	

- I-7. **U.S. importers.**--Please provide the names, contacts, email addresses, telephone numbers, and street addresses (not P.O. boxes) of the **FIVE** largest U.S. importers of your firm’s CSPV cells (whether or not partially or fully assembled into other products) in 2016.

No.	Importer’s name	Contact person	Email address	Area code and telephone number	Street address (not P.O. box), city, state, and zip code	Share of your firm’s 2016 U.S. exports (%)
1						
2						
3						
4						
5						

**PART II.--TRADE AND RELATED INFORMATION**

Further information on this part of the questionnaire can be obtained from **Mary Messer (202-205-3193, [Mary.Messer@usitc.gov](mailto:Mary.Messer@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 CSPV cells or the assembly (full or partial) of CSPV cells into other products since January 1, 2012.

<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/mergers/buyouts	
<input type="checkbox"/> Consolidations	
<input type="checkbox"/> Prolonged shutdowns or production curtailments	
<input type="checkbox"/> Revised labor agreements	
<input type="checkbox"/> Technology	
<input type="checkbox"/> Other	

II-3. **Anticipated changes in operations.**--Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of CSPV cells or the assembly (full or partial) of CSPV cells into other products in the future?

<b>No</b>	<b>Yes</b>	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue. <b>Include in the response a specific projection of your firm's capacity to produce CSPV cells and/or to assemble (fully or partially) CSPV cells into other products (in kilowatts) for 2017 and 2018.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

II-4. **Significance of safeguard measure.**--Describe the significance of the safeguard measure imposed by the President effective on February 7, 2018, in terms of its effect on your firm's production, production capacity, home market shipments, exports to the United States and other markets, and inventories. You may wish to compare your firm's operations before and after the imposition of the relief.

**II-5. Product shifting.**

- (i). Is your firm able to switch production (capacity) between the production of CSPV cells (including the assembly of CSPV cells into other products) and other products using the same equipment and/or labor?

<b>No</b>	<b>Yes</b>	If yes,(i.e., your firm has produced other products or is able to produce other products) please identify other actual or potential products
<input type="checkbox"/>	<input type="checkbox"/>	

- (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.

- (iii). Please report any changes in the mix of your production that have occurred since January 1, 2016 in facilities that produce CSPV cells (whether or not partially or fully assembled into other products) and non-scope products. In responding to this question, report: 1) the date(s) such changes occurred; 2) the time involved to make the change; 3) the reason(s) for the change.

- II-6. **Share of sales.**--What percentage of your firm’s total sales in its most recent fiscal year was represented by sales of CSPV products? \_\_\_\_\_ percent.

- II-7. **Estimated total production in the country identified by your firm on page 1.**--Please estimate the total production of CSPV cells (in terms of quantity in kilowatts) and assembly of CSPV cells into other products (e.g., laminates, panels, modules) (in terms of quantity in kilowatts) in the country specified on page 1.

Estimated total production of CSPV cells in country identified on page 1 in 2018: \_\_\_\_\_ kilowatts

Estimated total production of other products (e.g., laminates, panels, modules) partially or fully assembled from CSPV cells in the country identified on page 1 in 2018: \_\_\_\_\_ kilowatts

II-8. **Estimated total exports to the United States.**--Please estimate (in terms of kilowatts) the total exports to the United States from all firms in the country specified on page 1.

Estimated total exports of CSPV cells to the United States in 2018 from all firms in the country identified on page 1: \_\_\_\_\_ kilowatts

Estimated total exports of other products (e.g., laminates, panels, modules) partially or fully assembled from CSPV cells in 2018 from all firms in the country identified on page 1: \_\_\_\_\_ kilowatts

II-9. **Third country trade actions.**--Are the CSPV products exported by your firm subject to antidumping duty/countervailing duty/safeguard findings, remedies, or proceedings?

No	Yes	If yes, list the products(s), countries affected, and the date of such findings/remedies/proceedings.
<input type="checkbox"/>	<input type="checkbox"/>	

II-10. **Effect of U.S. orders.** Describe the significance, if any, of the existing U.S. antidumping and countervailing duty orders on CSPV products from China and Taiwan on your firm's production, capacity, U.S. exports, inventories, purchases, or other indicators. You may wish to compare your firm's operations before or after imposition of the orders. If your response differs for particular orders, please indicate and explain the particular effect of imposition of specific orders.

II-11. **Other export markets.**--Identify export markets (other than the United States) that your firm has developed or where it has increased its sales of CSPV products since January 1, 2016. Please identify and discuss below.

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

**“Production”** – All production in your establishment(s), including production consumed internally within your firm.

**“Shipments”** – Shipments of products produced in your establishment(s). Quantities reported should be net of returns.

**“Home market commercial shipments”** – Shipments, other than internal consumption and transfers to related firms in the market in which your establishments are located.

**“Home market internal consumption/transfers to related firms”** – Shipments made to related firms in the market in which your establishments are located, including product consumed internally by your firm, including CSPV cells used to assemble other CSPV products, such as modules, panels, and laminates.

**“Export shipments”** – Shipments to destinations outside the country indicated on page 1, 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.*

**Foreign Producers'/Exporters' Questionnaire –  
CSPV Products (Monitoring)**

II-12. **CSPV Cells.**--Since January 1, 2016, has your firm produced CSPV cells?

- No                       Yes--Please complete questions II-13 (CSPV cells in kilowatts). Also, indicate below the type of cell for which data are being reported in this questionnaire and provide an explanation concerning any product mix changes that have occurred since January 1, 2016.

<b><i>Check type of cell for which data are reported in this questionnaire. Check all that apply.</i></b>	
<input type="checkbox"/>	Mono cells
<input type="checkbox"/>	Multi cells
<input type="checkbox"/>	PERC cells
<input type="checkbox"/>	HIT cells
<input type="checkbox"/>	Bifacial cells
<input type="checkbox"/>	Other hybrid cells (please describe cell)
If checked, please provide explanation of any product mix changes since January 1, 2012.	



II-13. **Trade data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of CSPV cells in your establishment(s) during the specified periods. In this question, do not include resales of CSPV cells that your firm did not produce; data on such resales of CSPV cells that your firm did not produce, to the degree they are exported to the United States, should only be reported in question II-15. Do not submit data by manufacturing facility if the manufacturing facilities are in the same country. If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response. Do not submit data on multiple countries combined. The establishments reported here should all be located in the country of the firm's address reported on page 1. Multinational companies with production in multiple countries should submit separate foreign producer questionnaire responses for each country.

## CELLS

Quantity (in kilowatts)							
Item	Actual Experience					Projections <sup>1</sup>	
	Calendar year			January-June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
Average production capacity <sup>2</sup> (A)							
Beginning-of-period inventories (B)							
<b>Production:</b>							
Bifacial (quantity) (C) <sup>3</sup>							
Rear contact cells with tin-coated solid copper fingers (quantity) (D) <sup>2</sup>							
All other cells (quantity) (E)							
<b>Total cell production</b>	0	0	0	0	0	0	0
<b>Home market shipments:</b>							
Internal consumption/ transfers to related firms (F)							
Commercial home market shipments (G)							
<b>Export shipments:</b>							
to the United States (H)							
to Canada (I)							
to Mexico (J)							
to EU markets <sup>4</sup> (K)							
to all other markets <sup>5</sup> (L)							
<b>Total exports</b>	0	0	0	0	0	0	0
<b>Total shipments</b>	0	0	0	0	0	0	0
<b>End-of-period inventories (M)</b>							

<sup>1</sup> Please explain the basis for your firm's projections: \_\_\_\_\_.

<sup>2</sup> 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: \_\_\_\_\_.

<sup>3</sup> See definitions on pages 5-7.

<sup>4</sup> Identify your firm's principal EU export markets: \_\_\_\_\_.

<sup>5</sup> Identify your firm's principal *other* export markets: \_\_\_\_\_.

II-13. **Trade data.**—Continued.

## CELLS

***RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.**—Generally, the data reported for the end-of-period inventories (i.e., line M) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., lines C, D, and E), less total shipments (i.e., lines F, G, H, I, J, K, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm’s records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.*

Item	Actual experience					Projections	
	Calendar year			January-June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
B + C + D + E – F – G – H – I – J – K – L – M = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.							

II-14. **Trade data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of CSPV modules in your establishment(s) during the specified periods. Do not include resales of CSPV modules that your firm did not produce; those data to the degree they are exported to the United States should only be reported in question II-15. Do not submit data by manufacturing facility if the manufacturing facilities are in the same country. If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response. Do not submit data on multiple countries combined. The establishments reported here should all be located in the country of the firm's address reported on the certification page. Multinational companies with production in multiple countries should submit separate foreign producer questionnaire responses for each country. ***For purposes of II-14, report data for your firm's operations related to the assembly of modules, regardless of the source of the cell.***

## MODULES

Quantity (in kilowatts)							
Item	Actual Experience					Projections <sup>1</sup>	
	Calendar year			January-June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
Average production capacity <sup>2</sup> (N)							
Beginning-of-period inventories (O)							
<b>Production of modules incorporating:</b>							
Bifacial (quantity) (P) <sup>3</sup>							
Flexible fiberglass (quantity) (Q) <sup>3</sup>							
Light-directing film (quantity) (R) <sup>3</sup>							
Rear contact cells with tin-coated solid copper fingers (quantity) (S) <sup>3</sup>							
Low wattage (quantity) (T) <sup>3</sup>							
All other (quantity) (U)							
<b>Total, production</b>	0	0	0	0	0	0	0
<b>Home market shipments:</b>							
Internal consumption/transfers to related firms (V)							
Commercial home market shipments (W)							
<b>Export shipments:</b>							
to the United States (X)							
to Canada (Y)							
to Mexico (Z)							
to EU markets <sup>4</sup> (AA)							
to all other markets <sup>5</sup> (AB)							
<b>Total exports (quantity)</b>	0	0	0	0	0	0	0
<b>Total shipments (quantity)</b>	0	0	0	0	0	0	0
<b>End-of-period inventories (AC)</b>							

II-14. **Trade data.**—*Continued.*

## MODULES

**Footnotes continued.**

- <sup>1</sup> Please explain the basis for your firm's projections: \_\_\_\_\_.
- <sup>2</sup> 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: \_\_\_\_\_.
- <sup>3</sup> See definitions on pages 5-7.
- <sup>4</sup> Identify your firm's principal EU export markets: \_\_\_\_\_.
- <sup>5</sup> Identify your firm's principal *other* export markets: \_\_\_\_\_.

***RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.***--Generally, the data reported for the end-of-period inventories (i.e., line AC) should be equal to the beginning-of-period inventories (i.e., line O), plus production (i.e., lines P through U), less total shipments (i.e., lines V through AB). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Item	Actual experience					Projections	
	Calendar year			January-June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
O + P + Q + R + S + T + U – V – W – X – Y – Z – AA – AB – AC = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.							

II-15. **Exports to the United States not produced by your firm.**--Report your firm's exports to the United States of CSPV cells and CSPV modules that were produced in the country identified on page one of this response but not by your firm during the specified periods. Note these data should **not** be included in questions II-13 and II-14.

Quantity (in kilowatts)							
Item	Actual experience					Projections	
	Calendar year			January-June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
Exports to the United States not produced by your firm: Cells <sup>1</sup>							
Modules <sup>2</sup>							
<sup>1</sup> List the producer(s) of the cells. _____							
<sup>2</sup> List the producer(s) of the modules. _____							

II-16. **Source of cells used in modules exported to the United States.**--If your firm reported exports of modules to the United States in line (U) in question II-14, please indicate below the four largest country sources of CSPV cells for those modules and the quantity (in kilowatts) of cells from that country source in the indicated period. If the country source of your CSPV cells changed from one period to the next, please explain.

Source of CSPV Cells	Calendar year			January-June	
	2016	2017	2018	2018	2019
	<b>Quantity (in kilowatts)</b>				
<b>Exports of modules using CSPV cells made in.--<sup>1</sup></b>					
Canada (AD)					
China (AE)					
Germany (AF)					
India (AG)					
Indonesia (AH)					
Japan (AI)					
Korea (AJ)					
Malaysia (AK)					
Mexico (AL)					
Philippines (AM)					
Singapore (AN)					
Taiwan (AO)					
Thailand (AP)					
Turkey (AQ)					
Vietnam (AR)					
All other developing countries <sup>2</sup> (AS)					
All other developed countries <sup>3</sup> (AT)					
All other countries <sup>4</sup> (AU)					
<b>Total</b>	0	0	0	0	0

<sup>1</sup> Explanation for any change in the country source of CSPV cells from one period to the next:

<sup>2</sup> See definition on page 7. Please list other developing countries for which data were reported:

<sup>3</sup> See definition on page 7. Please list other developed countries for which data were reported:

<sup>4</sup> See definition on page 7. Please list the other countries for which data were reported:

II-16. **Source of cells used in modules exported to the United States.**--Continued.

*RECONCILIATION OF EXPORTS TO THE UNITED STATES.*--The data reported in item II-15 (lines AD through AU) should be equal to the quantity of exports to the United States (line X).

Item	Actual experience				
	Calendar year			January-June	
	2016	2017	2018	2018	2019
AD + AE + AF + AG + AH + AI + AJ + AK + AL + AM + AN + AO + AP + AQ + AR + AS + AT + AU - X = should equal zero ("0"), if not, revise	0	0	0	0	0

II-17. **Home market competition.**--Does your firm compete with imports of CSPV cells (whether or not partially or fully assembled into other products) in your home market?

No       Yes--Indicate and explain below the trend in your firm's home market competition with imports since January 1, 2016.

Decreased	Increased	Constant	Fluctuated	Explanation for trend
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-18. **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.

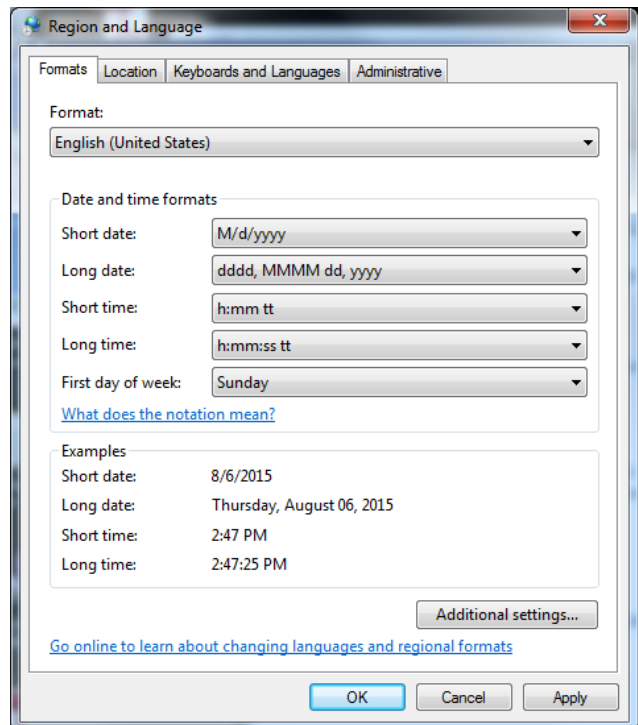
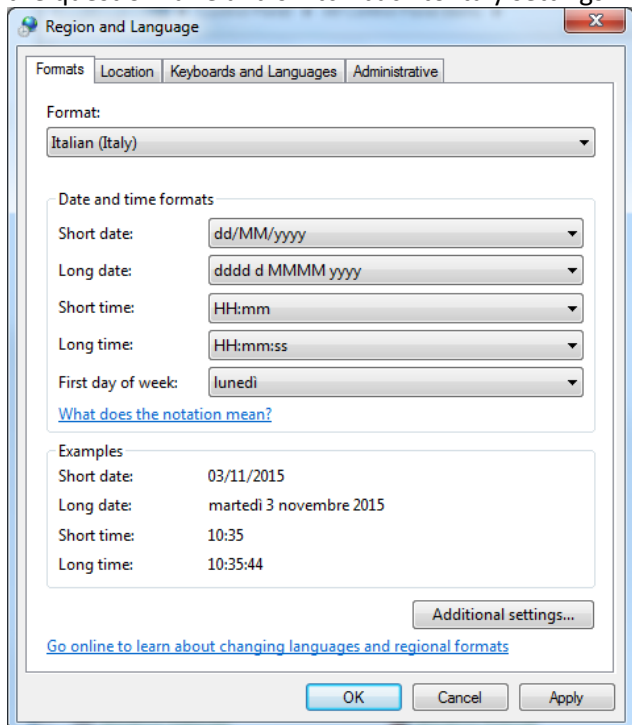
**Correcting Valid number error messages.**--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric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

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

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

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

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





## **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

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

[https://www.usitc.gov/investigations/title\\_7/2019/crystalline\\_silicon\\_photovoltaic\\_cells\\_whether\\_or/safeguard.htm](https://www.usitc.gov/investigations/title_7/2019/crystalline_silicon_photovoltaic_cells_whether_or/safeguard.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:** **CSPV**

- **E-mail.**--E-mail the MS Word questionnaire to **Mary Messer** ([Mary.Messer@usitc.gov](mailto:Mary.Messer@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 their 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 produce or export CSPV cells (whether or not partially or fully assembled into other products),** 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 C.F.R. § 206.17). 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 C.F.R. § 206.17). Service of the questionnaire must be made in paper form.