U.S. IMPORTERS' QUESTIONNAIRE

TOOL CHESTS AND CABINETS FROM CHINA AND VIETNAM

This questionnaire must be received by the Commission by <u>October 16, 2017</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 and antidumping investigations concerning tool chests and cabinets from China and Vietnam (Inv. Nos. 701-TA-575 and 731-TA-1360-1361 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

	f firm	
	State Zip Code	
Website _	·	
,	firm imported tool chests and cabinets; tool chests and cabinets not prepackaged for reta I tool chests and cabinets (as defined on next page) from any country at any time since Ja	,
	(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 Commis	sion)
•	questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking g g link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: TOOL)	on the

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	
	Phone:		
Signature		Email address	
	Fax:		

PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to a petition filed on April 11, 2017, by Waterloo Industries Inc., Sedalia, Missouri. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usite.gov/investigations/701721/2017/tool_chests_and_cabinets_chipa_and_vietnam/fin

https://www.usitc.gov/investigations/701731/2017/tool_chests_and_cabinets_china_and_vietnam/fina_l.htm.

<u>Tool chests and cabinets</u> All metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 10 inches but not exceeding 24 inches; and
- (5) prepackaged for retail sale.

For purposes of this scope, the width parameter applies to each individual unit, i.e., each individual top chest, intermediate top chest, tool cabinet, side cabinet, storage unit, mobile work bench, and work station.

Prepackaged for retail sale means the units are packaged in a cardboard box or other container suitable for retail display and sale. Subject tool chests and cabinets are covered whether imported in assembled or unassembled form. Subject merchandise includes tool chests and cabinets produced in China or Vietnam but assembled, prepackaged for sale, or subject to other minor processing in a third country prior to importation into the United States. Similarly, it would include tool chests and cabinets produced in China or Vietnam that are later found to be assembled, prepackaged for sale, or subject to other minor processing after importation into the United States.

Subject tool chests and cabinets may also have doors and shelves in addition to drawers, may have handles (typically mounted on the sides), and may have a work surface on the top. Subject tool chests and cabinets may be uncoated (e.g., stainless steel), painted, powder coated, galvanized, or otherwise coated for corrosion protection or aesthetic appearance.

Subject tool chests and cabinets may be packaged as individual units or in sets. When prepackaged in sets, they typically include a cabinet with one or more chests that stack on top of the cabinet. Tool cabinets act as a base tool storage unit and typically have rollers, casters, or wheels to permit them to be moved more easily when loaded with tools. Work stations and work benches are tool cabinets with a work surface on the top that may be made of rubber, plastic, metal, wood, or other materials.

Top chests are designed to be used with a tool cabinet to form a tool storage unit. The top chests may be mounted on top of the base tool cabinet or onto an intermediate chest. They are often packaged as a set with tool cabinets or intermediate chests, but may also be packaged separately. They may be packaged with mounting hardware (e.g. bolts) and instructions for assembling them onto the base tool cabinet or onto an intermediate tool chest which rests on the base tool cabinet. Smaller top chests typically have handles on the sides, while the larger top chests typically lacks handles. Intermediate tool

chests are designed to sit on top of the floor standing tool cabinet and to be used underneath the top tool chest. Although they may be packaged or used separately from the tool cabinet, intermediate chests are designed to be used in conjunction with tool cabinets. Intermediate chests typically do not have handles, but the intermediate and top chests may have the capability of being bolted together.

Side cabinets are designed to be bolted or otherwise attached to the side of the base storage cabinet to expand the storage capacity of the base tool cabinet.

Subject tool chests and cabinets also may be packaged with a tool set included. Packaging a subject tool chest and cabinet with a tool set does not remove an otherwise covered subject tool chest and cabinet from the scope. When this occurs the tools are not part of the subject merchandise.

All tool chests and cabinets that meet the above definition are included in the scope unless otherwise specifically excluded.

Excluded from the scope of the investigations are tool boxes, chests, and cabinets with bodies made of plastic, carbon fiber, wood, or other non-metallic substances. Also excluded from the scope of the investigations are industrial grade steel tool chests and cabinets. The excluded industrial grade steel tool chests and cabinets are those:

- (1) having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047 inches or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests			
Inches	Maximum Pounds		
> 21 ≤25	90		
> 25 ≤28	115		
> 28 ≤30	120		
> 30 ≤32	130		
> 32 ≤34	140		
> 34 ≤36	150		
> 36 ≤38	160		
> 38 ≤40	170		
> 40 ≤42	180		
> 42 ≤44	190		
> 44 ≤46	200		
> 46 ≤48	210		
> 48 ≤50	220		
> 50 ≤52	230		
> 52 ≤54	240		
> 54 ≤56	250		
> 56 ≤58	260		
> 58 ≤60	270		

Inches	Maximum Pounds
> 21 ≤25	155
> 25 ≤28	170
> 28 ≤30	185
> 30 ≤32	200
> 32 ≤34	215
> 34 ≤36	230
> 36 ≤38	245
> 38 ≤40	260
> 40 ≤42	280
> 42 ≤44	290
> 44 ≤46	300
> 46 ≤48	310
> 48 ≤50	320
> 50 ≤52	330
> 52 ≤54	340
> 54 ≤56	350
> 56 ≤58	360
> 58 ≤60	370

Also excluded from the scope of the investigations are service carts. The excluded service carts have all of the following characteristics:

- (1) casters, wheels, or other similar devices which allow the service cart to be rolled from place to place;
- (2) a flat top or flat lid on top of the unit that opens;
- (3) a space or gap between the casters, wheels, or other similar devices, and the bottom of the enclosed storage space (e.g., drawers) of at least 10 inches; and
- (4) a total unit height, including casters, of less than 48 inches.

Also excluded from the scope of the investigations are work benches having each of the following characteristics:

- (1) a solid top working surface;
- (2) no drawers, one drawer, or two drawers in a side-by side configuration; and
- (3) the unit is supported by legs and the unit has no solid front, side, or back panels enclosing the body of the unit.

Also excluded from the scope of the investigations are metal filing cabinets that are configured to hold hanging file folders and are classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheading 9403.10.0020.

Merchandise subject to the investigation is classified under HTSUS categories 9403.20.0021, 9403.20.0026, 9403.20.0030 and 7326.90.8688¹ but may also be classified under HTSUS category 7326.90.3500. While HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of this investigation is dispositive.

¹ On January 1, 2017, HTSUS subheading 7326.90.85 was re-designated as HTSUS subheading 7326.90.86.

1. Tool chests and cabinets not prepackaged for retail sale

This includes all metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 10 inches but not exceeding 24 inches; and
- (5) not prepackaged for retail sale.

2. Industrial tool chests and cabinets

The excluded industrial grade steel tool chests and cabinets are those:

- (1) Having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047" or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests				
Inches Maximum Pounds				
> 21 ≤25	90			
> 25 ≤28	115			
> 28 ≤30	120			
> 30 ≤32	130			
> 32 ≤34	140			
> 34 ≤36	150			
> 36 ≤38	160			
> 38 ≤40	170			
> 40 ≤42	180			
> 42 ≤44	190			
> 44 ≤46	200			
> 46 ≤48	210			
> 48 ≤50	220			
> 50 ≤52	230			
> 52 ≤54	240			
> 54 ≤56	250			
> 56 ≤58	260			
> 58 ≤60	270			

Weight to Width Ratio Tool Cabinets			
Inches	Maximum Pounds		
> 21 ≤25	155		
> 25 ≤28	170		
> 28 ≤30	185		
> 30 ≤32	200		
> 32 ≤34	215		
> 34 ≤36	230		
> 36 ≤38	245		
> 38 ≤40	260		
> 40 ≤42	280		
> 42 ≤44	290		
>44 ≤46	300		
> 46 ≤48	310		
> 48 ≤50	320		
> 50 ≤52	330		
> 52 ≤54	340		
> 54 ≤56	350		
> 56 ≤58	360		
> 58 ≤60	370		

Importer.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing tool chests and cabinets (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.

<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.

<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.

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

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

Hours	Dollars	

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-2. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol.

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

I-3a. <u>**Ownership**</u>.-- Is your firm owned, in whole or in part, by any other firm? Please include any firms that produced tool chests and cabinets not packaged for retail sale or industrial tool chests and cabinets ("other tool chests and cabinets").

No No

Yes--List the following information

Firm name	Address	Extent of ownership (<i>percent</i>)

I-3b. <u>Changes in ownership</u>.-- Has your firm experienced any change in ownership since January 1, 2014?

No Yes

Please provide details regarding the change in ownership include the names of the new owner and previous owner, the date of the change in ownership, and the motivations for the change in ownership.

- I-3c. <u>Impact.</u>--What is the impact of this change in ownership on your firm's operations regarding inscope tool chests and cabinets and other tool chests and cabinets, e.g. (projected products, brands owned or produced for, etc.)? Please respond separately regarding in-scope tool chests and cabinets and other tool chests and cabinets.
- I-3d. <u>Market outlook.</u>—If your firm responded yes to question II-3, please provide any market forecasts or other document relating to market outlook for in-scope tool chests and cabinets or other tool chests and cabinets as an attachment to this questionnaire.

I-4. <u>Related importers/exporters</u>.--Does your firm have any related firms, either domestic or foreign, that are engaged in importing tool chests and cabinets from China and Vietnam into the United States or that are engaged in exporting tool chests and cabinets from China and Vietnam to the United States? Please include any firms that produced tool chests and other tool chests and cabinets.

No

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 tool chests and cabinets? Please include any firms that produced tool chests and other tool chests and cabinets.

	No
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Yes--List the following information.

Country	Affiliation

I-6. **Importing operations**.--Please indicate the nature of your firm's importing operations on tool chests and cabinets. More than one answer may be applicable.

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

I-7. <u>Consignee</u>.--If your firm is an importer of record of tool chests and cabinets 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 tool chests and cabinets into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports tool chests and cabinets 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 designed 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).

	No	Yes
Foreign trade zones		
Bonded warehouses		
Temporary importation under bond		

I-9. **Other trade actions**.--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–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, abu.kanu@usitc.gov). **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	
Fax	

II-2. **Changes in operations.--**Please indicate whether your firm has experienced any of the following changes in relation to the importation of tool chests and cabinets since January 1, 2014.

(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)	

No

II-3. <u>Arranged imports</u>.--Has your firm imported or arranged for the importation of tool chests and cabinets for delivery after September 30, 2017?

"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.

Yes–Fill out the table below.

Quantity (<i>in units</i>)								
Period/Source	Oct-Dec 2017	Jan-Mar 2018	Apr-Jun 2018	Jul-Sep 2018				
China								
Vietnam								
Other sources								

II-4. **<u>Reasons for importing if producer</u>**.--If your firm also produces tool chests and cabinets 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) or consignee (i.e., to which the merchandise was first delivered).

"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).

"U.S. commercial 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.

"Transfers for retail sale <u>by your firm</u>" –Tool chests and cabinets that were directly imported by your firm for the purpose of sale to end users using your firm's own retail establishments. Report the shipment of these imports to their initial location for retail sale (*i.e.*, as transfers) with the shipments valued at fair market value.

"Internal consumption" – Product consumed internally by your firm. Such transactions are valued at fair market value.

"Transfers to related firms" –Shipments made to related domestic firms. Such transactions are valued at fair market value.

"Related firm" – A firm that your firm solely or jointly owns, manages, or otherwise controls.

"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>Imports from China</u>.–Report your firm's imports and your firm's shipments and inventories of tool chests and cabinets imported from China by your firm during the specified periods.

	L L	JIIIIa				
Quantity (in units), value (in \$1,000)						
	Calendar years			January-September		
Item	2014	2015	2016	2016	2017	
Beginning-of-period inventories (quantity) (A)						
Imports: ¹ Quantity (B)						
Value (C)						
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)						
Value (E)						
To end users: Quantity (F)						
Value (G)						
To unrelated retailers: Quantity (H)						
Value (I)						
Transfers for retail sale by your firm: ² Quantity (J)						
Value (K)						
Internal consumption: ² Quantity (L)						
Value ² (M)						
Transfers to related firms: ² Quantity (N)						
Value ² (O)						
Export shipments: ³ Quantity (P)						
Value (Q)						
End-of-period inventories (quantity) (R)						
¹ Please identify the foreign producers, if know	vn·	I	I		I	

China

¹ Please identify the foreign producers, if known: _____.

² Shipments destined for retail sale by your firm, sales to related firms, and internal consumption must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: ______.

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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			Calendar years January-September			eptember
Reconciliation	2014	2015	2016	2016	2017		
A + B - D - F - H - J - L - N - P - R = 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.e., "0") but are nonetheless accurate:

II-5b. <u>Monthly U.S. imports: China</u>.-- Report your firm's monthly U.S. imports of tool chests and cabinets from China from January 2016 through September 2017.

	Сппа	
	U.S.	imports
	Quantity	Value
Year and month	(units)	(1,000 dollars)
2016		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		
October (AJ)		
November (AK)		
December (AL)		
2017		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		

China

II-5c. U.S. shipments by product type: China.-- Report your firm's U.S. shipments of tool chests and cabinets by type of product made predominantly (i.e. body) of carbon steel and stainless steel for calendar year 2016.

Quantit	ty (<i>in units</i>) and value	(IN \$1,000)				
	Calendar year 2016					
Item	Carbon steel	Stainless steel	All steel types			
U.S. shipments: Prepackaged sets: Quantity (S)			C			
Value (T)			C			
Top chests: <i>Quantity</i> (U)			C			
Value (V)			C			
Intermediate chests: Quantity (W)			C			
Value (X)			C			
Tool cabinets: <i>Quantity</i> (Y)			C			
Value (Z)			C			
Side cabinets: Quantity (AA)			C			
Value (AB)			C			
All other in-scope products: ¹ Quantity (AC)			C			
Value (AD)			C			

China

or more drawers, etc.): _____.

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines S through AD) in each time period equal the quantities and values reported for U.S. shipments in part a (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: S + U + W + Y + AA + AC – D – F – H – J – L – N = zero ("0"),	
if not revise.	0
Value: T + V + X + Z + AB + AD - E - G - I - K - M - O = zero ("0"), if	
not revise.	0

II-6a. <u>Imports from Vietnam</u>.–Report your firm's imports and your firm's shipments and inventories of tool chests and cabinets imported from Vietnam by your firm during the specified periods.

	••	ethann					
Quantity (<i>in units</i>), value (<i>in \$1,000</i>)							
	Calendar years			January-September			
Item	2014	2015	2016	2016	2017		
Beginning-of-period inventories (quantity) (A)							
Imports: ¹ Quantity (B)							
Value (C)							
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)							
Value (E)							
To end users: <i>Quantity</i> (F)							
Value (G)							
To unrelated retailers: Quantity (H)							
Value (I)							
Transfers for retail sale by your firm: ² Quantity (J)							
Value (K)							
Internal consumption: ² Quantity (L)							
Value ² (M)							
Transfers to related firms: ² Quantity (N)							
Value ² (O)							
Export shipments: ³ Quantity (P)							
Value (Q)							
End-of-period inventories (quantity) (R)							

Vietnam

¹ Please identify the foreign producers, if known: _____.

² Shipments destined for retail sale by your firm, sales to related firms, and internal consumption must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

³ Identify your firm's principal export markets: ______.

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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			January-Se	eptember
Reconciliation	2014	2015	2016	2016	2017
A + B - D - F - H - J - L - N - P - R = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
	0	0	0	0	0

¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:

II-6b. <u>Monthly U.S. imports: Vietnam</u>.-- Report your firm's monthly U.S. imports of tool chests and cabinets from Vietnam from January 2016 through September 2017.

	U.S.	imports
	Quantity	Value
Year and month	(units)	(1,000 dollars)
2016		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		
October (AJ)		
November (AK)		
December (AL)		
2017		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		

Vietnam

II-6c. <u>U.S. shipments by product type: Vietnam</u>.-- Report your firm's U.S. shipments of tool chests and cabinets by type of product made predominantly (i.e. body) of carbon steel and stainless steel for calendar year 2016.

	Calendar year 2016					
Item	Carbon steel	Stainless steel	All steel types			
U.S. shipments:						
Prepackaged sets: Quantity (S)			0			
Value (T)			(
Top chests: Quantity (U)			C			
Value (V)			C			
Intermediate chests: Quantity (W)			(
Value (X)			(
Tool cabinets: <i>Quantity</i> (Y)			(
Value (Z)			(
Side cabinets: Quantity (AA)			(
Value (AB)			(
All other in-scope products: ¹ Quantity (AC)			(
Value (AD)			(

Vietnam

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines S through AD) in each time period equal the quantities and values reported for U.S. shipments in part a (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: S + U + W + Y + AA + AC – D – F – H – J – L – N = zero ("0"),	
if not revise.	0
Value: T + V + X + Z + AB + AD - E - G - I - K - M - O = zero ("0"), if	
not revise.	0

II-7 Imports from all other sources.–Report your firm's imports and your firm's shipments and inventories of tool chests and cabinets imported from all other sources by your firm during the specified periods.

(list sources:) Quantity (<i>in units</i>), value (<i>in \$1,000</i>)								
		Calendar years		January-Se	ptember			
ltem	2014 2015 2016			2016 2017				
Beginning-of-period inventories (quantity) (A)								
Imports: ¹								
Quantity (B)								
Value (C)								
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)								
Value (E)								
To end users: Quantity (F)								
Value (G)								
To unrelated retailers: Quantity (H)								
Value (I)								
Transfers for retail sale by your firm: ² <i>Quantity</i> (J)								
Value (K)								
Internal consumption: ² Quantity (L)								
Value ² (M)								
Transfers to related firms: ² Quantity (N)								
Value ² (O)								
Export shipments: ³ Quantity (P)								
Value (Q)								
End-of-period inventories (quantity) (R)								

All other sources

¹ Please identify the foreign producers, if known: ____

² Shipments destined for retail sale by your firm, sales to related firms, and internal consumption must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.

.

³ Identify your firm's principal export markets: ______.

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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	January-September		
Reconciliation	2014	2015	2016	2016	2017
A + B - D - F - H - J - L - N - P - R = 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.e., "0") but are nonetheless accurate:

II-7b. Monthly U.S. imports: All other sources.-- Report your firm's monthly U.S. imports of tool chests and cabinets from all other sources from January 2016 through September 2017.

All other sources

	U.S.	imports
Year and month	Quantity (<i>units</i>)	Value (1,000 dollars)
2016		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		
October (AJ)		
November (AK)		
December (AL)		
2017		
January (AA)		
February (AB)		
March (AC)		
April (AD)		
May (AE)		
June (AF)		
July (AG)		
August (AH)		
September (AI)		

II-7c. U.S. shipments by product type: All other sources. -- Report your firm's U.S. shipments of tool chests and cabinets by type of product made predominantly (i.e. body) of carbon steel and stainless steel for calendar year 2016.

Quantit	y (<i>in units</i>) and value	(In \$1,000)				
	Calendar year 2016					
Item	Carbon steel	Stainless steel	All steel types			
U.S. shipments:						
Prepackaged sets: Quantity (S)			C			
Value (T)			C			
Top chests: <i>Quantity</i> (U)			C			
Value (V)			C			
Intermediate chests: Quantity (W)			C			
Value (X)			(
Tool cabinets: Quantity (Y)			(
Value (Z)			(
Side cabinets: Quantity (AA)			0			
Value (AB)			C			
All other in-scope products: ¹ Quantity (AC)			(
Value (AD)			C			

All other sources

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines S through AD) in each time period equal the quantities and values reported for U.S. shipments in part a (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: S + U + W + Y + AA + AC – D – F – H – J – L – N = zero ("0"),	
if not revise.	0
Value: T + V + X + Z + AB + AD - E - G - I - K - M - O = zero ("0"), if	
not revise.	0

II-8. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part II that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Amelia Preece (303-205-3250, <u>amelia.preece@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	
Fax	

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, 2014 of the following products your firm imported from China and Vietnam:
- **Product 1**.--26-27 inch wide top chest sold in combination with a 26-27 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 9 to 10 total drawers (across both units) with ball bearing drawer slides, a minimum chest depth (front to back) of 15 inches, a minimum cabinet depth of 18 inches and a combined unit weight (not shipping weight) of 150 to 180 lbs.
- **Product 2.**--40-46 inch wide top chest sold in combination with a 40-46 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 16 to 21 drawers (across both units) with ball bearing slides, a chest depth of and cabinet depth of 16 to 19 inches; and combined unit weight (not shipping weight) of less than 420 lbs.
- **Product 3**.--45 to 56 inch wide workstation or mobile workbench, with a body of cold-rolled carbon steel, having 8 to 11 drawers or doors with ball bearing slides, a top work surface, a unit depth of 17-24 inches, and a unit weight (not shipping weight) of less than 175 lbs. This category specifically excludes work stations or mobile workbenches in which the body is made of stainless steel but includes tool chests and cabinets in which the drawers or door fronts are made of stainless steel.
- **Product 4.**--45 to 56 inch wide workstation or mobile workbench, with a body of cold-rolled carbon steel, having 8 to 11 drawers or doors with ball bearing slides, a top work surface, a unit depth of 17-24 inches, and a unit weight (not shipping weight) of less than 175 lbs. This category specifically excludes work stations or mobile workbenches in which the body is made of stainless steel but includes tool chests and cabinets in which the drawers or door fronts are made of stainless steel. Do not include workstation or mobile workbench sold with tools, stereos, or refrigerators.

Please note that values should be <u>f.o.b., 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 2014-September 2017, did your firm import from China and/or Vietnam and sell to unrelated U.S. <u>nonretail</u> customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data tables as appropriate.
NoSkip to question III-2d.

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

China

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

	Product 1		Produ	Product 2		Product 3		Product 4	
Period of shipment	Quantity	Value	Quantity Value		Quantity Value		Quantity	Value	
2014:									
January-March									
April-June									
July-September									
October-December									
2015:									
January-March									
April-June									
July-September									
October-December									
2016:									
January-March									
April-June									
July-September									
October-December									
2017:									
January-March									
April-June									
July-September									

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.

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:

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

Vietnam

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

			Quantity in unit					
	Produ	JCT 1	Produ	ict 2	Produ	JCT 3	Produ	ict 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
January-March								
April-June								
July-September								
October-December								
2015:								
January-March								
April-June								
July-September								
October-December								
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.

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:

III-2c. **Pricing data methodology.**—Please 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.

III-2d. Imports for retail/own use. –During January 2014-December 2016, did your firm import any of the products listed at III-2 from China and/or Vietnam for retail/own use.

YesPlease complete the following pricing data table(s) as appropriate.
NoSkip to question III-2h.

III-2e. Imports for retail/own use.--Report below the import data¹ for pricing products² imported from China and used for sales in your firm's retail locations or internally consumed.

China

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

			ntity <i>in units, l</i>		1		r	
	Product 1		Product 2		Product 3		Produ	uct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
January-March								
April-June								
July-September								
October-December								
2015:								
January-March								
April-June								
July-September								
October-December								
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								

¹ LDP value (i.e., landed duty-paid values) represents the cost paid to foreign supplier(s) plus any freight and insurance costs paid for international transportation as well as all Customs duties and fees. LDP value represents the f.o.b. value of your firm's imports at the U.S. port of entry after clearing Customs.

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:

III-2f. Imports for retail/own use.--Report below the import data¹ for pricing products² imported from Vietnam and used for sales in your firm's retail locations or internally consumed.

Vietnam

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

		(Qua	ntity <i>in units,</i>	LDP value in	dollars)			
	Prod	uct 1	Prod	uct 2	Prod	luct 3	Prod	luct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
January-March								
April-June								
July-September								
October-December								
2015:								
January-March								
April-June								
July-September								
October-December								
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								

¹ LDP value (i.e., landed duty-paid values) represents the cost paid to foreign supplier(s) plus any freight and insurance costs paid for international transportation as well as all Customs duties and fees. LDP value represents the f.o.b. value of your firm's imports at the U.S. port of entry after clearing Customs.

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:

III-2g. Additional costs for your direct imports of tool chests and cabinets for your firm's retail/own use.

(i) If your firm reported direct import purchase costs (questions III-2e, and/or 2f), please identify the factors that add to your cost of importing directly since January 1, 2014, estimate the share of the cost of the landed duty paid value, and explain the specific costs associated with each category.

Factors	Estimated share of landed duty paid value (percent)	Explanation
Logistical or supply chain costs		
Warehousing costs		
Currency conversion costs		
Other		

(ii) To which source does your firm compare costs in determining your additional transaction costs to directly import?

U.S. importers	U.S. producers	Both	Neither

(iii) (A) If your firm reported data above (question III-2e and/or 2f), briefly identify the benefits of directly importing tool chests and cabinets instead of purchasing tool chests and cabinets from a U.S. importer or from a U.S. producer.

(B) Please provide the estimated margin saved by having directly imported tool chests and cabinets instead of purchasing from a U.S. importer: _____ percent of landed duty-paid value.

(C) Explain any variation in the margin saved since January 1, 2014.

(iv) What is the approximate percentage of the total cost of tool chests and cabinets you directly imported from China and Vietnam that is accounted for by U.S. inland transportation or other logistics costs from the port of importation to your distribution network or retail store?

Country	Percent
China	%
Vietnam	%

III-2h. **Product specifications**.--If your firm provided pricing information please report their characteristics in the following table. If you sold different SKUs under any individual pricing product, report the characteristics of the most common SKU you sold within that pricing product.

Item	Prod	uct 1	Prod	uct 2	Prod	uct 3	Prod	uct 4
The product in question included only one	Yes	No	Yes	No	Yes	No	Yes	No
SKU?								
If you answered "no" above, please estimate the percent share that the largest SKU (as described below) accounted for of product in question								

Overall cabinet and chest (or for product 4, work station/bench)

	Largest SKU reported in					
Item	Product 1	Product 2	Product 3	Product 4		
Cabinet width (inches)						
Cabinet height (inches)						
Cabinet depth (inches)						
Cabinet total weight capacity (pounds)						
Chest width (inches)						
Chest height (inches)						
Chest depth (inches)						
Chest total weight capacity(pounds)						
Combined unit weight(pounds)						
Steel thickness (inches)						

<u>Paint</u>

		Largest SKU reported in						
Item	Product 1	Product 2	Product 3	Product 4				
Electric coat (check = yes)								
Powder coat (check = yes)								
Number of colors available								

Casters/wheels

	Largest SKU reported in				
Item	Product 1	Product 2	Product 3	Product 4	
Size of casters/wheels (inches)					

III-2h. **Product specifications**.--Continued

Drawers

	Largest SKU reported in						
Item	Product 1	Product 2	Product 3	Product 4			
Total number of drawers							
Each drawer supports (pounds)							
Number of ball bearings per glide							
Type of drawer latching mechanism							
Soft closing drawer slides (check = yes)							
Drawer liners included (check = yes)							
Drawer support brackets (check = yes)							

Construction factors

	Largest SKU reported in						
Item	Product 1	Product 2	Product 3	Product 4			
Double wall construction (check = yes)							
Seamless construction (check = yes)							
Roll formed inner panels (check = yes)							
Reinforced inner panels (check = yes)							
Gas struts for lid (check = yes)							
Stainless steel hinges (check = yes)							
Uses aluminum rivets (check = yes)							

Add-ons

	Largest SKU reported in			
ltem	Product 1	Product 2	Product 3	Product 4
Includes power strip				
Includes USB port(s)				
Includes Bluetooth enabled electronic locking				
Other (please describe)				

Other clarifications regarding product specifications.--.

- III-2i. If your firm is a direct importer for retail sales or your own use please check here and skip to question III-11.
- III-3. Price setting.--How does your firm determine the prices that it charges for sales of tool chests and cabinets (*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-4. **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-5. Pricing terms.--

(a) What are your firm's typical sales terms for tool chests and cabinets imported from China and Vietnam?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)

(b) On what basis are your firm's prices of imported tool chests and cabinets from China and Vietnam usually quoted (*check one*)?

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

III-6. Contract versus spot.--Approximately what share of your firm's sales of tool chests and cabinets imported from China and Vietnam in 2016 was on a wholesale (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, (4) spot sales basis or on a retail basis?

	Type of sale					
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Short-term contracts (multiple deliveries for less than 12 months)	Spot sales (for a single delivery)	Total (sł sum 100.0	to
Share of 2016 sales	%	%	%	%	0.0	%

III-7. <u>Contract provisions</u>.—Please fill out the table regarding your firm's typical sales contracts for tool chests and cabinets from China and Vietnam (or check "not applicable" if your firm does not sell on a long-term, short-term and/or annual 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			
Meet or release	Yes			
provision	No			
Not applicab	le			

III-8. <u>Lead times</u>.--What is your firm's share of sales of tool chests and cabinets imported from China and Vietnam 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 tool chests and cabinets?

Source	Share of 2016 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-9. Shipping information.—

- (a) What is the approximate percentage of the total delivered cost of tool chests and cabinets imported from China and Vietnam 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) When your firm sells tool chests and cabinets imported from China and Vietnam, from where is it shipped?
 Point of importation Storage facility (check one)
- (d) Indicate the approximate percentage of your firm's sales of tool chests and cabinets imported from China and Vietnam 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-10. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold tool chests and cabinets imported from subject countries since January 1, 2014 (check all that apply)?

Geographic area	China	Vietnam
Northeast.–CT, ME, MA, NH, NJ, NY, PA, RI, and VT.		
Midwest.–IL, 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-11. <u>End uses</u>.--List the end uses of the tool chests and cabinets that your firm imports from China and Vietnam.

	End uses for tool chests and cabinets
1	
2	
3	

III-12. <u>Substitutes</u>.--Can other products be substituted for tool chests and cabinets?

No

Yes--Please fill out the table.

		End use in which this	Have changes in the price of this substitut affected the price for tool chests and cabinets?		
	Substitute	substitute is used	No	Yes	Explanation
1.					
2.					
3.					

III-13. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for tool chests and cabinets has changed since January 1, 2014. 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				

III-14. **Product changes.--**Have there been any significant changes in the product range, product mix or marketing of tool chests and cabinets since January 1, 2014?

No	Yes	If yes, please describe.

III-15. Conditions of competition.-

(a) Is the tool chests and cabinets market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to tool chests and cabinets?

Check all that apply.		Please describe.
	Νο	Skip to question III-16.
	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 for tool chests and cabinets since January 1, 2014?

No	Yes	If yes, describe.

(c) Have financial dificutlies of any particularly large retailer (e.g., Sears, other) affected your firms tool chests and cabenets business?

No	Yes	If yes, describe.

(d) Have changes to the brick and mortar retail sector and increases in online retail affected your firm's tool chests and cabinets business?

No	Yes	If yes, describe.

III-16. **Supply constraints.-**-Has your firm refused, declined, or been unable to supply tool chests and cabinets since January 1, 2014 (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, been unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

III-17. <u>Customer preferences</u>.--Have customers requested customizations or product specifications of specific tool chests and cabinets that your firm has been unable or unwilling to provide since January 1, 2014?

No	Yes	If yes, please describe.

III-18. **Raw materials.--**How have tool chests and cabinets raw material prices changed since January 1, 2014?

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 tool chests and cabinets.

III-19. Brands.--

- (a) Please list the top 5 brands of tool chests and cabinets that your firm imports.
- (b) Please list what purchasers require for your firm to be eligible to import for a new brand for a purchaser.
- (c) Please estimate the number of days it would take for your firm to become eligible to import a new brand.

to	days

III-20. <u>Interchangeability</u>.--Are tool chests and cabinets 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	Vietnam	Other countries	
United States				
China				
Vietnam				
For any country-pair producing tool chests and cabinets 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, brand, etc.) between tool chests and cabinets 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	Vietnam	Other countries
United States			
China			
Vietnam			

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

III-22. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for tool chests and cabinets since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of tool chests and cabinets that each of these customers accounted for in 2016.

	Customer's name	City	State	Share of 2016 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

III-23. Other explanations.--If your firm would like to further explain a response to a question in Part III that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART IV – PURCHASING FACTORS

- IV-1. If your firm is not an importer for retail sales or your own use then please check here skip question IV-2.
- IV-2. If your firm is a retailer please check here and fill out a purchaser questionnaire available at: <u>https://www.usitc.gov/investigations/701731/2017/tool chests and cabinets china and vietn</u> <u>am/final.htm</u>. In the purchaser questionnaire you may skip the questions that do not apply to you because you are a retailer and you may also skip any question you have already responded to in the importer questionnaire.

PART V – ALTERNATIVE PRODUCT

Other tool chests and cabinets include the following items:

1. <u>Tool chests and cabinets not prepackaged for retail sale.</u>

This includes all metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 1 0 inches but not exceeding 24 inches; and
- (5) not prepackaged for retail sale.

2. Industrial tool chests and cabinets.

The excluded industrial grade steel tool chests and cabinets are those:

- (1) Having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047" or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests			
Inches	Maximum Pounds		
> 21 ≤25	90		
> 25 ≤28	115		
> 28 ≤30	120		
> 30 ≤32	130		
> 32 ≤34	140		
> 34 ≤36	150		
> 36 ≤38	160		
> 38 ≤40	170		
> 40 ≤42	180		
> 42 ≤44	190		
> 44 ≤46	200		
> 46 ≤48	210		
> 48 ≤50	220		
> 50 ≤52	230		
> 52 ≤54	240		
> 54 ≤56	250		
> 56 ≤58	260		
> 58 ≤60	270		

Weight to Width Ratio Tool Cabinets				
Inches	Maximum Pounds			
> 21 ≤25	155			
> 25 ≤28	170			
> 28 ≤30	185			
> 30 ≤32	200			
> 32 ≤34	215			
> 34 ≤36	230			
> 36 ≤38	245			
> 38 ≤40	260			
> 40 ≤42	280			
> 42 ≤44	290			
> 44 ≤46	300			
> 46 ≤48	310			
> 48 ≤50	320			
> 50 ≤52	330			
> 52 ≤54	340			
> 54 ≤56	350			
> 56 ≤58	360			
> 58 ≤60	370			

- V-1. <u>Comparability of in-scope tool chests and cabinets to out-of-scope other tool chests and</u> <u>cabinets</u> -- For each of the following factors, indicate whether in-scope tool chest and cabinets compared to select out-of-scope products are:
 - F: fully comparable or the same, *i.e.*, have no differentiation between them;
 - M: mostly comparable or similar;
 - S: somewhat comparable or similar;
 - N: never or not-at-all comparable or similar; or
 - 0: no familiarity with products.
 - (a) **<u>Physical Characteristics and Uses</u>**.--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses:</i>
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

(b) <u>Interchangeability</u>.--The ability to substitute the products in the in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>interchangeability</i> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

- V-1. Comparability of in-scope tool chests and cabinets to select out-of-scope products--Continued
 - (c) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether the products are manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>manufacturing facilities, production processes, and production employees</i> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

(d) <u>**Channels of distribution**</u>.--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesaler/distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

V-1. Comparability of in-scope tool chests and cabinets to select out-of-scope products--Continued

(e) <u>**Customer and producer perceptions**</u>.--Perceptions as to the differences and/or similarities in the products in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and producer perceptions</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

(f) <u>**Price**</u>.--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>prices</i> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

V-2a. <u>Imports from all sources</u>.–Report your firm's imports and your firm's shipments and inventories of other tool chests imported from all foreign sources by your firm during the specified periods.

All sources

Qu	antity (<i>in unit</i>	s), value (<i>in \$1,</i>	000)		
		Calendar years		January-Se	eptember
Item	2014	2015	2016	2016	2017
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)					
Value (E)					
To end users: Quantity (F)					
Value (G)					
To unrelated retailers: Quantity (H)					
Value (I)					
Transfers for retail sale by your firm: ² Quantity (J)					
Value (K)					
Internal consumption: ² Quantity (L)					
Value ² (M)					
Transfers to related firms: ² Quantity (N)					
Value ² (O)					
Export shipments: ³ Quantity (P)					
Value (Q)					
End-of-period inventories (quantity) (R)					

value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____3 Identify your firm's principal export markets: _____.

V-2a. **Imports from all sources**.--Continued

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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			January-September		
Reconciliation	2014	2015	2016	2016	2017	
A + B - D - F - H - J - L - N - P - R =						
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.e., " 0 ") but are nonetheless accurate:						

V-2b. U.S. shipments data by product category.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, transfers for retail sale by your own firm, internal consumption, and transfer to related parties) of imports of other tool chest and cabinets from all sources by product category.

	Calendar Years			January-September		
Items	2014	2015	2016	2015	2016	
U.S shipments: Tool chests and cabinets not prepackaged for retail sale:						
Quantity (S) Value (T)						
Other: Quantity (U)						
Value (V)						

RECONCILIATION OF U.S. SHIPMENTS.--Please ensure that the quantities and values reported for shipments by product category (i.e., lines S through V) in each time period equal the quantities and values reported for U.S. shipments in table V-2a (i.e., D through O) 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			January-September	
Reconciliation	2014	2015	2016	2016	2017
Quantity: $S + U - D - F - H - J - L - N =$ should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
Value: $T + V - E - G - I - K - M - O =$ should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0

[•] Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:____

V-3. U.S. shipments by product type.--Report your firm's U.S. shipments of other tool chests and cabinets by type of product made predominantly (*i.e.*, body) of carbon steel and stainless steel for calendar year 2016.

Quantity (<i>in units</i>) and value (<i>in \$1,000</i>)								
		Calendar year 2016						
ltem	Carbon steel	Stainless steel	All steel types					
J.S. shipments: Prepackaged sets: Quantity (W)			C					
Value (X)			C					
Top chests: <i>Quantity</i> (AA)			0					
Value (AB)			0					
Intermediate chests: Quantity (AC)			C					
Value (AD)			C					
Tool cabinets: <i>Quantity</i> (AE)			C					
Value (AF)			C					
Side cabinets: Quantity (AG)			C					
Value (AH)			C					
Others: ¹ Quantity (AI)			C					
Value (AJ)			(

Other tool chests and cabinets

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines W through AJ) in each time period equal the quantities and values reported for U.S. shipments in table V-a2 (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: $W + Y + AA + AC + AE + AG + AI - D - F - H - J - L - N = zero ("0"), if not revise.$	0
Value: $X + Z + AB + AD + AF + AH + AJ - E - G - I - K - M - O = zero ("0"), if not revise.$	0

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

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

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

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

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

🔗 Region and Language	e X		🐓 Region and Language	
Formats Location Key	boards and Languages Administrative		Formats Location Keyl	boards and Languages Administrative
Format:			Format:	
Italian (Italy)	Italian (Italy)		English (United State	s) 🔹
Date and time form	ats		Date and time form	ats
Short date:	dd/MM/yyyy		Short date:	M/d/yyyy
Long date:	dddd d MMMM уууу		Long date:	dddd, MMMM dd, yyyy
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 week:	Sunday
What does the nota	tion mean?		What does the nota	tion mean?
Examples			Examples	
Short date:	03/11/2015		Short date:	8/6/2015
Long date:	martedì 3 novembre 2015		Long date:	Thursday, August 06, 2015
Short time:	10:35		Short time:	2:47 PM
Long time:	10:35:44		Long time:	2:47:25 PM
Additional settings Additional settings				
	OK Cancel Apply			OK Cancel Apply

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: https://www.usitc.gov/investigations/701731/2017/tool chests and cabinets china a nd vietnam/final.htm.

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

• <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: https://dropbox.usitc.gov/oinv/ Pin: TOOL

• 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.