LOST SALES AND LOST REVENUE SURVEY FLUID END BLOCKS FROM CHINA, GERMANY, INDIA, AND ITALY

This survey must be received by the Commission by January 2, 2020

See last page for filing instructions.

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing duty/antidumping investigations concerning fluid end blocks from China, Germany, India, and Italy (Inv. Nos. 701-TA-632-635 and 731-TA-1466-1468 (Preliminary)). The information requested in the survey 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 possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Pamela Davis (202-205-2218, Pamela.Davis@usitc.gov).

| | rm | | | | | | |
|---|--|---|--|---|--|--|---|
| Address | | | | | | | |
| City | | | State | Zip (| Code | | |
| Website | | | | | | | |
| | n purchased, o ce January 1, 2 | | own use or retail s | ale, fluid en | d blocks (as defined | on next page) at | |
| ☐ NO | (Sign the cer | ification below and | promptly return on | y this page of | the survey to the Cor | mmission) | |
| YES | (Complete al | parts of the survey, | and return the ent | re survey to t | he Commission) | | |
| hat the infor | mation herein | sunnlied in this su | CERTIFICATION | | to the best of my | knowledge and | helief and |
| nd that the inj nt consent for | formation subr the Commissio | nitted is subject to n, and its employ | audit and verifices and contract | ation by the personnel, t | Commission. By sure of use the information of the Commission of th | ibmitting this cer | tification l this survey |
| | | | | | | | or similar |
| tion or other el (a) for deve and evaluati c 3; or (ii) by L | proceeding mo loping or main ons relating to J.S. governmen | y be disclosed to taining the record to the programs, | and used: (i) by Is of this or a rel personnel, and c contract personn | the Commis ated procee operations | request for informo sion, its employees ding, or (b) in inter of the Commission cybersecurity purp | s and Offices, and rnal investigation including unde | ghout this d contract ns, audits, r 5 U.S.C. |
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GENERAL INFORMATION

<u>Background.</u>-- This proceeding was instituted in response to petitions filed on December 19, 2019, by Ellwood City Forge Company, Ellwood Quality Steels Company, and Ellwood National Steel Company (collectively the "Ellwood Group"), Ellwood City, Pennsylvania; A. Finkl & Sons ("Finkl Steel"), Chicago, Illinois; and FEB Fair Trade Coalition (an *ad hoc* coalition whose members include the Forging Industry Association, the Ellwood Group, and Finkl Steel), Cleveland, Ohio. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization or dumping. Questionnaires and other information pertinent to this proceeding are available at https://usitc.gov/investigations/701731/2019/fluid end blocks china germany india and italy/preliminary.htm

<u>Fluid end blocks</u> covered by these investigations are forged steel fluid end blocks ("FEBs"), whether unfinished, semi-finished, or finished, and which are typically used in the manufacture or service of hydraulic pumps.

The term "forged" is an industry term used to describe the grain texture of steel resulting from the application of localized compressive force. Illustrative forging standards include, but are not limited to, American Society for Testing and Materials ("ASTM") specifications A668 and A788.

For purposes of these petitions, the term "steel" denotes metal containing the following chemical elements, by weight: (i) iron greater than or equal to 60 percent; (ii) nickel less than or equal to 8.5 percent; (iii) copper less than or equal to 6 percent; (iv) chromium greater than or equal to 0.4 percent, but less than or equal to 20 percent; and (v) molybdenum greater than or equal to 0.15 percent, but less than or equal to 3 percent. Illustrative steel standards include, but are not limited to, American Iron and Steel Institute ("AISI") or Society of Automotive Engineers ("SAE") grades 4130, 4135, 4140, 4320, 4330, 4340, 8630, 15-5, 17-4, F6NM, F22, F60, and XM25, as well as modified varieties of these grades.

The products covered by these petitions are either (1) cut-to-length FEBs with a height (measured from its highest point) of 8 inches (203.2 mm) to 40 inches (1,016.0 mm), a width (measured from its widest point) of 8 inches (203.2 mm) to 40 inches (1,016.0 mm), and a length (measured from its longest point) of 11 inches (279.4 mm) to 75 inches (1,905.0 mm), or (2) strings of FEBs with a height (measured from its highest point) of 8 inches (203.2 mm) to 40 inches (1,016.0 mm), a width (measured from its widest point) of 8 inches (203.2 mm) to 40 inches (1,016.0 mm), and a length (measured from its longest point) up to 360 inches (9,144.0 mm).

The products included in the scope of these petitions have a tensile strength of at least 70 KSI (measured in accordance with ASTM A370) and a hardness of at least 140 HBW (measured in accordance with ASTM E10).

FEBs may be unfinished or have undergone one or more of the following finishing operations: (1) milling one or more flat surfaces; (2) contour machining to custom shapes or dimensions; (3) drilling or boring holes; (4) heat treating; (5) painting, varnishing, or coating; (6) threading; and/or (7) the attachment of flanges, valves, seals, or connectors.

Fluid end blocks are currently imported under statistical reporting numbers 7218.91.0030, 7218.99.0030, 7224.90.0015, 7224.90.0045, 7326.19.0010, 7326.90.8688, or 8413.91.9055 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing fluid end blocks (as defined above) into the United States from a foreign manufacturer or through its selling agent.

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.

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

<u>Verification</u>.--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.

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

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

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

PURCHASE INFORMATION

1. <u>Purchases and imports.</u>— Report <u>separately</u> your firm's domestic purchases and imports of fluid end blocks.

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

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

| | 2016 | 2017 | 2018 |
|--|---------------------|------|------|
| Item | Quantity (in units) | | |
| Purchases of fluid end blocks produced in— | | | |
| United States | | | |
| China | | | |
| Germany | | | |
| India | | | |
| Italy | | | |
| All other countries ¹ | | | |
| Sources unknown ² | | | |
| Total purchases | 0 | 0 | 0 |
| Imports of fluid end blocks from— China | | | |
| Germany | | | |
| India | | | |
| Italy | | | |
| All other countries ¹ | | | |
| Total imports ³ | 0 | 0 | 0 |

¹ Please identify these countries:

² Please indicate the firm(s) from which you purchased this merchandise:

³ If your firm imported fluid end blocks at any time since January 1, 2016, please also complete and return a U.S. importers' questionnaire in this proceeding.

| 2. | <u>Changes in purchasing patterns.</u> —Please indicate how the shares of your firm's purchases of fluid |
|----|--|
| | end blocks from different sources have changed since January 1, 2016. |

| Source of purchases | Did not purchase | Decreased | Increased | Constant | Fluctuated | Explanation for trend | |
|---------------------|---|-----------|-----------|----------|------------|-----------------------|--|
| United States | | | | | | | |
| China | | | | | | | |
| Germany | | | | | | | |
| India | | | | | | | |
| Italy | | | | | | | |
| All other countries | | | | | | | |
| Sources unknown | | | | | | | |
| | Major purchasing factorsPlease list, in order of their importance, the main factors your firm | | | | | | |

| 3. | Major purchasing factorsPlease list, in order of their importance, the main factors your firm |
|----|---|
| | considers in deciding from whom to purchase fluid end blocks. |

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

| | 4. | Purchasing sul | ject imports rather | than domestic | products |
|--|----|-----------------------|---------------------|---------------|----------|
|--|----|-----------------------|---------------------|---------------|----------|

| (a) | Since January 2016, did your firm import and/or purchase imports of fluid end blocks |
|-----|--|
| | from China, Germany, India, and Italy instead of purchasing U.Sproduced fluid end |
| | blocks? Respond for each subject country. |

| | Yes | No (If "No" for all countries, skip to next |
|---------|-------------------------------------|--|
| Source | (also respond to parts (b) and (c)) | question) |
| China | | |
| Germany | | |
| India | | |
| Italy | | |

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

| Source | Yes | No |
|---------|-----|----|
| China | | |
| Germany | | |
| India | | |
| Italy | | |

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

| Source | Yes | If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2016 (in units) | No | If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product |
|---------|-----|--|----|---|
| China | | | | |
| Germany | | | | |
| India | | | | |
| Italy | | | | |

5. U.S. producers and import competition.--

(a) Since January 1, 2016, in connection with a sale or offer to sell fluid end blocks to your firm, did U.S. producers reduce their prices of domestically produced fluid end blocks in order to compete with lower-priced imports of fluid end blocks from the subject countries? Respond for each subject country.

| Source | Yes (also respond to question part (b)) | No (If "No" for all countries, skip to next question) | Don't know |
|---------|---|---|------------|
| China | | | |
| Germany | | | |
| India | | | |
| Italy | | | |

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

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

Finishing operations.--Does your firm contract with a machine shop to provide finishing

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6.

7.

8.

| C | heck all that apply. | | Please describe | 2. |
|--------------------|----------------------------|------------|---|---|
| ☐ Yes | | | If yes, and your firm has not already identified firms providing finishing services for fluid end blocks in its response to question I-10b in the Importers' questionnaire in this proceeding, please identify the largest supplier of such services below. | |
| No-Firm pro | ovides finishing operation | ons itself | | |
| No-Other | | | | |
|)) | | | | |
| Firm name | Contact name | Con | tact e-mail | Share (by quantity) of your firm's purchases, from January 2016 to September 2019 (percent) |
| | | | | % |
| ther explanationsF | Please provide any additi | ional comm | nents in this box. | |
| | | | | |

| 9. | 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): | |

OMB INFORMATION

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

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

The questions in this survey have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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

HOW TO FILE YOUR SURVEY RESPONSE

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

• <u>Upload via Secure Drop Box.</u>—Upload the MS Word survey along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

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

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

If your firm <u>did not </u>**purchase this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.