FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

STEEL TRAILER WHEELS FROM CHINA

This questionnaire must be received by the Commission by <u>August 22, 2018</u>

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 investigations concerning steel trailer wheels ("trailer wheels") from China (Inv. Nos. 701-TA-609 and 731-TA-1421 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII.

	Name of firm				
	Address				
	Website				
	Has your firm produced or exported trailer wheels (as defined on next page) at any time since January 1, 2015?				
	NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission				
	YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)		tire questionnaire to the Commission)		
	•	e via the Commission <i>Drop Box</i> by clicking .gov/oinv/. (PIN: TRAIL)	g on the following link:		
		CERTIFICATION			
neans on forma he Common h	of this certification I also ation provided in this quest amission on the same or sin andersigned, acknowledge ling or other proceedings ael (a) for developing or n , and evaluations relatin ix 3; or (ii) by U.S. governa t personnel will sign appro	o grant consent for the Commission, and itionnaire and throughout this proceeding in milar merchandise. that information submitted in response to may be disclosed to and used: (i) by the Containtaining the records of this or a related pay to the programs, personnel, and operationent employees and contract personnel, solo priate nondisclosure agreements.	tect to audit and verification by the Commission. By its employees and contract personnel, to use the any other import-injury proceedings conducted by this request for information and throughout this emmission, its employees and Offices, and contract proceeding, or (b) in internal investigations, audits, tions of the Commission including under 5 U.S.C. lely for cybersecurity purposes. I understand that all		
lame o	f Authorized Official	Title of Authorized Official	Date		
		Phone:			
ignature Email addres Fax:			Email address		
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PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to a petition filed on August 8, 2018, by Dexstar Wheel, Elkhart, Indiana. 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_trailer_wheels_china/preliminary.htm.

<u>Trailer wheels</u> covered by these investigations are certain on-the-road steel wheels, and components thereof, for tubeless tires with a nominal wheel diameter of 12 inches to 16.5 inches, regardless of width. Certain on-the-road steel wheels with a wheel diameter of 12 inches to 16.5 inches within the scope are generally for road and highway trailers and other towable equipment, including, *inter alia*, utility trailers, cargo trailers, horse trailers, boat trailers and recreational trailers. Rims may be entered separately and sold to towable mobile home customers where the rim will be mounted to the wheel hub without a disc. The standard widths of certain on-the-road steel wheels are 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches, but all certain on-the-road steel wheels, regardless of width, are covered by the scope.

The scope includes rims and discs for certain on-the-road steel wheels, whether imported as an assembly, unassembled, or separately. The scope includes certain on-the-road steel wheels regardless of steel composition, whether cladded or not cladded, whether finished or not finished, and whether coated or uncoated. The scope also includes certain on-the-road steel wheels with discs in either a "hub-piloted" or "stud-piloted" mounting configuration, though the stud-piloted configuration is most common in the size range covered.

All on-the-road wheels sold in the United States must meet Standard 110 or 120 of the National Highway Traffic Safety Administration's (NHTSA) Federal Motor Vehicle Safety Standards, which requires a rim marking, such as the "DOT" symbol, indicating compliance with applicable motor vehicle standards. *See* 49 C.F.R. § 571.110 and § 571.120. The scope includes certain on-the-road steel wheels imported with or without NHTSA's 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 or rims imported as an assembly with a tire mounted on the rim and/or with a valve stem are included in the scope of this investigation. However, if the steel wheels or rims are imported as an assembly with a tire mounted on the wheel or rim and/or with a valve stem attached, the tire and/or valve stem is not covered by the scope.

Excluded from this scope are the following: steel wheels for tube-type tires; such tires use multi-piece rims, which are two-piece and three-piece assemblies and require the use of an inner tube. Also excluded from this scope are aluminum wheels and certain on-the-road steel wheels that are coated with chrome. Steel wheels that do not meet Standard 110 or 120 of the NHTSA's requirements are excluded from the scope.

Certain on-the-road steel wheels subject to this investigation are properly classifiable under the following category of the Harmonized Tariff Schedule of the United States ("HTSUS"): 8716.90.5035 which covers the exact product covered by the scope whether entered as an assembled wheel or in components. Wheels entered with a tire mounted on them are believed entered under HTS 8716.90.5059 (Trailers and semi-trailers; other vehicles, not mechanically propelled, parts, wheels,

Foreign Producers' Questionnaire - Trailer wheels

other, wheels with other tires) (a category that will be broader than what is covered by the scope). While the HTSUS subheading is provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.

<u>Reporting of information</u>.-- 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).

I-1.	OMB statisticsPlease report below the actual number of hours required and the cost to you				
	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 20 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

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

"Establishment" Each facility of a firm in China involved in the production or export of trailer
wheels, including auxiliary facilities operated in conjunction with (whether or not physically
separate from) such facilities. Firms operating more than one establishment in China should
combine the data for all establishments into a single report.

I-3. <u>Related producers</u>.--Does your firm or any related firm produce, have the capability to produce, or have any plans to produce trailer wheels in the United States or other countries?

No	If yes, please name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission's producer questionnaire:

Foreign Producers' Questionnaire – **Trailer wheels**

I-4.	Related U.S. importers Does your firm or any related firm import or have any plans to import
	trailer wheels into the United States?

No	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire:

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 trailer wheels in 2017.

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

Foreign Producers' Questionnaire – **Trailer wheels**

PART II.--TRADE AND RELATED INFORMATION

Fax

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

II-1.	<u>Contact information</u> Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.			
	Name			
	Title			
	Email			
	Telephone			

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of trailer 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)	

Foreign Producers' Questionnaire - Trailer wheels

II-2b. Anticipated changes in operations.--Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of trailer 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 trailer 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-8. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-8 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

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

II-3a. **Production using same machinery.--**Continued

Quantity	(in pounds)			
Ca	lendar years	January-June		
2015	2016	2017	2017	2018
0	0	0	0	0
0	0	0	0	0
	2015 0	0 0	Calendar years 2015 2016 2017 0 0 0 0	Calendar years January 2015 2016 2017 2017 0 0 0 0

¹ Data reported for capacity (first line) should be greater than or equal to data reported for total production (last line).

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

Hours per week	Weeks per year

II-3c.	<u>Capacity calculation</u> Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity since January 1, 2015.
II-3d.	<u>Production constraints</u> Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

² Data entered for production of trailer wheels will populate here once reported in question II-8.

³ Please identify these products: _____.

Foreign Producers' Questionnaire – **Trailer wheels**

II-3e.	<u>Product</u>	shifting.—								
	(i). Is your firm able to switch production capacity between trailer wheels and other production capacity between trailer wheels and other production?									
	No	Yes	If yes (i.e., your firm has produced other products or is able to produce other products)—Please identify other actual or potential products:							
	ı	between pro	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which is enhance or constrain such shifts.							
II-4.			at percentage of your firm's total sales in its most recent fiscal year was sof trailer wheels? percent.							
II-5.			are of production in ChinaPlease estimate the percentage of total production China accounted for by your firm's production in 2017 percent.							
II-6.	the Unite		are of country's exportsPlease estimate the percentage of total exports to trailer wheels from China accounted for by your firm's exports in 2017.							
II-7.		ping/counte	actionsAre the trailer wheels exported by your firm subject to ervailing duty/safeguard findings, remedies, or proceedings in other							
	No	Yes	If yesList the products(s), countries affected, and the date of such findings/remedies/proceedings.							

II-8. <u>Trade data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of trailer wheels in your establishment(s) in China during the specified periods. Do not include resales of trailer 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-9.

<u>Do not submit data separately 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.

Foreign Producers' Questionnaire - Trailer wheels

II-8. <u>Trade data</u>.--*Continued*.

	Q	uantity (<i>in p</i>	oounds)					
	Actual experience						Projections ¹	
	Ca	lendar yea	r	January-June		Calendar 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 c culate produc	perating tion capacit	hours p					

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

	Actual experience						Projections	
	C	alendar yea	r	Janua	ry-June	Calend	dar 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-9. Exports to the United States not produced by your firm.--Report your firm's exports to the United States of trailer wheels that were produced in China but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-8.

	Quantity	(in pounds)				
	Act	ual experie	nce		Proje	ctions
(Calendar yea	ar	Janua	ry-June	Calend	ar year
2015	2016	2017	2017	2018	2018	2019
		Act Calendar yea	Calendar year	Actual experience Calendar year Januar	Actual experience Calendar year January-June	Actual experience Proje Calendar year January-June Calend

II-10.	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.

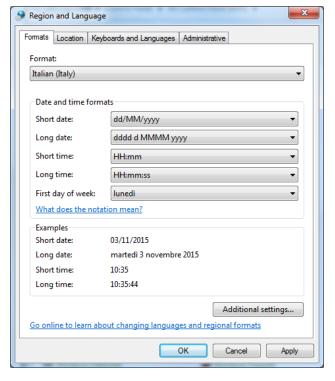
Correcting Valid number error messages.--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form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

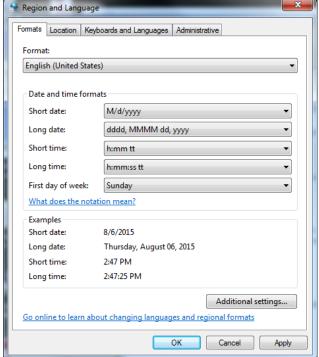
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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_trailer_wheels_china/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.

- <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:
 - o Web address: https://dropbox.usitc.gov/oinv/
 - o Enter Investigation: Select "Steel Trailer Wheels from China" in the drop down menu
 - o Pin: TRAIL
- E-mail.—E-mail your questionnaire to <u>jordan.harriman@usitc.gov</u>; 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.

<u>Parties to this proceeding</u>.—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.