U.S. PRODUCERS' QUESTIONNAIRE

TOOL CHESTS AND CABINETS FROM CHINA AND VIETNAM

This questionnaire must be received by the Commission by <u>October 16, 2017</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 and antidumping investigations concerning tool chests and cabinets from China and Vietnam (Inv. Nos. 701-TA-575 and 731-TA-1360-1361 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of f	irm		
Address			
City	State	Zip Cod	e
Website _			
•	m produced tool chests and cabinets; tool chests a ool chests and cabinets (as defined on next page) fr		
	(Sign the certification below and promptly return on	y this page of the	questionnaire to the Commission)
YES	(Complete all parts of the questionnaire, and return	he entire questio	nnaire to the Commission)
•	estionnaire via the U.S. International Trade Co link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: To		<i>p Box</i> by clicking on the

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
	Phone:	
Signature		Email address
	Fax:	

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on April 11, 2017, by Waterloo Industries Inc., Sedalia, Missouri. 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.usite.gov/investigations/701731/2017/tool_chests_and_cabinets_china_and_vietnam/fin

https://www.usitc.gov/investigations/701731/2017/tool_chests_and_cabinets_china_and_vietnam/fina_ l.htm.

<u>Tool chests and cabinets</u> All metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 10 inches but not exceeding 24 inches; and
- (5) prepackaged for retail sale.

For purposes of this scope, the width parameter applies to each individual unit, i.e., each individual top chest, intermediate top chest, tool cabinet, side cabinet, storage unit, mobile work bench, and work station.

Prepackaged for retail sale means the units are packaged in a cardboard box or other container suitable for retail display and sale. Subject tool chests and cabinets are covered whether imported in assembled or unassembled form. Subject merchandise includes tool chests and cabinets produced in China or Vietnam but assembled, prepackaged for sale, or subject to other minor processing in a third country prior to importation into the United States. Similarly, it would include tool chests and cabinets produced in China or Vietnam that are later found to be assembled, prepackaged for sale, or subject to other minor processing after importation into the United States.

Subject tool chests and cabinets may also have doors and shelves in addition to drawers, may have handles (typically mounted on the sides), and may have a work surface on the top. Subject tool chests and cabinets may be uncoated (e.g., stainless steel), painted, powder coated, galvanized, or otherwise coated for corrosion protection or aesthetic appearance.

Subject tool chests and cabinets may be packaged as individual units or in sets. When prepackaged in sets, they typically include a cabinet with one or more chests that stack on top of the cabinet. Tool cabinets act as a base tool storage unit and typically have rollers, casters, or wheels to permit them to be moved more easily when loaded with tools. Work stations and work benches are tool cabinets with a work surface on the top that may be made of rubber, plastic, metal, wood, or other materials.

Top chests are designed to be used with a tool cabinet to form a tool storage unit. The top chests may be mounted on top of the base tool cabinet or onto an intermediate chest. They are often packaged as a set with tool cabinets or intermediate chests, but may also be packaged separately. They may be packaged with mounting hardware (e.g. bolts) and instructions for assembling them onto the base tool cabinet or onto an intermediate tool chest which rests on the base tool cabinet. Smaller top chests typically have handles on the sides, while the larger top chests typically lacks handles. Intermediate tool chests are designed to sit on top of the floor standing tool cabinet and to be used underneath the top

tool chest. Although they may be packaged or used separately from the tool cabinet, intermediate chests are designed to be used in conjunction with tool cabinets. Intermediate chests typically do not have handles, but the intermediate and top chests may have the capability of being bolted together.

Side cabinets are designed to be bolted or otherwise attached to the side of the base storage cabinet to expand the storage capacity of the base tool cabinet.

Subject tool chests and cabinets also may be packaged with a tool set included. Packaging a subject tool chest and cabinet with a tool set does not remove an otherwise covered subject tool chest and cabinet from the scope. When this occurs the tools are not part of the subject merchandise.

All tool chests and cabinets that meet the above definition are included in the scope unless otherwise specifically excluded.

Excluded from the scope of the investigations are tool boxes, chests, and cabinets with bodies made of plastic, carbon fiber, wood, or other non-metallic substances. Also excluded from the scope of the investigations are industrial grade steel tool chests and cabinets. The excluded industrial grade steel tool chests and cabinets are those:

- (1) having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047 inches or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests			
Inches	Maximum Pounds		
> 21 ≤25	90		
> 25 ≤28	115		
> 28 ≤30	120		
> 30 ≤32	130		
> 32 ≤34	140		
> 34 ≤36	150		
> 36 ≤38	160		
> 38 ≤40	170		
> 40 ≤42	180		
> 42 ≤44	190		
> 44 ≤46	200		
> 46 ≤48	210		
> 48 ≤50	220		
> 50 ≤52	230		
> 52 ≤54	240		
> 54 ≤56	250		
> 56 ≤58	260		
> 58 ≤60	270		

Weight to Width Ratio Tool Cabinets				
Inches Maximum Pounds				
> 21 ≤25	155			
> 25 ≤28	170			
> 28 ≤30	185			
> 30 ≤32	200			
> 32 ≤34	215			
> 34 ≤36	230			
> 36 ≤38	245			
> 38 ≤40	260			
> 40 ≤42	280			
> 42 ≤44	290			
> 44 ≤46	300			
> 46 ≤48	310			
> 48 ≤50	320			
> 50 ≤52	330			
> 52 ≤54	340			
> 54 ≤56	350			
> 56 ≤58	360			
> 58 ≤60	370			

Also excluded from the scope of the investigations are service carts. The excluded service carts have all of the following characteristics:

- (1) casters, wheels, or other similar devices which allow the service cart to be rolled from place to place;
- (2) a flat top or flat lid on top of the unit that opens;
- (3) a space or gap between the casters, wheels, or other similar devices, and the bottom of the enclosed storage space (e.g., drawers) of at least 10 inches; and
- (4) a total unit height, including casters, of less than 48 inches.

Also excluded from the scope of the investigations are work benches having each of the following characteristics:

- (1) a solid top working surface;
- (2) no drawers, one drawer, or two drawers in a side-by side configuration; and
- (3) the unit is supported by legs and the unit has no solid front, side, or back panels enclosing the body of the unit.

Also excluded from the scope of the investigations are metal filing cabinets that are configured to hold hanging file folders and are classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheading 9403.10.0020.

Merchandise subject to the investigation is classified under HTSUS categories 9403.20.0021, 9403.20.0026, 9403.20.0030 and 7326.90.8688¹ but may also be classified under HTSUS category 7326.90.3500. While HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of this investigation is dispositive.

¹ On January 1, 2017, HTSUS subheading 7326.90.85 was re-designated as HTSUS subheading 7326.90.86.

Other tool chests and cabinets.--Other tool chests and cabinets include the following items:

1. Tool chests and cabinets not prepackaged for retail sale

This includes all metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 10 inches but not exceeding 24 inches; and
- (5) not prepackaged for retail sale.

2. Industrial tool chests and cabinets

The excluded industrial grade steel tool chests and cabinets are those:

- (1) Having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047" or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests				
Inches Maximum Pounds				
> 21 ≤25	90			
> 25 ≤28	115			
> 28 ≤30	120			
> 30 ≤32	130			
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> 44 ≤46	200			
> 46 ≤48	210			
> 48 ≤50	220			
> 50 ≤52	230			
> 52 ≤54	240			
> 54 ≤56	250			
> 56 ≤58	260			
> 58 ≤60	270			

Weight to Widt	h Ratio Tool Cabinets	
Inches Maximum Pounds		
> 21 ≤25	155	
> 25 ≤28	170	
> 28 ≤30	185	
> 30 ≤32	200	
> 32 ≤34	215	
> 34 ≤36	230	
> 36 ≤38	245	
> 38 ≤40	260	
> 40 ≤42	280	
> 42 ≤44	290	
> 44 ≤46	300	
> 46 ≤48	310	
> 48 ≤50	320	
> 50 ≤52	330	
> 52 ≤54	340	
> 54 ≤56	350	
> 56 ≤58	360	
> 58 ≤60	370	

<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, 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.

<u>Release of information</u>.--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.

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. <u>TAA information release</u>.--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
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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.**

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of tool chests and cabinets, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discussion on establishments consolidated in this questionnaire:			

I-3. <u>Petition support</u>.--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
China CVD			
China AD			
Vietnam AD			

I-4a. <u>**Ownership**</u>.-- Is your firm owned, in whole or in part, by any other firm? Please include any firms that produced tool chests and cabinets not packaged for retail sale or industrial tool chests and cabinets ("other tool chests and cabinets").

No

Yes--List the following information

Firm name	Address	Extent of ownership (percent)

I-4b. <u>Changes in ownership</u>.-- Has your firm experienced any change in ownership since January 1, 2014?

No Yes

Please provide details regarding the change in ownership include the names of the new owner and previous owner, the date of the change in ownership, and the motivations for the change in ownership.

- I-4c. <u>Impact.</u>--What is the impact of this change in ownership on your firm's operations regarding inscope tool chests and cabinets and other tool chests and cabinets, e.g. (projected products, brands owns or produced for, etc.)? Please respond separately regarding in-scope tool chests and cabinets and other tool chests and cabinets.
- I-4d. <u>Market outlook.</u>—If your firm responded yes to question II-3b, please provide any market forecasts or other document relating to market outlook for in-scope tool chests and cabinets or other tool chests and cabinets as an attachment to this questionnaire.

I-5. <u>Related importers/exporters</u>.--Does your firm have any related firms, either domestic or foreign, that are engaged in importing tool chests and cabinets from China and Vietnam into the United States or that are engaged in exporting tool chests and cabinets from China and Vietnam to the United States? Please include any firms that produced tool chests and other tool chests and cabinets.

No Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Related producers**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of tool chests and cabinets? Please include any firms that produced tool chests and other tool chests and cabinets.

Yes--List the following information.

No

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Abu B. Kanu** (202-205-2597, **abu.kanu@usitc.gov**). **Supply all data requested on a** <u>calendar-year</u> 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	
Fax	

II-2. **Changes in operations.--**Please indicate whether your firm has experienced any of the following changes in relation to the production of tool chests and cabinets since January 1, 2014.

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

II-3a. **Production of tool chests and cabinets using same machinery.--**Please report your firm's production of products made on the same equipment and machinery used to produce tool chests and cabinets, 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.

Quantity (<i>in units</i>)					
	Calendar years January-Sep				
Item	2014	2015	2016	2016	2017
Overall production capacity					
Production of:					
Tool chests and cabinets ¹	0	0	0	0	0
Other tool chests and cabinets ²					
Other products ³					
Total	0	0	0	0	0
¹ Data entered for production of tool chest ² Industrial tool chests and cabinets, as wel ³ 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 tool chests and cabinets and other products using the same equipment and/or labor?

- (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, 2014, has your firm been involved in a toll agreement regarding the production of tool chests and cabinets or industrial grade tool chests and cabinets?

"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.

Item	No	Yes	If yes Please describe the toll arrangement(s) and name the firm(s) involved.
Toll agreement(s)			

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

II-5. Foreign trade zones.--

(a) <u>Firm's FTZ operations</u>.--Does your firm produce tool chests and cabinets in and/or admit tool chests and cabinets 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	If yesDescribe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.

II-6. **Importer**.--Since January 1, 2014, has your firm imported tool chests and cabinets or industrial grade tool chests and cabinets?

"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	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

Definitions

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

"*Production*" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

"Commercial U.S. shipments" –Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report <u>net values</u> (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.

"Transfers for retail sale by your firm" – Tool chests and cabinets that were produced by your firm for the purpose of sale to end users using your firm's own retail establishments. Report the shipment of this product to their initial location for retail sale (i.e., as a transfer) with the shipments valued at fair market value.

"Internal consumption" – Product consumed internally by your firm. Such transactions are valued at fair market value.

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

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

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

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

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

II-7. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of tool chests and cabinets in its U.S. establishment(s) during the specified periods.

	(Calendar years	January-September		
ltem	2014	2015	2016	2016	2017
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)					
Value (E)					
To end users: <i>Quantity</i> (F)					
Value (G)					
To unrelated retailers: Quantity (H)					
Value (I)					
Transfers for retail sale by your firm: ² <i>Quantity</i> (J)					
Value (K)					
Internal consumption: ² Quantity (L)					
Value ² (M)					
Transfers to related firms: ² Quantity (N)					
Value ² (O)					
Export shipments: ³ Quantity (P)					
Value (Q)					
End-of-period inventories (quantity) (R)					

II-7. **Production, shipment, and inventory data**.--Continued

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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.

	Calendar years			January-September		
Reconciliation	2014	2015	2016	2016	2017	
B + C - D - F - H - J - L - N - P - R =						
should equal zero ("0") or provide an						
explanation. ¹	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-8. U.S. shipments by product type.--Report your firm's U.S. shipments of tool chests and cabinets by type of product made predominantly (*i.e.*, body) of carbon steel and stainless steel for calendar year 2016.

Quantity (<i>in units</i>) and value (<i>in \$1,000</i>)						
	Calendar year 2016					
Item	Carbon steel	Stainless steel	All steel types			
U.S. shipments:						
Prepackaged sets:						
Quantity (S)			0			
Value (T)			0			
Top chests:						
Quantity (U)			0			
Value (V)			0			
Intermediate chests:						
Quantity (W)			0			
Value (X)			0			
Tool cabinets:						
Quantity (Y)			0			
Value (Z)			0			
Side cabinets:						
Quantity (AA)			0			
Value (AB)			0			
All other in-scope products: ¹						
Quantity (AC)			0			
Value (AD)			C			
¹ Please identify these products (e.g. r	nobile work benches, w	ork stations, metal stor	age units with two			

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines S through AD) in each time period equal the quantities and values reported for U.S. shipments in table II-7 (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: S + U + W + Y + AA + AC – D – F – H – J – L – N = zero ("0"),	
if not revise.	0
Value: T + V + X + Z + AB + AD - E - G - I - K - M - O = zero ("0"), if	
not revise.	0

II-9. <u>Employment data</u>.--Report your firm's employment-related data related to the production of tool chests and cabinets and provide an explanation for any trends in these data.

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

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

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

"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.

	Calendar years January-Sep			eptember	
Item	2014	2015	2016	2016	2017
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

Explanation of trends:

II-10. **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-11. **Purchases**.--Other than direct imports, has your firm otherwise purchased tool chests and cabinets since January 1, 2014?

"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 No

Yes--Report such purchases below and explain the reasons for your firms' purchases:

Calendar ye 4 2015	ears 2016	January-S 2016	eptember 2017
4 2015	2016	2016	2017
			from which your firm purchased this product. If your source for each listed supplier:

II-12. <u>Other explanations</u>.--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 **Emily Kim** at (202) 205-1800, **Emily.kim@usitc.gov**).

III-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 III.

Name	
Title	
Email	
Telephone	
Fax	

- III-2. <u>Accounting system</u>.--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 tool chests and cabinets:
 - Does your firm prepare profit/loss statements for tool chests and cabinets:
 Yes
 No
 - 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
 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 tool chests and cabinets, as well as specific statements and worksheets) used to compile these data.

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

- III-4. <u>Allocation basis</u>.--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 tool chests and cabinets, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
tool chests and cabinets	%
	%
	%
	%
	%

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of tool chests and cabinets 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 tool chests and cabinets 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
Input valuation as r	ecorded in the firm's accounting books	and records

III-8. Inputs purchased from related suppliers.--Please confirm that the inputs purchased from related suppliers, as identified in question III-7, were reported in question III-9a (financial results on tool chests and cabinets) 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 question III-9a.

Operations on tool chests and cabinets.--Report the revenue and related cost information III-9a. requested below on the tool chests and cabinets operations of your firm's U.S. establishment(s).¹ 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, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Emily Kim at (202) 205-1800 before completing this section of the questionnaire.

	Fisc	al years ended		January-September	
Item	2014	2015	2016	2016	2017
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	C
Net sales values: ² Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	C
Cost of goods sold (COGS): ³ Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	C
Gross profit or (loss)	0	0	0	0	C
Selling, general, and administrative (SG&A) expenses: Selling expenses					
General and administrative expenses					
Total SG&A expenses	0	0	0	0	0
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense items					
All other income items	1				
Net income or (loss) before income taxes	0	0	0	0	C
Depreciation/amortization included above	1				

² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment guantities and values reported in Part II of this guestionnaire.

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

	F	iscal years ended	J	January-S	eptember
	2014	2015	2016	2016	2017
Nonrecurring item: 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	•	em: In these col em reported in q	umns please repo uestion III-9a.	ort the amount o	f the relevant
classified.			Value (<i>\$1,000</i>)		
1. , classified as					
2. , classified as					
3. , classified as					
4. , classified as					
5. , classified as					
6. , classified as					
7. , classified as					

- III-11. <u>Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company</u>.--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. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of tool chests and cabinets. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for tool chests and cabinets 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 <u>net assets</u> after any accumulated depreciation and allowances deducted.

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

Value (<i>in \$1,000</i>)					
	Fiscal years ended				
Item	2014	2015	2016		
Total assets (net) ¹					
¹ Describe	Describe				

III-13. **Capital expenditures and research and development expenses**.--Report your firm's capital expenditures and research and development expenses for tool chests and cabinets. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (<i>in \$1,000</i>)						
Fiscal years ended January-September			eptember			
2014	2015	2016	2016	2017		
Research and development expenses ²						
		Fiscal years ender	Fiscal years ended	Fiscal years ended January-Se		

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.

² 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

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.

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.

		Full year data	Partial year periods		
Reconciliation	2014	2015	2016	2016	2017
Quantity: Trade data from part II less financial data from part III, = zero ("0") except as noted above.	0	0	0	0	0
Value: Trade data from part II less financial data from part III, = zero ("0") except as noted above.	0	0	0	0	0

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

Yes	No	If no, please explain.

No

III-15. <u>Effects of imports on investment</u>.--Since January 1, 2014, 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 tool chests and cabinets from China and Vietnam?

Yes--My firm has experienced actual negative effects as follows:

(cł	neck as many as appropriate)	(please describe)
	Cancellation, postponement, or rejection of expansion projects	
	Denial or rejection of investment proposal	
	Reduction in the size of capital investments	
	Return on specific investments negatively impacted	
	Other	

III-16. Effects of imports on growth and development.--Since January 1, 2014, 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 tool chests and cabinets from China and Vietnam?

🗌 No

Yes--My firm has experienced actual negative effects as follows:

(ch	neck as many as appropriate)	(please describe)
	Rejection of bank loans	
	Lowering of credit rating	
	Problem related to the issue of stocks or bonds	
	Ability to service debt	
	Other	

III-17. <u>Anticipated effects of imports</u>.--Does your firm anticipate any negative effects due to imports of tool chests and cabinets from China and Vietnam?

No	Yes	If yes, my firm anticipates negative effects as follows:

III-18. <u>Other explanations</u>.--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 Amelia Preece (303-205-3250, <u>amelia.preece@usitc.gov</u>).

IV-1. **<u>Contact information</u>**.--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, 2014 of the following products produced by your firm.
- **Product 1**.--26-27 inch wide top chest sold in combination with a 26-27 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 9 to 10 total drawers (across both units) with ball bearing drawer slides, a minimum chest depth (front to back) of 15 inches, a minimum cabinet depth of 18 inches and a combined unit weight (not shipping weight) of 150 to 180 lbs. Do not include tool chests or cabinets sold with tools, stereos, or refrigerators.
- **Product 2**.--40-46 inch wide top chest sold in combination with a 40-46 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 16 to 21 drawers (across both units) with ball bearing slides, a chest depth of and cabinet depth of 16 to 19 inches; and combined unit weight (not shipping weight) of less than 420 lbs. Do not include tool chests or cabinets sold with tools, stereos, or refrigerators.
- **Product 3**.--50 to 56 inch wide top chest sold in combination with a 50-56 inch wide rolling cabinet, each with a body of cold-rolled carbon steel, having 15 to 18 drawers (across both units) with ball bearing slides, a chest depth of and cabinet depth of 16 to 21 inches; and combined unit weight (not shipping weight) of less than 500 lbs. Do not include tool chests or cabinets sold with tools, stereos, or refrigerators.
- **Product 4.**--45 to 56 inch wide workstation or mobile workbench, with a body of cold-rolled carbon steel, having 8 to 11 drawers or doors with ball bearing slides, a top work surface, a unit depth of 17-24 inches, and a unit weight (not shipping weight) of less than 175 lbs. This category specifically excludes work stations or mobile workbenches in which the body is made of stainless steel but includes tool chests and cabinets in which the drawers or door fronts are made of stainless steel. Do not include workstation or mobile workbench sold with tools, stereos, or refrigerators.

Please note that values should be <u>f.o.b., U.S. point of shipment</u> 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).

During January 2014- September 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)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question IV-3.

IV-2a. **Price data**.--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

Report data in actual units and actual dollars (not 1,000s).

		(0	Quantity in units	s, value in do	llars)			
	Prod	Product 1		Product 2		Product 3		uct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2014:								
January-March								
April-June								
July-September								
October-December								
2015: January-March								
April-June								
July-September			Ī					
October-December								
2016: January-March								
April-June								
July-September								
October-December								
2017: January-March								
April-June								
July-September								
¹ Net values (i.e., gro your firm's U.S. point of sh ² Pricing product defi Note If your firm's produc	nipment. nitions are pro	vided on the	first page of Par	t IV.			-	
description of your firm's							icu product, pre	
Product 1:								
Product 2:								
Product 3:								
Product 4:								

IV-2b. **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-2c. **Product specifications**.--If your firm provided pricing information in question IV-2a please report their characteristics in the following table. If you sold different SKUs under an individual pricing product report the characteristics of the most common SKU you sold within that pricing product.

Item	Prod	uct 1	Prod	uct 2	Prod	uct 3	Prod	uct 4
The product in question included only	Yes	No	Yes	No	Yes	No	Yes	No
one SKU?								
If you answered "no" above, please estimate the percent share that the largest SKU (as described below) accounted for of product in question								

Overall cabinet and chest (or for product 4, work station/bench)

	Largest SKU reported in				
Item	Product 1	Product 2	Product 3	Product 4	
Cabinet width (inches)					
Cabinet height (inches)					
Cabinet depth (inches)					
Cabinet total weight capacity (pounds)					
Chest width (inches)					
Chest height (inches)					
Chest depth (inches)					
Chest total weight capacity(pounds)					
Combined unit weight(pounds)					
Steel thickness (inches)					

<u>Paint</u>

	Largest SKU reported in						
Item	Product 1	Product 2	Product 3	Product 4			
Electric coat (check = yes)							
Powder coat (check = yes)							
Number of colors available							

Drawers

	Largest SKU reported in						
Item	Product 1	Product 2	Product 3	Product 4			
Total number of drawers							
Each drawer supports (pounds)							
Number of ball bearings per glide							
Type of drawer latching mechanism							
Soft closing drawer slides (check = yes)							
Drawer liners included (check = yes)							
Drawer support brackets (check = yes)							

IV-2c. **Product specifications**.--Continued

Casters/wheels

		Largest SKU	reported in	
Item	Product 1	Product 2	Product 3	Product 4
Size of casters/wheels (inches)				

Construction factors

	Largest SKU reported in						
Item	Product 1 Product 2 Product 3 Produ						
Double wall construction (check = yes)							
Seamless construction (check = yes)							
Roll formed inner panels (check = yes)							
Reinforced inner panels (check = yes)							
Gas struts for lid (check = yes)							
Stainless steel hinges (check = yes)							
Uses aluminum rivets (check = yes)							

<u>Add-ons</u>

	Largest SKU reported in			
Item	Product 1	Product 2	Product 3	Product 4
Includes power strip				
Includes USB port(s)				
Includes Bluetooth enabled electronic locking				
Other (please describe)				

Other clarifications regarding product specifications.--.

IV-3. Price setting.--How does your firm determine the prices that it charges for sales of tool chests and cabinets (*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

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

IV-5. Pricing terms.--

(a) What are your firm's typical sales terms for its U.S.-produced tool chests and cabinets?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)

(b) On what basis are your firm's prices of domestic tool chests and cabinets usually quoted *(check one)*?

Delivered	F.o.b.	If f.o.b., specify point

IV-6. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of its U.S.-produced tool chests and cabinets in 2016 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						
	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)	Tota l (shoul sum t 100.0%	ld o	
Share of 2016 sales	%	%	%	%	0.0	%	

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

Typical sales contract provisions	ltem	Annual contracts (multiple deliveries for less than 12 months) Annual contracts (multiple deliveries for 12 months)		Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Meet or release	Yes			
provision	No			
Not applicab	Not applicable			

IV-8. <u>Lead times</u>.--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 tool chests and cabinets?

Source	Share of 2016 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9. Shipping information.--

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

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-10. **Geographical shipments.--** In which U.S. geographic market area(s) has your firm sold its U.S.- produced tool chests and cabinets since January 1, 2014 (check all that apply)?

Geographic area	v if applicable
Northeast.–CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	
MidwestIL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	
SoutheastAL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	
Central Southwest.–AR, LA, OK, and TX.	
Mountains.–AZ, CO, ID, MT, NV, NM, UT, and WY.	
Pacific Coast.–CA, OR, and WA.	
Other .–All other markets in the United States not previously listed, including AK, HI, PR, and VI.	

IV-11. End uses.--List the end uses of the tool chests and cabinets that your firm manufactures.

	End uses for tool chests and cabinets
1	
2	
3	

IV-12. Substitutes.-- Can other products be substituted for tool chests and cabinets?

No

Yes--Please fill out the table.

		End use in which this		Have changes in the price of this substitute affected the price for tool chests and cabinets?		
	Substitute	substitute is used	No	Yes	Explanation	
1.						
2.						
3.						

IV-13. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for tool chests and cabinets has changed since January 1, 2014. 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					
Outside the United States					

IV-14. **Product changes.--**Have there been any significant changes in the product range, product mix, or marketing of tool chests and cabinets since January 1, 2014?

No	Yes	If yes, please describe and quantify if possible.

IV-15. Conditions of competition.--

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

Check all that apply.		Please describe.
	Νο	Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for tool chests and cabinets since January 1, 2014?

No	Yes	If yes, describe.

(c) Have the financial difficulties of any particular large retailer (e.g., Sears, other) affected your firm's tool chests and cabinets business?

No	Yes	If yes, describe.

(d) Have changes to the brick and mortar retail sector and increases in online retail affected your firm's tool chests and cabinets business?

No	Yes	If yes, describe.

IV-16. <u>Supply constraints</u>.--Has your firm refused, declined, or been unable to supply tool chests and cabinets since January 1, 2014 (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, been unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

IV-17. <u>Customer preferences</u>.--Have customers requested customizations or product specifications of specific tool chests and cabinets that your firm has been unable or unwilling to provide since January 1, 2014?

No	Yes	If yes, please describe.

IV-18. <u>Raw materials</u>.--How have tool chests and cabinets raw material prices changed since January 1, 2014?

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 tool chests and cabinets.

IV-19. Brands.--

- (a) Please list the top 5 brands of tool chests and cabinets that your firm produces.
- (b) Please list what purchasers require for your firm to be eligible to produce for a new brand for a purchaser.
- (c) Please estimate the number of days it would take for your firm to become eligible to produce a new brand.

to days

IV-20. <u>Interchangeability</u>.--Is tool chests and cabinets 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 0 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
- 0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Vietnam	Other countries	
United States				
China				
Vietnam				
For any country-pair producing tool chests and cabinets 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-21. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, brand etc.) between tool chests and cabinets 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 0 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

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

Country-pair	China	Vietnam	Other countries
United States			
China			
Vietnam			

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of tool chests and cabinets, identify the country-pair and report the advantages or disadvantages imparted by such factors:

IV-22. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for tool chests and cabinets since January 1, 2014. Indicate the share of the quantity of your firm's total shipments of tool chests and cabinets that each of these customers accounted for in 2016.

	Customer's name	City	State	Share of 2016 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-23. Competition from imports

(a) Lost revenue.--Since January 1, 2014: To avoid losing sales to competitors selling tool chests and cabinets from China and Vietnam, did your firm:

	No	Yes
Reduce prices		
Roll back announced price increases		

(b) Lost sales.--Since January 1, 2014: Did your firm lose sales of tool chests and cabinets to imports of this product from China and Vietnam?

No	Yes

IV-24. <u>Other explanations</u>.--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 PRODUCT

Other tool chests and cabinets include the following items:

1. Tool chests and cabinets not prepackaged for retail sale

This includes all metal tool chests and cabinets, including top chests, intermediate chests, tool cabinets and side cabinets, storage units, mobile work benches, and work stations and that have the following physical characteristics:

- (1) a body made of carbon, alloy, or stainless steel and/or other metals;
- (2) two or more drawers for storage in each individual unit;
- (3) a width (side to side) exceeding 15 inches for side cabinets and exceeding 21 inches for all other individual units but not exceeding 60 inches;
- (4) a depth (front to back) exceeding 1 0 inches but not exceeding 24 inches; and
- (5) not prepackaged for retail sale.

2. Industrial tool chests and cabinets

The excluded industrial grade steel tool chests and cabinets are those:

- (1) Having a body that is over 60 inches wide; or
- (2) having each of the following physical characteristics:
 - (a) a body made of steel that is 0.047" or more in thickness;
 - (b) a body depth (front to back) exceeding 21 inches; and
 - (c) a unit weight that exceeds the maximum unit weight shown below for each width range:

Weight to Width Ratio Tool Chests				
Inches	Maximum Pounds			
> 21 ≤25	90			
> 25 ≤28	115			
> 28 ≤30	120			
> 30 ≤32	130			
> 32 ≤34	140			
> 34 ≤36	150			
> 36 ≤38	160			
> 38 ≤40	170			
> 40 ≤42	180			
> 42 ≤44	190			
> 44 ≤46	200			
> 46 ≤48	210			
> 48 ≤50	220			
> 50 ≤52	230			
> 52 ≤54	240			
> 54 ≤56	250			
> 56 ≤58	260			
> 58 ≤60	270			

Weight to Width Ratio Tool Cabinets				
Inches	Maximum Pounds			
> 21 ≤25	155			
> 25 ≤28	170			
> 28 ≤30	185			
> 30 ≤32	200			
> 32 ≤34	215			
> 34 ≤36	230			
> 36 ≤38	245			
> 38 ≤40	260			
> 40 ≤42	280			
> 42 ≤44	290			
> 44 ≤46	300			
> 46 ≤48	310			
> 48 ≤50	320			
> 50 ≤52	330			
> 52 ≤54	340			
> 54 ≤56	350			
> 56 ≤58	360			
> 58 ≤60	370			

- V-1. Comparability of in-scope tool chests and cabinets to other tool chests and cabinets -- For each of the following factors, indicate whether in-scope tool chest and cabinets compared to select out-of-scope products 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
 - 0: no familiarity with products.
 - (a) **Physical Characteristics and Uses**.--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses:</i>
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs out-of-scope <u>other</u> <u>tool chests and cabinets</u>		

V-1. Comparability of in-scope tool chests and cabinets to other tool chests and cabinets -- *Continued*

(c) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether the products are manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities</u> , production processes, and <u>production employees</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

V-1. <u>Comparability of in-scope tool chests and cabinets to other tool chests and cabinets</u>--*Continued*

(e) <u>**Customer and producer perceptions**</u>.--Perceptions as to the differences and/or similarities in the products in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and producer perceptions</u> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

(f) <u>**Price**</u>.--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>prices</i> :
In-scope <u>tool chests and</u> <u>cabinets</u> vs <u>other tool chests</u> <u>and cabinets</u>		

V-2a. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of other tool chests and cabinets in its U.S. establishment(s) during the specified periods.

Other tool chests and cabinets

	(Calendar years	January-September		
Item	2014	2015	2016	2016 20	
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments: Commercial U.S. shipments: To distributors: Quantity (D)					
Value (E)					
To end users: Quantity (F)					
Value (G)					
To unrelated retailers: Quantity (H)					
Value (I)					
Transfers for retail sale by your firm: ² <i>Quantity</i> (J)					
Value (K)					
Internal consumption: ² Quantity (L)					
Value ² (M)					
Transfers to related firms: ² Quantity (N)					
Value ² (O)					
Export shipments: ³ Quantity (P)					
Value (Q)					
End-of-period inventories (quantity) (R)					

¹ 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 _____.

³ Identify your firm's principal export markets: _____

V-2a. Production, shipment, and inventory data.--Continued

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line R) 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, J, L, N, and P). 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.

		Calendar years	January-September		
Reconciliation	2014	2015	2016	2016	2017
B + C - D - F - H - J - L - N - P - R =					
should equal zero ("0") or provide an					
explanation. ¹	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:					

V-2b. U.S. shipments data by product category.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, transfers for retail sale by your own firm, internal consumption, and transfer to related parties) of imports of other tool chest and cabinets from all sources by product category.

	Calendar Years			January-September	
Items	2014	2015	2016	2015	2016
U.S shipments:					
Tool chests and cabinets not prepackaged for retail sale:					
Quantity (S)					
Value (T)					
Industrial tool chests and					
cabinets:					
Quantity (U)					
Value (V)					

<u>RECONCILIATION OF U.S. SHIPMENTS.--Please ensure that the quantities and values reported for</u> shipments by product category (i.e., lines S through V) in each time period equal the quantities and values reported for U.S. shipments in table V-2a (i.e., D through O) 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.

	Calendar years			January-September	
Reconciliation	2014	2015	2016	2016	2017
Quantity: $S + U - D - F - H - J - L - N =$ should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
Value: $T + V - E - G - I - K - M - O =$ should equal zero ("0") or provide an explanation. ¹	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:					

V-3. U.S. shipments by product type.--Report your firm's U.S. shipments of other tool chests and cabinets by type of product made predominantly (*i.e.*, body) of carbon steel and stainless steel for calendar year 2016.

		Calendar year 2016						
ltem	Carbon steel	Stainless steel	All steel types					
U.S. shipments: Prepackaged sets: Quantity (W)			C					
Value (X)			C					
Top chests: <i>Quantity</i> (AA)			C					
Value (AB)			C					
Intermediate chests: Quantity (AC)			C					
Value (AD)			C					
Tool cabinets: <i>Quantity</i> (AE)			C					
Value (AF)			C					
Side cabinets: Quantity (AG)			C					
Value (AH)			C					
Other:¹ <i>Quantity</i> (AI)			C					
Value (AJ)			C					

Other tool chests and cabinets

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities and values reported for shipments by product type (i.e., lines S through AD) in each time period equal the quantities and values reported for U.S. shipments in table V-2a (i.e., D through O) 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.

Reconciliation	Calendar year 2016
Quantity: $W + Y + AA + AC + AE + AG + AI - D - F - H - J - L - N = zero$	
("0"), if not revise.	0
Value: X + Z + AB + AD + AF + AH + AJ - G - I - K - M - O = zero ("0"),	
if not revise.	0

V-4. <u>Employment data</u>.--Report your firm's employment-related data related to the production of other tool chests and cabinets and provide an explanation for any trends in these data.

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

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

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

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

	Calendar years			January-September	
Item	2014	2015	2016	2016	2017
Average number of PRWs (<i>number</i>)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

Other tool chests and cabinets

Explanation of trends:

V-5. **Operations on industrial tool chests**.--Report the revenue and related cost information requested below on the other tool chests and cabinets operations of your firm's U.S. establishment(s).¹ 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, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact **Emily Kim** at (202) 205-1800 before completing this section of the questionnaire.

Quantity (in units) and value (in \$1,000)						
	Fiscal years ended			January-September		
Item	2014	2015	2016	2016	2017	
Net sales quantities: ²						
Commercial sales ("CS")						
Internal consumption ("IC")						
Transfers to related firms ("Transfers")						
Total net sales quantities	0	0	0	0	C	
Net sales values: ²						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	C	
Cost of goods sold (COGS): ³ Raw materials						
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	C	
Gross profit or (loss)	0	0	0	0	C	
Selling, general, and administrative (SG&A) expenses: Selling expenses						
General and administrative expenses						
Total SG&A expenses	0	0	0	0	0	
Operating income (loss)	0	0	0	0	0	
Other expenses and income: Interest expense						
All other expense items						
All other income items	1					
Net income or (loss) before income taxes	0	0	0	0	C	
Depreciation/amortization included above	1 1					

Other tool chests and cabinets

¹ Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u>.

² 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.

³ 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.

V-6. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of other tool chests and cabinets. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for other tool chests and cabinets 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 <u>net assets</u> after any accumulated depreciation and allowances deducted.

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

Other tool chests and cabinets

Value (<i>in \$1,000</i>)						
	Fiscal years ended					
Item	2014 2015 2016					
Total assets (net) ¹						
¹ Describe						

V-7. **Capital expenditures and research and development expenses**.--Report your firm's capital expenditures and research and development expenses for other tool chests and cabinets. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Other tool chests and cabinets

Value (<i>in \$1,000</i>)							
	Fis	cal years ende	January-September				
Item	2014	2015	2016	2016	2017		
Capital expenditures ¹							
Research and development expenses ²							
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product ² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product							

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--Please ensure that the quantities and values reported for total shipments in part V-2 equal the quantities and values reported total net sales in part V-5 of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.

		Full year data	Partial year periods		
Reconciliation	2014	2015	2016	2016	2017
Quantity: Trade data from part V-2 less financial data from part V-5, = zero ("0") except as noted above.	0	0	0	0	0
Value: Trade data from partV-2 less financial data from part V-5, = zero ("0") except as noted above.	0	0	0	0	0

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/701731/2017/tool chests and cabinets china a nd vietnam/final.htm

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

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

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

• E-mail.—E-mail the MS Word questionnaire to <u>abu.kanu@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 <u>does not</u> 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.