

## U.S. PRODUCERS' QUESTIONNAIRE

### RUBBER BANDS FROM CHINA, SRI LANKA, AND THAILAND

This questionnaire must be received by the Commission by **February 13, 2018**  
*See last page for filing instructions.*

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping and countervailing duty investigations concerning rubber bands from China, Sri Lanka, and Thailand (Inv. Nos. 701-TA-598-600 and 731-TA-1408-1410 (Preliminary)). 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 rubber bands (as defined on next page) and/or select excluded rubber band products (as defined on next page) from any country 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>BAND</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 January 30, 2018 by Alliance Rubber Co., Hot Springs, Arkansas. Antidumping and countervailing 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 dumping and subsidization. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2018/rubber\\_bands\\_china\\_sri\\_lanka\\_and\\_thailand/preliminary.htm](https://www.usitc.gov/investigations/701731/2018/rubber_bands_china_sri_lanka_and_thailand/preliminary.htm).

**Rubber bands** covered by these investigations are defined as bands made of vulcanized rubber, with a flat length, as measured end-to-end by the band lying flat, no less than 1/2 inch and no greater than 10 inches; with a width, which measures the dimension perpendicular to the length, of at least 3/64 inch and no greater than 2 inches; and a wall thickness from 0.020 inch to 0.125 inch. Vulcanized rubber has been chemically processed into a more durable material by the addition of sulfur or other equivalent curatives or accelerators. Subject products are included regardless of color or inclusion of printed material. The scope includes vulcanized rubber bands which are contained or otherwise exist in various fowls and packages, such as, without limitation, vulcanized rubber bands included within a desk accessory set or other type of set or package, and vulcanized rubber band balls, but excludes Bedford Elastitags®, and bands that are being used at the time of import to fasten an imported product.

Rubber bands are currently imported under statistical reporting number 4016.99.3510 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**Select excluded (or out-of-scope) rubber band products** are as follows: (1) Vulcanized rubber bands with a flat length less than 1/2 inches or greater than 10 inches, a width less than 3/64 inches or greater than 2 inches, or a wall thickness less than 0.020 inches or greater than 0.125 inches (“Excluded vulcanized rubber bands”); (2) Bedford Elastitags®; and (3) Non-latex rubber bands.

**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 rubber bands 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.

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 rubber bands, 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. **Petition support.**--Does your firm support or oppose the petition?

Petition	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"/>
Sri Lanka AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sri Lanka CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **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 Amanda Lawrence (202-205-3185, [amanda.lawrence@usitc.gov](mailto:amanda.lawrence@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	
Fax	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of rubber bands 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 made on the same equipment and machinery used to produce rubber bands, and the combined production capacity on this shared equipment and machinery 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).

**"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 pounds)</b>			
<b>Item</b>	<b>Calendar years</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Overall production capacity</b>			
<b>Production of:</b>			
In-scope rubber bands <sup>1</sup>	0	0	0
Products not covered:			
Excluded vulcanized rubber bands <sup>2</sup>			
Bedford Elastitags®			
Non-latex rubber bands			
Other products <sup>3</sup>			
Subtotal, products not covered	0	0	0
<b>Total</b>	0	0	0
<sup>1</sup> Data entered for production of in-scope rubber bands will populate here once reported in question II-7. <sup>2</sup> Excluded vulcanized rubber bands, as defined on page 2, include bands made of vulcanized rubber with a flat length less than 1/2" or greater than 10", a width less than 3/64" or greater than 2", and a wall thickness less than 0.020" or greater than 0.125". <sup>3</sup> Please identify these products: _____.			

II-3b. **Operating parameters.**--The production capacity reported in II-3a is based on operating \_\_\_\_\_ 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 in-scope rubber bands and other products using the same equipment and/or labor?

No                       Yes-- (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:

\_\_\_\_\_.

(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. **Tolling.**--Since January 1, 2015, has your firm been involved in a toll agreement regarding the production of in-scope rubber bands?

**"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.

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

II-5. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce in-scope rubber bands in and/or admit in-scope rubber bands 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 in-scope rubber bands into a foreign trade zone (FTZ) for use in distribution of in-scope rubber bands and/or the production of downstream articles?

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

- II-6. **Importer.**--Since January 1, 2015, has your firm imported in-scope rubber bands and/or select excluded rubber band products?

**“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-7. **Production, shipment, and inventory data of in-scope rubber bands.**--Report your firm's production capacity, production, shipments, and inventories related to the production of in-scope rubber bands 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.

**"Bulk 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. For the purposes of this questionnaire, bulk commercial U.S. shipments should include sales to distributors, to end users, and to retail establishments, whether or not already packaged for retail sale, but should not include sales made at the retail level of trade to individual customers (including to other businesses).

**"Internal consumption / including for retail sale"** --Product consumed internally by your firm and product that is destined for sale at a retail level to individual consumers. Such transactions should be valued at fair market value of the bulk in-scope rubber bands (i.e., not the retail price).

**"Transfers to related firms"** –Shipments made to related domestic firms. Such transactions are valued at fair market value.

**"Related firm"** –A firm that your firm solely or jointly owns, manages, or otherwise controls.

**"Export shipments"** –Shipments to destinations outside the United States, including shipments to related firms.

**"Inventories"**— Finished goods inventory, not raw materials or work-in-progress.

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

**II-7. Production, shipment, and inventory data of in-scope rubber bands.--Continued**

Quantity (in pounds) and value (in dollars)			
Item	Calendar years		
	2015	2016	2017
<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>Bulk commercial shipments:</b>			
Quantity (D)			
Value (E)			
<b>Internal consumption (including for retail sale by your firm):</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> <sup>4</sup> (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		
	2015	2016	2017
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0
<p><sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:_____.</p>			

II-8. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of bulk commercial U.S. shipments, internal consumption, and transfers to related firms) of in-scope rubber bands by channel of distribution.

<b>Quantity (in pounds)</b>			
<b>Item</b>	<b>Calendar years</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Channels of distribution:</b>			
<b>U.S. shipments:</b>			
To distributors (M)			
To retailers and office supply stores: branded <sup>1</sup> (N)			
To retailers and office supply stores: private label <sup>1</sup> (O)			
To end users: agricultural/floral/grocery (P)			
To end users: industrial/hardware/construction (Q)			
To end users: newspaper/packaging/stationery <sup>2</sup> (R)			
To end users: all other end users <sup>3</sup> (S)			
<sup>1</sup> Include stationery stores, such as Staples, Office Depot, etc., in retail category. <sup>2</sup> Include end users, such as government or post offices, that purchase rubber bands for stationery use in end users category. <sup>3</sup> Please specify the other types of end users: _____.			

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines M through S) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

<b>Reconciliation</b>	<b>Calendar years</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
M + N + O + P + Q + R + S – D – F – H = zero ("0"), if not revise.	0	0	0

II-9. **U.S. shipments by product size.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of in-scope rubber bands produced by your firm by product size.

<b>Quantity (in pounds)</b>	
<b>Item</b>	<b>Calendar year 2017</b>
<b>U.S. shipments.--</b> Rubber bands balls (T)	
Other than rubber band balls: Sizes 8 through 19 and 117-A <sup>1</sup> (U)	
Sizes 27 through 33 and 117-B <sup>2</sup> (V)	
All other sizes (W) <sup>3</sup>	
<sup>1</sup> Sizes 8 through 19 and 117-A, based on common industry standards, have a width of 1/16". Lengths are as follows: size 8—7/8", size 10—1 ¼", size 12—1 ¾", size 14—2", size 16—2 ½", size 18—3", size 19—3 ½", and size 117-A—7". <sup>2</sup> Sizes 27 through 33 and 117-B, based on common industry standards, have a width of 1/8". Lengths are as follows: size 27—1 ¼", size 30—2", size 31—2 ½", size 32—3", size 33—3 ½", and size 117-B—7". <sup>3</sup> Please specify the other sizes: _____.	

**RECONCILIATION OF U.S. SHIPMENTS.**--Please ensure that the quantities and values reported for US shipments by product type (i.e., lines T through W) in 2017 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2017 in question II-7. 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 year 2017</b>
<b>Quantity:</b> T + U + V + W – D – F – H = zero ("0"), if not revise.	0

II-10. **Employment data.**--Report your firm's employment-related data related to the production of in-scope rubber bands and provide an explanation for any trends in these data.

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

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

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

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

Item	Calendar years		
	2015	2016	2017
Average number of PRWs ( <i>number</i> )			
Hours worked by PRWs ( <i>number of hours</i> )			
Wages paid to PRWs ( <i>dollars</i> )			

Explanation of trends:

II-11. **Related firms.**--If your firm reported transfers to related firms in question II-7, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a 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-12. **Purchases.**--Other than direct imports, has your firm otherwise purchased in-scope rubber bands since January 1, 2015?

**“Purchase”** – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

**“Direct import”** –A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.

No             Yes--Report such purchases below and explain the reasons for your firms' purchases:

<b>(Quantity in pounds)</b>			
<b>Item</b>	<b>Calendar years</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Purchases from U.S. importers<sup>1</sup> of in-scope rubber bands from—</b>			
China			
Sri Lanka			
Thailand			
All other countries			
<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-13. **Other explanations.**--If 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.

**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Janet Freas (202-205-3107, [janet.freas@usitc.gov](mailto:janet.freas@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	
Fax	

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:

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

2. Does your firm prepare profit/loss statements for rubber bands:  
 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. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes rubber bands, 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 in-scope rubber bands, 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>
In-scope rubber bands	%
	%
	%
	%
	%

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

Yes--Continue to question III-7.       No--Continue to question III-9a.

III-7. **Inputs from related suppliers.**--Please identify the inputs used in the production of rubber bands 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 rubber bands) in a manner consistent with your firm's accounting books and records.

Yes

No--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in table III-9a.

III-9a. **Operations on in-scope rubber bands.**--Report the revenue and related cost information requested below on the in-scope rubber bands 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 fiscal years.

Quantity (in pounds) and value (in dollars)			
Item	Fiscal years ended--		
	2015	2016	2017
<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
<b>Net sales values:</b> <sup>2</sup>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	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
<b>Gross profit or (loss)</b>	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
<b>Operating income (loss)</b>	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
<b>Depreciation/amortization included above</b>			
<sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations. <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 costs associated with CS, IC, and Transfers.			

*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 rubber bands.**--Please indicate the share of total raw material costs reported in III-9a in 2017 for the following raw material inputs:

Input costs	Share of 2017 total raw material costs (percent)
Natural rubber	%
Synthetic rubber	%
Other input costs (e.g., pigments, dyes) <sup>1</sup>	%
Total (should sum to 100 percent)	0.0 %
<sup>1</sup> Please indicate any notable "other" raw materials not expressly identified above and provide the share of the 2017 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?

Yes     No--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.

III-10. **Nonrecurring items (charges and gains) included in the subject product financial results.**--For each annual 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 dollars*), 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.

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

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the 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.

III-12. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of rubber bands. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for rubber bands 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 fiscal years.

**Note:** Total assets should reflect net assets after any accumulated depreciation and allowances deducted.

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

<b>Value (in dollars)</b>			
<b>Item</b>	<b>Fiscal years ended--</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
Total assets (net) <sup>1</sup>			
<sup>1</sup> Describe _____			

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

<b>Value (in dollars)</b>			
<b>Item</b>	<b>Fiscal years ended--</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
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-7 (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. 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	Full year data		
	2015	2016	2017
<b>Quantity:</b> Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
<b>Value:</b> Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

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

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

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

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 rubber bands from China, Sri Lanka, and Thailand?

- No                       Yes--My firm has experienced actual negative effects as follows:

<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 rubber bands from China, Sri Lanka, and Thailand?

- No                       Yes--My firm has experienced actual negative effects as follows:

<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 rubber bands from China, Sri Lanka, and Thailand?

<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 that did not provide a narrative box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

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

Further information on this part of the questionnaire can be obtained from Lauren Gamache (202-205-3489, [lauren.gamache@usitc.gov](mailto:lauren.gamache@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	
Fax	

**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.**-- Size #32 rubber bands (3" x 1/8"), natural/latex, sold in 1 lb. poly bags

**Product 2.**-- Size #33 rubber bands (3 1/2" x 1/8"), natural/latex, sold in 1 lb. poly bags

**Product 3.**-- Size #64 rubber bands (3 1/2" x 1/4"), natural/latex, sold in 1 lb. poly bags

**Product 4.**-- Size #18 rubber bands (3" x 1/16"), newspaper size, natural/latex, sold in 1 lb. poly bags

**Product 5.**-- Size #14 rubber bands (2" x 1/16"), agricultural size, natural/latex, sold in 1 lb. poly bags

**Product 6.**-- Size #16, rubber bands (2 1/2" x 1/16"), agricultural size, natural /latex, sold in 1 lb. poly bags

**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-December 2017, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data table(s) 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.

**Report data in pounds and dollars.**

<b>(Quantity in pounds, value in dollars)</b>						
<b>Period of shipment</b>	<b>Product 1</b>		<b>Product 2</b>		<b>Product 3</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<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>(Quantity in pounds, value in dollars)</b>						
<b>Period of shipment</b>	<b>Product 4</b>		<b>Product 5</b>		<b>Product 6</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<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						

<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 4: \_\_\_\_\_

Product 2: \_\_\_\_\_ Product 5: \_\_\_\_\_

Product 3: \_\_\_\_\_ Product 6: \_\_\_\_\_

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) and pounds?	<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 Part II 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 rubber bands (*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 rubber bands?

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 its domestic rubber bands 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 rubber bands in 2017 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

	Type of sale				Total (should sum to 100.0%)
	Long-term contracts (multiple deliveries for more than 12 months)	Annual contracts (multiple deliveries for 12 months)	Short-term contracts (multiple deliveries for less than 12 months)	Spot sales (for a single delivery)	
<b>Share of 2017 sales</b>	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced rubber bands (or check "not applicable" if your firm does not sell on a long-term, short-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"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 rubber bands?

<b>Source</b>	<b>Share of 2017 sales</b>	<b>Lead time</b> (Average number of days)
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 rubber bands 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 rubber bands 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 rubber bands 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. **End uses.**--List the end uses of the rubber bands that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by rubber bands and other inputs?

End use product	Share of total cost of end use product accounted for by		Total (should sum across to 100.0%)
	Rubber bands	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **Substitutes.**--Can other products be substituted for rubber bands?

No       Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for rubber bands?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-13. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for rubber bands has changed since January 1, 2015. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<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"/>	

IV-14. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of rubber bands since January 1, 2015?

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

IV-15. **Conditions of competition.**--

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

Check all that apply.	Please describe.
<input type="checkbox"/> <b>No</b>	Skip to question IV-16.
<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 rubber bands since January 1, 2015?

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

IV-16. **Supply constraints.**--Has your firm refused, declined, or been unable to supply rubber bands 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.)?

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

IV-17. **Raw materials.**--How have rubber bands raw material prices changed since January 1, 2015?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for rubber bands.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-18. **Bundling sales.**--Does your firm bundle sales of rubber bands with other products?

No	Yes	Estimate share of your rubber band sales that were sold in a bundle in 2017	Describe other product(s) that are typically in bundled sales
<input type="checkbox"/>	<input type="checkbox"/>		

IV-19. **Interchangeability.**--Are rubber bands 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	Sri Lanka	Thailand	Other countries
United States				
China				
Sri Lanka				
Thailand				
For any country-pair producing rubber bands 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-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between rubber bands produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or O in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

<b>Country-pair</b>	China	Sri Lanka	Thailand	Other countries
United States				
China	X			
Sri Lanka	X	X		
Thailand	X	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 rubber bands, identify the country-pair and report the advantages or disadvantages imparted by such factors:				

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

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

**IV-22. Competition from imports**

- (a) **Lost revenue.**--Since January 1, 2015: To avoid losing sales to competitors selling rubber bands from China, Sri Lanka, and Thailand, 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 rubber bands to imports of this product from China, Sri Lanka, and Thailand?

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

- (c) **The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.**

If your firm indicated “yes” to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at [http://usitc.gov/trade\\_remedy/question.htm](http://usitc.gov/trade_remedy/question.htm). Note that the Commission may contact the firms named to verify the allegations reported.

Is your firm submitting the lost sales/lost revenues worksheet?

<input type="checkbox"/>	No—Please explain.
<input type="checkbox"/>	Yes—Please complete the worksheet and submit via the Commission dropbox. <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> . (PIN: <b>BAND</b> )

- IV-23. Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

**PART V.-- ALTERNATIVE PRODUCTS**

Further information on this part of the questionnaire can be obtained from Amanda Lawrence (202-205-3185, [amanda.lawrence@usitc.gov](mailto:amanda.lawrence@usitc.gov)).

V-1. **Comparability of rubber band products.**--For each of the following product pairs indicate whether in-scope rubber bands produced in the United States are:

- F: fully comparable or the same, *i.e.*, have no differentiation between them;
- M: mostly comparable or similar;
- S: somewhat comparable or similar;
- N: never or not-at-all comparable or similar; or
- O: no familiarity with products.

Note.--Excluded vulcanized rubber bands, as defined on page 2, include bands made of vulcanized rubber with a flat length less than 1/2" or greater than 10", a width less than 3/64" or greater than 2", and a wall thickness less than 0.020" or greater than 0.125".

(a) **Physical Characteristics and Uses.**--The differences and similarities in the physical characteristics and uses.

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses</i> :			

(b) **Interchangeability.**--The ability to substitute the products in the same application.

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <i>interchangeability</i> :			

V-1. **Comparability of rubber band products.**--Continued

- (c) **Common manufacturing facilities, production processes, and production employees.**--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <u>common manufacturing facilities, production processes, and production employees</u> :			

- (d) **Channels of distribution.**--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesalers/distributors, etc.).

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distributon</u> :			

- (e) **Consumer and producer perceptions.**--Perceptions as to the differences and/or similarities.

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <u>consumer and producer perceptions</u> :			

V-1. **Comparability of rubber band products.**--*Continued*

(f) **Price.**--Whether prices are comparable or differ between products.

<b>Product-pair</b>	Excluded vulcanized rubber bands	Bedford Elastitags®	Non-latex rubber bands
In-scope rubber bands			
For any product-pair for which you indicated "S" or "N", please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :			

V-2. **U.S. shipments of out-of-scope rubber bands.**--Report your firm's U.S. shipments of out-of-scope rubber band products (i.e. excluded vulcanized rubber bands, as defined on page 2, Bedford Elastitags®, and non-latex rubber bands). Data reported in question V-2 should not be included in data reported in part II.

<b>Quantity (in pounds)</b>			
<b>Item</b>	<b>Calendar years</b>		
	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>U.S. shipments:</b>			
<b>Excluded vulcanized rubber bands:</b>			
<i>Quantity</i>			
<i>Value</i>			
<b>Bedford Elastitags®:</b>			
<i>Quantity</i>			
<i>Value</i>			
<b>Non-latex rubber bands:</b>			
<i>Quantity</i>			
<i>Value</i>			

V-3. **Other explanations.**--If your firm would like to further explain a response to a question in Part V 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.

## 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/rubber\\_bands\\_china\\_sri\\_lanka\\_and\\_thailand/preliminary.htm](https://www.usitc.gov/investigations/701731/2018/rubber_bands_china_sri_lanka_and_thailand/preliminary.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:** **BAND**

- **E-mail.**—E-mail the MS Word questionnaire to [amanda.lawrence@usitc.gov](mailto:amanda.lawrence@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.