

## LOST SALES AND LOST REVENUE SURVEY

### STEEL RACKS FROM CHINA

This survey must be received by the Commission by **July 5, 2018**

*See last page for filing instructions.*

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning steel racks from China (Inv. Nos. 701-TA-608 and 731-TA-1420 (Preliminary)). The information requested in the survey 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 possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Jon Ruder (202-205-3435, [jonathan.ruder@usitc.gov](mailto:jonathan.ruder@usitc.gov)).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm purchased steel racks (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 survey to the Commission)

**YES** (Complete all parts of the survey, and return the entire survey to the Commission)

Return questionnaire via the U.S. International Trade Commission *Drop Box* by clicking on the following link: <https://dropbox.usitc.gov/oinv/>. (PIN: **SRACK**)

#### CERTIFICATION

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

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

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on June 20, 2018, by Bulldog Rack Company, Weirton, West Virginia; Hannibal Industries, Inc., Los Angeles, California; Husky Rack and Wire, Denver, North Carolina; Ridg-U-Rak, Inc., North East, Pennsylvania; SpaceRAK, A Division of Heartland Steel Products, Inc., Marysville, Michigan; Speedrack Products Group, Ltd., Sparta, Michigan; Steel King Industries, Inc., Stevens Point, Wisconsin; Tri-Boro Shelving & Partition Corp., Farmville, Virginia; and UNARCO Material Handling, Inc., Springfield, Tennessee. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. U.S. producers of steel racks have provided the USITC with allegations about sales or revenue that they have lost due to competition from imports of steel racks from China. One or more domestic producer(s) have named your firm in such an allegation. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2018/steel\\_racks\\_china/preliminary.htm](https://www.usitc.gov/investigations/701731/2018/steel_racks_china/preliminary.htm).

**Steel racks** covered by these investigations are steel racks and parts thereof, assembled or unassembled. Steel racks are racks made of steel of dimensions and configurations that can be adjusted as required, with or without locking tabs or slots, and with or without bolted, clamped, or welded connections, including any of the following: uprights, posts, columns, braces, frames, beams, arms, locking devices, and rails.

A steel rack is a structure typically made from cold-formed or hot-rolled steel structural members and includes, but is not limited to, components such as plates, rods, angles, shapes, sections, tubes and the like. Welding, bolting, and clipping are the typical methods of assembly. Connections may also be made with locking devices such as clips, end plates, and beam connectors. Steel racks may be made to ANSI MH16.1 or ANSI MH16.3. All steel racks and parts thereof meeting the physical description set out herein are covered by the scope of this investigation, whether or not produced according to a particular standard.

The vertical components of steel racks may be referred to as posts, columns, or uprights, and may be connected with horizontal or diagonal braces to form upright frames. A typical storage configuration comprises upright frames perpendicular to the aisles, independently adjustable, positive locking beams parallel to the aisle and spanning between the upright frames, and braces designed to support unit loads between the beams. A cantilever rack consists of uprights running parallel to the aisle and cantilever beams or arms connected to the uprights and running perpendicular to the aisle rather than spanning two upright frames.

The scope includes all steel racks and parts thereof meeting the description above, regardless of: (1) dimensions, weight, strength, gauge, or load rating; (2) vertical upright or frame type (including structural, roll-form, or other); (3) horizontal support or beam / brace type (including but not limited to structural, roll-form, slotted, unslotted, Z-beam, C-beam, L-beam, step beam, cantilever beam, and cargo rack); (4) number of supports; (5) number of levels; (6) surface coating, if any (including but not limited to paint, epoxy, powder coating, zinc, and other metallic coating); (7) shape (including but not limited to rectangular, square, corner, and cantilever); (8) the method by which the vertical and horizontal supports connect (including but not limited to locking tabs or slots, bolting, clamping, and

welding); and (9) the inclusion or not of moving components (including but not limited to rails, wheels, rollers, tracks, channels, carts, and conveyors).

Steel racks may be referred to as pallet racks, storage racks, stacker racks, retail racks, pick modules, or cantilever racks. Steel racks that incorporate moving components may also be referred to as pallet flow racks, carton flow racks, push back racks, movable shelf racks, drive-in racks, and drive-through racks.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by coating, painting, assembling, attaching to, or packaging with another product, or any other finishing, assembly, or packaging that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the steel racks and parts thereof.

Steel racks and parts thereof are covered whether or not imported attached to, or in conjunction with, other parts and accessories such as wire decking, nuts, and bolts. If steel racks and parts thereof are imported attached to, or in conjunction with, such non-subject merchandise, only the steel racks and parts thereof are covered by the scope.

Specifically excluded from the scope of this investigation are any products covered by the existing antidumping and countervailing duty orders on boltless steel shelving units prepackaged for sale from the People's Republic of China. *See Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Antidumping Duty Order*, 80 Fed. Reg. 63,741 (October 21, 2017); *Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order*, 80 Fed. Reg. 63,745 (October 21, 2017).

Merchandise covered by this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheadings: 7326.90.8688<sup>1</sup> and 9403.20.0080.<sup>2</sup> Subject merchandise may also enter under subheadings 7308.90.3000, 7308.90.6000, 7308.90.9590, and 9403.20.0090. The HTSUS subheadings set forth above are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.

**Reporting of information.**--If information is not readily available from your records, provide carefully prepared estimates.

**Confidentiality.**--The data furnished in response to this survey 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.

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<sup>1</sup> Prior to January 1, 2017, such merchandise was classified under HTS statistical reporting number 7326.90.8588.

<sup>2</sup> From July 1, 2015 through December 31, 2017, such merchandise was classified under HTS statistical reporting number 9403.20.0080. Prior to July 1, 2015 such merchandise was classified under HTS statistical reporting number 9403.20.0020.

**Release of information.**--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

**Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

**Firms operating more than one establishment should combine the data for all establishments into a single response.**

**PURCHASE INFORMATION**

II-1. **Purchases and imports.**--Report separately your firm’s domestic purchases and imports of steel racks.

**“Purchase”** – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

**“Import”** – Purchase directly from a foreign supplier and your firm is the importer of record.

Item	Quantity (in pounds)				
	Calendar years			January-March	
	2015	2016	2017	2017	2018
<b>Purchases of steel racks produced in—</b>					
United States					
China					
All other countries <sup>1</sup>					
Sources unknown					
Total purchases	0	0	0	0	0
<b>Imports of steel racks from—</b>					
China					
All other countries <sup>1</sup>					
Total imports	0	0	0	0	0
<sup>1</sup> Please identify these countries:					

**Lost Sales and Lost Revenue Survey- Steel racks (Preliminary)**

2. **Changes in purchasing patterns.**--Please indicate how the shares of your firm's purchases of steel racks from different sources have changed since January 1, 2015.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

3. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase steel racks. For example, load rating, price, color, warranty, reliability of supplier, delivery time, terms, etc.

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions:	

**4. Purchasing subject imports rather than domestic products.—**

(a) Since January 2015, did your firm purchase imports of steel racks from China instead of U.S.-produced steel racks?

<b>Source</b>	<b>Yes (also respond to parts (b) and (c))</b>	<b>No (If “No” skip to question 5)</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(b) If you responded “Yes” to part (a), was the imported product priced lower than the domestic product?

<b>Source</b>	<b>Yes</b>	<b>No</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(c) If you responded “Yes” to part (a), was price a primary reason for purchasing subject imports rather than domestic product?

<b>Source</b>	<b>Yes</b>	<b>If Yes, estimate the quantity of imports purchased instead of domestic product since January 2015 (in pounds)</b>	<b>No</b>	<b>If No, please indicate the reason your firm purchased imports instead of domestic product</b>
China	<input type="checkbox"/>		<input type="checkbox"/>	

5. **U.S. producers and import competition.**—

(a) Since January 1, 2015, in connection with a sale or offer to sell steel racks to your firm, did U.S. producers reduce their prices of domestically produced steel racks in order to compete with lower-priced imports of steel racks from the subject countries?

Source	Yes (also respond to question part (b))	No (If “No”, skip to question 6)	Don’t know
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) If your firm responded “yes” to any of the above countries, please provide an estimate of the reduction in U.S. producers’ prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

Source	Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
China	%	

6. **Method of purchase**--Please provide a general description of your firm’s method(s) of purchase (e.g., individual purchase, contract, bids, Internet purchases, etc.) for steel racks.

7. **Other explanations**--Please provide any additional comments in this box.



**OMB INFORMATION**

8. **OMB statistics.**--Please report the actual number of hours required and the cost to your firm of completing this survey.

Hours	Dollars

The questions in this survey 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 survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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

## **HOW TO FILE YOUR SURVEY RESPONSE**

***Please do not attempt to modify the format or permissions of the survey document.***

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

- **Upload via Secure Drop Box.**—Upload the MS Word survey 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/>
- **Enter Investigation:** Select “**Steel racks from China**” in the drop down menu
- **Pin:** **SRACK**

- **E-mail.**—E-mail the MS Word survey to [jonathan.ruder@usitc.gov](mailto:jonathan.ruder@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 did not purchase this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.