FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

STEEL WHEELS FROM CHINA

This questionnaire must be received by the Commission by November 30th, 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.

Name of firm

Website		
Has your firm produced	d or exported steel wheels (as defined on nex	kt page) at any time since January 1, 2015?
NO (Sign the	e certification below and promptly return only this	s page of the questionnaire to the Commission)
YES (Comple	ete all parts of the questionnaire, and return the e	ntire questionnaire to the Commission)
•	re via the Commission <i>Drop Box</i> by clicking c.gov/oinv/. (PIN: WHEEL)	ng on the following link:
	CERTIFICATION	
-	stionnaire and throughout this proceeding i	its employees and contract personnel, to use t in any other import-injury proceedings conducted
the undersigned, acknowledge oceeding or other proceedings rsonnel (a) for developing or r views, and evaluations relatio pendix 3; or (ii) by U.S. govern	e that information submitted in response to s may be disclosed to and used: (i) by the C maintaining the records of this or a related ng to the programs, personnel, and operc	Commission, its employees and Offices, and control proceeding, or (b) in internal investigations, auditations of the Commission including under 5 U.S
the undersigned, acknowledge oceeding or other proceedings rsonnel (a) for developing or r views, and evaluations relatio pendix 3; or (ii) by U.S. govern	e that information submitted in response to s may be disclosed to and used: (i) by the C maintaining the records of this or a related ng to the programs, personnel, and oper nment employees and contract personnel, so	Commission, its employees and Offices, and control proceeding, or (b) in internal investigations, auditations of the Commission including under 5 U.S
the undersigned, acknowledge oceeding or other proceedings rsonnel (a) for developing or n views, and evaluations relatin pendix 3; or (ii) by U.S. govern ntract personnel will sign appro	e that information submitted in response to s may be disclosed to and used: (i) by the C maintaining the records of this or a related ing to the programs, personnel, and oper niment employees and contract personnel, so opriate nondisclosure agreements.	

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 Maxion 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.

<u>Steel wheels</u> 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 cladded or not cladded, 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, purchaser and/or foreign producer questionnaire), you need not respond to duplicated questions.

<u>Confidentiality</u>.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. §1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

<u>Verification</u>.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

<u>Valid number error messages.</u>—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 Jordan Harriman (202-205-2610, jordan.harriman@usitc.gov).

OMB stati	mpleting	this questionnair	e
Hou	rs	Dollars	
issues of o and as lim 20 hours	concern a ited as po per resp	are adequately a ossible. Public re _l	have been reviewed with market participants to ensur ddressed and that data requests are sufficient, mean porting burden for this questionnaire is estimated to ave the time for reviewing instructions, gathering data ionnaire.
reducing t	he burde s to your	n, and any sugge response or send	he accuracy of this burden estimate, suggestions for stions for improving this questionnaire. Please attach so the Office of Investigations, USITC, 500 E St. SW,
			ne name and address of establishment(s) covered by the traded, please specify the stock exchange and trading
wheels, in separate f	cluding a rom) suc	uxiliary facilities of the facilities of the facilities. Firms	firm in China involved in the production or export of stoperated in conjunction with (whether or not physically operating more than one establishment in China shoulents into a single report.
		•	or any related firm produce, have the capability to pro vheels in the United States or other countries?
No	Yes	' ' '	ame the firm(s) and country(ies) below and, if U.S. issure that they complete the Commission's producer:
	.S. impor	tersDoes your	firm or any related firm import or have any plans to im
		ne United States?	

I-5. <u>U.S. importers</u>.--Please provide the names, contacts, telephone numbers, and e-mail addresses of the <u>FIVE</u> largest U.S. importers of your firm's steel wheels in 2017.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2017 U.S. exports (%)
1					
2					
3					
4					
5					

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Jordan Harriman (202-205-2610, <u>jordan.harriman@usitc.gov</u>). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1.		mationPlease identify the responsible taff may contact that individual regardir	individual and the manner by which ng the confidential information submitted
	Name		
	Title		
	Email		
	Telephone		
	Fax		

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of steel wheels since January 1, 2015.

(che	ck as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other (e.g., technology)	

II-2b. <u>Anticipated changes in operations.</u>--Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of steel wheels in the future?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions.

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 for all products manufactured in that establishment using the same manufacturing equipment. 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-9. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope mercandhise, then the "average production capacity" reported in question II-9 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"Production" -- All production in your establishment(s) in China, including production consumed internally within your firm.

Quantity (in actual number of wheels)								
	(Calendar years	January-S	January-September				
Item	2015	2016	2017	2017	2018			
Overall production capacity								
Production of: Steel wheels ¹	0	0	0	0	0			
Out of scope production: Other products ²								
Subtotal, out-of-scope	0	0	0	0	0			
Total	0	0	0	0	0			

¹ Data entered for production of steel wheels will populate here once reported in question II-9.

² Please identify these products: .

	Hours per v	veek	Weeks pe	er year		
		 -	scribe the method xplain any changes		calculate overall produc apacity.	ction
	ion constra		describe the cons	traint(s) that s	et the limit(s) on your fi	rm's
	shifting.—					
			ch production capa ent and/or labor?	acity between	steel wheels and other	produc
No	Yes	- \	•	•	s or are able to produce otential products:	other
	Please desc	ribe the facto	•	•	to shift production capa e, etc.), and the degree to	-

Yes

No

(i)	Ple fir		ntify and describe the type(s) of coating applied to steel wheels produced
	(ch	eck as n	nany as appropriate)	(Description of specific coating)
			Zinc phosphate pretreatment	
			Epoxy E-coat	
			Other (non-epoxy) E-coat	
			Powder top coating	
			Galvanized plating	
			Other	
(ii)				to steel wheels produced by your firm, does your of its standard product offerings?
No)	Yes	If yes Please describe th	ese combination(s) below.

If yes-- Please describe these steel wheels below.

II-5.	<u>Share of sales</u> What percentage of your firm's total sales in its most recent fiscal year was represented by sales of steel wheels? percent.										
II-6.	<u>Firm's estimated share of production in China</u> Please estimate the percentage of total production of steel wheels in China accounted for by your firm's production in 2017: percent.										
II-7.	Firm's estimated share of country's exportsPlease estimate the percentage of total exports to the United States of steel wheels from China accounted for by your firm's exports in 2017: percent.										
II-8.	<u>Third country trade actions</u> Are the steel wheels exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?										
	No	Yes	If yesList the product(s), countries affected, and the date(s) of such findings/remedies/proceedings.								
	No Yes findings/remedies/proceedings.										

II-9. <u>Trade data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of steel wheels in your establishment(s) in China during the specified periods. Do not include resales of steel wheels that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-10.

<u>Do not submit data by manufacturing facility if they are in the same country.</u> If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response.

"Average production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. 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 establishment(s) in China, including production consumed internally within your firm.

"Shipments"--Shipments of products produced in your establishment(s) in China. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within China.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in China, including product consumed internally by your firm.

"Export shipments"--Shipments to destinations outstide of the country indicacted on page 1 (China), 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-9. <u>Trade data</u>.--Continued.

Quantity (in actual number of wheels)								
		Act	ual experie	nce		Proje	ctions ¹	
	Ca	Calendar year January-Sept			eptember	Calend	dar year	
Item	2015	2016	2017	2017	2018	2018	2019	
Average production capacity ² (A)								
Beginning-of-period inventories (B)								
Production (C)								
Home market shipments: Internal consumption/ transfers (D)								
Commercial shipments (E)								
Exports to the United States (F)								
Exports to all other markets ³ (G)								
Total exports (H) (should equal F+G)	0	0	0	0	0	0	0	
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0	0	0	
End-of-period inventories (J)								
¹ Please explain the basis for your f ² The production capacity reported describe the methodology used to calc ³ Identify principal other export ma	is based on coulo	operating _ tion capaci	hours					

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

		Act	ual experie	nce		Projections		
	Calendar year			January-	September	Calendar year		
Item	2015	2016	2017	2017	2018	2018	2019	
B + C - D - E - F - G - J = should equal								
zero ("0") or provide an explanation. ¹	0	0	0	0	0	0	0	

¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:

II-10. Exports to the United States not produced by your firm.—Report your firm's exports to the United States of steel wheels that was produced in China but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-9.

Quantity (in actual number of wheels)							
	Act	Actual experience			Projections		
	Calendar year January-September			Calendar year			
Item	2015	2016	2017	2017	2018	2018	2019
Exports of steel wheels to the United States not produced by your firm ¹							
¹ List the producer(s)							

II-11. Supplier qualification.—

(a)	Has your firm been qualified by any U.S. OEMs to supply steel wheels? If yes, please list all
	OEMs for which your firm has qualified to supply Chinese steel wheels (if more lines are
	needed, please continue in question II-12).

No	Yes—fill out table below.		

Date		steel wheels t	sold Chinese o this OEM for anufacturing?	If no, please explain why your firm has not sold steel wheels to this OEM.
Name of OEM	qualified	Yes	No	

II-11.	Supplier	qualification.	Continued
11 ⁻ ±±.	Jubbliel	qualification	

(b)	Has your firm attempted to achieve qualification to supply steel wheels with any U.S. OEM
	customers but has not been approved? (If 'yes' and more lines are needed, please continue
	in question II-12.)

No	Yes—fill out table below.		

Name of OEM	Date	Status of qualification process and/or reason(s) for failure to qualify.

II-12.	Other explanationsIf your firm would like to further explain a response to a question in Part II
	that did not provide a narrative box, please note the question number and the explanation in
	the space provided below. Please also use this space to highlight any issues your firm had in
	providing the data in this section, including but not limited to technical issues with the MS Word
	questionnaire.

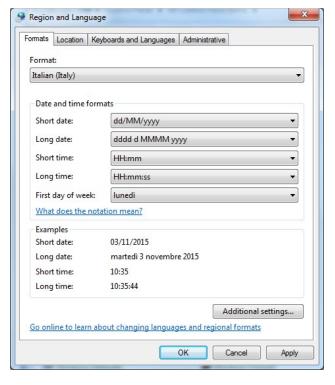
Correcting Valid number error messages.—If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form 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.

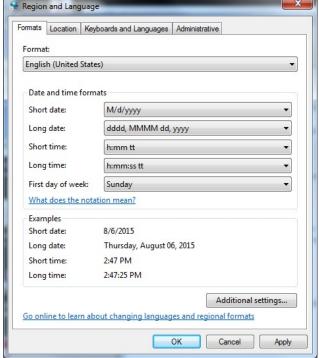
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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 USITC foreign producer questionnaire form. 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/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.

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: WHEEL

• E-mail.—E-mail your questionnaire to 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 did not produce or export 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, you are 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.