## U.S. PRODUCERS' QUESTIONNAIRE

## ACETONE FROM BELGIUM, KOREA, SINGAPORE, SOUTH AFRICA, AND SPAIN

## This questionnaire must be received by the Commission by September 3, 2019 <br> 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, Singapore, South Africa, and Spain Inv. No. 731-TA-1435-1436 and 1438-1440 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm $\qquad$
Address $\qquad$
City $\qquad$ State $\qquad$ Zip Code $\qquad$
Website $\qquad$
Has your firm produced acetone (as defined on next page) 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)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: ACET)

## 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.


Signature
Phone
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/final.htm

Acetone covered by this 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 C 3 H 6 O , with a specific molecular formula of CH 3 COCH 3 or ( CH 3 )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.

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

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 Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as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

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

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

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 macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade remedy/question.htm) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is optional. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

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

| Hours | Dollars |
| :---: | :---: |
|  |  |

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

I-1b. TAA information release.--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?
$\square$
I-2a. Establishments' covered.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. Firms operating more than one establishment should combine the data for all establishments into a single report.
"Establishment"--Each facility of a firm involved in the production of acetone, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

| Establishments <br> covered $^{1}$ | City, State | Zip (5 digit) | Description |
| :---: | :---: | :---: | :---: |
| 1 |  |  |  |
| 2 |  |  |  |
| 3 |  |  |  |
| 4 |  |  |  |
| 5 |  |  |  |
| 6 |  |  |  |
| ${ }^{1}$ Additional discussion on establishments consolidated in this questionnaire: |  |  |  |

l-2b. Stock symbol information.-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: $\qquad$ _.

I-2c. 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: $\qquad$ .
Lead attorney(s): $\qquad$ .

I-3. Petitioner status.--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

| No | Yes |
| :---: | :---: |
| $\square$ | $\square$ |

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

| Country | Support | Oppose | Take no position |
| :---: | :---: | :---: | :---: |
| Belgium | $\square$ | $\square$ | $\square$ |
| Korea | $\square$ | $\square$ | $\square$ |
| Singapore | $\square$ | $\square$ | $\square$ |
| South Africa | $\square$ | $\square$ | $\square$ |
| Spain | $\square$ | $\square$ | $\square$ |

I-5. Ownership.--Is your firm owned, in whole or in part, by any other firm?NoYes--List the following information.

| Firm name | Country | Extent of <br> ownership <br> (percent) |
| :--- | :--- | :--- |
|  |  |  |
|  |  |  |
|  |  |  |

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

| Firm name | Country | Affiliation |
| :--- | :--- | :--- |
|  |  |  |
|  |  |  |
|  |  |  |

U.S. Producers' Questionnaire - Acetone (Final)

1-7. Related producers.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of acetone?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 (202-205-2597, abu.kanu@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 also indicate whether each identified change was a result of a decision based on acetone market conditions or based on phenol market conditions.

| (check as many as appropriate) | (If checked, please describe; leave blank if not <br> applicable) |  |
| :--- | :--- | :--- |
| $\square$ | plant openings |  |
| $\square$ | plant closings |  |
| $\square$ | relocations |  |
| $\square$ | expansions |  |
| $\square$ | acquisitions |  |
| $\square$ | consolidations |  |
| $\square$ | prolonged shutdowns or |  |
| production curtailments |  |  |

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-9. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-9 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) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Calendar years |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Overall production capacity ${ }^{1}$ |  |  |  |  |  |
| Production of: Acetone ${ }^{2}$ | 0 | 0 | 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 | 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-9.
${ }^{3}$ 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. Capacity calculation.--Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.
$\square$
II-3d. Production constraints.--Please describe the constraint(s) that set the limit(s) on your firm's production capacity (including, if applicable, constraints relating to the storage of finished goods)..
$\square$

## II-3e. Product shifting.-

(i) Is your firm able to switch production (capacity) between acetone and other (i.e., alternative) products using the same equipment and/or labor?

| No | Yes | If yes—(i.e., have produced other than co-/by-products or are able to <br> produce other products) Please identify other actual or potential <br> products. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

(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.
$\square$

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

| Process | Check one |
| :--- | :---: |
| Cumene process | $\square$ |
| IPA dehydration process | $\square$ |
| Fischer-Tropsch synthesis process | $\square$ |
| Other process ${ }^{1}$ | $\square$ |
| Describe the process your firm uses: |  |

II-3g. Acetone vs phenol ratio.--If your firm reported co-/by-product (phenol) production in II-3a, what was the average ratio of acetone production to the co-/by-products (phenol) production your firm achieved over the January 2016 through June 2019 period? $\qquad$ percent (acetone to phenol).

Also was there variability in this ratio of primary product (acetone) to co-/by-product (phenol) production over the period?

| No | Yes | If yes--Please describe the range in the ratio and how it changed over the <br> January 2016 through June 2019 period, and indicate to what degree this <br> variability was controlled by your firm. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

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) <br> involved. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

## II-5. Foreign trade zones.--

(a) Firm's FTZ operations.--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 designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

| No | Yes | If yes-- Describe the nature of your firms operations in FTZs and identify <br> the specific FTZ site(s). |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

(b) Other firms' FTZ operations.--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 yes--Identify the firms and the FTZs. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

II-6a. Production decisions.--If your firm is a by-/co-product producer, indicate which product primarily drives your firm's production decisions for acetone (check only one option) and describe the primary factors involved in the production decision(s).

| Solely <br> acetone | Primarily <br> acetone | Equally <br> acetone and <br> phenol | Primarily <br> phenol | Solely <br> phenol |
| :---: | :---: | :---: | :---: | :---: |
| $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |

Please describe the factors driving the production decision(s).

II-7. Storage capacity.--Report the total storage capacity (i.e., both owned and leased, including barges) associated with your firm's acetone and phenol operations at the end of the specified period (i.e., December 31)?

| Quantity (in short tons) |  |  |  |
| :---: | :---: | :---: | :---: |
| Item | Calendar years ended (December 31)-- |  |  |
|  | 2016 | 2017 | 2018 |
|  | Acetone Storage Capacity |  |  |
| Owned |  |  |  |
| Leased $^{1}$ |  |  |  |
| Total | 0 | 0 | 0 |
|  | Phenol Storage Capacity ${ }^{2}$ |  |  |
| Owned |  |  |  |
| Leased $^{3}$ |  |  |  |
| Total | 0 | 0 | 0 |
| Total Storage Capacity | 0 | 0 | 0 |

${ }^{1}$ Please report the name of the firm(s) from which you leased acetone storage capacity:
${ }^{2}$ Can your firm's phenol storage capacity be switched to acetone storage capacity with minimal to no capital investment or retooling? $\square$ Yes. No. If no, please describe the amount of time, money, and effort that would be required to convert your firm's phenol storage capacity to acetone storage capacity: $\qquad$ _.
${ }^{3}$ Please report the name of the firm(s) from which you leased phenol storage capacity:
II-8a. Storage expansion decisions.--Please report any periods during which your firm was required to purchase or lease additional storage capacity for your acetone operations since January 1, 2016. In your response, please identify the date the new capacity was required, the volume of that new capacity, your reasons for adding capacity in that time period, and whether the decision to add storage capacity was affected by (or affected) acetone prices.

| Occurrence | Storage capacity expansion (short tons) | Date of expansion | Description |
| :---: | :---: | :---: | :---: |
| First |  |  |  |
| Second |  |  |  |
| Third |  |  |  |
| All subsequent expansions |  |  |  |

II-8b. Discounted sales in lieu of storage expansions.--Please report instances when your firm decided to sell acetone at a discount in order to free up storage capacity for additional acetone storage since January 1, 2016. In your response, please identify the date of the discounted sales and the amount of the discount provided.

| Occurrence | Discounted <br> quantity sold <br> (short tons) | Date of <br> discounted <br> sale | Description |
| :--- | :---: | :---: | :---: |
| First |  |  |  |


| Second |  |  |  |
| :--- | :--- | :--- | :--- |
| Third |  |  |  |
| All subsequent expansions |  |  |  |

II-8c. Inventories exceeding 90 percent of storage capacity.--Report the share of the specified period that your firm maintained inventory levels of acetone in excess of 90 percent of your firm's acetone's storage capacity (i.e., a 75 percent would mean that your firm maintained inventories at levels at or above 90 percent of your firm's acetone storage capacity in approximately 273 out of 365 days in the period).

| Item | Calendar year |  |  |
| :--- | :---: | :---: | :---: |
|  | 2016 |  |  |
| 2017 | 2018 |  |  |
| $>=90$ percent of capacity | Share of the period (percent) |  |  |
|  |  |  |  |

## Select definitions

"Average production capacity" or "capacity" - The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
"Production" - All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.
"Commercial U.S. shipments" -Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.
"Internal consumption" - Product consumed internally by your firm. Such transactions are valued at fair market value.
"Transfers to related firms" -Shipments made to related firms. Such transactions are valued at fair market value.
"Related firm"-A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.
"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-9. 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.

| Quantity (in short tons) and value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Calendar years |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Average production capacity ${ }^{1}$ (quantity) (A) |  |  |  |  |  |
| Beginning-of-period inventories (quantity) (B) |  |  |  |  |  |
| Production (quantity) (C) |  |  |  |  |  |
| U.S. shipments: <br> Commercial shipments: <br> Quantity (D) |  |  |  |  |  |
| Value (E) |  |  |  |  |  |
| Internal consumption: ${ }^{2}$ Quantity (F) |  |  |  |  |  |
| Value $^{2}$ (G) |  |  |  |  |  |
| Transfers to related firms: ${ }^{2}$ Quantity (H) |  |  |  |  |  |
| Value $^{2}$ (I) |  |  |  |  |  |
| Export shipments: ${ }^{3}$ <br> Quantity (J) |  |  |  |  |  |
| Value (K) |  |  |  |  |  |
| End-of-period inventories (quantity) (L) |  |  |  |  |  |
| ${ }^{1}$ The production capacity reported is based on operating $\qquad$ hours per week, $\qquad$ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity $\qquad$ - <br> ${ }^{2}$ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): $\qquad$ . However, the data provided above in this table should be based on fair market value. <br> ${ }^{3}$ Identify your firm's principal export markets: . $\qquad$ |  |  |  |  |  |

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--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.

| Reconciliation | Calendar years |  |  | January-June |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| $B+C-D-F-H-J-L=$ should equal zero ("O") or provide an explanation. ${ }^{1}$ | 0 | 0 | 0 | 0 | 0 |
| ${ }^{1}$ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:__. |  |  |  |  |  |

II-10. Channels of distribution.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

| Quantity (in short tons) and value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Calendar years |  |  | January-June |  |
| U.S. shipments | 2016 | 2017 | 2018 | 2018 | 2019 |
| To distributors: Quantity (M) |  |  |  |  |  |
| Value ( N ) |  |  |  |  |  |
| To end users: Quantity (0) |  |  |  |  |  |
| Value (P) |  |  |  |  |  |

RECONCILIATION OF CHANNELS.--Please ensure that the quantity and value reported for channels of distribution (i.e., lines M through P) in each time period equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in each time period in question II-9. If the calculated fields below return values other than zero (i.e., " 0 "), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar years |  |  | January-June |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Quantity: $\mathrm{M}+\mathrm{O}$ - $\mathrm{D}-\mathrm{F}$ - H=zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |
| Value: N + P - E-G - I= zero ("0"), if not revise. | 0 | 0 | 0 | 0 | 0 |

II-11. US shipments by type.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) in 2018 by product type.

| Quantity (in short tons) |  |
| :---: | :---: |
| U.S. shipments | Calendar year 2018 |
| Benzene free acetone.-- <br> Standard / technical grade (Q) |  |
| Specialty grades (e.g., low water, NF grade) (R) |  |
| Other acetone.-- <br> Standard / technical grade (S) |  |
| Specialty grades (e.g., low water, NF grade) (T) |  |

RECONCILIATION OF SHIPMENTS BY TYPE.--Please ensure that the quantity reported for shipments by type (i.e., lines $Q$ through $T$ ) in this question equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in 2018 in question II-10. If the calculated fields below return values other than zero (i.e., " 0 "), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year 2018 |
| :---: | ---: |
| Q + S - D - F - H= zero ("O"), if not revise. | 0 |

II-12. Employment data.--Report your firm's employment-related data 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 15 th of the month and divide that total by 6 . For the January to June periods, calculate similarly and divide by 6 .
"Hours worked" includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.
"Wages paid" -Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

| Item | Calendar years |  |  | January-June |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
|  | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 9}$ |
| Average number of PRWs (number) |  |  |  |  |  |
| Hours worked by PRWs (1,000 hours) |  |  |  |  |  |
| Wages paid to PRWs (\$1,000) |  |  |  |  |  |

Explanation of trends:
$\square$
II-13. Joint PRWs.--Are any PRWs above also involved in the production of phenol? If yes, please describe how has impacted the reported employment data relating to acetone above.

| No | Yes | If yes, please describe |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

II-14. Related firms.--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-15. Purchases. -- 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 <br> for your firms' purchases. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

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 short tons) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Calendar years |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Purchases from U.S. importers ${ }^{1}$ of acetone from- <br> Belgium |  |  |  |  |  |
| Korea |  |  |  |  |  |
| 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) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: $\qquad$ <br> ${ }^{2}$ Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: $\qquad$ - |  |  |  |  |  |

II-16. Imports.--Since January 1, 2016, has your firm imported acetone?

| No | Yes |  |
| :---: | :---: | :---: |
| $\square$ | $\square$ | If yes-- COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE |

II-17. Import inquiries.--Since January 1, 2016, has your firm made purchase inquires to foreign acetone producers that did not result in a purchase?

| No | Yes | If yes--Report the timing of such inquiries and the reasons for your firm's <br> initial inquiries. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

II-18. Other explanations.--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.
$\square$

## PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Samuel Varela-Molina (202-205-3429, Samuel.Varela-Molina@usitc.gov).

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

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

III-2. Accounting system.--Briefly describe your firm's financial accounting system.
A. When does your firm's fiscal year end (month and day)? $\qquad$ 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:

3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
$\square$ Audited, $\square$ unaudited, $\square$ annual reports, $\square$ 10Ks, $\square$ 10Qs,
$\square$ Monthly, $\square$ quarterly, $\square$ semi-annually, $\square$ annually
Accounting basis: $\square$ GAAP, $\square$ cash, $\square$ tax, or $\square$ 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. Cost accounting system.--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. Allocation basis.--Briefly describe your firm's allocation basis, if any, for COGS, SG\&A, and interest expense and other income and expenses.
$\square$
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 | $\%$ |
| Phenol | $\%$ |
|  | $\%$ |
|  | $\%$ |
|  | $\%$ |
|  | $\%$ |

III-6. Inputs from related suppliers.--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)?

| Yes--Continue to question III-7 | No--Continue to question III-9a. |
| :---: | :---: |
| $\square$ | $\square$ |

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 no--In the space below, please report the valuation basis of inputs <br> purchased from related suppliers as reported in question III-9a. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

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 | Accounting <br> treatment of <br> non-acetone <br> products | Yes | If yes--Please identify the other (non-acetone) co- <br> products or by-products. |
| :---: | :---: | :---: | :--- |
| $\square$ | Co-products | $\square$ |  |
| $\square$ | $\square$ |  |  |

III-9b. 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-products, and describe how those costs are apportioned between acetone and the co-product(s).
$\square$
III-9c. (i) By-product revenue.-- If your firm reported yes to by-product accounting treatment in III-9a, 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, and for the specified interim periods. Note: the data provided below will appear in question III-9d as a reduction to COGS.

| Value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Fiscal years ended-- |  |  | January-June |  |
|  | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 9}$ |
|  |  |  |  |  |  |
| 1 <br> ² Please describe how your firm classifies these by-product revenues in the normal course of business (e.g., <br> included in net sales values, as a reduction to COGS, included in "all other income"). |  |  |  |  |  |

III-9c. (ii) Phenol revenue.-- Report your firm's total phenol sales revenue of your U.S.
establishment(s). Provide data for the three most recently completed fiscal years, and for the specified interim periods.

| Value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Fiscal years ended-- |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Phenol sales revenue |  |  |  |  |  |

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, and for the specified interim periods.

| Quantity (in short tons) and value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Fiscal years ended-- |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Net sales quantities: ${ }^{2}$ <br> Commercial sales ("CS") |  |  |  |  |  |
| Internal consumption ("IC") |  |  |  |  |  |
| Transfers to related firms ("Transfers") |  |  |  |  |  |
| Total net sales quantities | 0 | 0 | 0 | 0 | 0 |
| Net sales values: ${ }^{2}$ Commercial sales |  |  |  |  |  |
| Internal consumption |  |  |  |  |  |
| Transfers to related firms |  |  |  |  |  |
| Total net sales values | 0 | 0 | 0 | 0 | 0 |
| Cost of goods sold (COGS): ${ }^{3}$ <br> Raw materials (from III-9f) ${ }^{4}$ | 0 | 0 | 0 | 0 | 0 |
| Direct labor |  |  |  |  |  |
| Other factory costs |  |  |  |  |  |
| Less: By-product revenue (from III-9b) | 0 | 0 | 0 | 0 | 0 |
| Total COGS | 0 | 0 | 0 | 0 | 0 |
| Gross profit or (loss) | 0 | 0 | 0 | 0 | 0 |
| Selling, general, and administrative (SG\&A) expenses: <br> Selling expenses |  |  |  |  |  |
| General and administrative expenses |  |  |  |  |  |
| Total SG\&A expenses | 0 | 0 | 0 | 0 | 0 |
| Operating income (loss) | 0 | 0 | 0 | 0 | 0 |
| Other expenses and income: Interest expense |  |  |  |  |  |
| All other expense items |  |  |  |  |  |
| All other income items |  |  |  |  |  |
| Net income or (loss) before income taxes | 0 | 0 | 0 | 0 | 0 |
| Depreciation/amortization included above |  |  |  |  |  |
| ${ }^{1}$ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations. <br> ${ }^{2}$ 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. <br> ${ }^{3}$ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers. <br> ${ }^{4}$ Data on raw material costs will populate here once reported in question III-9f. |  |  |  |  |  |

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

III-9e. Financial data reconciliation.--The calculable line items from question III-9a (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?

|  | If no-- If the calculated fields do not show the correct data, please double <br> check the feeder data for data entry errors and revise. Also, check signs <br> accorded to the post operating income line items; the two expense line <br> items should report positive numbers (i.e., expenses are positive and <br> incomes or reversals are negative--instances of the latter should be rare in <br> those lines) while the income line item also in most instances should have <br> its value be a positive number (i.e., income is positive, expenses or reversals <br> are negative). If after reviewing and potentially revising the feeder data <br> your firm has provided, the differences between your records and the <br> calculated fields persist please identify and discuss the differences in the <br> space below. |  |
| :---: | :---: | :--- |
| $\square \square$ | Nos |  |
| $\square$ |  |  |

III-9f. Raw materials.- Report the raw materials costs related to your firm's sales of acetone in the specified periods by method of production and sourcing of material inputs.

| Item | Fiscal years ended-- |  |  | January-June |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 9}$ |
| Production using Cumene process <br> Purchased/imported cumene |  |  |  |  |  |
| Internally produced cumene.- <br> Benzene |  |  |  |  |  |
| Propylene |  |  |  |  |  |
| Other inputs ${ }^{1}$ |  |  |  |  |  |
| Other material inputs ${ }^{2}$ |  |  |  |  |  |
| Production using IPA (or other) process <br> Isopropyl alcohol |  |  |  |  |  |
| Other material inputs ${ }^{3}$ |  |  |  |  |  |
| Total raw materials |  |  |  |  |  |

[^0]III-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-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-- |  |  | January-June |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Item |  | 2016 | 2017 | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 8}$ |
|  | Value (\$1,000) |  |  |  | 2019 |  |
| 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.

| Item | Description of the <br> nonrecurring item | Income statement classification of the nonrecurring <br> item |
| :--- | :--- | :--- |
| Nonrecurring item 1 |  |  |
| Nonrecurring item 2 |  |  |
| Nonrecurring item 3 |  |  |
| Nonrecurring item 4 |  |  |
| Nonrecurring item 5 |  |  |
| Nonrecurring item 6 |  |  |
| Nonrecurring item 7 |  |  |

III-11. Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.--If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9d.
$\square$
III-12. Asset values.--Report the total 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 net assets after any accumulated depreciation and allowances deducted.

Total assets should be allocated to the subject products if these assets are also related to other products. Please provide a brief explanation if there are any substantial changes in total asset value during the period (e.g., due to asset write-offs, revaluation, and major purchases) as well as a brief explanation of any allocation methodologies used for assets used in co-production.

| Value (in \$1,000) |  |  |  |
| :---: | :---: | :---: | :---: |
| Item | Fiscal years ended-- |  |  |
|  | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ |
|  |  |  |  |
| ${ }^{1}$ 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, and for the specified interim periods.

| Value (in \$1,000) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Item | Fiscal years ended-- |  |  | January-June |  |
|  | 2016 | 2017 | 2018 | 2018 | 2019 |
| Capital expenditures ${ }^{1}$ |  |  |  |  |  |
| Research and development expenses ${ }^{2}$ |  |  |  |  |  |
| ${ }^{1}$ Please describe the nature, focus, as well as a brief explanation of any alloc product and any co-product(s). $\qquad$ <br> ${ }^{2}$ Please describe the nature, focus, well as a brief explanation of any alloca covering both subject product and any | gnifica meth <br> ignifica method oduct(s) | our firm es use <br> ur firm used | expen al exp <br> xpens <br> $h$ and | n the cover <br> to sub ent exp | produ <br> sub <br> duct |

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 |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |
|  | $\square$ |  |

Please note the quantities and values reported in question III-9d should reconcile with the data reported in question II-9 (including export shipments) as long as they are reported on the same calendar year basis.

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported for total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. 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-- |  |  | January-June |  |
| :--- | ---: | ---: | ---: | ---: | ---: |
| Reconciliation | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 9}$ |
| Quantity: Trade data from question II-9 <br> (lines D, F, H, and J) less financial total <br> net sales quantity data from question III- <br> 9d, = zero ("O"). |  |  |  |  |  |
| Value: Trade data from question II-9 <br> (lines E, G, I, and K) less financial total <br> net sales value data from question III-9d, <br> = zero ("O"). | 0 |  |  |  |  |

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

| Yes | No | If no, please explain. |
| :--- | :--- | :--- |
| $\square$ | $\square$ |  |

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. Effects of imports on investment.--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, Singapore, South Africa and/or Spain?

| No | Yes |  |
| :---: | :---: | :--- |
|  | $\square$ | If yes, my firm has experienced actual negative effects as follows. |


| (check as many as appropriate) |  | (please describe) |
| :--- | :--- | :--- |
| $\square$ | Cancellation, <br> postponement, or <br> rejection of expansion <br> projects |  |
| $\square$ | Denial or rejection of <br> investment proposal |  |
| $\square$ | Reduction in the size of <br> capital investments |  |
| $\square$ | Return on specific <br> investments negatively <br> impacted |  |
| $\square$ | Other |  |
| $\square$ |  |  |

III-16. Effects of imports on growth and development.--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, Singapore, South Africa and/or Spain?


| (check as many as appropriate) |  | (please describe) |
| :--- | :--- | :--- |
| $\square$ | Rejection of bank loans |  |
| $\square$ | Lowering of credit rating |  |
| $\square$ | Problem related to the <br> issue of stocks or bonds |  |
| $\square$ | Ability to service debt |  |
| $\square$ | Other |  |

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

| No | Yes | If yes, my firm anticipates negative effects as follows. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

III-18. Other explanations.--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.
$\square$

## PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, cindy.cohen@usitc.gov).

IV-1. Contact information.--Please identify the individual that Commission staff may contact regarding the confidential information submitted in part IV.

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

## PRICE DATA

IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 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 f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the final net amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).

IV-2a. During January 2016-June 2019, 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)?

| $\square$ | Yes.--Please complete the following pricing data table as appropriate. |
| :--- | :--- |
| $\square$ | No.--Skip to question IV-3. |

IV-2b. Price data.--Report below the quarterly price data ${ }^{1}$ for pricing products ${ }^{2}$ produced and sold by your firm.

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

| (Quantity in short tons, value in dollars) |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Period of shipment | Product 1 |  | Product 2 |  | Product 3 |  | Product 4 |  |
|  | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2016: |  |  |  |  |  |  |  |  |
| April-June |  |  |  |  |  |  |  |  |
| July-September |  |  |  |  |  |  |  |  |
| October-December |  |  |  |  |  |  |  |  |
| 2017: <br> January-March |  |  |  |  |  |  |  |  |
| April-June |  |  |  |  |  |  |  |  |
| July-September |  |  |  |  |  |  |  |  |
| October-December |  |  |  |  |  |  |  |  |
| 2018: <br> January-March |  |  |  |  |  |  |  |  |
| April-June |  |  |  |  |  |  |  |  |
| July-September |  |  |  |  |  |  |  |  |
| October-December |  |  |  |  |  |  |  |  |
| 2019: <br> January-March |  |  |  |  |  |  |  |  |
| April-June |  |  |  |  |  |  |  |  |
| ${ }^{1}$ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. <br> ${ }^{2}$ Pricing product definitions are provided on the first page of Part IV. <br> Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data. <br> Product 1: <br> Product 2: <br> Product 3: <br> Product 4: |  |  |  |  |  |  |  |  |

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

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

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

(a) 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 <br> by <br> transaction | Contracts | Set <br> Srice <br> lists | Published <br> benchmark/ <br> price (e.g. <br> large buyer <br> price, RGP) | Other |  |
| :---: | :---: | :---: | :---: | :--- | :--- |
| $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |  |
|  | $\square$ | $\square$ |  |  |  |

(b) If your firm determines acetone prices by reference to the large buyer price or other benchmark, or published RGP or other raw material price, please indicate how the discount or multiplier is determined.
$\square$
(c) Has the discount or multiplier from published prices for acetone changed since January 1, 2016?

| No | Yes | If yes, please describe the changes. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

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

|  | Annual <br> total <br> Quantity <br> discounts | No <br> discounts | discount <br> policy | Other |
| :---: | :---: | :---: | :---: | :--- |$\quad$|  |
| :---: |
| $\square$ |

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 |
| :---: | :---: | :---: |
| $\square$ | $\square$ |  |

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

| Share of sales in | Type of sale |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | 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) | Total (Each row should sum to 100.0\%) |
| 2016 | \% | \% | \% | \% | 0.0 \% |
| 2017 | \% | \% | \% | \% | 0.0 \% |
| 2018 | \% | \% | \% | \% | 0.0 \% |
| January-June 2019 | \% | \% | \% | \% | 0.0 \% |

## IV-7. Contract provisions.

(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 <br> contract provisions | Item | Short-term contracts <br> (multiple deliveries <br> for less than 12 <br> months) | Annual contracts <br> (multiple <br> deliveries for 12 <br> months) | Long-term contracts <br> (multiple deliveries <br> for more than 12 <br> months) |
| :---: | :---: | :---: | :---: | :---: |
| Average contract <br> duration | No. of <br> days |  | 365 | $\square$ |
| Price renegotiation <br> (during contract <br> period) | Yes | No | $\square$ | $\square$ |
|  | $\square$ | $\square$ | $\square$ | $\square$ |
|  | Quantity | $\square$ | $\square$ | $\square$ |
| Indexed to raw <br> material costs ${ }^{1}$ | $\square$ | $\square$ | $\square$ | $\square$ |

IV-8. Lead times.--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 <br> 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? $\qquad$ percent
(b) Who generally arranges the transportation to your firm's customers' locations?Your firmPurchaser (check one)
(c) Does your firm generally recover transportation expenses through additives to the price (e.g. "prepaid \& add")? $\square$ Yes $\square$ No (check one)
(d) 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 $100.0 \%$ ) | $0.0 \quad \%$ |

IV-10. Geographical shipments.-- 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. | $\square$ |
| Midwest.-IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI. | $\square$ |
| Southeast.-AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV. | $\square$ |
| Central Southwest.-AR, LA, OK, and TX. | $\square$ |
| Mountains.-AZ, CO, ID, MT, NV, NM, UT, and WY. | $\square$ |
| Pacific Coast.-CA, OR, and WA. | $\square$ |
| Other.-All other markets in the United States not previously listed, <br> including AK, HI, PR, and VI. | $\square$ |

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

| End-use product | Share of total cost of end use product <br> accounted for by |  | Total <br> (should sum to <br> 100 |
| :--- | :---: | :---: | :---: |
|  | Acetone | Other inputs |  |
|  | $\%$ | $\%$ | $0.0 \%$ |
| BPA | $\%$ | $\%$ | $0.0 \%$ |
|  | $\%$ | $\%$ | $0.0 \%$ |
|  | $\%$ | $\%$ | $0.0 \%$ |
|  | $\%$ | $0.0 \%$ |  |

IV-12. Substitutes.-- Can other products be substituted for acetone, either directly or in downstream uses (e.g. production methods of MMA, BPA, or other downstream products, that do not use acetone)?
$\square$ No $\quad \square$ Yes--Please fill out the table.

| Substitute |  | End use in which this substitute is used | Have changes in the price of this substitute affected the price for acetone? |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | No | Yes | Explanation |
| 1. |  |  |  |  | $\square$ |  |
| 2. |  |  |  | $\square$ |  |
| 3. |  |  |  | $\square$ |  |

IV-13. Demand trends.-- Indicate how demand within the United States and outside of the United States for acetone and phenol has changed since January 1, 2016. Explain any trends and describe the principal factors that have affected these changes in demand.

| Market | Overall <br> increase | No <br> change | Overall <br> decrease | Fluctuate <br> with no <br> clear trend | Don't <br> know | Explanation and factors |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Acetone demand within <br> the United States | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |
| Acetone demand outside <br> the United States | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |
| Phenol demand within <br> the United States | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |
| Phenol demand outside <br> the United States | $\square$ | $\square$ | $\square$ | $\square$ | $\square$ |  |

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. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

## 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. |
| :---: | :--- |
| $\square \quad$ No | Skip to question IV-16. |
| $\square \quad$Yes-Business cycles (e.g. <br> seasonal business) |  |
| $\square \quad$Yes-Other distinctive <br> conditions of competition |  |
| $\square \quad$ |  |

(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. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

(c) Have business cycles or conditions of competition of phenol affected the business cycles or conditions of competition for acetone since January 1, 2016?

| No | Yes | If yes, describe. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

## IV-16. Supply constraints.-

(a) Has your firm refused, declined, or been unable to supply acetone since January 1, 2016 (including an inability to supply the total volume requested formally or informally for the following calendar year)? (Examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, declining to supply the quantity of acetone requested by new or existing customers seeking to commit volume for annual requirements, delivering less than the quantity promised, being unable to meet timely shipment commitments, force majeure, etc.)

| No | Yes | If yes, please describe in detail, including the dates, customers, and <br> quantities of acetone involved. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

(b) Since January 1, 2016, have weather-related events or plant closures (including the timing of closure announcements versus actual closures) affected the overall supply of U.S.-produced acetone in the U.S. market?

| No | Yes | If yes, please describe, noting the specific events, and dates that the <br> market was affected. |
| :---: | :---: | :--- |
| $\square$ | $\square$ |  |

IV-17. Raw materials.--How have acetone raw material prices changed since January 1, 2016?

| Overall <br> increase | No <br> change | Overall <br> decrease | Fluctuate <br> with no <br> clear trend | Explain, noting how raw material price changes <br> have affected your firm's selling prices for <br> acetone. |
| :---: | :---: | :---: | :---: | :---: |
| $\square$ | $\square$ | $\square$ | $\square$ |  |

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
$\mathrm{F}=$ the products are frequently interchangeable
$\mathrm{S}=$ the products are sometimes interchangeable
$\mathrm{N}=$ the products are never interchangeable
$0=n o$ familiarity with products from a specified country-pair

| Country-pair | Belgium | Korea | Singapore | South Africa | Spain | Other countries |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| United States |  |  |  |  |  |  |
| Belgium |  |  |  |  |  |  |
| Korea |  |  |  |  |  |  |
| Singapore |  |  |  |  |  |  |
| South Africa |  |  |  |  |  |  |

For any country-pair producing acetone that is sometimes or never interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:

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
$\mathrm{F}=$ such differences are frequently significant
$\mathrm{S}=$ such differences are sometimes significant
$\mathrm{N}=$ such differences are never significant
$0=n o$ familiarity with products from a specified country-pair

| Country-pair | Belgium | Korea | Singapore | South Africa | Spain | Other countries |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| United States |  |  |  |  |  |  |
| Belgium |  |  |  |  |  |  |
| Korea |  |  |  |  |  |  |
| Singapore |  |  |  |  |  |  |
| South Africa |  |  |  |  |  |  |

For any country-pair for which factors other than price always or frequently 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:
U.S. Producers' Questionnaire - Acetone (Final)

IV-20. Customer identification.--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 |  | City | State | Share of 2018 sales <br> (\%) |
| :--- | :--- | :--- | :--- | :--- |
| 1 |  |  |  |  |
| 2 |  |  |  |  |
| 3 |  |  |  |  |
| 4 |  |  |  |  |
| 5 |  |  |  |  |
| 6 |  |  |  |  |
| 7 |  |  |  |  |
| 8 |  |  |  |  |
| 9 |  |  |  |  |
| 10 |  |  |  |  |

U.S. Producers' Questionnaire - Acetone (Final)

## IV-21. Competition from imports.--

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

| Item | No | Yes |
| :--- | :---: | :---: |
| Reduce prices | $\square$ | $\square$ |
| Roll back announced price increases | $\square$ | $\square$ |

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

| No | Yes |
| :---: | :---: |
| $\square$ | $\square$ |

IV-22. Other explanations.--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.

## 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/final.htm

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

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

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

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

If your firm does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

Parties to this proceeding.-If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.


[^0]:    ${ }^{1}$ List other material inputs into your firm's internally produced cumene:
    ${ }^{2}$ List other material inputs in addition to cumene used in your firm's acetone production:
    ${ }^{3}$ List other material inputs in addition to isopropyl alcohol used in your firm's acetone production:

