U.S. IMPORTERS' QUESTIONNAIRE

VERTICAL SHAFT ENGINES FROM CHINA

This questionnaire must be received by the Commission by <u>January 29, 2020</u> See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping duty investigations concerning vertical shaft engines from China (Inv. Nos. 701-TA-637 and 731-TA-1471 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of f	irm
Address	
City	State Zip Code
Website	
Has your fir January 1, 2	rm imported vertical shaft engines (as defined on next page) from any country at any time since 2016?
	(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)
•	estionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: ENGCN)

CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.

I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.

Name of Authorized Official	Title of Authorized Official	Date	
Signature	Phone	Email address	

PART I.—<u>GENERAL INFORMATION</u>

This proceeding was instituted in response to a petition filed on January 15, 2020, by the Coalition of American Vertical Engine Producers (Kohler Co., Kohler, Wisconsin, and Briggs & Stratton Corporation, Wauwatosa, Wisconsin). Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes affirmative determinations of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at

https://www.usitc.gov/investigations/701731/2020/vertical_shaft_engines_china/preliminary.htm.

<u>Vertical shaft engines</u> covered by these investigations are spark-ignited, non-road, vertical shaft engines, whether finished or unfinished, whether assembled or unassembled, designed primarily for use in riding lawn mowers and zero-turn radius lawn mowers. Engines meeting this physical description may also be designed for use in other non-hand-held outdoor power equipment. The subject engines are spark ignition, single or multiple cylinder, air cooled, internal combustion engines with vertical power take off shafts with a minimum displacement of 225 cubic centimeters ("cc") and a maximum displacement of 999cc. Typically, engines with displacements of this size generate gross power of between 6. 7 kilowatts ("kw") to 42 kw.

Engines covered by this scope normally must comply with and be certified under Environmental Protection Agency (EPA) air pollution controls title 40, chapter I, subchapter U, part 1054 of the Code of Federal Regulations standards for small non-road spark-ignition engines and equipment. Engines that otherwise meet the physical description of the scope but are not certified under 40 CFR part 1054 and are not certified under other parts of subchapter U of the EPA air pollution controls are not excluded from the scope of this proceeding. Engines that may be certified under both 40 CFR part 1054 as well as other parts of subchapter U remain subject to the scope of this proceeding.

For purposes of these investigations, an unfinished engine covers at a minimum a sub-assembly comprised of, but not limited to, the following components: crankcase, crankshaft, camshaft, pistons(s), connecting rod(s), and oil pan. Importation of these components together, whether assembled or unassembled, and whether or not accompanied by additional components such as a manifold, cylinder head(s), valve train, or valve cover(s), constitutes an unfinished engine for purposes of these investigations. The inclusion of other products such as spark plugs fitted into the cylinder head or electrical devices (*e.g.*, ignition modules, ignition coils) for synchronizing with the motor to supply tension current does not remove the product from the scope. The inclusion of any other components not identified as comprising the unfinished engine subassembly in a third-country does not remove the engine from the scope.

The engines subject to these investigations are typically classified in the Harmonized Tariff Schedule of the United States (HTSUS) at statistical reporting numbers: 8407.90.1020, 8407.90.1060, and 8407.90.1080. Engines subject to these investigations may also enter under HTSUS 8407.90.9060 and 8407.90.9080. The engine subassemblies that are subject to these investigations enter under HTSUS 8409.91.5085, and 8409.91.9990. The HTSUS statistical reporting numbers are provided for convenience and customs purposes only, and the written description of the merchandise under investigation is dispositive.

Importer.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing vertical shaft engines (as defined above) into the United States from a foreign manufacturer or through its selling agent.

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

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

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

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

<u>Valid number error messages.</u>--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Abu B. Kanu (202-205-2597, <u>abu.kanu@usitc.gov</u>).

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (<u>https://www.usitc.gov/trade_remedy/question.htm</u>) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is <u>optional</u>. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool 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 40 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-2a. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>importation</u> of vertical shaft engines, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

- I-2b. <u>Stock symbol information.</u>-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.
- 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:	
Lead attorney(s):	

I-3. **Ownership**.--Is your firm owned, in whole or in part, by any other firm?

No

No No

Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

I-4. <u>**Related importers/exporters.**</u>--Does your firm have any related firms, either domestic or foreign, that are engaged in importing vertical shaft engines from China into the United States or that are engaged in exporting vertical shaft engines from China to the United States?

Yes--List the following information.

Firm name	Country	Affiliation

I-5. **<u>Related producers</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of vertical shaft engines?

No

Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Importing operations**.--Please indicate the nature of your firm's importing operations on vertical shaft engines. More than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported product(s)	Customs broker or freight forwarder

I-7. <u>Consignee</u>.--If your firm is an importer of record of vertical shaft engines but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. **FTZ, TIB, or bonded warehouses**.--Please indicate whether your firm enters vertical shaft engines into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports vertical shaft engines under the TIB (temporary importation under bond) program.

"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, as well as other savings. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

"Bonded warehouse" is a secured facility supervised by U.S. Customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

"Temporary Importation under Bond ("TIB") program" is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States (HTS).

Item	No	Yes
Foreign trade zones		
Bonded warehouses		
Temporary importation under bond		

I-9. <u>Other trade actions</u>.--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes, Yes–Please specify.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Abu B. Kanu (202-205-2597, <u>abu.kanu@usitc.gov</u>). **Supply all data requested on a** <u>calendar-year</u> basis.

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

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of vertical shaft engines since January 1, 2016.

(chea	ck as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	Office/warehouse openings	
	Office/warehouse closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or importation curtailments	
	Revised labor agreements	
	Other (e.g., technology)	

II-3a. <u>Arranged imports</u>.--Has your firm imported or arranged for the importation of vertical shaft engines for delivery after **September 30, 2019**?

"Arranged imports" are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

No	Yes	
		If yes, fill out the table below.

	Period						
Source	Oct-Dec 2019	Jan-Mar 2020	Apr-June 2020	Jul-Sept 2020			
	Quantity (in units)						
China							
All other sources							

II-3b. **Imports in the 12 month period preceding the petition**.--Has your firm imported vertical shaft engines from any source between January 2019 and December 2019 (*i.e.*, all of 2019)

No	Yes	
		If yes, report the quantity of such import below by source.

Quantity (in units)					
Source	January 2019 through December 2019				
China					
All other sources					

II-4. <u>Reasons for importing if producer</u>.--If your firm also produces vertical shaft engines in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

Definitions

"Imports" –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (*i.e.*, was responsible for paying any import duty).

"Import quantities" -Quantities reported should be net of returns.

"Import values"—Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (*i.e.*, all charges except inland freight in the United States).

"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 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-5a. <u>U.S. imports from China</u>.–Report your firm's imports and your firm's shipments and inventories of vertical shaft engines imported from China by your firm during the specified periods.

China

		Calendar years		January-September	
Item	2016	2017	2018	2018	2019
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: 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 Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

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.*): _____. However, the data provided above in this table should be based on fair market value.

³ Identify your firm's principal export markets: _____

II-5a. U.S. imports from China.-Continued

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (*i.e.*, line A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (*e.g.*, theft, loss, damage, record systems issues, etc.) if they exist.

	(Calendar years	5	January-S	September
Reconciliation	2016	2017	2018	2018	2019
A + B – D – F – H – J – L = should equal					
zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields ab accurate:	ove are returr	ning values oth	ier than zero (i	.e., "0") but ar	e nonetheless

II-5b. **Channels of distribution: China**.--Report your firm's U.S. shipments (*i.e.* inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution.

China

	Calendar years			January-September	
Item	2016	2017	2018	2018	2019
		Q	uantity (<i>in unit</i>	s)	
Channels of distribution: U.S. shipments: To distributors or dealers (M)					
To OEMs (N)					

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

		Calendar years	i	January-S	eptember
Reconciliation item	2016	2017	2018	2018	2019
M + N – D – F – H = zero ("0"), if not					
revise.	0	0	0	0	0

II-5c. U.S. imports by level of processing: China.--Report your firm's U.S. imports from China by level of processing during the specified periods.

	Quantity (in un	its) and value	(in \$1,000s)		
		Calendar year	S	January-September	
Item	2016	2017	2018	2018	2019
U.S. imports: Unfinished: ¹ Quantity (O)					
Value (P)					
Finished: Quantity (Q)					
Value (R)					
¹ Does your company finish the u describe the nature and extent of th	•	•		? 🗌 No 🗌 Ye	s If yes, please

China

<u>RECONCILATION OF IMPORTS BY LEVEL OF PROCESSING</u>.--Please ensure that the quantities and values reported for U.S. imports in this question (i.e., lines O through R) in each time period equal the quantity and value reported for U.S. imports in previous question II-5a (i.e., lines B and C) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

		Calendar years		January-S	eptember
Reconciliation	2016	2017	2018	2018	2019
Quantity : O + Q – B = zero ("0"), if not revise	0	0	0	0	0
Value : P + R – C = zero, ("0"), if not revise.	0	0	0	0	0

II-6a. <u>Imports from all other sources</u>.–Report your firm's imports and your firm's shipments and inventories of vertical shaft engines imported from **all other sources** by your firm during the specified periods.

All other sources

(list sources: _

		nits), value (in			
		Calendar years	1	January-September	
Item	2016	2017	2018	2018	2019
Beginning-of-period inventories (<i>quantity</i>) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: 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 Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

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.*): _____. However, the data provided above in this table should be based on fair market value.

³ Identify your firm's principal export markets: _____

II-6a. Imports from all other sources.-Continued

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	(Calendar years	January-September					
Reconciliation	2016	2017	2018	2018	2019			
A + B - D - F - H - J - L = should equal								
zero ("0") or provide an explanation. ¹	0	0	0	0	0			
¹ Explanation if the calculated fields above are returning values other than zero (<i>i.e.</i> , "0") but are nonetheless								
accurate: .								

II-6b. **Channels of distribution: All other sources**.--Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution.

All other sources

	Calendar years			January-September			
ltem	2016	2017	2018	2018	2019		
	Quantity (<i>in units</i>)						
Channels of distribution: U.S. shipments: To distributors or dealers (M)							
To OEMs (N)							

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

		Calendar years	January-September		
Reconciliation item	2016	2017	2018	2018	2019
M + N – D – F – H = zero ("0"), if not					
revise.	0	0	0	0	0

II-6c. U.S. Imports by level of processing: All other sources.--Report your firm's U.S. imports from all other sources by level of processing during the specified periods.

All other sources

	Quantity (<i>in ur</i>	nits) and value	(in \$1,000)		
		Calendar year	January-So	eptember	
Item	2016	2017	2018	2018	2019
U.S. Imports: Unfinished: ¹ Quantity (O)					
Value (P)					
Finished: Quantity (Q)					
Value (R)					
¹ Does your company finish th describe the nature and extent o	-	•		? No Ye	s If yes, please

<u>RECONCILATION OF IMPORTS BY LEVEL OF PROCESSING</u>.--Please ensure that the quantities and values reported for U.S. imports in this question (i.e., lines O through R) in each time period equal the quantity and value reported for U.S. imports in previous question II-5a (i.e., lines B and C) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

		Calendar years	January-September		
Reconciliation	2016	2017	2018	2019	
Quantity : $O + Q - B = zero ("0")$, if not					
revise	0	0	0	0	0
Value : P + R – C = zero, ("0"), if not					
revise.	0	0	0	0	0

- II-7. **Transfers to related firms.--**If your firm reported transfers to related firms in any of the data tables in part II, 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) and whether the transfers were priced at market value or by a non-market formula.
- II-8. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part II for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--PRICING AND MARKET FACTORS

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

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- III-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 your firm imported from China:
 - **Product 1.--** Vertical Shaft Engine, Air-Cooled, Single Cylinder, Carbureted, 340-400cc displacement
 - **Product 2.--** Vertical Shaft Engine, Air-Cooled, Single Cylinder, Carbureted, 410-550cc displacement
 - **Product 3.--** Vertical Shaft Engine, Air-Cooled, Twin Cylinder, Carbureted, 650-700cc displacement
 - **Product 4.--** Vertical Shaft Engine, Air-Cooled, Twin Cylinder, Carbureted, 701-725cc displacement

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

During January 2016-September 2019, did your firm import from China and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

III-2a. **Price data**.--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

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

	Product 1		Product 2		Product 3		Product 4	
Period of shipment	Quantity Value		Quantity Value		Quantity Value		Quantity Val	
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								
October-December								
2018:								
January-March								
April-June								
July-September								
October-December								
2019:								
January-March								
April-June								
July-September								

² Pricing product definitions are provided on the first page of Part III.

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.

Product 1:

Product 2:

Product 3:

Product 4:

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.

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

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

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

PURCHASE COST DATA

III-3. This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above (on the first page of part III) for internal consumption from China since January 1, 2016. These are imports that your firm does not resell as vertical shaft engines.

During January 2016-September 2019, did your firm import any of the products listed on the first page of part III from China for internal consumption?

Yes Please complete the following table(s) as appropriate.
NoSkip to question III-4.

III-3a. <u>Imports for internal use.</u>—Report below the import data¹ for pricing products² imported from China and used by your own firm. These are imports that your firm does not resell as vertical shaft engines.

Please note that values should be <u>landed, duty-paid (LDP)</u> and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (*i.e.*, should be net of all returns, discounts, allowances, and rebates).

China

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

(Quantity <i>in units,</i> value <i>in dollars</i>)								
	Product 1 Product 2 Product 3				luct 3	Product 4		
Period of importation	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								
October-December								
2018:								
January-March								
April-June								
July-September								
October-December								
2019:								
January-March								
April-June								
July-September								

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See "Import values" definition in Part II (Trade and Related Information – Definitions).

² Pricing product definitions are provided on the first page of Part III.

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.

Product 1:

Product 2:

Product 3:

Product 4:

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.

Business Proprietary

U.S. Importers' Questionnaire - Vertical Shaft Engines (Preliminary)

The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import vertical shaft engines rather than purchase from a U.S. producer or importer of vertical shaft engines.

III-3b. Additional costs for your firm's imports of vertical shaft engines for your firm's internal use.—

i. Did your firm incur any additional costs by importing vertical shaft engines rather than purchasing from a U.S. producer or importer (*e.g.*, logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)?

No	Yes—Please answer	parts ii,	iii, and
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Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing vertical shaft engines rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do <u>NOT</u> include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) _____ percent compared to LDP value.

iv.

iii. Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for vertical shaft engines, either directly or indirectly, and that are not already included in the LDP value. Do <u>NOT</u> report costs that your firm would incur when purchasing vertical shaft engines from a U.S. producer or importer.)

Costs	Estimated percentage compared to LDP value (percent)	Explanation
	%	
	%	
	%	
	%	

iv. Briefly describe how your firm's additional costs (beyond the purchase price) by importing vertical shaft engines directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer.

III-3c. **Decision basis.**—To which source(s) does your firm compare costs in determining whether or not to import vertical shaft engines? Check all that apply.

U.S. importers	U.S. producers	Neither U.S. importers nor U.S. producers	

III-3d. Benefits of importing vertical shaft engines.

- i. Briefly identify the benefits of importing vertical shaft engines instead of purchasing vertical shaft engines from a U.S. importer or from a U.S. producer.
- ii. Is it your firm's experience that the vertical shaft engines your firm imported from China are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

Imports are priced lower when	No	Yes (If yes to either, please answer parts iii and iv)
Not including the additional costs above		
Including the additional costs above		

iii. Please estimate your firm's savings by importing vertical shaft engines instead of purchasing from a U.S. producer or U.S. importer since January 1, 2016 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3.b).

Factors	Estimated savings (percent of purchase price from U.S. importer/producer)	
U.S. producer	%	
U.S. importer	%	

 What methods or experience did you base the estimates in III-3d.iii (*i.e.* based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

Reported estimates in III-3d.iii based on	√ if Yes
Previous company transactions	
Market research	
Other – Please explain	

If your firm imports vertical shaft engines for internal use only, please skip to question III-12.

III-4. **Price setting.--**How does your firm determine the prices that it charges for sales of vertical shaft engines (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe

III-5. **Discount policy.--**Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

III-6. **Pricing terms.**--On what basis are your firm's prices of imported vertical shaft engines from China usually quoted (*check one*)?

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

III-7. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of vertical shaft engines imported from China in 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	Type of sale					
Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	Tota l (shoul sum t 100.0%	ld o
Share of 2018 sales	%	%	%	%	0.0	%

III-8. <u>Contract provisions</u>.--Please fill out the table regarding your firm's typical sales contracts for vertical shaft engines imported from China (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicab	le			
¹ Please identify the in	dexes used:			

III-9. <u>Lead times</u>.--What is your firm's share of sales of vertical shaft engines imported from China 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 vertical shaft engines?

Source	Share of 2018 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

III-10. Shipping information.—

- (a) Who generally arranges the transportation to your firm's customers' locations? Your firm Purchaser (check one)
- (b) When your firm sells vertical shaft engines imported from China, from where is it shipped?
 Point of importation Storage facility (check one)
- (c) Indicate the approximate percentage of your firm's sales of vertical shaft engines imported from China that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

III-11. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold vertical shaft engines imported from China since January 1, 2016 (check all that apply)?

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

III-12. <u>Inland transportation costs.</u>—What is the approximate percentage of the cost of vertical shaft engines imported from vertical shaft engines that is accounted for by U.S. inland transportation costs? _____ percent.

III-13. <u>End uses</u>.--List the end uses of the vertical shaft engines that your firm imports. For each enduse product, what percentage of the <u>total cost</u> is accounted for by vertical shaft engines and other inputs?

	Share of total cost o accounte	Total	
		(should sum to	
End-use product	Vertical shaft engines Other inputs		100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

- III-14. Substitutes.--Can other products be substituted for vertical shaft engines?
 - 🗌 No

Yes--Please fill out the table.

		End use in which this			nanges in the price of this substitute I the price for vertical shaft engines?
	Substitute	substitute is used	No	Yes	Explanation
1.					
2.					
3.					

III-15. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for vertical shaft engines has changed since January 1, 2016. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Fluctuate with no clear trend	Explanation and factors
Within the United States				
Outside the United States	5 🗌			

III-16. **Product changes.--**Have there been any significant changes in the product range, product mix or marketing of vertical shaft engines since January 1, 2016?

No	Yes	If yes, please describe.

III-17. Conditions of competition.-

(a) Is the vertical shaft engines market subject to business cycles (other than general economywide conditions) and/or other conditions of competition distinctive to vertical shaft engines?

Check all that apply.		Please describe.
	Νο	Skip to question III-18.
	Yes-Business cycles (<i>e.g.</i> seasonal business)	
	Yes-Other distinctive conditions of competition	

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

No	Yes	If yes, describe.

III-18. **Supply constraints.--**Has your firm refused, declined, or been unable to supply vertical shaft engines since January 1, 2016 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

III-19. Raw materials.—

(a) How have vertical shaft engines raw material prices changed since January 1, 2016?

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for vertical shaft engines.
Cost of raw materials					

(b) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact raw material costs for vertical shaft engines?

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend
Cost of raw materials after section 232 tariffs imposed				

(c) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact your firm's sales price for vertical shaft engines?

Factor	No change	Overall Increase	Overall Decrease	Fluctuate with no clear trend	Explanation
Prices for vertical shaft engines					

III-20. **Interchangeability.--**Are vertical shaft engines produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

- A = the products from a specified country-pair are *always* interchangeable
- F = the products are *frequently* interchangeable
- S = the products are *sometimes* interchangeable
- N = the products are *never* interchangeable
- 0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Other countries				
United States						
China						
For any country-pair producing vertical shaft engines that is cometimes or never interchangeable						

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

III-21. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between vertical shaft engines produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

- A = such differences are *always* significant
- F = such differences are *frequently* significant
- S = such differences are *sometimes* significant
- N = such differences are *never* significant
- 0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Other countries			
United States					
China					
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant					

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of vertical shaft engines, identify the country-pair and report the advantages or disadvantages imparted by such factors:

III-22. Impact of section 301 tariffs.-- Did the imposition of tariffs on Chinese-origin products under section 301 have an impact on the vertical shaft engines market in the United States?

Yes — Please indicate the impact in the table below.	No	Don't know

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 301 affected each factor of the vertical shaft engines market in the United States.
Supply of U.S produced vertical shaft engines					
Supply of vertical shaft engines imported from China					
Supply of vertical shaft engines imported from other countries					
Prices for vertical shaft engines					
Overall U.S. demand for vertical shaft engines					
Raw material costs for vertical shaft engines					

III-23. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for vertical shaft engines since January 1, 2016. Indicate the share of the quantity of your firm's total shipments of vertical shaft engines that each of these customers accounted for in 2018.

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

III-24. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part III 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.

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

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

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

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

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

Formats Location Key	boards and Languages Administrativ	Formats Location	Keyboards and Languages Administra		
Format:		Format:			
Italian (Italy)		English (United S	itates)		
Date and time form	nats	Date and time fo	ormats		
Short date:	dd/MM/yyyy	Short date:	М/d/уууу		
Long date:	dddd d MMMM yyyy	Long date:	dddd, MMMM dd, уууу		
Short time:	HH:mm	Short time:	h:mm tt		
Long time:	HH:mm:ss	Long time:	h:mm:ss tt		
First day of week:	lunedì	First day of wee	k: Sunday		
What does the nota	ation mean?	What does the r	notation mean?		
Examples		Examples			
Short date:	03/11/2015	Short date:	8/6/2015		

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: <u>https://www.usitc.gov/investigations/701731/2020/vertical_shaft_engines_china/preli</u> <u>minary.htm</u>

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

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

Web address: <u>https://dropbox.usitc.gov/oinv/</u> Pin: ENGCN

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

If your firm <u>did not</u> **import 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.