

## U.S. PRODUCERS' QUESTIONNAIRE

### STEEL WHEELS FROM CHINA

This questionnaire must be received by the Commission by **November 26<sup>th</sup>, 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 duty and antidumping duty investigations concerning steel wheels from China (Inv. Nos. 701-TA-602 and 731-TA-1412 (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)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm produced steel wheels (as defined on next page) at any time since January 1, 2015?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return <b>only</b> 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 U.S. International Trade 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>WHEEL</b>)</p>
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#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Phone*

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

**PART I.—GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on March 27, 2018, by Accuride Corporation, Evansville, Indiana, and Maxon Wheels Akron LLC, Akron, Ohio. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2018/steel\\_wheels\\_china/final.htm](https://www.usitc.gov/investigations/701731/2018/steel_wheels_china/final.htm).

**Steel wheels** covered by these investigations are certain on-the-road steel wheels, discs, and rims for tubeless tires, with a nominal rim diameter of 22.5 inches and 24.5 inches, regardless of width. Certain on-the-road steel wheels with a nominal wheel diameter of 22.5 inches and 24.5 inches are generally for Class 6, 7, and 8 commercial vehicles (as classified by the Federal Highway Administration Gross Vehicle Weight Rating system), including tractors, semi-trailers, dump trucks, garbage trucks, concrete mixers, and buses, and are the current standard wheel diameters for such applications. The standard widths of certain on-the-road steel wheels are 7.5 inches, 8.25 inches, and 9.0 inches, but all certain on-the-road steel wheels, regardless of width, are covered by the scope. While 22.5 inches and 24.5 inches are standard wheel sizes used by Class 6, 7, and 8 commercial vehicles, the scope covers sizes that may be adopted in the future for Class 6, 7, and 8 commercial vehicles.

The scope includes certain on-the-road steel wheels with either a "hub-piloted" or "stud-piloted" mounting configuration, and includes rims and discs for such wheels, whether imported as an assembly or separately. The scope includes certain on-the-road steel wheels, discs, and rims, of carbon and/or alloy steel composition, whether clad or not clad, whether finished or not finished, and whether coated or uncoated. All on-the-road wheels sold in the United States are subject to the requirements of the National Highway Traffic Safety Administration and bear markings, such as the "DOT" symbol, indicating compliance with applicable motor vehicle standards. See 49 CFR 571.120. The scope includes certain on-the-road steel wheels imported with or without the required markings. Certain on-the-road steel wheels imported as an assembly with a tire mounted on the wheel and/or with a valve stem attached are included. However, if the certain on-the-road steel wheel is imported as an assembly with a tire mounted on the wheel and/or with a valve stem attached, the certain on-the-road steel wheel is covered by the scope, but the tire and/or valve stem is not covered by the scope.

Excluded from the scope are:

- (1) steel wheels for tube-type tires that require a removable side ring;
- (2) aluminum wheels;
- (3) wheels where steel represents less than fifty percent of the product by weight; and
- (4) steel wheels that do not meet National Highway Traffic Safety Administration requirements, other than the rim marking requirements found in 49 CFR 571.120S5.2.

Imports of the subject merchandise are currently classified under the following Harmonized Tariff Schedule of the United States (HTSUS) subheadings: 8708.70.4530, 8708.70.4560, 8708.70.6030, 8708.70.6060, 8716.90.5045, and 8716.90.5059. Merchandise meeting the scope description may also enter under the following HTSUS subheadings: 4011.20.1015, 4011.20.5020, and 8708.99.4850. While HTSUS subheadings are provided for convenience and customs purposes, the written description of the subject merchandise 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.

**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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of steel wheels and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

**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-1a. **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 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 release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

Yes       No

I-2. **Establishments covered.**--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 steel wheels, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			

<sup>1</sup> Additional discussion on establishments consolidated in this questionnaire: \_\_\_\_\_.

I-3. **Petitioner status.**--Is your firm the petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Petition support.**--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
China - AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China - CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-5. **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)



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

Further information on this part of the questionnaire can be obtained from Jordan Harriman (202-205-2610, [jordan.harriman@usitc.gov](mailto:jordan.harriman@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 production of steel wheels since January 1, 2015.

<i>(check as many as appropriate)</i>	<i>(If checked, please describe; leave blank if not applicable)</i>
<input type="checkbox"/> plant openings	
<input type="checkbox"/> plant closings	
<input type="checkbox"/> relocations	
<input type="checkbox"/> expansions	
<input type="checkbox"/> acquisitions	
<input type="checkbox"/> consolidations	
<input type="checkbox"/> prolonged shutdowns or production curtailments	
<input type="checkbox"/> revised labor agreements	
<input type="checkbox"/> other (e.g., technology)	

II-3a. **Production using same machinery.**-- Please report your firm's production of products using the same equipment, machinery, or employees as used to produce steel wheels, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

**"Overall production capacity" or "capacity"** – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-8. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-8 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

**"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.

<b>Quantity (in actual number of wheels)</b>					
<b>Item</b>	<b>Calendar years</b>			<b>January-September</b>	
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2017</b>	<b>2018</b>
<b>Overall production capacity</b>					
<b>Production of:</b>					
Steel wheels <sup>1</sup>	0	0	0	0	0
Out of scope production:					
Other products <sup>2</sup>					
Subtotal, out-of-scope	0	0	0	0	0
Total	0	0	0	0	0
<sup>1</sup> Data entered for production of steel wheels will populate here once reported in question II-8. <sup>2</sup> Please identify these products: _____.					

II-3b. **Operating parameters.**--The production capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

II-3c. **Capacity calculation.**--Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.

II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

II-3e. **Product shifting.**—

(i) Is your firm able to switch production capacity between steel wheels and other products using the same equipment and/or labor?

No	Yes	If yes (i.e., have produced other products or are able to produce other products) — Please identify other actual or potential products:
<input type="checkbox"/>	<input type="checkbox"/>	

(ii) Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

II-4. **Wheel coatings.**—

(i) Please identify and describe the type(s) of coating applied to steel wheels produced by your firm.

<i>(check as many as appropriate)</i>		<i>(Description of specific coating)</i>
<input type="checkbox"/>	Zinc phosphate pretreatment	
<input type="checkbox"/>	Epoxy E-coat	
<input type="checkbox"/>	Other (non-epoxy) E-coat	
<input type="checkbox"/>	Powder top coating	
<input type="checkbox"/>	Galvanized plating	
<input type="checkbox"/>	Other	

(ii) If multiple types of coating are applied to steel wheels produced by your firm, does your firm offer combination(s) of coatings as part of its standard product offerings?

No	Yes	If yes-- Please describe these combination(s) below.
<input type="checkbox"/>	<input type="checkbox"/>	

(iii) Does your firm produce in-scope steel wheels that do not come with a coating applied?

No	Yes	If yes-- Please describe these steel wheels below.
<input type="checkbox"/>	<input type="checkbox"/>	

II-5. **Tolling**--Since January 1, 2015, has your firm been involved in a toll agreement regarding the production of steel wheels?

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

<b>No</b>	<b>Yes</b>	<b>If yes-- Please describe the toll arrangement(s) and name the firm(s) involved.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

II-6. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce steel wheels in and/or admit steel wheels 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	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import steel wheels into a foreign trade zone (FTZ) for use in distribution of steel wheels and/or the production of downstream articles?

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

II-7. **Importer.**--Since January 1, 2015, has your firm imported steel wheels?

**"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	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <b><u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u></b>

II-8. **Production, shipment, and inventory data**--Report your firm's production capacity, production, shipments, and inventories related to the production of steel wheels 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 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.

**If your firm sells steel wheels (as described on page 2) with a tire already mounted on the wheel and/or with a valve stem attached, the value and weight of such sales reported in questions II-8, II-9, and II-10 should exclude the portion of the value and weight accounted for by the attached tire and/or valve stem.**

**"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-8. **Production, shipment, and inventory data.**--Continued

Quantity (in actual number of wheels) and value (in \$1,000)					
Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
<b>Average production capacity</b> <sup>1</sup> (quantity) (A)					
<b>Beginning-of-period inventories</b> (quantity) (B)					
<b>Production</b> (quantity) (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> The production capacity reported is based on operating _____ hours per week, _____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity _____.</p> <p><sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>					

***RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.***--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.

Reconciliation	Calendar years			January-September	
	2015	2016	2017	2017	2018
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-9. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution during the specific periods.

<b>Quantity (in actual number of wheels); Value (in \$1,000)</b>					
<b>Item</b>	<b>Calendar years</b>			<b>January-September</b>	
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2017</b>	<b>2018</b>
<b>U.S. shipments:</b>					
<u>To truck OEMs</u>					
Quantity (M)					
Value (N)					
<u>To trailer OEMs</u>					
Quantity (O)					
Value (P)					
<u>To bus OEMs</u>					
Quantity (Q)					
Value (R)					
<u>To other OEMs<sup>1</sup></u>					
Quantity (S)					
Value (T)					
<u>To aftermarket<sup>2</sup></u>					
Quantity (U)					
Value (V)					
<sup>1</sup> Please identify the nature of these 'other' OEMS (e.g. military, emergency vehicle, etc.): _____. <sup>2</sup> This category includes aftermarket or replacement distributors, original equipment service ("OES") providers (both product distribution centers and dealer direct shipments), and other aftermarket firms.					

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities and values reported for channels of distribution (i.e., lines M through U) in each time period equal the quantity and value reported for U.S. shipments (i.e., line D through I) in each time period in question II-8. 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.

<b>Reconciliation</b>	<b>Calendar years</b>			<b>January-September</b>	
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2017</b>	<b>2018</b>
<b>Quantity:</b> M + O + Q + S + U – D – F – H = zero ("0"), if not revise.	0	0	0	0	0
<b>Value:</b> N + P + R + T + V – E – G – I = zero ("0"), if not revise.	0	0	0	0	0

II-10. **US shipments by product type.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by type of product during the specific periods.

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
<b>U.S. shipments:</b>					
<u>Carbon steel: 22.5 diameter</u> Quantity (W) in units					
Weight (X) in pounds					
Value (Y) in \$1,000					
<u>Carbon steel: 24.5 diameter</u> Quantity (Z) in units					
Weight (AA) in pounds					
Value (AB) in \$1,000					
<u>Alloy steel: 22.5 diameter</u> Quantity (AC) in units					
Weight (AD) in pounds					
Value (AE) in \$1,000					
<u>Alloy steel: 24.5 diameter</u> Quantity (AF) in units					
Weight (AG) in pounds					
Value (AH) in \$1,000					

**RECONCILIATION OF U.S. SHIPMENTS.**--Please ensure that the quantities and values reported for U.S. shipments by product type (i.e., lines W through AH) in each time period equal the quantity and value reported for U.S. shipments (i.e., line D through I) in each time period in question II-8. 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.

Reconciliation	Calendar years			January-September	
	2015	2016	2017	2017	2018
<b>Quantity:</b> $W + Z + AC + AF - D - F - H =$ zero ("0"), if not revise.	0	0	0	0	0
<b>Value:</b> $Y + AB + AE + AH - E - G - I =$ zero ("0"), if not revise.	0	0	0	0	0

II-11. **Employment data.**--Report your firm's employment-related data related to the production of steel wheels and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

**"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.

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
Average number of PRWs ( <i>number</i> ) <sup>1</sup>					
Hours worked by PRWs ( <i>1,000 hours</i> )					
Wages paid to PRWs ( <i>\$1,000</i> )					
<sup>1</sup> What percent of your reported PRWs for steel wheels were unionized in 2017? _____ percent.					

Explanation of trends:

II-12. **Related firms.**--If your firm reported transfers to related firms in question II-8, 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 non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-13. **Purchases.**--Other than direct imports, has your firm otherwise purchased steel wheels 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.

**"Import"** –A transaction to buy from a foreign supplier where your firm is the importer of record.

<b>No</b>	<b>Yes</b>	<b>If yes-- Report such purchases below and explain the reasons for your firms' purchases:</b>
<input type="checkbox"/>	<input type="checkbox"/>	

<b>(Quantity in actual number of wheels)</b>					
<b>Item</b>	<b>Calendar years</b>			<b>January-September</b>	
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2017</b>	<b>2018</b>
<b>Purchases from U.S. importers<sup>1</sup> of steel wheels from--</b>					
China					
Mexico					
All other sources					
<b>Purchases from domestic producers<sup>2</sup></b>					
<b>Purchases from other sources<sup>2</sup></b>					
<sup>1</sup> 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: _____. <sup>2</sup> Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: _____.					

II-14. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative 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.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Charles Yost (202-205-3432, [charles.yost@usitc.gov](mailto:charles.yost@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. **Accounting system.**--Briefly 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:

\_\_\_\_\_

Note.--Please note that we are requesting that firms report their financial data on a calendar year basis.

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include steel wheels:

\_\_\_\_\_

2. Does your firm prepare profit/loss statements for steel wheels:  
 Yes       No
3. 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,    10Qs,  
 Monthly,    quarterly,    semi-annually,    annually
4. Accounting basis:  GAAP,    cash,    tax, or    other comprehensive basis of accounting (specify) \_\_\_\_\_

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. **Please submit with your questionnaire response a spreadsheet that shows the major cost categories and values of each category for (1) raw materials; (2) direct labor; (3) other factory costs; and (4) selling, general and administrative expenses. Also, submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes steel wheels, as well as specific statements and worksheets) used to compile these data.***

III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

--

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

<b>Products</b>	<b>Share of sales</b>
Steel wheels	%
	%
	%
	%
	%

If your firm produced products other than steel wheels in the same facility, please describe how joint costs of COGS, SG&A, interest expense, and other income and expenses were allocated to steel wheels.

--

III-6. **Inputs from related suppliers.**--Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of steel wheels from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

<b>Yes--Continue to question III-7</b>	<b>No--Skip to question III-9a.</b>
<input type="checkbox"/>	<input type="checkbox"/>

III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of steel wheels that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input on the basis of your most recently completed fiscal year. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS
<b>Input valuation as recorded in the firm's accounting books and records</b>		

III-8. **Inputs purchased from related suppliers.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on steel wheels) in a manner consistent with your firm's accounting books and records.

<b>Yes</b>	<b>No</b>	<b>If no -- In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a:</b>
<input type="checkbox"/>	<input type="checkbox"/>	

III-9a. **Operations on steel wheels.**--Report the revenue and related cost information requested below on the steel wheels operations of your firm's U.S. establishment(s).<sup>1</sup> 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 calendar years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Charles Yost (202-205-3432, [charles.yost@usitc.gov](mailto:charles.yost@usitc.gov)) before completing this section of the questionnaire.

Item	Quantity (in actual number of wheels) and value (in \$1,000)				
	Calendar years			January-September	
	2015	2016	2017	2017	2018
<b>Net sales quantities:</b> <sup>2</sup>					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b> <sup>2</sup>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>					
Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense items					
All other income items					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<b>Depreciation/amortization included above</b>					
<sup>1</sup> Include only sales (whether <u>domestic or export</u> ) and costs related to your <u>U.S. manufacturing operations</u> . <sup>2</sup> 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. <sup>3</sup> COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u> .					

*Note -- The table above contains calculations that will appear when you have entered data in the MS Word form fields.*

III-9b. **Raw materials for steel wheels.**--Please indicate the share of total raw material costs reported in III-9a in 2017 for the following raw material inputs:

<b>Products</b>	<b>Share of total raw material costs (percent)</b>
Steel costs	%
Paint/coating costs	%
Other material inputs <sup>1</sup>	%
Total (should sum to 100 percent)	0.0 %
<sup>1</sup> Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs that they account for:	

III-9c. **Financial data reconciliation.**--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<p><b>If no--</b> If 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 negative--instances 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.</p>
<b>Yes</b>	<b>No</b>	
<input type="checkbox"/>	<input type="checkbox"/>	

III-10. **Nonrecurring items (charges and gains) included in the subject product financial results.**--For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

Item	Calendar years			January-September	
	2015	2016	2017	2017	2018
	Value (\$1,000)				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

**Nonrecurring item:** In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9a.

Identify:  Explanation:
-------------------------------

III-12. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of steel wheels. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for steel wheels in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's three most recently completed calendar years, and for the specified interim periods.

Assets should be allocated to steel wheels if these assets are also related to other products. Please provide a brief explanation if there are any substantial changes in total or categories asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Item	Value (in \$1,000)				
	Calendar years			January-September	
	2015	2016	2017	2017	2018
Total current assets <sup>1</sup>					
Non-current assets: Property, plant, and equipment (PP&E at historical cost)					
Less: Accumulated depreciation <sup>2</sup>					
PP&E (book value) <sup>3</sup>	0	0	0	0	0
All other non-current assets					
Total assets (net) <sup>4</sup>	0	0	0	0	0
<sup>1</sup> Include cash, accounts receivable, inventories, and other current assets for steel wheels. <sup>2</sup> Include any write-offs, disposals, or impairments. Report the accumulated depreciation as a positive number. <sup>3</sup> What is the average age of your firm's PP&E and depreciation policy _____ <sup>4</sup> Explain substantial changes in the categories above _____					

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for steel wheels. Provide data for your firm's three most recently completed calendar years.

Item	Value (in \$1,000)				
	Calendar years			January-September	
	2015	2016	2017	2017	2018
Capital expenditures <sup>1</sup>					
Research and development expenses <sup>2</sup>					
<sup>1</sup> Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product. _____ <sup>2</sup> Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product. _____					

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

Calendar year	Fiscal year	Specify fiscal year
<input type="checkbox"/>	<input type="checkbox"/>	

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-8 (including export shipments) as long as they are reported on the same calendar year basis.

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**--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.*

Reconciliation	Calendar years--			January-September	
	2015	2016	2017	2017	2018
<b>Quantity:</b> Trade data from question II-8 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question II-8 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

Do these data in question III-9a reconcile with data in question II-8?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Effects of imports on investment.**--Since January 1, 2015, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of steel wheels from China?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm has experienced actual negative effects as follows.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

III-16. **Effects of imports on growth and development.**--Since January 1, 2015, 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 advanced version of the product) as a result of imports of steel wheels from China?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm has experienced actual negative effects as follows.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

III-17. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of steel wheels from China?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm anticipates negative effects as follows:</b>
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative 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 IV.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Emily Burke (202-205-3191, [emily.burke@usitc.gov](mailto:emily.burke@usitc.gov)).

IV-1. **Contact information.**--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.

**Product 1.**--22.5 inches by 8.25 inches steel wheels, regardless of coating, weighing 60 to 75 lbs., inclusive, sold to OEMs.

**Product 2.**--22.5 inches by 8.25 inches steel wheels, regardless of coating, weighing 60 to 75 lbs., inclusive, sold to the aftermarket.

**Product 3.**--22.5 inches by 8.25 inches steel wheels, regardless of coating, weighing more than 75 lbs., sold to OEMs.

**Product 4.**--22.5 inches by 8.25 inches steel wheels, regardless of coating, weighing more than 75 lbs., sold to the aftermarket.

Note: Aftermarket includes aftermarket or replacement distributors, original equipment service ("OES") providers (both product distribution centers and dealer direct shipments), and other aftermarket firms.

**Please note that values should be f.o.b., U.S. point of shipment 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-September 2018, 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)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question IV-3.

IV-2(b). **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm. Do not include sales of wheels with tires and/or valve stems already attached.

Report data in ***number of wheels*** and ***actual dollars*** (not 1,000s).

<i>(Quantity in number of wheels, value in dollars)</i>								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2015:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2016:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2017:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2018:</b>								
January-March								
April-June								
July-September								

<sup>1</sup> 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.

<sup>2</sup> 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:

Product 4:

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

Is the price data reported above:	<b>√ if Yes</b>
In actual dollars ( <b>not</b> \$1,000)?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have returns credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Less than reported commercial shipments in question II-8 in each year?	<input type="checkbox"/>

IV-2 (d). **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of steel wheels (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"/>	

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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-5. **Pricing terms.**--

(a) What are your firm's typical sales terms for its U.S.-produced steel wheels?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced steel wheels in 2017 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

Item	Type of sale				Total (should sum to 100.0%)
	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)	Spot sales (for a single delivery)	
Share of 2017 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced steel wheels (or check "not applicable" if your firm does not sell on a short-term, long-term, and/or annual contract basis).

<b>Typical sales contract provisions</b>	<b>Item</b>	<b>Short-term contracts</b> (multiple deliveries for less than 12 months)	<b>Annual contracts</b> (multiple deliveries for 12 months)	<b>Long-term contracts</b> (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"/>
Meet or release provision	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Raw material price adjustments <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 explain.--				

IV-8. **Lead times.**--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 steel wheels?

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

**IV-9. Shipping information.**

- (a) What is the approximate percentage of the cost of U.S.-produced steel wheels 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 steel wheels that are delivered the following distances from its production facility.

<b>Distance from production facility</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>

- IV-10. Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced steel wheels since January 1, 2015 (check all that apply)?

<b>Geographic area</b>	<b>√ if applicable</b>
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<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"/>

IV-11. **Aluminum wheels.**—

(a) Can aluminum wheels be substituted for steel wheels?

No	Yes	Explain
<input type="checkbox"/>	<input type="checkbox"/>	

(b) Since January 1, 2015, have changes in the price of aluminum wheels affected the price for steel wheels?

No	Yes	Explain
<input type="checkbox"/>	<input type="checkbox"/>	

(c) Since January 1, 2015, have changes in demand for aluminum wheels impacted demand for steel wheels in the U.S. market?

No	Yes	Explain
<input type="checkbox"/>	<input type="checkbox"/>	

IV-12. **Demand trends.**—

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

<b>Market</b>	<b>Overall increase</b>	<b>No change</b>	<b>Overall decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explanation and factors</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) Indicate how demand within the United States for steel wheels has changed since January 1, 2015 for the uses specified below.

<b>U.S. demand for steel wheels for:</b>	<b>Overall increase</b>	<b>No change</b>	<b>Overall decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explanation and factors</b>
Truck OEM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Trailer OEM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bus OEM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Service/repair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-13. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of steel wheels since January 1, 2015?

<b>No</b>	<b>Yes</b>	<b>If yes, please describe and quantify if possible.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

**IV-14. Conditions of competition.--**

(a) Is the market for steel wheels subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to steel wheels? If yes, describe.

<b>Check all that apply.</b>	<b>Please describe.</b>
<input type="checkbox"/> <b>No</b>	Skip to question IV-15.
<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 steel wheels since January 1, 2015?

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

**IV-15. Supply constraints.--**Has your firm refused, declined, or been unable to supply steel wheels since January 1, 2015 (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, etc.)?

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

**IV-16. Raw materials.--**How have steel wheels' raw material prices changed since January 1, 2015?

<b>Overall increase</b>	<b>No change</b>	<b>Overall decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explain, noting how raw material price changes, including the section 232 steel tariffs imposed in March 2018, have affected your firm's selling prices for steel wheels.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-17. **Impact of the section 301 investigation.**--This question concerns the section 301 investigation and subsequent announcement on additional tariffs that include steel wheels proposed and implemented by the United States in response to Chinese trade practices. On September 17, 2018, the White House announced the placement of an additional 10 percent tariff on steel wheels imported from China under HTS subheadings 4011.20.10, 4011.20.50, 8708.70.45, 8708.70.60, 8708.99.48, and 8716.90.50, which took effect on September 24, 2018. Effective January 1, 2019, these tariffs will rise to 25 percent. (See <https://www.gpo.gov/fdsys/granule/FR-2018-07-17/2018-15090> and <https://www.whitehouse.gov/briefings-statements/statement-from-the-president-4/>)

- (a) Did the imposition of the additional 10 percent tariffs and/or announcement of the future increase in these tariffs impact, or do you anticipate that they will impact, your firm's steel wheels business and/or the U.S. steel wheels market as a whole?

Yes	No	Don't know	If yes, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

IV-18. **Interchangeability.**--Are the steel wheels 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	Mexico	Other countries
United States			
China	X		
Mexico	X	X	
For any country-pair producing steel wheels that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:			

IV-19. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between steel wheels 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

Country-pair	China	Mexico	Other countries
United States			
China	X		
Mexico	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 steel wheels, identify the country-pair and report the advantages or disadvantages imparted by such factors:			

IV-20. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for steel wheels since January 1, 2015. Indicate the share of the quantity of your firm's total shipments of steel wheels that each of these customers accounted for in 2017.

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

**IV-21. Competition from imports**

(a) **Lost revenue**--Since January 1, 2015: To avoid losing sales to competitors selling steel wheels from China, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

(b) **Lost sales**--Since January 1, 2015: Did your firm lose sales of steel wheels to imports of this product from China?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

IV-22. **Other explanations**--If your firm would like to further explain a response to a question in Part IV 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.

## 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/steel\\_wheels\\_china/final.htm](https://www.usitc.gov/investigations/701731/2018/steel_wheels_china/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.

- **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:** **WHEEL**

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

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

***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.