U.S. PRODUCERS' QUESTIONNAIRE

POLYTETRAFLOUROETHYLENE RESIN ("PTFE RESIN") FROM CHINA AND INDIA

This questionnaire must be received by the Commission by **April 13, 2018**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 polytetrafluoroethylene resin ("PTFE resin") from China and India (Inv. Nos. 701-TA-588 and 731-TA-1392-1393 (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)).

Name of firm

Address		
City	State Zip Code	
Website		
Has your firm p	oduced PTFE resin (as defined on next page) at any time since January 1, 2015?	
☐ NO	Sign the certification below and promptly return only this page of the questionnaire to the Commission)	
☐ YES	Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)	
- II	nnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the https://dropbox.usitc.gov/oinv/ . (PIN: PTFE)	
	CERTIFICATION	
ans of this certification provided in the commission on the same and endersigned, acknowledged for other processionnel (a) for developiews, and evaluations pendix 3; or (ii) by U.S.	understand that the information submitted is subject to audit and verification by the Commin I also grant consent for the Commission, and its employees and contract personnel, it is questionnaire and throughout this proceeding in any other import-injury proceedings contract or similar merchandise. We or similar merchandise. We disclosed to and used: (i) by the Commission, its employees and Offices, and or maintaining the records of this or a related proceeding, or (b) in internal investigation relating to the programs, personnel, and operations of the Commission including under government employees and contract personnel, solely for cybersecurity purposes. I understand appropriate nondisclosure agreements	to use the nducted by aghout this decentrace on the contrace on the contrace on the contrace of the contract o
me of Authorized Offici	Title of Authorized Official Date	
	Phone:	
nature	Email address	

PART I.—GENERAL INFORMATION

<u>Background</u>.--This proceeding was instituted in response to petitions filed on September 28, 2017, by The Chemours Company FC LLC, Wilmington, Delaware. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://usitc.gov/investigations/701731/2018/polytetrafluoroethylene_ptfe_resin_china_and_india/fina_l.htm.

<u>PTFE resin</u> covered by these investigations is polytetrafluoroethylene (PTFE) resin, including but not limited to granular, dispersion, or coagulated dispersion (also known as fine powder). PTFE is covered by the scope of this investigation whether filled or unfilled, whether or not modified, and whether or not containing co-polymer additives, pigments, or other materials. Also included is PTFE wet raw polymer. The chemical formula for PTFE is C2F4, and the Chemical Abstracts Service Registry number is 9002-84-0.

PTFE further processed into micropowder, having particle size typically ranging from 1 to 25 microns, and a melt-flow rate no less than 0.1 gram/10 minutes, is excluded from the scope of this investigation.

PTFE is classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheadings 3904.61.0010 and 3904.61.0090. Subject merchandise may also be classified under HTSUS subheading 3904.69.5000. Although the HTSUS subheadings and CAS Number are provided 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.

Confidentiality.--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.

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.	TAA information releaseIn 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?

Vac		NιΛ

I-2a. <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.

"Establishment"--Each facility of a firm involved in the production of PTFE resin.

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional disc	ussion on establishments con	solidated in this questic	onnaire:

I-2b. <u>Auxiliary facilities covered</u>.--Provide the city, state, zip code, and brief description of each auxiliary facility covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table.

"<u>Auxiliary facility</u>"--Each facility of a firm involved in the <u>compounding or processing</u> operations of PTFE resin that is operated in conjunction with the establishments listed in question I-2a.

Auxiliary facility covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discus	ssion on auxiliary facility cor	nsolidated in this questi	onnaire:

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

Country	Support	Oppose	Take no position
China (AD)			
India (AD)			
India (CVD)			

		y any other firm?
□ No □ Ye	sList the following information	
Firm name	Address	Extent of ownership (percent)
foreign, that are engage that are engaged in ex	·	
Firm name	Country	Affiliation
engaged in the produc		
engaged in the produc	tion of PTFE resin?	irms, either domestic or foreign, that . Affiliation
engaged in the produc	tion of PTFE resin? sList the following information	
engaged in the produc	tion of PTFE resin? sList the following information	
engaged in the produc	tion of PTFE resin? sList the following information	
engaged in the produc	tion of PTFE resin? sList the following information	
engaged in the produc	tion of PTFE resin? sList the following information	

Title Email Telephone

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Robert Casanova (202-708-2719, robert.casanova@usitc.gov). Supply all data requested on a calendar-year basis.

II-1.	Contact inform	ation Please identify the responsible	individual and the manner by which
	Commission sta in part II.	iff may contact that individual regardi	ng the confidential information submitted
	Name		

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 PTFE resin since January 1, 2015. (Please specify whether these changes relate to granular PTFE, fine powder PTFE, or dispersion PTFE).

(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	
	ceased manufacturing certain in-scope products	
	revised labor agreements	
	other (e.g., technology)	

II-3a. **Production using same machinery.**—

No	Yes	If yes Please explain
	-	firm produce granular PTFE resin on the same equipment and machinery or PTFE resin?
No	Yes	If yes Please explain
	-	firm produce granular PTFE resin on the same equipment and machinery PTFE resin?
No	Yes	If yes Please explain
	-	firm produce dispersion PTFE on the same equipment and machinery as FE resin ?
	-	
po	owder PT	
No	Yes	FE resin ?
No Operating per week,	Yes parame w calculatio	If yes Please explain tersThe production capacity reported in II-3a is based on operating
No Operating per week,	Yes parame w calculatio	If yes Please explain tersThe production capacity reported in II-3a is based on operatingeeks per year. nPlease describe the methodology used to calculate overall production

II-3e.	Product shifting.—		
	(i)	•	able to switch production (capacity) amongst granular PTFE resin, fine powder dispersion PTFE resin, and other products using the same equipment and/or
		☐ No	Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
	(ii)	between pro	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which s enhance or constrain such shifts.
	(iii)	-	rm operate integrated facilities that manufacture TFE that is used in the of PTFE resin and other products such as ETFE, FEP, and PFA?
	No	Yes	If yes—Please list the products that you firm manufactures using internally produced TFE. Also please indicate whether shifting production among TFE and other products in response to changing market conditions is your firm's normal business practice.
II-4. TollingSince January 1, 2015, has y production of any type of PTFE resin			ary 1, 2015, has your firm been involved in a toll agreement regarding the upe of PTFE resin?
	materia	ls and the se	agreement between two firms whereby the first firm furnishes the raw econd firm uses the raw materials to produce a product that it then returns 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
II⁻J.	IUICIEII	uaue	2011C3

(a) <u>Firm's FTZ operations</u>.--Does your firm produce PTFE resin in and/or admit PTFE 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 PTFE resin into a foreign trade zone (FTZ) for use in distribution of PTFE resin and/or the production of downstream articles?

No	Yes	If yesIdentify the firms and the FTZs.

II-6. <u>Importer</u>.--Since January 1, 2015, has your firm imported PTFE 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. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of PTFE 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. <u>Production, shipment, and inventory data (granular PTFE resin).</u>--Report your firm's production capacity, production, shipments, and inventories related to the production of <u>granular PTFE resin</u> in its U.S. establishment(s) during the specified periods

GRANULAR PTFE RESIN

Quantity (in 1,00	0 pounds in dry weig	ght) and value (in \$1,000)	
, , ,	Calendar years		
ltem	2015	2016	2017
Average production capacity ¹ (quantity) (A)			
Beginning-of-period inventories (<i>quantity</i>) (B)			
Production (quantity) (C)			
U.S. shipments: Commercial shipments: Quantity (D)			
Value (E)			
Internal consumption: ² Quantity (F)			
Value² (G)			
Transfers to related firms: ² Quantity (H)			
Value² (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 relate different basis for valuing these transactions, p the data above at fair market value). ³ Identify your firm's principal export market	capacity, and explair ted firms must be va llease specify that ba	n any changes in reported c lued at fair market value. C	apacity Does your firm use a

<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		
Reconciliation	2015	2016	2017
B + C - D - F - H - J - L = should equal zero			
("0") or provide an explanation. ¹	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 (granular PTFE resin)</u>.--Report your firm's U.S. shipments of granular <u>PTFE resin</u> by channel of distribution.

GRANULAR PTFE RESIN

Quantity (in 1,000 pounds in dry weight)				
	Calendar years			
ltem	2015	2016	2017	
Channels of distribution:				
U.S. shipments:				
To distributors (M)				
To fillers/further processors (N)				
To end users (O)				

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

	Calendar years		
Reconciliation	2015	2016	2017
M + N + O - D - F - H = zero ("0"), if			
not revise.	0	0	0

II-9. <u>U.S. shipments by grade (granular PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of granular PTFE resin by grade.

GRANULAR PTFE RESIN

<u>Commodity grade</u>.--PTFE resin that does not require any qualifications for the processor or downstream customer.

<u>Specialty grade.</u>--PTFE resin that necessarily requires qualification for the processor or downstream product.

Quantity (in 1,000 pounds in dry weight) and value (in \$1,000)			
	Calendar years		
Item	2015	2016	2017
U.S. shipments Commodity grade:			
Quantity (P)			
Value (Q)			
Specialty grade ¹ : Quantity (R)			
Value (S)			

¹ Please describe the products reported as "specialty grade" and outline the qualifications required for these products:

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

	Calendar years		
Reconciliation	2015	2016	2017
Quantity: $P + R - D - F - H = zero$ ("0"), if not revise.	0	0	0
Value: $Q + S - E - G - I = zero$ ("0"), if not revise.	0	0	0

II-10. <u>U.S. shipments by type (granular PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of <u>granular PTFE resin</u> by type in 2017.

Modified.--Granular PTFE that is produced by adding a co-monomer.

<u>Reactor bead.</u>--Unmodified granular PTFE resin that has a much lower value than finished products.

Fine cut.--Unmodified PTFE that is processed by compression molding.

<u>Free flow.</u>--Unmodified PTFE that is processed by automatic compression molding.

Presintered.--Unmodified PTFE that is processed by ram extrusion.

GRANULAR PTFE RESIN

Quantity (in 1,000 pounds in dry weight)			
Item Calendar year 201			
U.S. shipments Modified (T)			
Unmodified: Reactor bead (U)			
Fine cut (V)			
Free flow (W)			
Presintered (X)			
Other forms ¹ (Y)			
¹ Identify the other form(s):			

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines T, U, V, W, X, and Y) in 2017 equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in 2017. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior Jo submission to the Commission.

Reconciliation	Calendar year 2017
T + U + V + W + X + Y - D - F - H = zero ("0"), if not revise.	0

II-11. <u>Employment data (granular PTFE resin)</u>.--Report your firm's employment-related data related to the production of <u>granular PTFE resin</u> 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.

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

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

GRANULAR PTFE RESIN

	Calendar years		
Item	2015	2016	2017
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

Explanation of trends:	

II-12. <u>Production, shipment, and inventory data (fine powder PTFE resin).--</u>Report your firm's production capacity, production, shipments, and inventories related to the production of <u>fine powder PTFE resin</u> in its U.S. establishment(s) during the specified periods

FINE POWDER PTFE RESIN

Quantity (in 1,00	00 pounds in dry weig	ht) and value (in \$1,000)		
	Calendar years			
ltem	2015	2016	2017	
Average production capacity ¹ (quantity) (A)				
Beginning-of-period inventories (<i>quantity</i>) (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)				
Value² (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 reladifferent basis for valuing these transactions, p the data above at fair market value). ³ Identify your firm's principal export market	capacity, and explain ted firms must be val llease specify that ba	any changes in reported o ued at fair market value. I	capacity Does your firm use a	

<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			
Reconciliation	2015	2016	2017	
B + C - D - F - H - J - L = should equal zero				
("0") or provide an explanation. ¹	0	0	0	
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:				

II-13. Channels of distribution (fine powder PTFE resin).--Report your firm's commercial U.S. shipments of fine powder PTFE resin by channel of distribution.

FINE POWDER PTFE RESIN

Quantity (in 1,000 pounds in dry weight)				
	Calendar years			
ltem	2015	2016	2017	
Channels of distribution:				
U.S. shipments:				
To distributors (M)				
To fillers/further processors (N)				
To end users (O)				

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

II-14. <u>U.S. shipments by grade (fine powder PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of <u>fine powder PTFE resin</u> by grade.

FINE POWDER PTFE RESIN

<u>Commodity grade</u>.--PTFE resin that does not require any qualifications for the processor or downstream customer.

<u>Specialty grade.</u>--PTFE resin that necessarily requires qualification for the processor or downstream product.

Quantity (in 1,000 pounds in dry weight) and value (in \$1,000)			
	Calendar years		
Item	2015	2016	2017
U.S. shipments Commodity grade: Quantity (P)			
Value (Q)			
Specialty grade ¹ : Quantity (R)			
Value (S)			

¹ Please describe the products reported as "specialty grade" and outline the qualifications required for these products:

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

	Calendar years			
Reconciliation	2015	2016	2017	
Quantity: $P + R - D - F - H = zero$ ("0"), if not revise.	0	0	0	
Value: $Q + S - E - G - I = zero$ ("0"), if not revise.	0	0	0	

II-15. <u>U.S. shipments by type (fine powder PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of <u>fine powder PTFE resin</u> by type in 2017.

Modified.--Fine powder PTFE resin produced by adding a co-monomer.

Broad specification.--Fine powder PTFE resin that does not fit into one of the other categories.

<u>Ultra-high molecular weight.</u>--Fine powder PTFE resin with SSG (standard specific gravity) of less than 2.165 (with no modifier).

FINE POWDER PTFE RESIN

Quantity (in 1,000 pounds in dry weight)		
Item	Calendar year 2017	
U.S. shipments Modified (T)		
Ultra-high molecular weight (U)		
Broad specification (V)		
Other forms ¹ (W)		
¹ Identify the other form(s):		

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines T, U, V, and W) in 2017 equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in 2017. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior Jo submission to the Commission.

Reconciliation	Calendar year 2017
T + U + V + W - D - F - H = zero ("0"), if not revise.	0

II-16. <u>Employment data (fine powder PTFE resin)</u>.--Report your firm's employment-related data related to the production of <u>fine powder PTFE resin</u> 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.

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

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

FINE POWDER PTFE RESIN

	Calendar years		
Item	2015	2016	2017
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

Explanation of trends:		

II-17. <u>Production, shipment, and inventory data (dispersion PTFE resin).</u>— Report your firm's production capacity, production, shipments, and inventories related to the production of <u>dispersion PTFE resin</u> in its U.S. establishment(s) during the specified periods

DISPERSION PTFE RESIN

Quantity (in 1,00	00 pounds in dry weig	ht) and value (<i>in \$1,000</i>)	
	Calendar years		
Item	2015	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)			
Value² (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 different basis for valuing these transactions, p the data above at fair market value). ³ Identify your firm's principal export market	capacity, and explain ted firms must be valu lease specify that bas	any changes in reported ca led at fair market value. D	apacity Does your firm use a

<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			
Reconciliation	2015	2016	2017	
B + C - D - F - H - J - L= should equal zero				
("0") or provide an explanation. ¹	0	0	0	
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:				

II-18. <u>Channels of distribution (dispersion PTFE resin)</u>.--Report your firm's commercial U.S. shipments of <u>dispersion PTFE resin</u> by channel of distribution.

DISPERSION PTFE RESIN

Quantity (in 1,000 pounds in dry weight)				
	Calendar years			
Item	2015	2016	2017	
Channels of distribution:				
U.S. shipments:				
To distributors (M)				
To fillers/further processors (N)				
To end users (O)				

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

		Calendar years	
Reconciliation	2015	2016	2017
M + N + O - D - F - H = zero ("0"), if			
not revise.	0	0	0

II-19. <u>U.S. shipments by grade (dispersion PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of <u>dispersion PTFE resin</u> by grade.

DISPERSION PTFE RESIN

<u>Commodity grade</u>.--PTFE resin that does not require any qualifications for the processor or downstream customer.

<u>Specialty grade</u>.--PTFE resin that necessarily requires qualification for the processor or downstream product.

2015	Calendar years	
2015	2212	
	2016	2017
		Ity grade" and outline the qualifications require

¹ Please describe the products reported as "specialty grade" and outline the qualifications required for these products:

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

		Calendar years	
Reconciliation	2015	2016	2017
Quantity: $P + R - D - F - H = zero$ ("0"), if not revise.	0	0	0
Value: $Q + S - E - G - I = zero$ ("0"), if not revise.	0	0	0

II-20. <u>U.S. shipments by type (dispersion PTFE resin).</u> -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of <u>dispersion PTFE resin</u> by type.

Modified. -- Dispersion PTFE resin produced by adding a co-monomer .

Unmodified.--Dispersion PTFE resin that does include a co-monomer additive

DISPERSION PTFE RESIN

Quantity (in 1,000 pounds in dry weight)			
Item	Calendar year 2017		
U.S. shipments Modified (T)			
Unmodified (U)			
Other forms ¹ (V)			
¹ Identify the other form(s):			

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines T, U, and V) in 2017 equal the quantity reported for U.S. shipments (i.e., lines 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 Jo submission to the Commission.

Reconciliation	Calendar year 2017
T + U + V - D - F - H = zero ("0"), if not	
revise.	0

Explanation of trends:

II-21. <u>Employment data (dispersion PTFE resin)</u>.--Report your firm's employment-related data related to the production of <u>dispersion PTFE resin</u> 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.

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

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

DISPERSION PTFE RESIN

	Calendar years		
Item	2015	2016	2017
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

II-22.	Related firms.—If your firm reported transfers to related firms in question II-7, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a nonmarket formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.
--------	--

All other sources

Purchases from domestic

Purchases from other

producers²

sources²

I-23.	<u>Purchases (granular P</u> granular PTFE resin sir		irect imports, has your f	firm otherwise purchased	
	"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product. "Direct import" – A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.				
No ☐ YesReport such purchases below and explain the reasons for your purchases:				reasons for your firms'	
		GRANULAR P	TFE RESIN		
		(Quantity in 1,000 pour	nds in dry weight)		
			Calendar years		
	Item	2015	2016	2017	
India	l				

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-24.	<u>Purchases (fine powder PTFE resin)</u> Other than direct imports, has your firm otherwise purchased <u>fine powder PTFE resin</u> since January 1, 2015?				
"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.					
	"Direct import" –A tra record or consignee.	**Direct import" –A transaction to buy from a foreign supplier where your firm is the importer of ecord or consignee.			
No YesReport such purchases below and explain the reasons for your firm purchases:				easons for your firms'	
	F	INE POWDER I	PTFE RESIN		
		(Quantity in 1,000 pound	ds in dry weight)		
		_	Calendar years		
	Item	2015	2016	2017	
impor	ases from U.S. ters ¹ of fine powder esin from—				
Indi	a				
All c	other sources				
Purcha produ	ases from domestic cers ²				
Purcha	ases from other				
supplie	rs differ by source, please	mporter(s) from which your fidentify the source for each producer(s) or U.S. distributo	listed supplier:		

II-25.	Purchases (dispersion PTFE resin)Other than direct imports, has your firm otherwise purchased dispersion PTFE resin since January 1, 2015? "Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.							
	"Direct import" –A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.							
	□ No □ Yes	No YesReport such purchases below and explain the reasons for your firms' purchases:						
	1	DISPERSION F	PTFE RESIN					
		(Quantity in 1,000 pour	nds in dry weight)					
		2015	Calendar years 2016					
impo	rases from U.S. rters¹ of dispersion resin from— na							
Ind	ia							
All	other sources							
Purch produ	ases from domestic ucers ²							
sourc								
suppli	ers differ by source, please	identify the source for eac	r firm purchased this product h listed supplier: or(s) from which your firm p					
II-26.	that did not provide a the space provided bel	narrative box, please not ow. Please also use this	further explain a respons te the question number a space to highlight any iss not limited to technical is	nd the explanation in ues your firm had in				

PART III.--FINANCIAL INFORMATION

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

Name		
Title		
Email		
Teleph	one	
Accou	nting sy	stemBriefly describe your firm's financial accounting system.
	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) for which financial statements are prepared that include PTFE resin:
	2.	Does your firm prepare profit/loss statements for PTFE resin: Yes No
	3.4.	How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below. Audited, unaudited, annual reports, 10Ks, 10 Qs, 10 Qs, 10 Monthly, quarterly, semi-annually, annually Accounting basis: GAAP, cash, tax, or other comprehensi
	used in regardi submit profit-a specific	basis of accounting (specify) As requested in Part I of this questionnaire, please keep all supporting documents/record the preparation of the financial data, as Commission staff may contact your firm ing questions on the financial data. The Commission may also request that your compart copies of the supporting documents/records (financial statements, including internal and-loss statements for the division or product group that includes PTFE resin, as well as a statements and worksheets) used to compile these data.
		ng systemBriefly describe your firm's cost accounting system (e.g., standard cost, etc.).

III-5. **Product listing**.--Please list the products your firm produced in the facilities in which your firm produced PTFE resin, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Share of sales
%
%
%
%
%
%
%

111-6.	production of PTFE resin from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?				
	YesContinue to question III-7.	NoContinue to question III-9a.			

- III-7. Inputs from related suppliers.--Please identify the inputs used in the production of PTFE resin that your firm purchases from related suppliers and that are reflected in questions III-9a (financial results on Granular PTFE resin), III-9c (financial results on Fine Powder PTFE resin), and III-9e (financial results on Dispersion PTFE resin). 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.
 - a. Granular PTFE resin (corresponding to COGS reported in III-9a)

Input	Related supplier	Share of total COGS
Input valuation as recorded in	n the firm's accounting books and recor	ds

b. Fine Powder PTFE resin (corresponding to	COGS reported in III-9c)
-----------------------------	------------------	--------------------------

	Related supplier	Share of total COGS			
Input valuation as rec	orded in the firm's accounting books	and records			
c Disnersion PTFF resin	(corresponding to COGS reported in II	II-9 ₀)			
c. Dispersion i in E resin	(corresponding to cods reported in in	11 30)			
Input	Related supplier	Share of total COGS			
•					
Input valuation as rec	orded in the firm's accounting books	and records			
	related suppliersPlease confirm tha	·			
related suppliers, as identified in III-7, were reported in questions III-9a (financial results on					
	Granular PTFE resin), III-9c (financial results on Fine Powder PTFE resin), and III-9e (financial				
results on Dispersion P1	FE resin) in a manner consistent with				
results on Dispersion P1					
results on Dispersion PT records.					
· · · · · · · · · · · · · · · · · · ·					
results on Dispersion PT records.					
results on Dispersion PT records.		your firm's accounting books ar			
results on Dispersion PT records. Yes NoIn the space bel	FE resin) in a manner consistent with	your firm's accounting books ar of inputs purchased from relate			
results on Dispersion PT records. Yes NoIn the space bel	FE resin) in a manner consistent with one of the resin ow, please report the valuation basis of	your firm's accounting books ar of inputs purchased from relate			
results on Dispersion PT records. Yes NoIn the space bel	FE resin) in a manner consistent with one of the resin ow, please report the valuation basis of	your firm's accounting books an of inputs purchased from relate			

III-9a. Operations on Granular PTFE resin.--Report the revenue and related cost information requested below on the Granular PTFE 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 suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact David Boyland at (202) 708-4725 before completing this section of the questionnaire.

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

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.

² 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 <u>costs associated with CS, IC, and Transfers.</u>

III-9b. Granular PTFE resin other factory costs.--For the total other factory costs reported in table III-9a, please individually identify primary cost/expense categories, representing 8 percent or more of total other factory costs, and miscellaneous category, representing remaining total other factory costs. The annual period sum should equal the corresponding total other factory costs reported in table III-9a.

	Fiscal years ended		
	2015	2016	2017
Other factory costs: In this column please name each primary cost/expense category which represents 8 percent or more of total other factory costs. The row designated "miscellaneous" applies to remaining other factory costs/expenses, not previously identified as a primary cost/expense. Depending on how primary costs/expenses are classified, not all rows may be needed.		Value (\$1,000)	
Primary other factory costs category 1.			
Primary other factory costs category 2.			
Primary other factory costs category 3.			
Primary other factory costs category 4.			
Primary other factory costs category 5.			
Primary other factory costs category 6.			
Primary other factory costs category 7.			
Primary other factory costs category 8.			
Primary other factory costs category 9.			
Primary other factory costs category 10.			
Miscellaneous other factory costs.			
Total (should equal total other factory costs reported in III-9a)			

In the space provide below, please describe the costs/expenses included in each identified primary category, as well as the costs/expenses which are included in the miscellaneous category. Please describe the extent to which identified costs/expenses changed notably during the period examined.

Primary other factory costs category 1.
Primary other factory costs category 2.
Primary other factory costs category 3.
Primary other factory costs category 4.
Primary other factory costs category 5.
Primary other factory costs category 6.
Primary other factory costs category 7.
Primary other factory costs category 8.
Primary other factory costs category 9.
Primary other factory costs category 10.
Miscellaneous other factory costs.

III-9c. Operations on Fine Powder PTFE resin. -- Report the revenue and related cost information requested below on the Fine Powder PTFE 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 suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact David Boyland at (202) 708-4725 before completing this section of the questionnaire.

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

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.

² 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 <u>costs associated with CS, IC, and Transfers.</u>

III-9d. <u>Fine Powder PTFE resin other factory costs</u>.--For the total other factory costs reported in table III-9c, please individually identify primary cost/expense categories, representing 8 percent or more of total other factory costs, and miscellaneous category, representing remaining total other factory costs. The annual period sum should equal the corresponding total other factory costs reported in table III-9c.

	Fiscal years ended		
	2015	2016	2017
Other factory costs: In this column please name each primary cost/expense category which represents 8 percent or more of total other factory costs. The row designated "miscellaneous" applies to remaining other factory costs/expenses, not previously identified as a primary cost/expense. Depending on how primary costs/expenses are classified, not all rows may be needed.		Value (\$1,000)	
Primary other factory costs category 1.			
Primary other factory costs category 2.			
Primary other factory costs category 3.			
Primary other factory costs category 4.			
Primary other factory costs category 5.			
Primary other factory costs category 6.			
Primary other factory costs category 7.			
Primary other factory costs category 8.			
Primary other factory costs category 9.			
Primary other factory costs category 10.			
Miscellaneous other factory costs.			
Total (should equal total other factory costs reported in III-9c)			

In the space provide below, please describe the costs/expenses included in each identified primary category, as well as the costs/expenses which are included in the miscellaneous category. Please describe the extent to which identified costs/expenses changed notably during the period examined.

III-9e. Operations on Dispersion PTFE resin.--Report the revenue and related cost information requested below on the Dispersion PTFE 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 suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact David Boyland at (202) 708-4725 before completing this section of the questionnaire.

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

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.

² 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 <u>costs associated with CS, IC, and Transfers.</u>

U.S. Producers' Questionnaire - PTFE Resin

III-9f. <u>Dispersion PTFE resin other factory costs</u>.--For the total other factory costs reported in table III-9e, please individually identify primary cost/expense categories, representing 8 percent or more of total other factory costs, and miscellaneous category, representing remaining total other factory costs. The annual period sum should equal the corresponding total other factory costs reported in table III-9e.

	Fiscal years ended		
	2015	2016	2017
Other factory costs: In this column please name each primary cost/expense category which represents 8 percent or more of total other factory costs. The row designated "miscellaneous" applies to remaining other factory costs/expenses, not previously identified as a primary cost/expense. Depending on how primary costs/expenses are classified, not all rows may be needed.		Value (\$1,000)	
Primary other factory costs category 1.			
Primary other factory costs category 2.			
Primary other factory costs category 3.			
Primary other factory costs category 4.			
Primary other factory costs category 5.			
Primary other factory costs category 6.			
Primary other factory costs category 7.			
Primary other factory costs category 8.			
Primary other factory costs category 9.			
Primary other factory costs category 10.			
Miscellaneous other factory costs.			
Total (should equal total other factory costs reported in III-9e)			

In the space provide below, please describe the costs/expenses included in each identified primary category, as well as the costs/expenses which are included in the miscellaneous category. Please describe the extent to which identified costs/expenses changed notably during the period examined.

Primary other factory costs category 1.
Primary other factory costs category 2.
Primary other factory costs category 3.
Primary other factory costs category 4.
Primary other factory costs category 5.
Primary other factory costs category 6.
Primary other factory costs category 7.
Primary other factory costs category 8.
Primary other factory costs category 9.
Primary other factory costs category 10.
Miscellaneous other factory costs.

III-9g.	(i.e., total income (calculate	data reconciliationThe calculable line items from questions III-9a, III-9c, and III-9e I net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net or loss)) have been calculated from the data submitted in the other line items. Do the d fields return the correct data according to your firm's financial records ignoring non-differences that may arise due to rounding?
	Yes	NoIf the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.
		Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negativeinstances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive, expenses or reversals are negative).
		If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-10a. Nonrecurring items (charges and gains) included in Granular PTFE resin financial results.--For each annual period for which financial results are reported in question III-9a, please specify all 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 report the allocated value amount in question III-9a in the schedule below. Note: The Commission's objective here is to gather information only on significant nonrecurring items which impacted financial results reported in question III-9a.

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

III-10b. Nonrecurring items (charges and gains) included in Fine Powder PTFE resin financial results.—For each annual period for which financial results are reported in question III-9c, please specify all significant nonrecurring items (charges and gains) in the schedule below, the specific question III-9c 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-9c; i.e., if an aggregate nonrecurring item has been allocated to question III-9c, only report the allocated value amount in question III-9c in the schedule below. Note: The Commission's objective here is to gather information only on significant nonrecurring items which impacted financial results reported in question III-9c.

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

III-10c. Nonrecurring items (charges and gains) included in Dispersion PTFE resin financial results.—
For each annual period for which financial results are reported in question III-9e, please specify all significant nonrecurring items (charges and gains) in the schedule below, the specific question III-9e 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-9e; i.e., if an aggregate nonrecurring item has been allocated to question III-9e, only report the allocated value amount in question III-9e in the schedule below. Note: The Commission's objective here is to gather information only on significant nonrecurring items which impacted financial results reported in question III-9e.

	Fiscal years ended		
	2015	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-9e where the nonrecurring item is	Nonrecurring item: In these columns, please report the amount of the relevant nonrecurring item reported in question III-9e.		
classified.	Value (<i>\$1,000</i>)		
1. , classified as			
2. , classified as			
3. , classified as			
4. , classified as			
5. , classified as			
6. , classified as			
7. , classified as			

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

III-12.	<u>Asset values</u> Report the <u>total</u> assets (i.e., both current and long-term assets) associated with
	the production, warehousing, and sale of the specified PTFE resin categories. If your firm does
	not maintain some or all of the specific asset information necessary to calculate total assets for
	the specified PTFE resin categories 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 questions III-9a, III-9c, and III-9e. Assets that are common to each
	PTFE resin category should also be allocated in a manner that is consistent with cost allocations
	in III-9a, III-9c, and III-9e. 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. In note 1 to each table, 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.

a. Granular PTFE resin

Value (<i>in \$1,000</i>)				
	Fiscal years ended			
Item	2015	2016	2017	
Total assets (net) ¹				
Describe				

b. Fine Powder PTFE resin

Value (<i>in \$1,000</i>)				
Fiscal years ended				
Item	2015 2016 2017			
Total assets (net) ¹				
Describe				

c. Dispersion PTFE resin

Value (<i>in \$1,000</i>)				
	Fiscal years ended			
ltem	2015 2016 2017			
Total assets (net) 1				
Describe				

III-13. Capital expenditures and research and development expenses.--Report your firm's capital expenditures and research and development expenses for the PTFE resin categories identified below. Provide data for your firm's three most recently completed fiscal years. With respect to capital expenditures and research and development expenses that are common to all PTFE categories, please allocate to specified product category using a method (such as production, sales, or costs) that is consistent with relevant cost allocations in questions III-9a, III-9c, and III-9e.

a. Granular PTFE resin

Value (<i>in \$1,000</i>)			
	Fiscal years ended		
ltem	2015	2016	2017
Capital expenditures ¹			
Research and development expenses ²			
¹ Please describe the nature, focus, and significance of your firm's capital expenditures related to granular PTFE resin ² Please describe the nature, focus, and significance of your firm's R&D expenses related to granular PTFE resin.			

b. Fine Powder PTFE resin

Value (in \$1,000)					
	Fiscal years ended				
Item	2015	2016	2017		
Capital expenditures ¹					
Research and development expenses ²					
1 Diagon describe the nature, focus, and significance of your firm's capital expenditures related to fine newdor					

¹ Please describe the nature, focus, and significance of your firm's capital expenditures related to fine powder PTFE resin.

c. Dispersion PTFE resin

Value (<i>in \$1,000</i>)				
Fiscal years ended				
Item	2015	2016	2017	
Capital expenditures ¹				
Research and development expenses ²				

¹ Please describe the nature, focus, and significance of your firm's capital expenditures related to dispersion PTFE resin. _____

² Please describe the nature, focus, and significance of your firm's R&D expenses related to fine powder PTFE resin. _____

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

III-14.	Data consistency and reconciliationPlease indicate whether your firm's financial data for					
	questions III-9a, III-9c, III-9e, III-12, and III-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, III-9c, III-9e should reconcile with the corresponding data reported in question II-7, II-12, II-17 (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.

a. Granular PTFE resin

	Full year data				
Reconciliation	2015	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		
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		

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

Y	es	No	If no, please explain.

b. Fine Powder PTFE resin

		Full year data	
Reconciliation	2015	2016	2017
Quantity: Trade data from question II-12 (lines D, F, H, and J) less financial total net sales quantity data from question III-9c, = zero ("0").	0	0	0
Value: Trade data from question II- 12 (lines E, G, I, and K) less financial total net sales value data from question III-9c, = zero ("0").	0	0	0

Do these data in question III-9c reconcile with data in question II-12?					
Yes	No	If no, please explain.			

c. Dispersion PTFE resin

	Full year data				
Reconciliation	2015	2016	2017		
Quantity: Trade data from question II-17 (lines D, F, H, and J) less financial total net sales quantity data from question III-9e, = zero ("0").	0	0	0		
Value: Trade data from question II- 17 (lines E, G, I, and K) less financial total net sales value data from question III-9e, = zero ("0").	0	0	0		

Do these data in question III-9e reconcile with data in question II-17?

,	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 or type of PTFE (granular, fine powder, or dispersion), please describe these differences and, as applicable, indicate which country or countries or which products or products your response refers to in the relevant form fields.

III-15.	negativ imports	s of imports on investmentSince January 1, 2016, has your firm experienced any actual we effects on its return on investment or the scale of capital investments as a result of its of PTFE resin from China and India? Specify whether these negative effects relate to ar, fine powder, or dispersion PTFE.				
	☐ 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			

U.S. Pro	baucers	Que	stionnai	re – PIFE Kesin	Page 45
III-16.	Effects of imports on growth and development.—Since January 1, 2016, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more ac version of the product) as a result of imports of PTFE resin from China and India? Specify whether these negative effects relate to granular, fine powder, or dispersion PTFE.				
	☐ No			YesMy firm has experi	enced actual negative effects as follows:
		(cl	heck as i	many as appropriate)	(please describe)
			Rejecti	on of bank loans	
			Loweri	ng of credit rating	
				m related to the issue ks or bonds	
			Ability	to service debt	
			Other		
III-17.	Anticipated effects of importsDoes your firm anticipate any negative effects due to imports of PTFE resin from China and India? Specify whether these anticipated negative effects relate to granular, fine powder, or dispersion PTFE.				
	No		Yes	If yes, my firm anticip	ates 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 Emily Burke (202-205-3191, <u>Emily.Burke@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	

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, 2015 of the following products produced by your firm.
 - <u>Product 1</u>.-- Commodity grade granular PTFE resin, fine cut, bulk density 400-500g/L, 25-40um average particle size, not modified, not filled, in packages of 25kg or greater.
 - **Product 2.--** Commodity grade granular PTFE resin, free flowing, bulk density 500-850g/L, 290-700um average particle size, not modified, not filled, in packages of 25kg or greater.
 - **Product 3.--** Commodity grade PTFE fine powder resin, not modified, in packages of 25kg or greater.
 - **<u>Product 4.--</u>** Commodity grade PTFE fine powder resin, modified, in packages of 25kg or greater.
 - <u>Product 5.--</u> Commodity grade PTFE dispersion, general purpose, 50-65% solid content, packaged in drums or totes of 50 gallons or greater.

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

IV-2 (a). During January 2015-December 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 tables as appropriate.
NoSkip to question IV-3.

U.S. Producers' Questionnaire - PTFE Resin

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 in dry weight* and *actual dollars* (not 1,000s).

	Produ	ct 1	Produ	ct 2	Produ	Product 3	
Period of shipment	Quantity (pounds in dry weight)	Value (dollars)	Quantity (pounds in dry weight)	Value (<i>dollars</i>)	Quantity (pounds in dry weight)	Value (dollars)	
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							
October-December							

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 IV.

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:

IV-2(b). <u>Price data (Continued)</u>.--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

nds in dry	Value	Quantity	
eight)	(dollars)	(pounds in dry weight)	Value (<i>dollars</i>)

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.

NoteIf 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.

Ρ	ro	d	uc	t	4	•
Ρ	ro	a١	uc	τ	4	١

Product 5:

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

U.S. Producers' Questionnaire - PTFE Resin

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

Is	the price data reported above:	√ if Yes			
	Value data in actual dollars (<i>not</i> \$1,000)				
	Quantity data in actual pounds dry weight (not 1,000 pounds dry weight)?				
	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 – II-8 in each year?				

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.

If your responses to any of the questions in part IV differ by type of PTEF (granular, fine powder, or dispersion), please describe those differences in the most appropriate narrative field provided.

IV-3. <u>Price setting.</u>—How does your firm determine the prices that it charges for sales of PTFE resin (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

IV-4. **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

- IV-5. Pricing terms.--
 - (a) What are your firm's typical sales terms for its U.S.-produced PTFE resin?

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

(b) On what basis are your firm's prices of domestic PTFE resin usually quoted (check one)?

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

IV-6. Contract versus spot.--Approximately what share of your firm's sales of its U.S.-produced PTFE resin in 2017 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales 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 (shoul sum t 100.0%	ld o	
Share of 2017 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 PTFE 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	rice renegotiation Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
ana, 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 PTFE resin?

Source	Share of 2017 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

U.S. Producers' Questionnaire – PTFE Resin

IV-9. Shipping information.	-9. Shipping in	formation
-----------------------------	-----------------	-----------

(a)	What is the approximate percentage of the cost of U.Sproduced PTFE 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 PTFE 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 PTFE resin since January 1, 2015 (check all that apply)?

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

IV-11. End uses.

(a) List the end uses of the *granular* PTFE resin that your firm manufactures. For each enduse product, what percentage of the <u>total cost</u> is accounted for by *granular* PTFE resin and other inputs?

	Share of total cost in each of the product(s) accounted for by			Total (should	
Product(s) using granular					sum to 100.0%
PTFE resin	PTFE resin		Other inputs		across)
	%	+	%	=	0.0 %
	%	+	%	II	0.0 %
	%	+	%	Ш	0.0 %

(b) List the end uses of the *fine powder* PTFE resin that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by *fine powder* PTFE resin and other inputs?

	Share of total cost in each of the product(s) accounted for by			Total (should	
Product(s) using fine					sum to 100.0%
powder PTFE resin	PTFE resin		Other inputs		across)
	%	+	%	II	0.0 %
	%	+	%	Ш	0.0 %
	%	+	%	=	0.0 %

(c) List the end uses of the *dispersion* PTFE resin that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by *dispersion* PTFE resin and other inputs?

	Share of total cost in each of the product(s)			Total	
	accoun	ted	tor by		(should
					sum to
Product(s) using					100.0%
dispersion PTFE resin	PTFE resin		Other inputs		across)
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %

IV-12. <u>Substitutes</u> Can other products be substituted for PTFE resin? Please specify if the substitute applies to <i>only</i> granular, fine powder, or dispersion PTFE.								
	No YesPlease fill out the table.							
End use in which this				Have changes in the price of this substitute affected the price for PTFE resin?				
	Substitute			Yes	Explanation			
1.								
2.								
3.								

IV-13. **Demand trends.**—

(a) Indicate how demand within the United States and outside of the United States (if known) for PTFE resin has changed since January 1, 2015. Explain any trends and describe the principal factors that have affected these changes in demand.

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

IV-14.

IV-15.

		•	1, 2015 been different for different types of PTFE resin ersion)? If so, please describe.
No	Yes	If yes, please elaborate type of PTFE resin.	e on how the demand trends have differed for each
Product (changes.	_	
of I	PTFE resi		nges in the product range, product mix, or marketing Please specify if there have been any changes specific on PTFE.
No	Yes	If yes, please describ	e and quantify if possible.
no	longer of	fered for sale in the U.S.	E products that your firm ceased to manufacture and . market as of January 1, 2015, specifying whether your firm's shifting production to other products.
(a) Is t cor des	he PTFE i	and/or other conditions ease specify if any conditions	ousiness cycles (other than general economy-wide of competition distinctive to PTFE resin? If yes, tion of competition is specific to granular, fine powder
Check al	I that ap	ply.	Please describe.
	No		Skip to question IV-16.
		Business cycles (e.g. onal business)	
	Yes-	Other distinctive	

conditions of competition

No	Yes	If yes, d	describe.	
Supply co	nstraints	_		
(exa acce pror	mples incl pt new cu nised, bei	lude placing Istomers or ng unable t	g customers of renew existin o meet timely	n unable to supply PTFE resin since January 1, 2 n allocation or "controlled order entry," declining customers, delivering less than the quantity shipment commitments, etc.)? Please specify if owder, or dispersion PTFE.
		If ves. nlea	ase describe.	
No	Yes	yes, p.ee	ase describer	
(b) Has 1, 20	the availal	bility of raw	v materials uso	
(b) Has 1, 20 or d	the availa 015? Pleas	bility of raw se specify if PTFE.	v materials uso there have be	
(b) Has 1, 20	the availal	bility of raw se specify if PTFE.	v materials uso	ed in the production of PTFE changed since Janu een any changes specific to granular, fine powde
(b) Has 1, 20 or d	the availa 015? Pleas	bility of raw se specify if PTFE.	v materials uso there have be	
(b) Has 1, 20 or d	the availal 015? Pleas ispersion F Yes	bility of raw se specify if PTFE. If yes, plea	v materials uso there have be ase describe. E resin raw ma	
(b) Has 1, 20 or d	the availal 015? Pleas ispersion F Yes	bility of raw se specify if PTFE. If yes, plea	v materials uso there have be ase describe. E resin raw ma	een any changes specific to granular, fine powde

IV-18. <u>Interchangeability.</u>--Is the same form of PTFE resin (i.e., granular, fine powder, or dispersion) 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	India	Germany	Italy	Other countries
United States					
China					
India					
Germany					
Italy					

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

U.S. Producers' Questionnaire - PTFE Resin

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 the same form of PTFE resin (i.e., granular, fine powder, or dispersion) 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	India	Germany	Italy	Other countries
United States					
China					
India					
Germany					
Italy					

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

IV-20a. <u>Interchangeability of grades</u>.—Are certain grades of PTFE resin interchangeable with each other (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 product-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 product-pair

Product-pair	Commodity grade			
Specialty grade				
If this product pair is <i>sometimes</i> or <i>never</i> interchangeable, explain the factors that lip preclude interchangeable use:				

IV-20b. <u>Interchangeability of forms.</u>—Are certain forms of PTFE resin interchangeable with each other (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 product-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 product-pair

Product-pair	Unfilled PTFE						
Filled PTFE							
If this product pair is son preclude interchangeabl	netimes or never interchangeable, explain the factors that limit or e use:						

IV-21. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for PTFE resin since January 1, 2015. Indicate the share of the quantity of your firm's total shipments of PTFE resin that each of these customers accounted for in 2017.

C	Customer's name	City	State	Share of 2017 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

U.S. Producers' Questionnaire – PTFE Resin

IV-22. Competition from imports

(a) <u>Lost revenue</u>.--Since January 1, 2015: To avoid losing sales to competitors selling PTFE resin from China and India, did your firm:

	Gran	Granular		Fine Powder		ersion
Item	Yes	No	Yes	No	Yes	No
Reduce prices						
Roll back announced price increases						

(b) <u>Lost sales.</u>--Since January 1, 2015: Did your firm lose sales of PTFE resin to imports of this product from China and India?

Item	Granular	Fine Powder	Dispersion
No			
Yes			

IV-23.	Other explanationsIf your firm would like to further explain a response to a question in Part
	IV 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 V.--PROCESSORS/FILLERS

Further information on this part of the questionnaire can be obtained from Robert Casanova (202-708-2719, robert.casanova@usitc.gov). Please contact David Boyland (202-708-4725, david.boyland@usitc.gov) regarding questions specific to the financial section of this part of the questionnaire (questions V-4, V-5, and V-6).

V-1a. <u>Filling operations</u>.--Since January 1, 2015, has your firm purchased unfilled PTFE resin covered by the investigations (either domestic or imported) and further processed those purchases into products that still match the definition of PTFE resin (i.e., filled PTFE)?

No	Yes	If yes—Please describe the nature and extent of the following items in relation to your firm's filling/further processing operations in the United States.		
		Capital investments		
		Technical expertise		
		Value added		
		Employment		
		Quantity, type and source of parts		
		Costs and activities		

V-1b. Filling operations' complexity and importance.--On a scale of 1 to 5, please provide your firm's subjective opinion as to the complexity, intensity, and importance of filling/ further processing activities. 1 being minimally complex, intense or important; 5 being extremely complex, intense, and important.

1: Minimally complex, intense, and important	2	3	4	5: Extremely complex, intense, and important		
Please describe the reason for your rating.						

V-2. Production, shipment, and inventory data for filling PTFE resin.--

Quantity (in 1,000 pounds in dry weight) and value (in \$1,000)				
	Calendar years			
Item	2015	2016	2017	
Average production capacity ¹ (quantity) (A)				
Beginning-of-period inventories (quantity) (B)				
Production (quantity) using.— Purchases of U.Smanufactured PTFE resin (C)				
Purchases/imports of PTFE resin from subject sources (D)				
Purchases/imports of PTFE resin from nonsubject sources (E)				
Total production (F)	0	0	0	
U.S. shipments: Commercial shipments: Quantity (G)				
Value (H)				
Internal consumption: ² Quantity (I)				
Value ² (J)				
Transfers to related firms: ² Quantity (K)				
Value ² (L)				
Export shipments: ³ Quantity (M)				
Value (N)				
End-of-period inventories (quantity) (O)				
Channels of distribution: Commercial U.S. shipments: To distributors (P)				
To end users (Q)				
¹ The production capacity reported is based on of the methodology used to calculate production capa ² Internal consumption and transfers to related fi basis for valuing these transactions in your records, the data provided above in this table should be base ³ Identify your firm's principal export markets:	city, and explain any ch rms must be valued at f please specify that basi	anges in reported capacit fair market value. If your is (e.g., cost, cost plus, <i>et</i> c	ry firm uses a different	

V-2. Production, shipment, and inventory data for filling PTFE resin.--Continued

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

	Calendar years			
Reconciliation	2015	2016	2017	
B + C + D + E - G - I - K - M - O = should equal zero ("0") or provide an explanation. ¹	0	0	0	
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:				

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

		Calendar years	
Reconciliation	2015	2016	2017
P + Q - G = zero ("0"), if not revise.	0	0	0

V-3. <u>Employment data</u>.--Report your firm's employment-related data related to the production of PTFE resin using unfinished PTFE 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.

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

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

	Calendar years		
Item	2015	2016	2017
Average number of PRWs (number)			
Hours worked by PRWs (1,000 hours)			
Wages paid to PRWs (\$1,000)			

t	Explanation of trends:					

V-4. Operations on Filling / further processing PTFE resin.--Report the revenue and related cost information requested below on the filling / further processing PTFE 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 suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact David Boyland at (202) 708-4725 before completing this section of the questionnaire.

Quantity (in 1,000 pounds dry weight) and value (in \$1,000)				
	Fiscal years ended			
Item	2015	2016	2017	
Net sales quantities: ²				
Net sales values: ²				
Cost of goods sold (COGS): ³ Raw materials				
Direct labor				
Other factory costs				
Total COGS	0	0	0	
Gross profit or (loss)	0	0	0	
Selling, general, and administrative (SG&A) expenses: Selling expenses				
General and administrative expenses				
Total SG&A expenses	0	0	0	
Operating income (loss)	0	0	0	
Other expenses and income: Interest expense				
All other expense items				
All other income items				
Net income or (loss) before income taxes	0	0	0	
Depreciation/amortization included above	_			

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

² 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 <u>costs associated with commercial sales, internal consumption, and transfers.</u>

V-5. Asset values.--Report the total assets (i.e., both current and long-term assets) associated with your filling / further processing PTFE operations to include processing/filling, warehousing, and sale. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for filling / further processing PTFE operations in the normal course of business, please estimate this information, as applicable, based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in questions III-9a, III-9c, and III-9e. Assets that are common to other PTFE resin categories, as applicable, should also be allocated in a manner that is consistent with cost allocations in III-9a, III-9c, and III-9e. 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.

In note 1 to the table, please provide a <u>brief explanation if there are any substantial changes</u> in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Filling / Further Processing

Value (<i>in \$1,000</i>)						
	Fiscal years ended					
Item	2015	2016	2017			
Total assets (net) ¹						
¹ Describe						

V-6. <u>Capital expenditures and research and development expenses</u>.--Report your firm's capital expenditures and research and development expenses for filling / further processing PTFE resin operations. Provide data for your firm's three most recently completed fiscal years.

Value (<i>in \$1,000</i>)				
Fiscal years ended				
Item	2015	2016	2017	
Capital expenditures ¹				
Research and development expenses ²				

¹ Please describe the nature, focus, and significance of your firm's capital expenditures related to Filling only PTFE resin operations. _____

² Please describe the nature, focus, and significance of your firm's R&D expenses related to Filling only PTFE resin operations.

PART VI.--ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from Robert Casanova (202-708-2719. robert.casanova@usitc.gov).

- VI-1. <u>Comparability of granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin.</u>--For each of the following factors, indicate whether granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin 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>Characteristics and Uses.</u> The differences and similarities in the physical characteristics and end uses between granular PTFE, fine powder PTFE, and dispersion PTFE resin.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their physical characteristics and uses:
Granular PTFE vs Dispersion PTFE		
<u>Granular PTFE</u> vs <u>Fine powder</u> <u>PTFE</u>		
Fine powder PTFE vs Dispersion PTFE		

(b) <u>Interchangeability</u>.--The ability to substitute granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
Granular PTFE vs Dispersion PTFE		
<u>Granular PTFE</u> vs <u>Fine powder</u> <u>PTFE</u>		
Fine powder PTFE vs Dispersion PTFE		

VI-1. Comparability of granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin.— Continued

- 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.
- (c) <u>Manufacturing facilities, production processes, and production employees</u>.—Whether granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin 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 processes</i> :
Granular PTFE vs Dispersion PTFE		
Granular PTFE vs Fine powder PTFE		
Fine powder PTFE vs <u>Dispersion</u> PTFE		

(d) <u>Channels of distribution</u>.-- Channels of distribution/market situation through which granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin are sold (i.e., sold direct to end users, through distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>channels of distribution</i> :
Granular PTFE vs Dispersion PTFE		
<u>Granular PTFE</u> vs <u>Fine powder</u> <u>PTFE</u>		
Fine powder PTFE vs Dispersion PTFE		

VI-1. Comparability of granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin.— Continued

- 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.
- (e) <u>Customer and producer perceptions</u>.--Perceptions as to the differences and/or similarities in granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin 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 consumer and producer perception:
Granular PTFE vs Dispersion PTFE		
<u>Granular PTFE</u> vs <u>Fine powder</u> <u>PTFE</u>		
Fine powder PTFE vs Dispersion PTFE		

(f) <u>Price</u>.--Whether prices are comparable or differ between granular PTFE resin, fine powder PTFE resin, and dispersion PTFE resin

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
Granular PTFE vs Dispersion PTFE		
<u>Granular PTFE</u> vs <u>Fine powder</u> <u>PTFE</u>		
Fine powder PTFE vs Dispersion PTFE		

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/701731/2018/polytetrafluoroethylene ptfe resin china and india/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: PTFE

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

If your firm <u>does not </u>**produce 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.