U.S. PRODUCERS' QUESTIONNAIRE

POLYETHYLENE TEREPHTHALATE RESIN FROM BRAZIL, INDONESIA, KOREA, PAKISTAN, AND TAIWAN

This questionnaire must be received by the Commission by October 10, 2017

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigations concerning polyethylene terephthalate resin ("PET resin") from Brazil, Indonesia, Korea, Pakistan, and Taiwan (Inv. Nos. 731-TA-1387-1391 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm

Address												
City			S	State		Zip Co	de					
Website												
Has your firm	produced P	T Resin (as d	efined on next	t page) at a	any tin	ne since	e Januar	/ 1, 201	4?			
□ NO	(Sign the ce	rtification belov	w and promptly	return only	y this pa	age of t	he questi	onnaire	to the (Commis	sion)	
☐ YES	(Complete a	ll parts of the o	questionnaire, a	and return tl	he entii	re quest	tionnaire	to the C	ommiss	ion)		
•			nternational cc.gov/oinv/.			sion <i>D</i>	rop Box	by clic	king o	n the		
				ERTIFICAT								
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PART I.—GENERAL INFORMATION

<u>Background</u>.--This proceeding was instituted in response to petitions filed on September 26, 2017, by DAK Americas LLC, Charlotte, NC; Indorama Ventures USA, Inc., Decatur, AL; M&G Polymers USA, LLC, Houston, TX; and Nan Ya Plastics Corporation, America Lake City, SC. Antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of dumping. Questionnaires and other information pertinent to this proceeding are available at

https://usitc.gov/investigations/701731/2017/polyethylene_terephthalate_resin_brazil_indonesia/prel_iminary.htm

<u>PET resin</u> covered by these investigations is polyethylene terephthalate (PET) resin having an intrinsic viscosity of at least 70, but not more than 88, milliliters per gram (0.70 to 0.88 deciliters per gram). The scope includes blends of virgin PET resin and recycled PET resin containing 50 percent or more virgin PET resin content by weight, provided such blends meet the intrinsic viscosity requirements above. The scope includes all PET resin meeting the above specifications regardless of additives introduced in the manufacturing process.

PET resin is currently imported under statistical reporting numbers 3907.61.0000 and 3907.69.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). Prior to January 1, 2017, PET resin was imported under statistical reporting number 3907.60.0030. 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 PET Resin 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.

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, 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
res	INO

I-2. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. Firms operating more than one establishment should combine the data for all establishments into a single report.

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

Establishments covered ¹	City, State	Zip (5 digit)	Description	
1				
2				
3				
4				
5				
6				
¹ Additional disc	¹ Additional discussion on establishments consolidated in this questionnaire:			

I-3. **Petition support**.--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
Brazil			
Indonesia			
Korea			
Pakistan			
Taiwan			

Firm name	Address	Extent of ownership (percent)
	portersDoes your firm have any reged in importing PET resin from Braz	
foreign, that are enga Faiwan into the Unite Korea, Pakistan, and T	portersDoes your firm have any reged in importing PET resin from Brazed States or that are engaged in exporaiwan to the United States?	il, Indonesia, Korea, Pakistan,
foreign, that are enga Faiwan into the Unite Korea, Pakistan, and T	ged in importing PET resin from Brazed States or that are engaged in exporaisment to the United States?	il, Indonesia, Korea, Pakistan,

I-6.	<u>Related producers</u> Does your firm have any related firms, either domestic or foreign, that are engaged in the production of PET resin?					
	No YesList the	e following information.				
	Firm name	Country	Affiliation			

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Calvin Chang** (202-205-3062, hangwul.chang@usitc.gov). **Supply all data requested on a calendar-year 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. <u>Changes in operations.</u>--Please indicate whether your firm has experienced any of the following changes in relation to the production of PET resin since January 1, 2014.

(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 made on the same equipment and machinery used to produce PET resin, and the combined production capacity on this shared equipment and machinery 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).

"**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	1,000 poun	ds)			
	Calendar years			January-June		
Item	2014	2015	2016	2016	2017	
Overall production capacity						
Production of: PET resin ¹	0	0	0	0	0	
Other products ²						
Total	0	0	0	0	0	

¹ Data entered for production of PET resin will populate here once reported in question II-7.
² Please identify these products: _____.

II-3b.	hours per week, weeks per year.
II-3c.	<u>Capacity calculation</u> Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.
II-3d.	Hot fill PET resin production. – What percentage of your firm's total PET resin production was hot fill PET resin in 2016? percent.
II-3e.	<u>Production constraints</u> Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

-3t.	<u>Produ</u>	<u>ct shifting</u> .—
	(i)	Is your firm able to switch production (capacity) between PET resin and other products using the same equipment and/or labor?
		No Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
	(ii)	Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

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II-4.	TollingSince January 1, 2014, has your firm been involved in a toll agreement regarding the
	production of PET resin?

"Toll agreement"--Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes Please describe the toll arrangement(s) and name the firm(s) involved.

II-5. Foreign trade zones.--

(a) <u>Firm's FTZ operations</u>.--Does your firm produce PET resin in and/or admit PET resin 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 designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	If yes Describe 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 PET resin into a foreign trade zone (FTZ) for use in distribution of PET resin and/or the production of downstream articles?

N	lo	Yes	If yesIdentify the firms and the FTZs.

II-6. <u>Importer</u>.--Since January 1, 2014, has your firm imported PET resin?

"Importer" – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf. The importer may be the consignee, or the importer of record.

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

- II-7. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of PET resin 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. Report <u>net values</u> (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 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-7. Production, shipment, and inventory data.--Continued

Quantity (in 1,000 pounds) and value (in \$1,000)							
		Calendar years		Januai	ry-June		
ltem	2014	2015	2016	2016	2017		
Average production capacity ¹ (quantity) (A)							
Beginning-of-period inventories (quantity) (B)							
Production (quantity) (C)							
U.S. shipments: Commercial shipments: Quantity (D)							
Value (E)							
Internal consumption: ² Quantity (F)							
Value ² (G)							
Transfers to related firms: ² Quantity (H)							
Value ² (I)							
Export shipments: ³ Quantity (J)							
Value (K)							
End-of-period inventories (quantity) (L)							
¹ The production capacity reported is based the methodology used to calculate production ² Internal consumption and transfers to relat uses a different basis for valuing these transact data using that basis for each of the periods no ³ Identify your firm's principal export market	capacity, and extending the cape of the ca	xplain any chang be valued at fair lecify that basis (e	es in reported o market value. I	capacity n the event tha	at your firm		

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.</u>--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line 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			January-June	
2014	2015	2016	2016	2017
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-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.

Quantity (in 1,000 pounds)								
	Calendar years			January-June				
Item	2014 2015		2016	2016	2017			
Channels of distribution: U.S. shipments: To distributors (quantity) (M)								
To end users Bottle producers (N)								
Carpeting manufacturers (O)								
Sheet, packaging, and strapping manufacturers (P)								
Other end users ¹ (Q)								
¹ Please describe the other end users		1	1	1				

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M through Q) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, and H) 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-June		
Reconciliation	2014	2015	2016	2016	2017	
M + N + O + P + Q - D - F - H = zero						
("0"), if not revise.	0	0	0	0	0	

Explanation of trends:

II-9. <u>Employment data</u>.--Report your firm's employment-related data related to the production of PET resin 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. For the January to June periods, calculate similarly and divide by 6.

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3).

"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, oldage 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			January-June	
Item	2014	2015	2016	2016	2017
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

	Related firmsIf your firm reported transfers to related firms in question II-7, please indicated 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.
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II-11.	11. <u>Purchases</u> Other than direct imports, has your firm otherwise purchased PET resin since January 1, 2014?					esin since
"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.						
"Direct import" –A transaction to buy from a foreign supplier where your firm is the imp of record or consignee.						the importer
	No YesReport such purchases below and explain the reasons for your fir purchases:					
		(Quantit	ty in 1,000 pou	ınds)		
		Calendar years		January-June		
	Item	2014 2015 2016			2016 2017	
Purchases from U.S. importers ¹ of PET resin from- Brazil						
Indo	onesia					
Kor	ea					
Pak	istan					
Taiv	van					
All c	other sources					
Purch: produ	ases from domestic cers ²					
Purch:	ases from other es ²					
supplie	¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: ² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product:					

II-11.	<u>Purcha</u>	nses.—Continued
	(b)	Do any of the data reported in questions II-7 (production, shipments, and inventories) or question III-9a (Operations on certain PET resin) include data sourced from the purchases reported above?
		No Yes—PLEASE REVISE the data in questions II-7 and III-9a to exclude data for resales of PET resin not produced by your firm prior to submission of this questionnaire response to the Commission.
II-12.	II that the spa provid	explanationsIf your firm would like to further explain a response to a question in Part did not provide a narrative box, please note the question number and the explanation in acceprovided below. Please also use this space to highlight any issues your firm had in ing the data in this section, including but not limited to technical issues with the MS questionnaire.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Mary Klir (202-205-3247, mary.klir@usitc.gov).

Commission si	taff may contact that individual regarding the confidential information submitted
in part III.	,
Name	
Title	
Email	
Telephone	
Fax	
A.	When does your firm's fiscal year end (month and day)? If your firm's fiscal year changed during the data-collection period, explain below:
B.1.	Describe the lowest level of operations (e.g., plant, division, company-wide) fo which financial statements are prepared that include PET resin:
B.1. 2.	
	which financial statements are prepared that include PET resin: Does your firm prepare profit/loss statements for PET resin:

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes PET resin, as well as specific statements and worksheets) used to compile these data.

III-3.	Cost accounting system/InventoriesBriefly describe your firm's cost accounting system (e.g., standard cost, job order cost) and your firm's basis for valuing raw material inventories (e.g., FIFO, LIFO, weighted average) related to PET resin operations, as well as the average number of weeks of MEG and PTA inventories maintained for normal operations.		
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. **Product listing**.--Please list the products your firm produced in the facilities in which your firm produced PET resin, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales			
PET resin	%			
	%			
	%			
	%			
	%			

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III-6.	Does your firm purchase inputs (raw materials, labor, energy, or any services) used in the production of PET resin from any related sources (e.g., inclusive of transactions between related firms , divisions and/or other components within the same company)?						
	YesContinue to question III-7. NoContinue to question III-9a.						
III- 7 .	<u>Inputs from related suppliers.</u> Please identify the inputs used in the production of PET resin that your firm purchases from related sources 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 i	Input valuation as recorded in the firm's accounting books and records					
III-8.	Inputs purchased from related suppliersPlease confirm that the inputs purchased from related sources, as identified in III-7, were reported in III-9a (financial results on PET resin) in a manner consistent with your firm's accounting books and records. Yes						
	NoIn the space below, ple suppliers as reported	ease report the valuation basis of inputs p in table III-9a.	ourchased from related				

III-9a. Operations on PET resin.--Report the revenue and related cost information requested below on the PET resin operations of your firm's U.S. establishment(s). Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related sources should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Quantity	(in 1,000 pounds)		-		
	Fiscal years ended			January-	June
Item	2014	2015	2016	2016	2017
Net sales quantities: ² Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	C
Net sales values: ² Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	C
Cost of goods sold (COGS): ³ Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	C
Gross profit or (loss)	0	0	0	0	C
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	0	0	C
Depreciation/amortization included above					

¹ 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.

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.

³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

III-9b. Raw materials for PET resin.--Please indicate the share of total raw material costs reported in III-9a in 2016 for the following raw material inputs:

	(percent)
PTA	%
MEG	%
Other ¹	%
Total (should sum to 100 percent)	0.0 %
Please indicate any other notable "other" raw materials not expres and provide the share of the total raw material costs that they account	

III-9c.	9c. <u>Financial data reconciliation</u> The calculable line items from question III-9a (i.e. quantities and values, total COGS, gross profit (or loss), total SG&A, and net incompared been calculated from the data submitted in the other line items. Do the concept return the correct data according to your firm's financial records ignoring non-indifferences that may arise due to rounding?					
		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-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-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 of the subject product in question III-9a.

	Fiscal years ended		January-June		
	2014	2015	2016	2016	2017
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in table III-9a where the nonrecurring item is	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in question III-9a.				
classified.	Value (\$1,000)				
1. , classified as					
2. , classified as					
3. , classified as					
4. , classified as					
5. , classified as					
6. , classified as					
7. , classified as					

<u>and records of the company</u> If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and
records in the normal course of business; i.e., just as responses to question III-10 identify
where these items are reported in question III-9a.

III-12. Asset values.--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of PET resin. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for PET resin 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 allocated to the subject products if these assets are also related to other products. Please provide a brief explanation if there are any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value (in \$1,000)			
	Fiscal years ended		-
Item	2014	2015	2016
Total assets (net) 1			
¹ Describe	•		

III-13. <u>Capital expenditures and research and development expenses</u>.--Report your firm's capital expenditures and research and development expenses for PET resin. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in \$1,000)				
Fiscal years ended		January	/-June	
2014	2015	2016	2016	2017
		Fiscal years ende	Fiscal years ended	Fiscal years ended January

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.

² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.

III-14.	Data consistency and reconciliation Please indicate whether your firm's financial data fo
	questions III-9a, 12, and 13 are based on a calendar year or on your firm's fiscal year:

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.

		Full year data	Partial year periods		
Reconciliation	2014	2015	2016	2016	2017
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

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

Yes	No	If no, please explain.

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15.	Effects of imports on investmentSince January 1, 2014, 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 PET resin from Brazil, Indonesia, Korea, Pakistan, and Taiwan?				
	☐ No		YesMy firm has experi	enced actual negative effects as follows:	
		(ch	neck 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		

II-16.	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 PET resin from Brazil, Indones				
	Korea,	Pakis	tan, and Taiwan?	ienced actual negative effects as follows:	
		(ch	neck 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		

III-17.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports
	of PET resin from Brazil, Indonesia, Korea, Pakistan, and Taiwan?

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 that did not provide a narrative 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.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Joanne Guth (202-205-3264, <u>Joanne.Guth@usitc.gov</u>).

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	
Fax	

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, 2014 of the following products produced by your firm.
 - <u>Product 1</u>.--PET resin, being either a clear homo- or co-polymer, and having an intrinsic viscosity of 0.72 IV to 0.84 IV, in the solid stated form. This PET resin product is typically used in water bottle applications.
 - <u>Product 2.--PET resin</u>, being either a clear homo- or co-polymer, and having an intrinsic viscosity of 0.72 IV to 0.84 IV, in the solid stated form. This PET resin product is typically used in sheet and strapping.
 - <u>Product 3.--PET resin</u>, being either a clear homo- or co-polymer, and having an intrinsic viscosity of 0.78 IV to 0.86 IV, in the solid stated form. This PET resin product is typically used in carbonated soft drink applications.
 - <u>Product 4.--PET resin</u>, being mainly a co-polymer, and having an intrinsic viscosity of 0.75 IV to 0.86 IV, in the solid stated form. This PET resin product is typically used in heat set or hot fill applications; food, household, and other products.

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

IV-2 (a). During January 2014-June 2017, 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-2(b). Price data.--Report below the quarterly price data for pricing products produced and sold by your firm.

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

			(Quantity in pour					
	Produ	ıct 1	Produ	ıct 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								

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.

NoteIf your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of yo	ur
firm's product. Also, please explain any anomalies in your firm's reported pricing data.	

firm's product. Also, please explain any anomalies in your firm's reported pricing data.
Product 1:
Product 2:
Product 3:
Product 4:

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

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

Is the price data reported above:	√ if Yes
In actual dollars (not \$1,000)?	
In actual pounds (not 1,000 of pounds)?	
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?	

` '	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-3a.		<u>setting.</u> How does your firm determine the prices that it charges for sales of PET resin k all that apply)? If your firm issues price lists, please submit sample pages of a recent list.							
	Transa by transa	,	Contra	р	Set rice ists	Other			If other, describe
IV-3b.	/-3b. Do your firm's contracts set prices based on a comparison to raw material costs or raw material price indexes?								w material costs or raw material
	ı	No		Yes		If yes,	please briefly	des	cribe each pricing mechanism
IV-4.	Discoun apply).	t policy.	Pleas	e indicat	e and	d describe	your firm's di	sco	unt policies (<i>check all that</i>
	Quant discou	ity	Annual total volume iscoun	e disc	No count dicy	Other			Describe
IV-5.	Pricing terms(a) What are your firm's typical sales terms for its U.Sproduced PET resin?								
		Net day		Net 60 days		/10 net 80 days	Other		Other (specify)
]						
	(b)	On what	t basis	are your	firm'	s prices o	f domestic PET	res	sin usually quoted (check one)?
		Delive		F.o.b			., specify poin		,

IV-6. <u>Contract versus spot.</u>--Approximately what share of your firm's sales of its U.S.-produced PET resin in 2016 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

	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 (shoul sum t 100.09	ld o
Share of 2016 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 PET resin (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	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
and, or price	Both			
Meet or release	Yes			
provision	No			
Not applicable				

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 PET resin?

Source	Share of 2016 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9.	Shipping information	

(a)	What is the approximate percentage of the cost of U.Sproduced PET resin 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 PFT resin that are deliver

(c) Indicate the approximate percentage of your firm's sales of PET resin 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 PET resin since January 1, 2014 (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.	
SoutheastAL, 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 PET resin that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by PET resin and other inputs?

	Share of total cost account	Total		
End use product	PET resin	(should sum to 100.0% across)		
Bottled water/soda Excluding liquid contents (e.g., just the bottle)	%	%	0.0 %	
Inclusive of liquid contents (e.g., final			0.0 70	
bottled product)	%	%	0.0 %	
Carpet	%	%	0.0 %	
Roll of PET sheet	%	%	0.0 %	
PET strapping	%	%	0.0 %	
Other:	%	%	0.0 %	

	☐ No	YesPlease fill out t	he tal	ole.	
		End use in which this	На		nanges in the price of this substitute fected the price for PET resin?
Substitute		substitute is used	No	Yes	Explanation
1.					
2.					
3.					

IV-12. **Substitutes.--** Can other products be substituted for PET resin?

IV-13. <u>Demand trends.</u>--Indicate how demand within the United States and outside of the United States (if known) for PET resin has changed since January 1, 2014. Explain any trends and describe the principal factors that have affected these changes in demand.

Marke	et	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United						
Bottler sector						
All other sector	·s					
Outside the Unite						
IV-14.		ng of PET resi	in since Jar	nuary 1, 201	_	ne product range, product mix,
	cond desc	itions) and/o ribe.		nditions of	competition distind	nan general economy-wide ctive to PET resin? If yes,
	cond	itions) and/o ribe.		nditions of		tive to PET resin? If yes,
	cond desc	itions) and/o ribe. hat apply.	ess cycles	nditions of	competition distind	tive to PET resin? If yes,
	cond desc	itions) and/oribe. that apply. No Yes-Busin seasonal I	ess cycles	PI Sk (e.g.	competition distind	tive to PET resin? If yes,
	Check all t	itions) and/oribe. that apply. No Yes-Busin seasonal I Yes-Other conditions	ess cycles obusiness) r distinctive s of compe	PI Sk (e.g. e etition	ease describe.	tive to PET resin? If yes,
	Check all t	itions) and/oribe. that apply. No Yes-Busin seasonal I Yes-Other conditions s, have there	ess cycles obusiness) r distinctive s of compe	PI Sk (e.g. etition changes in t	ease describe.	6.

IV-16. <u>Supply constraints.</u>--Has your firm refused, declined, or been unable to supply PET resin since January 1, 2014 (examples include placing customers on allocation or "controlled order entry,"

declining to accept new customers or renew ex	xisting customers, delivering less than the
quantity promised, being unable to meet time	ly shipment commitments, etc.)?

No	Yes	If yes, please describe.

IV-17. Raw materials.--How have PET resin 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 PET resin.

IV-18. <u>Interchangeability.--</u>Is PET resin 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	Brazil	Indonesia	Korea	Pakistan	Taiwan	Canada	Mexico	Other countries
United States								
Brazil								
Indonesia								
Korea			\times					
Pakistan			\times	\times				
Taiwan			\times	\times	\times			
Canada			\times	\times	\times	\times		
Mexico			\times		\times	\times	\times	

For any country-pair producing PET resin that is *sometimes* or *never* 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 PET resin 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	Brazil	Indonesia	Korea	Pakistan	Taiwan	Canada	Mexico	Other countries
United States								
Brazil								
Indonesia								
Korea			\times					
Pakistan			\times	\times				
Taiwan			\times		\times			
Canada			\times	\times	X	\times		
Mexico			\times		\times	\times	\times	

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of PET resin, 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 PET resin since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of PET resin that each of these customers accounted for in 2016.

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

IV-21. Competition from	om imports
-------------------------	------------

	resin from Brazil, Indonesia, Korea, Pakistan	No	Yes				
	Reduce prices						
	Roll back announced price increases						
(b)	Lost salesSince January 1, 2014: Did your firm lose sales of PET resin to imports of this product from Brazil, Indonesia, Korea, Pakistan, and Taiwan? No Yes						
(c)	be completed only	by NON-					
	If your firm indicated "yes" to any of the above, your firm can provide the Commis with additional information by downloading and completing the lost sales/lost revenues worksheet at http://usitc.gov/trade_remedy/question.htm . 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 work https://dropbox.usitc.gov/oinv/	nit via the Commiss	ion dropbox.				
IV th	Other explanationsIf your firm would like to further explain a response to a question in Part / that did not provide a narrative response box, please note the question number and the xplanation in the space provided below. Please also use this space to highlight any issues your rm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.						

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://usitc.gov/investigations/701731/2017/polyethylene_terephthalate_resin_brazil_indonesia/preliminary.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: PETR

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

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

<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.