

## U.S. IMPORTERS' QUESTIONNAIRE

### UTILITY SCALE WIND TOWERS FROM CHINA AND VIETNAM

This questionnaire must be received by the Commission by **October 31, 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 review of the countervailing and antidumping duty orders concerning utility scale wind towers ("wind towers") from China and Vietnam (Inv. Nos. 701-TA-486 and 731-TA-1195-1196 (Review)). 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)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm imported wind towers (as defined on the next page) <i>from any country</i> at any time since January 1, 2012?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> <b>YES</b> (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)</p> <p>Return questionnaire via the Commission <i>Drop Box</i> by clicking on the following link: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a>. (PIN: <b>WIND</b>)</p>
--

#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone:

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

**PART I.—GENERAL INFORMATION**

**Background.**--On February 15, 2013, the Department of Commerce ("Commerce") issued countervailing and antidumping duty orders on imports of wind towers from China and Vietnam. On January 2, 2018, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the orders will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the orders. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2018/utility\\_scale\\_wind\\_towers\\_china\\_and\\_vietnam/full\\_review.htm](https://www.usitc.gov/investigations/701731/2018/utility_scale_wind_towers_china_and_vietnam/full_review.htm).

**Wind towers** covered by these investigations are certain wind towers, whether or not tapered, and sections thereof. Certain wind towers are designed to support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity in excess of 100 kilowatts and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (i.e., where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment, or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical buss boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section. Several wind tower sections are normally required to form a completed wind tower.

Wind towers and sections thereof are included within the scope whether or not they are joined with nonsubject merchandise, such as nacelles or rotor blades, and whether or not they have internal or external components attached to the subject merchandise.

Specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Also excluded are any internal or external components which are not attached to the wind towers or sections thereof.

Wind towers are currently imported under statistical reporting numbers 7308.20.0020<sup>1</sup> or 8502.31.0000<sup>2</sup> of the Harmonized Tariff Schedule of the United States (HTSUS). Prior to 2011, subject merchandise was classified in the HTSUS under statistical reporting number 7308.20.0000 and may continue to be to some degree. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**Unit.**—A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

---

<sup>1</sup> Wind towers are classified under HTSUS 7308.20.0020 when imported as a tower or tower section(s) alone.

<sup>2</sup> Wind towers may also be classified under HTSUS 8502.31.0000 when imported as part of a wind turbine (i.e., accompanying nacelles and/or rotor blades).

**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, purchaser and/or foreign producer 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.

**Verification.**--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.

**Valid number error messages.**--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Keysha Martinez (202-205-2136, [Keysha.martinez@usitc.gov](mailto:Keysha.martinez@usitc.gov)).

**D-GRIDS tool.**--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage ([https://www.usitc.gov/trade\\_remedy/question.htm](https://www.usitc.gov/trade_remedy/question.htm)) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is *optional*. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

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

**"Establishment"**--Each facility of a firm involved in the importation of wind towers, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

--

I-3. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No       Yes--List the following information.

Firm name	Address	Extent of ownership (percent)

I-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing wind towers into the United States or that are engaged in exporting wind towers to the United States?

No             Yes--List the following information.

<b>Firm name</b>	<b>Country</b>	<b>Affiliation</b>

I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of wind towers?

No             Yes--List the following information.

<b>Firm name</b>	<b>Country</b>	<b>Affiliation</b>

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

<b>Importer of record</b>	<b>Takes title to the imported product(s)</b>	<b>Consignee of the imported products(s)</b>	<b>Customs broker or freight forwarder</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-7. **Consignees.**--If your firm is an importer of record of wind towers but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters wind towers into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports wind towers under the TIB (temporary importation under bond) program.

**“Foreign trade zone”** is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise, as well as other savings. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

**“Bonded warehouse”** is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

**“Temporary Importation under Bond (“TIB”) program”** is a procedure whereby, imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule (HTS).

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

I-9. **Business plan.**--In Parts II and III of this questionnaire we request a copy of your company's business plan. Does your company or any related firm have a business plan or any internal documents that describe, discuss, or analyze expected market conditions for wind towers?

- No             Yes--Please provide the requested documents. If you are not providing the requested documents, please explain why not.

I-10. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

- No             Yes--Please specify.

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

Further information on this part of the questionnaire can be obtained from Keysha Martinez (202-205-2136, [Keysha.martinez@usitc.gov](mailto:Keysha.martinez@usitc.gov)). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of wind towers since January 1, 2012.

<b><i>Check as many as appropriate.</i></b>		<b><i>If checked, please describe, including the month and year of the event; leave blank if not applicable.</i></b>
<input type="checkbox"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Other (e.g., technology)	



II-2b **Anticipated changes in operations.**--Does your firm anticipate any changes in in the character of its operations or organization relating to the importation of wind towers in the future?

<b>No</b>	<b>Yes</b>	<b>If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

II-3. **Arranged imports.**--Has your firm imported or arranged for the importation of wind towers for delivery after **June 30, 2018**?

**“Arranged imports”** are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

No             Yes--Fill out the table below.

<b>Quantity (in units)</b>				
<b>Period/Source</b>	<b>Jul-Sept 2018</b>	<b>Oct-Dec 2018</b>	<b>Jan-Mar 2019</b>	<b>Apr-Jun 2019</b>
China				
Vietnam				
All other sources: <sup>1</sup>				
<sup>1</sup> Identify your other sources:				

II-4. **Reasons for importing if producer.**--If your firm also produces wind towers in the United States, please indicate the reasons for importing this product. If your firm’s reasons differ by source, please elaborate.

**Definitions**

**“Imports”** --Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty) or consignee (i.e., to which the merchandise was first delivered).

**“Import quantities”** --Quantities reported should be net of returns.

**“Import values”**--Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

**“U.S. commercial shipments”**-- Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

**“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.

**“Unit”**--A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to  $\frac{1}{4}$  or 0.25 wind towers).

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

II-5a. **Imports from China.**-- Report your firm's imports and your firm's shipments and inventories of wind towers imported from China during the specified periods.

A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

**\*\*If your firm reports internal consumption (lines F and G below), please complete a U.S. PURCHASERS' questionnaire.\*\***

## CHINA

Quantity (in units), value (in \$1,000)								
Item	Calendar year						January-June	
	2012	2013	2014	2015	2016	2017	2017	2018
<b>Beginning-of-period inventories (quantity) (A)</b>								
<b>Imports:<sup>1</sup></b>								
Quantity (B)								
Value (C)								
<b>U.S. shipments:</b>								
<b>Commercial shipments:</b>								
Quantity (D)								
Value (E)								
<b>Internal consumption:<sup>2</sup></b>								
Quantity (F)								
Value <sup>2</sup> (G)								
<b>Transfers to related firms:<sup>2</sup></b>								
Quantity (H)								
Value <sup>2</sup> (I)								
<b>Export shipments:<sup>3</sup></b>								
Quantity (J)								
Value (K)								
<b>End-of-period inventories (quantity) (L)</b>								
<p><sup>1</sup> Please list the 10-digit HTS statistical reporting numbers used for Customs classification purposes: _____.</p> <p>Please identify the foreign producers, if known: _____.</p> <p><sup>2</sup> Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above: _____.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>								



II-6a. **Imports from Vietnam.**-- Report your firm's imports and your firm's shipments and inventories of wind towers imported from Vietnam during the specified periods.

A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

**\*\*If your firm reports internal consumption (lines F and G below), please complete a U.S. PURCHASERS' questionnaire.\*\***

## VIETNAM

Quantity (in units), value (in \$1,000)								
Item	Calendar year						January-June	
	2012	2013	2014	2015	2016	2017	2017	2018
<b>Beginning-of-period inventories</b> (quantity) (A)								
<b>Imports:</b> <sup>1</sup>								
Quantity (B)								
Value (C)								
<b>U.S. shipments:</b>								
<b>Commercial shipments:</b>								
Quantity (D)								
Value (E)								
<b>Internal consumption:</b> <sup>2</sup>								
Quantity (F)								
Value <sup>2</sup> (G)								
<b>Transfers to related firms:</b> <sup>2</sup>								
Quantity (H)								
Value <sup>2</sup> (I)								
<b>Export shipments:</b> <sup>3</sup>								
Quantity (J)								
Value (K)								
<b>End-of-period inventories</b> (quantity) (L)								
<p><sup>1</sup> Please list the 10-digit HTS statistical reporting numbers used for Customs classification purposes: _____.</p> <p>Please identify the foreign producers, if known: _____.</p> <p><sup>2</sup> Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above: _____.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>								



II-7a. **Imports from all other sources.**-- Report your firm's imports and your firm's shipments and inventories of wind towers imported from **all other sources combined** during the specified periods.

A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

**\*\*If your firm reports internal consumption (lines F and G below), please complete a U.S. PURCHASERS' questionnaire.\*\***

## ALL OTHER SOURCES COMBINED

(list sources: \_\_\_\_\_)

Quantity (in units), value (in \$1,000)								
Item	Calendar year						January-June	
	2012	2013	2014	2015	2016	2017	2017	2018
<b>Beginning-of-period inventories (quantity) (A)</b>								
<b>Imports:<sup>1</sup></b>								
Quantity (B)								
Value (C)								
<b>U.S. shipments:</b>								
<b>Commercial shipments:</b>								
Quantity (D)								
Value (E)								
<b>Internal consumption:<sup>2</sup></b>								
Quantity (F)								
Value <sup>2</sup> (G)								
<b>Transfers to related firms:<sup>2</sup></b>								
Quantity (H)								
Value <sup>2</sup> (I)								
<b>Export shipments:<sup>3</sup></b>								
Quantity (J)								
Value (K)								
<b>End-of-period inventories (quantity) (L)</b>								

<sup>1</sup> Please list the 10-digit HTS statistical reporting numbers used for Customs classification purposes: \_\_\_\_\_.  
Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Sales to related firms (including internal consumption) must be valued at fair market value. In the event that your firm uses a different basis for valuing these sales within your company, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each period identified above: \_\_\_\_\_.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.





For questions II-8 and II-9, if your firm's response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

II-8. **Effect of order(s).**--Describe the significance of the existing countervailing and antidumping duty orders covering imports of wind towers from China and Vietnam in terms of its effect on your firm's imports, U.S. shipments of imports, and inventories. You may wish to compare your firm's operations before and after the imposition of the order.

--

II-9. **Likely impact of revocation.** --Would your firm anticipate any changes in in the character of its operations or organization, including its imports, U.S. shipments of imports, or inventories of wind towers in the future if the countervailing and antidumping duty orders on wind towers from China and Vietnam were to be revoked?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.
<input type="checkbox"/>	<input type="checkbox"/>	

II-10. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

**PART III.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, cindy.cohen@usitc.gov).

III-1. **Contact information.**-- Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	

III-2. **Price setting.**-- How does your firm determine the prices that it charges for sales of wind towers (*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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-3. **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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-4. **Pricing terms.**--On what basis are your firm's prices of imported wind towers from China and Vietnam usually quoted? (*check one*)

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

III-5. **Contract versus spot.**-- Approximately what share of your firm's sales of wind towers imported from China and Vietnam 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				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for less than 12 months)	Spot sales (for a single delivery)	
<b>Share of your 2017 sales</b>	%	%	%	%	0.0 %

III-6. **Contract provisions.**— Please fill out the table regarding your firm's typical sales contracts for wind towers from China and Vietnam (or check "not applicable" if your firm does not sell on a long-term, short-term, and/or 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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs <sup>1</sup>	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Please identify the indexes used:				

III-7. **Long-term arrangements.**—Please list any long-term contracts or supply agreements that your firm has with purchasers of wind towers. Briefly describe these agreements, including the name of the purchaser, dates, any minimum purchase quantities, and any dedicated capacity.

Purchaser name	Dates covered	Minimum purchase quantities (units)	Dedicated capacity (units)	Brief description

III-8. **Lead times.**-- What is your firm's share of sales of wind towers imported from China and Vietnam from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of wind towers?

Source	Share of 2017 sales	Lead time (average number of days)
From inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

III-9. **Shipping information.--**

- (a) What is the approximate percentage of the cost of wind towers imported from China and Vietnam that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ %
- (b) Who generally arranges the transportation to your firm's customers' locations?  
 Your firm     Purchaser *(check one)*
- (c) When your firm sells wind towers imported from China and Vietnam, from where is it shipped?  
 Point of importation     Storage facility *(check one)*
- (d) Indicate the approximate percentage of your sales of wind towers imported from China and Vietnam that are delivered the following distances from your firm's U.S. point of shipment.

<b>Distance from your firm's U.S. point of shipment</b>	<b>Share</b>
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total (should sum to 100.0%)</b>	<b>0.0 %</b>

- III-10. **Geographical shipments.--** In which U.S. geographic market area(s) has your firm sold wind towers imported from subject countries since January 1, 2012 (check all that apply)? Also, please indicate the share of your firms' 2017 shipments that were shipped to each region.

<b>Geographic area</b>	<b>Shipments since January 1, 2012</b>		<b>Share of shipments in 2017</b>	
	<b>China</b>	<b>Vietnam</b>	<b>China</b>	<b>Vietnam</b>
<b>Northeast.</b> —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Midwest.</b> —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Southeast.</b> —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Central Southwest.</b> —AR, LA, OK, and TX.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Mountains.</b> —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Pacific Coast.</b> —CA, OR, and WA.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Other.</b> —All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Total (columns should individually sum to 100.0%)</b>			0.0	0.0

III-11. **End uses.**-- Have there been any changes in the end uses of wind towers since January 1, 2012? Do you anticipate any future changes?

<b>Changes in end uses</b>	<b>No</b>	<b>Yes</b>	<b>Explain</b>
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

III-12. **Substitutes.**-- Have there been any changes in the number or types of products that can be substituted for wind towers since January 1, 2012? Do you anticipate any future changes?

<b>Changes in substitutes</b>	<b>No</b>	<b>Yes</b>	<b>Explain</b>
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

III-13. **Availability of supply.**--Has the availability of wind towers in the U.S. market changed since January 1, 2012? Do you anticipate any future changes?

<b>Availability in the U.S. market</b>	<b>No</b>	<b>Yes</b>	<b>Please explain, noting the countries and reasons for the changes.</b>
<b>Changes since January 1, 2012:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China and Vietnam	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Anticipated changes:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China and Vietnam	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

III-14. **Demand trends.**-- Indicate how demand within the United States and outside of the United States (if known) for wind towers has changed since January 1, 2012, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors (for example, federal or state government policies and natural gas prices) that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
<b>Demand since January 1, 2012</b>					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Anticipated future demand</b>					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Product changes.**-- Have there been any significant changes in the product range, product mix, or marketing of wind towers since January 1, 2012? Do you anticipate any future changes?

Changes in product range, product mix, or marketing			Explain
	No	Yes	
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

III-16. **Conditions of competition.**--

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

Check all that apply.	Please describe.
<input type="checkbox"/> <b>No</b>	Skip to question III-17.
<input type="checkbox"/> <b>Yes-Business cycles (e.g. seasonal business)</b>	
<input type="checkbox"/> <b>Yes-Other distinctive conditions of competition</b>	

(b) If yes, have there been any changes in the business cycles or conditions of competition for wind towers since January 1, 2012?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

III-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply wind towers since January 1, 2012 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, inability to meet certain specifications, etc.)?

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	



III-18. **Raw materials.**--

(a) Indicate how wind towers' raw material prices have changed since January 1, 2012, and how you expect they will change in the future.

Raw materials prices	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain (including if applicable, the effect of section 232 and antidumping duty tariffs on steel products).
Changes since January 1, 2012	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Have raw material price changes affected your firm's selling prices for wind towers?

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Price comparisons.**--Please compare market prices of wind towers in U.S. and non-U.S. markets if known. Provide information as to time periods and regions for any price comparisons.

--

III-20. **Market studies.**--Please provide as a separate attachment to this request any studies, surveys, etc. that you are aware of that quantify and/or otherwise discuss wind towers supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including China and Vietnam, and (3) the world as a whole. Of particular interest is such data from 2012 to the present and forecasts for the future.

III-21. **Interchangeability**--Is wind towers 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 O 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

O = *no familiarity* with products from a specified country-pair

Country-pair	China	Vietnam	Other countries
United States			
China	X		
Vietnam	X	X	
For any country-pair producing wind towers which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:			

III-22. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between wind towers 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 O 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

O = *no familiarity* with products from a specified country-pair

<b>Country-pair</b>	China	Vietnam	Other countries
United States			
China	X		
Vietnam	X	X	
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of wind towers, identify the country-pair and report the advantages or disadvantages imparted by such factors:			

**If your firm imported wind towers from China or Vietnam for internal use (i.e., you reported internal consumption in question II-5a or II-6a), please answer question III-23. If not, skip to question III-24.**

**III-23. Additional costs for your firm's direct imports of wind towers for your firm's internal use.**

- (a) Please identify the factors (**other than** costs already included in landed duty paid values) that add to your cost of importing directly since January 1, 2012. Estimate the share of the cost of the landed duty-paid value accounted for by these factors.

Factors	Estimated share of landed duty-paid value (percent)

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

U.S. importers	U.S. producers	Both	Neither
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (c) Briefly identify the benefits of directly importing wind towers instead of purchasing wind towers from a U.S. importer or from a U.S. producer.

- (d) Please provide the estimated margin saved by having directly imported wind towers instead of purchasing from a U.S. importer. \_\_\_\_\_ percent of landed duty-paid value.

III-24. **Impact of the section 301 investigation.**— This question concerns the section 301 investigation and tariffs on wind towers that have been proposed and implemented by the United States in response to Chinese trade practices.

(a) Did the announcement in March, 2018 and subsequent implementation of tariff remedies in the section 301 investigation impact, or do you anticipate that it will impact, your firm's wind tower business and/or the U.S. wind tower market as a whole?

<b>Yes</b> —Please fill out table below and answer part (b)	<b>No</b>	<b>Don't know</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item	Response
Impact on your firm <sup>1</sup>	
Impact on overall U.S. market <sup>1</sup>	
<sup>1</sup> Please identify the magnitude and timing of any effects, and compare your firm's operations/overall market before and after the announcement of the section 301 measures.	

(b) **Assessment of specific impacts of the section 301 investigation.**--Please indicate the impact of the announcement and subsequent implementation of remedies in the section 301 investigation and tariff actions regarding wind towers.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Overall demand for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-25. **Other explanations.**-- If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

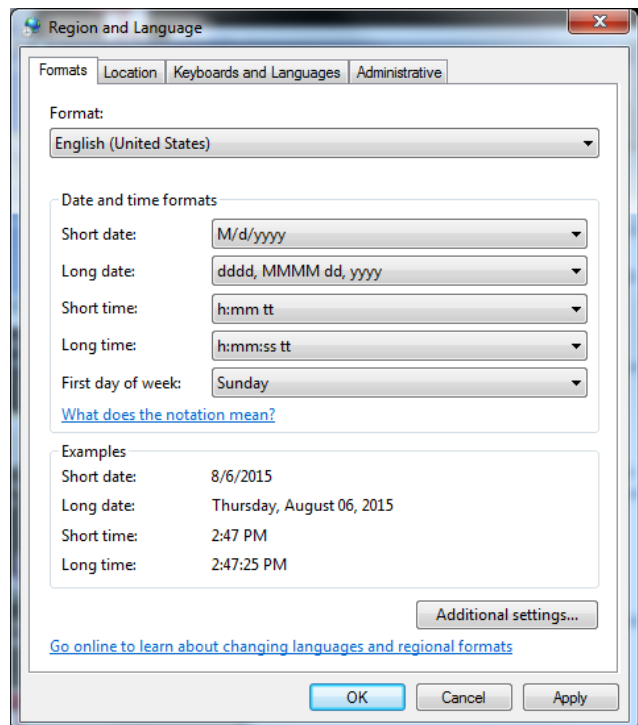
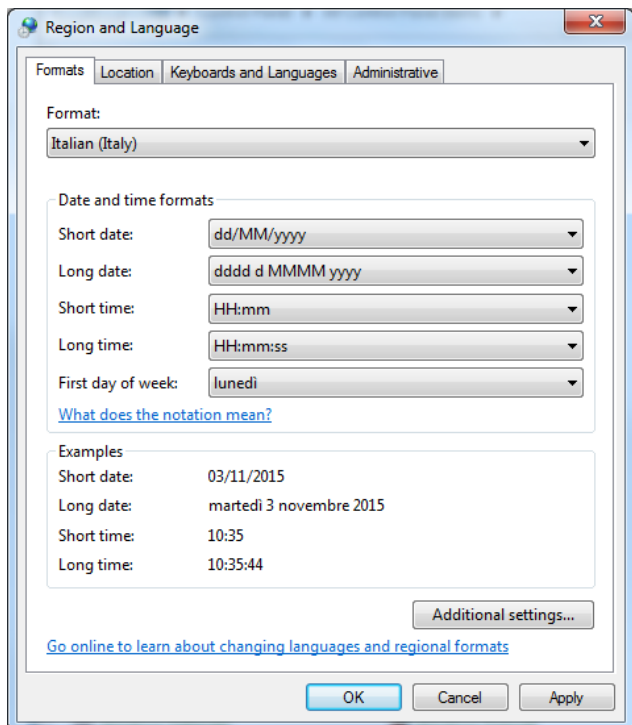
**Correcting Valid number error messages.**--If you are completing a Commission questionnaire in a country that uses periods (“.”) to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric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

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

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

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

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



## HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

[https://www.usitc.gov/investigations/701731/2018/utility\\_scale\\_wind\\_towers\\_china\\_and\\_vietnam/full\\_review.htm](https://www.usitc.gov/investigations/701731/2018/utility_scale_wind_towers_china_and_vietnam/full_review.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.

- **Upload via Secure Drop Box.**—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:** WIND

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

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

***Parties to this proceeding.***—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.