## **U.S. PRODUCERS' QUESTIONNAIRE**

### **DIFLUROMETHANE (R-32) FROM CHINA**

This questionnaire must be received by the Commission by <u>February 6, 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 antidumping investigation concerning difluoromethane ("R-32") from China (Inv. No. 731-TA-1472 (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)).

Address _ City			State		Ziı	р Со	de						
Website _													
Has your fi	m produced R-	32 (as defined on n	ext page) at any	y time siı	ince	Janu	ary 1, 2	017?					
□NO	NO (Sign the certification below and promptly return <b>only</b> this page of the questionnaire to the Commission)												
☐ YES	(Complete a	I parts of the questio	nnaire, and retur	n the ent	tire (	questi	ionnaire	to the	Commis	sion)			
•		a the U.S. Interna Iropbox.usitc.gov,			ssio	n <i>Dr</i>	ор Во	by cli	cking	on th	e		
			CERTIFICATION	ON									
dge and belief	and understar	n supplied in resp d that the informo rant consent for t	oonse to this on	question d is subje	ject	to au	ıdit an	d verifi	cation	by th	e Com	mission	. By
dge and belief of this certific ntion provided nmission on th andersigned, a ling or other p nel (a) for devolute in, and evaluat lix 3; or (ii) by	and understar ation I also g in this questio e same or simil cknowledge the roceedings ma cloping or main ions relating to U.S. governme	d that the information to the consent for the consent for the condition of the condition of the condition of the programs, interpologies and containing the condition of the programs, interpologies and containing the conditions of the conditions o	nonse to this of the commission hout this proces omitted in respond used: (i) by the soft this or a repersonnel, and contract person	question d is subje n, and i eding in conse to y the Co related p	iect its on an o the omn prod tion	to au empl y oth is rec nissic ceedi s of	oyees ner imp quest f nn, its o ng, or the Co	d verifi and co ort-injo or info employ (b) in in	cation ntract ury pro rmatio ees an nterna ion in	by the person on and Office of investigation of the person	e Comonnel, ings cod throu is throu ices, au stigation	mission to use nducted ughout nd cont ons, aud er 5 U.	. By the d by this ract dits, S.C.
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#### PART I.—GENERAL INFORMATION

**Background.**--This proceeding was instituted in response to a petition filed on January 23, 2020, by Arkema Inc., King of Prussia, Pennsylvania. 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

http://wwwadmin.usitc.gov/investigations/701731/2020/difluoromethane r 32 china/preliminary.htm 0.

<u>Difluoromethane ("R-32")</u> covered by this investigation is difluoromethane ("R-32") or its chemical equivalent, regardless of form, type or purity level. R-32 has the Chemical Abstracts Service ("CAS") registry number of 75-10-5 and the chemical formula  $CH_2F_2$ . R-32 is also referred to as difluoromethane, HFC-32, FC-32, Freon-32, methylene difluoride, methylene fluoride, carbon fluoride hydride, halocarbon R32, fluorocarbon R32, and UN 3252.

Subject merchandise also includes R-32 and unpurified R-32 that are processed in a third country or the United States, including, but not limited to, purifying or any other processing that would not otherwise remove the merchandise from the scope of this investigation if performed in the country of manufacture of the in-scope R-32. R-32 that has been blended with products other than pentafluoroethane (R-125) is included within this scope if such blends contain 85% or more by volume on an actual percentage basis of R-32. In addition, R-32 that has been blended with any amount of R-125 is included within this scope if such blends contain more than 52% by volume on an actual percentage basis ofR-32. Whether R-32 is blended with R-125 or other products, only the R-32 component of the mixture is covered by the scope of these orders. The scope also includes R-32 that is commingled with R-32 from sources not subject to this investigation. Only the subject component of such commingled products is covered by the scope of this order.

Excluded is merchandise covered by the scope of the antidumping order on Hydrofluorocarbon Blends from the People's Republic of China. See Hydrofluorocarbon Blends from the People's Republic of China, 81 Fed. Reg. 55436 (Aug. 19, 2016).

R-32 is currently imported under statistical reporting numbers 2903.39.2035 of the Harmonized Tariff Schedule of the United States (HTSUS). It may also be imported under HTSUS statistical reporting numbers 2903.39.2045 and 3824.78.0020. The HTSUS provisions are for convenience and customs purposes; the written description of the scope 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.

<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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of R-32 and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

<u>D-GRIDS tool.</u>--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 (<a href="https://www.usitc.gov/trade\_remedy/question.htm">https://www.usitc.gov/trade\_remedy/question.htm</a>) 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. <u>OMB statistics</u>.--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

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

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

I-1b.	<u>TAA information release</u> In the event that the U.S. International Trade Commission (USITC)
	makes an affirmative final determination in this proceeding, do you consent to the USITC's
	release of your contact information (company name, address, contact person, contact person's
	title, 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?

Yes	No

I-2b.

I-2c.

I-3.

**Establishments covered**.--Provide the city, state, zip code, and brief description of each I-2a. establishment covered by this questionnaire. Firms operating more than one establishment should combine the data for all establishments into a single report.

•		· · · · · · · · · · · · · · · · · · ·	of R-32, including auxiliary parate from) such facilities.
Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> Additional discu	ussion on establishments co	onsolidated in this question	onnaire:
stock exchange and  External counsel I	trading symbol:	n is represented by exte	ernal counsel in relation to ad attorney(s).
Law firm:			
Lead attorney(s):			
Petitioner statusIs petitioning entity?  No Ye	s your firm a petitioner in	n this proceeding or a n	nember firm of the

<u>Petition support</u>.--Does your firm support or oppose the petition? I-4.

Country	Support	Oppose	Take no position
China			

# U.S. Producers' Questionnaire - R-32 (Preliminary) I-5. Ownership.--Is your firm owned, in whole or in part, by any other firm? No Yes--List the following information, relating to the ultimate parent/owner. Extent of ownership (percent) Firm name Country I-6. Related importers/exporters. -- Does your firm have any related firms, either domestic or foreign, that are engaged in importing R-32 from China into the United States or that are engaged in exporting R-32 from China to the United States? Yes--List the following information. Firm name Affiliation Country

<b>U.S. Producers</b>	Questionnaire	- R-32	(Preliminary	/)
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Firm name	Country	Affiliation
production of R-32 sir	o R-32 on productionPlease desc ce January 1, 2017. Include both d ements, if any, that may affect the	omestic regulations required by
production of R-32 sir	ce January 1, 2017. Include both d	omestic regulations required by
oroduction of R-32 sir and international agre	ce January 1, 2017. Include both deements, if any, that may affect the	omestic regulations required by e production of R-32.
production of R-32 single and international agreement of R-32	ce January 1, 2017. Include both dements, if any, that may affect the replacements Since January 1, 2	omestic regulations required by e production of R-32.
production of R-32 single and international agreement of R-32 developing and/or production of R-32 developing and/or produ	replacements Since January 1, 2010 de January 1, 2017. Include both of ements, if any, that may affect the ements and the ements are larger 1, 20 ducing more environmentally frie	omestic regulations required by e production of R-32. 2017, has your firm been involved andly replacements for R-32? Plea
Development of R-32 single Development of R-32 developing and/or product(s) Please include inform	replacements Since January 1, 20 under development a that may be under development action on the availability of the production.	omestic regulations required by e production of R-32.  2017, has your firm been involved andly replacements for R-32? Pleatind/or production to replace R-3: duct(s) in the market today (indic
Development of R-32 single Development of R-32 developing and/or product(s) Please include information of the product when the product of the	replacements Since January 1, 2 ducing more environmentally frie that may be under development a	e production of R-32.  2017, has your firm been involved andly replacements for R-32? Pleatind/or production to replace R-3. duct(s) in the market today (indicexisting equipment needs to be

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

Telephone

Further information on this part of the questionnaire can be obtained from Ahdia Bavari (202-205-3191, ahdia.bavari@usitc.gov). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1.	<b>Contact inform</b>	ationPlease identify the responsible	individual and the manner by which
	Commission sta in part II.	aff may contact that individual regarding	ng the confidential information submitted
	Name		
	Title		
	Email		

II-2. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of R-32 since January 1, 2017.

(chec	k as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other (e.g., technology)	

II-3a. **Production using same machinery.--**Please report your firm's production of products using the same equipment, machinery, or employees as used to produce R-32, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

"Overall production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-7 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"**Production**" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Quantity (in short tons)						
	Calendar years					
Item	2017	2018	2019			
Overall production capacity <sup>1</sup>						
Production of:						
R-32 <sup>2</sup>	0	0	0			
Other products <sup>3</sup>						
Total production using same machinery or workers	0	0	0			

<sup>&</sup>lt;sup>1</sup> Data reported for capacity (first line) should be greater than data reported for total production (last line).

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

Hours per week	Weeks per year

<sup>&</sup>lt;sup>2</sup> Data entered for production of R-32 will populate here once reported in question II-7.

<sup>&</sup>lt;sup>3</sup> Please identify these products: \_\_\_\_\_.

U.S. Pr	oducers' (	Questionnai	re - <b>R-32 (Preliminary)</b> Page 10
II-3c.	-		Please describe the methodology used to calculate overall production II-3a, and explain any changes in reported capacity.
II-3d.		i <b>on constrai</b> on capacity	ntsPlease describe the constraint(s) that set the limit(s) on your firm's
II-4.	Product	shifting.—	
		-	able to switch production (capacity) between R-32 and other products using the ment and/or labor?
	No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
		between pro	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which is enhance or constrain such shifts.
II-5.		-Since Janua on of R-32?	ary 1, 2017, has your firm been involved in a toll agreement regarding the
	material	s and the se	agreement between two firms whereby the first firm furnishes the raw cond firm uses the raw materials to produce a product that it then returns a charge for processing costs, overhead, etc.
	No	Yes	If yesPlease describe the toll arrangement(s) and name the firm(s) involved.

II-6.	<b>Foreign</b>	trade	zones

(a) <u>Firm's FTZ operations</u>.--Does your firm produce R-32 in and/or admit R-32 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	If yesDescribe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

(b) Other firms' FTZ operations.--To your knowledge, do any firms in the United States import R-32 into a foreign trade zone (FTZ) for use in distribution of R-32 and/or the production of downstream articles?

No	Yes	If yesIdentify the firms and the FTZs.

- II-7. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of R-32 in its U.S. establishment(s) during the specified periods.
  - "Average production capacity" or "capacity" The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
  - "Production" All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.
  - "Commercial U.S. shipments"— Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. This excludes commercial arms-length transactions that involve, at least in part, non-monetary "in kind" transactions (a.k.a., swap transactions). 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.
  - "Swaps" Shipments made commercially in arms-length transactions that involve, at least in part, non-monetary "in kind" transfer of product.
  - "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-7. **Production, shipment, and inventory data.--Continued**

Quantity	y (in short tons) and valu	e ( <i>in \$1,000</i> )	
	Calendar years		
Item	2017	2018	2019
Average production capacity <sup>1</sup> (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity) (C)			
U.S. shipments: Commercial shipments: Quantity (D)			
Value (E)			
Internal consumption: <sup>2</sup> Quantity (F)			
Value <sup>2</sup> (G)			
Transfers to related firms: <sup>2</sup> Quantity (H)			
Value <sup>2</sup> (I)			
Swaps³: Quantity (J)			
Value⁴ (K)			
Export shipments: Commercial shipments: Quantity (L)			
Value (M)			
Other (internal consumption, transfers to related firms, or swap) shipments:  Quantity (N)			
Value² (O)			
End-of-period inventories (quantity) (P)			
<sup>1</sup> Please identify the foreign producers, if knot 2 Internal consumption and transfers to relate basis for valuing these transactions in your record the data provided above in this table should be 3 Please (1) identify the companies from white particular goods or services in-kind received put exchange included in the swap transactions in 4 Report the value inclusive of the "in kind" of the swap transactions. <sup>5</sup> Identify your firm's principal export market	ted firms must be valued ords, please specify that be based on fair market valued ch your firm receives the irsuant to your swap traneach calendar year:	pasis (e.g., cost, cost plus, ue. goods or services in-kind sactions, and (3) quantify 	etc.): However, , (2) indicate the vany net monetary

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

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

II-8. <u>Channels of distribution</u>.--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.

		Calendar years	
Item	2017	2018	2019
		Quantity (in short tons)	
Channels of distribution: U.S. shipments: To distributors and service companies (Q)			
To HFC component blenders (R)			
To OEMs and other non- blender end users (S)			

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines Q, R, and S) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H, and J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

		Calendar years	
Reconciliation item	2017	2018	2019
Q + R + S - D -F - H- J = zero ("0"), if			
not revise.	0	0	0

Explanation of trends:

II-9. <u>Employment data</u>.--Report your firm's employment-related data related to the production of R-32 and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

"Hours worked" includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

"Wages paid" – Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

		Calendar years	
Item	2017	2018	2019
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

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-11.	<u>Purchases</u> Has your firm purchased R-32 produced in the United States or in other countries since January 1, 2017? (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	If yesReport such purchases in the table below and explain the reasons for your firms' purchases.

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

	(Quantity in short to	ns)	
		Calendar years	
Item	2017	2018	2019
Purchases from U.S. importers <sup>1</sup> of R-32			
from—			
China			
All other sources			
Purchases from domestic producers <sup>2</sup>			
Purchases from other sources <sup>3</sup>			
<sup>1</sup> Please list the name of the importer( suppliers differ by source, please identify <sup>2</sup> Please list the name of the U.S. produ <sup>3</sup> Please list the name of the firm(s) from	the source for each listed ucer(s) from which your	d supplier: firm purchased this prod	uct:

II-12. Imports.--Since January 1, 2017, has your firm imported R-32?

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

115	Producers'	Questionnaire	- R-32	Proliminary
0.5.	ribuuceis	Questionnane	- N-32 I	ricillilliaiv

II-13.	<u>Internal consumption/transfers to related firms</u> — In 2019, did your firm internally consume,
	transfer to a related firm, and/or swap any portion of its R-32 production, as reported in lines F,
	H. and J of question II-7?

No- Do not complete question II-14	Yes- Complete question II-14.

II-14. <u>Captive production use.</u> — Please report the share of your firm's 2019 internal consumption, transfers to related firms, and/or swaps for the uses identified below. These data should reconcile with the 2019 quantities reported in question II-7 (lines F, H, and J).

Products	Internal consumption 2019 (short tons)	Swaps 2019 (short tons)	Transfers to related firms 2019 (short tons)
Sold as is (Re-entry into merchant market)	N/A		
Assembled into other products <sup>1</sup>			
<sup>1</sup> Please describe these products:			

<u>RECONCILIATION OF CAPTIVE PRODUCTION USE</u>.— The sum of the data reported above should be equal to the data reported in lines A and C of question II-7 of each calendar year and interim period.

	Calendar years
Reconciliation	2019
Internal consumption (line F in II-7) reconciliation.	0
Transfers to related parties (line H in II-7) reconciliation.	0
Swaps (line J in II-7) reconciliation.	0
<sup>1</sup> Explanation if the calculated fields above are accurate:	returning values other than zero (i.e., "0") but are nonetheless

II-15.	Other explanationsIf your firm would like to further explain a response to a question in Part II
	for which a narrative box was not provided, please note the question number and the
	explanation in the space provided below. Please also use this space to highlight any issues your
	firm had in providing the data in this section, including but not limited to technical issues with
	the MS Word questionnaire.

# PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to	David Boyland (202-708-4725,
david.boyland@usitc.gov).	

Name	
Title	
Email	
Telephon	
Accounti accountir	<b>g system</b> .—Please provide the following information on your firm's financial g system.
Δ	When does your firm's fiscal year end (month and day)?
	If your firm's fiscal year changed during the data-collection period, expla below:
В	Describe the lowest level of operations (e.g., plant, division, company-wi which financial statements are prepared that include R-32:
	2. Does your firm prepare profit/loss statements for R-32:  Yes No
	3. How often did your firm (or parent company) prepare financial statemer (including annual reports, 10Ks)? Please check relevant items below. Audited, unaudited, annual reports, 10Ks, 10 Qs Monthly, quarterly, semi-annually, annually
	4. Accounting basis: U.S. GAAP, IFRS cash, tax, or oth comprehensive basis of accounting (specify)
u re s p	ote: As requested in Part I of this questionnaire, please keep all supporting documents/ed in the preparation of the financial data, as Commission staff may contact your firm garding questions on the financial data. The Commission may also request that your combinated by the supporting documents/records (financial statements, including interpolit-and-loss statements for the division or product group that includes R-32, as well as attements and worksheets) used to compile these data.
Cost acco	unting systemBriefly describe your firm's cost accounting system (e.g., stand

III-3b.	Swap accountingFrom the perspective of revenue and cost, please describe the company's routine accounting treatment of R-32 swaps. As applicable, please describe how the company's routine accounting treatment differs from the manner in which swaps are reported in table III-9a. Please confirm that swap values reported in table III-9a reflect fair market value and provide a general description of how that value was determined.
III-3c.	<u>Swap value</u> In the space below, please confirm that R-32 swap values reported in table III-9a represent fair market value. Please provide a general description of swap valuation basis in table III-9a.
III-3d.	<u>Swap ratios</u> Please identify the counterparties to R-32 swap arrangements during the period examined, components exchanged for R-32, relevant swap ratios, and how the basis of reported ratios. Please also describe the extent to which relevant swap ratios and/or other important aspects of swap arrangements changed during the period and the reason for the changes.
III-3e.	<u>Changes in swap arrangements.</u> Please describe the extent to which relevant swap ratios and/or other important aspects of swap arrangements changed during the period and the reason for the changes.
III-4.	<u>Allocation basis</u> Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

III-5.	<b>Product listing</b> Please list the products your firm produced in the facilities in which your firm
	produced R-32, and provide the share of net sales accounted for by these products in your firm's
	most recent fiscal year.

Products	Share of sales
R-32	%
	%
	%
	%
	%

III-6.	Inputs from related suppliersDoes your firm purchase inputs (raw materials, labor, energy, or
	any services) used in the production of R-32 from any related suppliers (e.g., inclusive of
	transactions between related firms, divisions and/or other components within the same
	company)?

YesContinue to question III-7	No—Skip to question III-9a.

III-7. Inputs from related suppliers detailed.--Please identify the inputs used in the production of R-32 that your firm purchases from related suppliers and that are reflected in question III-9a. 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. <u>Inputs purchased from related suppliers.</u>--Please confirm that the inputs purchased from related suppliers, as identified in III-7, are reported in III-9a and III-9b in a manner consistent with your firm's accounting books and records.

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

III-9a. Overall operations on R-32.--Report the revenue and related cost information requested below on the R-32 operations of your firm's U.S. establishment(s). Do not report resales of products. Note that transfers to related firms, internal consumption, and swaps (R-32 given up in exchange for another HFC component and reported in the revenue section of this table) 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.

Quantity (in short tons) and value (in \$1,000)				
	Fiscal years ended			
Item	2017	2018	2019	
Net sales quantities: <sup>2</sup> Commercial sales ("CS")				
Transfers to related firms ("Transfers")				
Internal consumption ("IC")				
Swaps				
Total net sales quantities	0	0	0	
Net sales values: <sup>2</sup> Commercial sales				
Internal consumption				
Transfers to related firms				
Swaps				
Total net sales values	0	0	0	
Cost of goods sold (COGS): <sup>3</sup> Raw materials				
Direct labor				
Other factory costs				
Less: byproduct revenue				
Total COGS	0	0	0	
Gross profit or (loss)	0	0	0	
Selling, general, and administrative (SG&A) expenses: Selling expenses				
General and administrative expenses				
Total SG&A expenses	0	0	0	
Operating income (loss)	0	0	0	
Other expenses and income: Interest expense				
All other expense items				
All other income items				
Net income or (loss) before income taxes	0	0	0	
Depreciation/amortization included above				

<sup>&</sup>lt;sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

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

<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> COGS (whether for domestic or export sales) should include <u>costs associated with CS, Transfers, IC, and swaps</u>. Costs associated with input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records.

III-9b. Open market operations (U.S. commercial shipments and commercial exports only) on R-32.—Report the revenue and related cost information requested below on the R-32 operations of your firm's U.S. establishment(s).¹ Include both the domestic and export commercial sales of R-32 producer by your firm, but do not report the resale of R-32. 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.

Quantity (in short tons) and value (in \$1,000)				
	Fiscal years ended			
Item	2017	2018	2019	
Net sales quantities: <sup>2</sup>				
Commercial sales ("CS")	0	0	0	
Net sales values: <sup>2</sup>				
Commercial sales	0	0	0	
Cost of goods sold (COGS):3				
Raw materials				
Direct labor				
Other factory costs				
Less: byproduct revenue				
Total COGS	0	0	0	
Gross profit or (loss)	0	0	0	
Selling, general, and administrative (SG&A)				
expenses:				
Selling expenses				
General and administrative expenses				
Total SG&A expenses	0	0	0	
Operating income (loss)	0	0	0	
Other expenses and income:				
Interest expense				
All other expense items				
All other income items				
Net income or (loss) before income taxes	0	0	0	
Depreciation/amortization included above				

<sup>&</sup>lt;sup>1</sup> Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u>.

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

<sup>&</sup>lt;sup>2</sup> 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. Commercial sales quantities and commercial sales values reported here will be populated from data entered into question III-9a.

<sup>&</sup>lt;sup>3</sup> COGS (whether for domestic or export sales) should include <u>costs associated with commercial sales only,</u> Costs associated with input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records.

III-9c.	Financial data reconciliation The calculable line items from question III-9a and III-9b (i.e., total
	net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or
	loss)) have been calculated from the data submitted in the other line items. Do the calculated
	fields return the correct data according to your firm's financial records ignoring non-material
	differences that may arise due to rounding?

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

III-9d. Raw materials.--Please identify and report the share of raw material costs in 2019 (reported in III-9a):

		Sou	Source	
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm	
Chlorinated compounds:				
Hydrofluoric acid				
Other material inputs				
Total (should sum to 100 percent)	0.0			

III-10a. Nonrecurring items (charges and gains) included in III-9a (overall operations on R-32).--For each annual period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a 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-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a 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 reported in III-9a.

	Fiscal years ended		
ltem	2017	2018	2019
		Value ( <i>\$1,000</i> )	
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

**Nonrecurring item:** In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

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

	Fiscal years ended		
Item	2017	2018	2019
		Value ( <i>\$1,000</i> )	
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

**Nonrecurring item:** In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9b where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11.	Classification of identified nonrecurring items (charges and gains) in the accounting books and
	records of the companyIf non-recurring items were reported in question III-10a and III-10b
	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-10a and III-10b
	identify where these items are reported in question III-9a and III-9b, respectively.

III-12. <u>Asset values.</u>—Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of R-32. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for R-32 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-9a. Provide data as of the end of your firm's three most recently completed fiscal years.

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

Total assets should be <u>allocated to R-32 operations</u> if these assets are also related to other products. As reported in table III-12, please provide a <u>brief explanation if there are any substantial changes</u> in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value ( <i>in \$1,000</i> )			
	Fiscal years ended		
Item	2017	2018	2019
Total assets (net) 1			
<sup>1</sup> Describe			

III-13. <u>Capital expenditures and research and development expenses</u>.--Report your firm's capital expenditures and research and development expenses for R-32. Provide data for your firm's three most recently completed fiscal years.

Value ( <i>in \$1,000</i> )			
Item	Fiscal years ended		
	2017	2018	2019
Capital expenditures <sup>1</sup>			
R&D expenses <sup>2</sup>			

<sup>&</sup>lt;sup>1</sup> Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.

<sup>&</sup>lt;sup>2</sup> Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.

III-14.	Data consistency and reconciliationPlease indicate whether your firm's financial data for
	questions III-9a, III-9b, III-12, and III-13 are based on a calendar year or on your firm's fiscal yea

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported for total net sales in part III of this questionnaire in each time period 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			
Reconciliation	2017	2018	2019	
Quantity: Trade data from question II-7 (lines D, F, H, J, and L) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	
Value: Trade data from question II-7 (lines E, G, I, K, and M) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	

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

Yes	No	If no, please explain.

III-15.	Effects of imports on investmentSince January 1, 2017, 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 R-32 from China?

No	Yes			
		If yes, my firm has experienced actual negative effects as follows.		
	(chec	ck as many as appropriate)	(please describe)	
		Cancellation, postponement, or rejection of expansion projects		
		Denial or rejection of investment proposal		
		Reduction in the size of capital investments		
		Return on specific investments negatively impacted		
		Other		

III-16.	Effects of imports on growth and developmentSince January 1, 2017, 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 R-32 from China?

-		
Yes		
	If yes, my firm has experience	d actual negative effects as follows.
(che	ck as many as appropriate)	(please describe)
	Rejection of bank loans	
	Lowering of credit rating	
	Problem related to the issue of stocks or bonds	
	Ability to service debt	
	Other	
		If yes, my firm has experience   (check as many as appropriate)   Rejection of bank loans   Lowering of credit rating   Problem related to the issue of stocks or bonds   Ability to service debt

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III-17.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports of
	R-32 from China?

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

III-18.	Other explanationsIf your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

### PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Natalia King (202-205-2049, Natalia.King@usitc.gov).

IV-1. <u>Contact information</u>.--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, 2017 of the following products produced by your firm.

**Product 1.—**R-32, sold in bulk to blenders

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> 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 2017-December 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)?

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

IV-2b. <u>Price data</u>.--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

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

(Quantity in pounds, value in dollars)			
	Product 1		
Period of shipment	Quantity	Value	
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			
October-December			
1			

<sup>&</sup>lt;sup>1</sup> 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.

**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:

<sup>&</sup>lt;sup>2</sup> Pricing product definitions are provided on the first page of Part IV.

IV-2d.

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

Are the price data reported above:	√ if Yes	
In actual dollars ( <i>not</i> \$1,000)?		
In pounds ( <i>not</i> short tons)?		
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?		
Net of all discounts and rebates?		
Have returns credited to the quarter in which the sale occurred?		
Less than reported commercial shipments in question II-7 in each year?		
Pricing data methodologyPlease describe the method and the kinds of documents/records that were used to compile your price data.		

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

IV-3.	Price settingHow does your firm determine the prices that it charges for sales of R-32 (check
	all that apply)? If your firm issues price lists, please submit sample pages of a recent list.

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

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

IV-5. <u>Pricing terms.</u>--On what basis are your firm's prices of domestic R-32 usually quoted *(check one)*?

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

IV-6. Contract versus spot.--Approximately what share of your firm's sales of its U.S.-produced R-32 in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

		Туре о	f sale			
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)	Spot sales (for a single delivery)	Total (shoul sum t 100.0%	ld o
Share of 2019 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced R-32 (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) <sup>1</sup>	No			
	Quantity			
Fixed quantity and/or price	Price			
ana, en price	Both			
Indexed to raw	Yes			
material costs <sup>2</sup>	No			
Not applicab	le			
<sup>1</sup> Please explain how c <sup>2</sup> Please identify the in		ns are renegotiated (i.e.,	meet or release clau	se):

IV-8. <u>Lead times.</u>—What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced R-32?

Source	Share of 2019 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9.	Shij	O	oing	information

(a)	What is the approximate percentage of the cost of U.Sproduced R-32 that is accounted for by U.S. inland transportation costs? percent
(b)	Who generally arranges the transportation to your firm's customers' locations?  Your firm Purchaser (check one)

(c) Indicate the approximate percentage of your firm's sales of R-32 that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-10. <u>Geographical shipments.--</u>In which U.S. geographic market area(s) has your firm sold its U.S.-produced R-32 since January 1, 2017 (check all that apply)?

Geographic area	√ if applicable
NortheastCT, 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.	

IV-11. <u>End uses.--</u>List the end uses of the R-32 that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by R-32 and other inputs?

		t of end use product ted for by	Total
			(should sum to
End-use product	R-32	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

			ind use in w	vhich this	На		anges in the price of this substi affected the price for R-32?
	Substitute		substitute		No	Yes	Explanation
1.							
2.							
3. IV-13.	States (if kn	own) for R-3	32 has chan	ged since J	anuary 1	1, 201	States and outside of the United 17. Explain any trends and descri
		own) for R-3	32 has chan	ged since J	anuary : changes	1, 201 s in de	7. Explain any trends and descri
	States (if kn	own) for R-3	32 has chan	ged since J	anuary 1	1, 201 in de iate	7. Explain any trends and descri
	States (if knother principal	own) for R-3 Il factors tha	32 has chan at have affe	ged since Jacted these	anuary 1 changes Fluctu	1, 201 s in de late no	7. Explain any trends and descri
IV-13.	States (if knother principal	own) for R-3 Il factors tha Overall	32 has chan at have affe	ged since Jacted these  Overall	anuary i changes Fluctu with	1, 201 s in de late no	.7. Explain any trends and descri

IV-15. Conditions of competition
----------------------------------

IV-16.

IV-17.

(a)	Is the R-32 market subject to business cycles (other than general economy-wide
	conditions) and/or other conditions of competition distinctive to R-32? If yes, describe

January 1, 2017 (examples include placing customers on allocation or "controlled orde	etition for				
Yes-Business cycles (e.g. seasonal business)  Yes-Other distinctive conditions of competition  (b) If yes, have there been any changes in the business cycles or conditions of competition R-32 since January 1, 2017?  No Yes If yes, describe.  Supply constraintsHas your firm refused, declined, or been unable to supply R-32 since January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?	etition for				
Supply constraintsHas your firm refused, declined, or been unable to supply R-32 since January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?	etition for				
conditions of competition  (b) If yes, have there been any changes in the business cycles or conditions of competitions.  R-32 since January 1, 2017?  No Yes If yes, describe.  Supply constraintsHas your firm refused, declined, or been unable to supply R-32 since January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?	etition for				
R-32 since January 1, 2017?  No Yes If yes, describe.  Supply constraintsHas your firm refused, declined, or been unable to supply R-32 single January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?	etition for				
Supply constraintsHas your firm refused, declined, or been unable to supply R-32 single January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?					
January 1, 2017 (examples include placing customers on allocation or "controlled orded declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?					
January 1, 2017 (examples include placing customers on allocation or "controlled orded 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.	Supply constraintsHas your firm refused, declined, or been unable to supply R-32 since lanuary 1, 2017 (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.)?				
Raw materialsHow have R-32 raw material prices changed since January 1, 2017?					
	Overall with no Explain, noting how raw material price changes				

IV-18. <u>Interchangeability</u>.--Is R-32 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 R-32 that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:					

IV-19. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between R-32 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 factor in your firm's sales of R-32, identify						

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of R-32, identify the country-pair and report the advantages or disadvantages imparted by such factors:

IV-20. <u>Customer identification.</u>--List the names and contact information for your firm's 10 largest U.S. customers for R-32 since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of R-32 that each of these customers accounted for in 2019.

C	Customer's name	Contact person	Email	Telephone	City	State	Share of 2019 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

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IV-21.	Com	petition	from	impo	rts

(a)	<u>Lost revenue</u> Since January 1, 2017: To avoid losing sales to competitors selling R-32
	from China, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>--Since January 1, 2017: Did your firm lose sales of R-32 to imports of this product from China?

No	Yes

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

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

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

No—Please explain.
Yes—Please complete the worksheet and submit via the Commission dropbox. <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> . (PIN: DIFLU)

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:

http://wwwadmin.usitc.gov/investigations/701731/2020/difluoromethane r 32 china/preliminary.htm 0.

**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: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: DIFLU

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

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

<u>Parties to this proceeding</u>.—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.