

## U.S. IMPORTERS' QUESTIONNAIRE

### STEEL RACKS FROM CHINA

This questionnaire must be received by the Commission by **July 5, 2018**  
*See last page for filing instructions.*

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning steel racks from China (Inv. Nos. 701-TA- 608 and 731-TA-1420 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm imported steel racks (as defined on next page) from any country at any time since January 1, 2015?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return <b>only</b> this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> <b>YES</b> (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)</p> <p>Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a>. (PIN: <b>SRACK</b>)</p>
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#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone:

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

**PART I.—GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on June 20, 2018, by Bulldog Rack Company, Weirton, West Virginia; Hannibal Industries, Inc., Los Angeles, California; Husky Rack and Wire, Denver, North Carolina; Ridg-U-Rak, Inc., North East, Pennsylvania; SpaceRAK, A Division of Heartland Steel Products, Inc., Marysville, Michigan; Speedrack Products Group, Ltd., Sparta, Michigan; Steel King Industries, Inc., Stevens Point, Wisconsin; Tri-Boro Shelving & Partition Corp., Farmville, Virginia; and UNARCO Material Handling, Inc., Springfield, Tennessee. 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\\_racks\\_china/preliminary.htm](https://www.usitc.gov/investigations/701731/2018/steel_racks_china/preliminary.htm).

**Steel racks** covered by these investigations is steel racks and parts thereof, assembled or unassembled. Steel racks are racks made of steel of dimensions and configurations that can be adjusted as required, with or without locking tabs or slots, and with or without bolted, clamped, or welded connections, including any of the following: uprights, posts, columns, braces, frames, beams, arms, locking devices, and rails.

A steel rack is a structure typically made from cold-formed or hot-rolled steel structural members and includes, but is not limited to, components such as plates, rods, angles, shapes, sections, tubes and the like. Welding, bolting, and clipping are the typical methods of assembly. Connections may also be made with locking devices such as clips, end plates, and beam connectors. Steel racks may be made to ANSI MH16.1 or ANSI MH16.3. All steel racks and parts thereof meeting the physical description set out herein are covered by the scope of this investigation, whether or not produced according to a particular standard.

The vertical components of steel racks may be referred to as posts, columns, or uprights, and may be connected with horizontal or diagonal braces to form upright frames. A typical storage configuration comprises upright frames perpendicular to the aisles, independently adjustable, positive locking beams parallel to the aisle and spanning between the upright frames, and braces designed to support unit loads between the beams. A cantilever rack consists of uprights running parallel to the aisle and cantilever beams or arms connected to the uprights and running perpendicular to the aisle rather than spanning two upright frames.

The scope includes all steel racks and parts thereof meeting the description above, regardless of: (1) dimensions, weight, strength, gauge, or load rating; (2) vertical upright or frame type (including structural, roll-form, or other); (3) horizontal support or beam / brace type (including but not limited to structural, roll-form, slotted, unslotted, Z-beam, C-beam, L-beam, step beam, cantilever beam, and cargo rack); (4) number of supports; (5) number of levels; (6) surface coating, if any (including but not limited to paint, epoxy, powder coating, zinc, and other metallic coating); (7) shape (including but not limited to rectangular, square, corner, and cantilever); (8) the method by which the vertical and horizontal supports connect (including but not limited to locking tabs or slots, bolting, clamping, and welding); and (9) the inclusion or not of moving components (including but not limited to rails, wheels, rollers, tracks, channels, carts, and conveyors).

Steel racks may be referred to as pallet racks, storage racks, stacker racks, retail racks, pick modules, or cantilever racks. Steel racks that incorporate moving components may also be referred to as pallet flow racks, carton flow racks, push back racks, movable shelf racks, drive-in racks, and drive-through racks.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by coating, painting, assembling, attaching to, or packaging with another product, or any other finishing, assembly, or packaging that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the steel racks and parts thereof.

Steel racks and parts thereof are covered whether or not imported attached to, or in conjunction with, other parts and accessories such as wire decking, nuts, and bolts. If steel racks and parts thereof are imported attached to, or in conjunction with, such non-subject merchandise, only the steel racks and parts thereof are covered by the scope.

Specifically excluded from the scope of this investigation are any products covered by the existing antidumping and countervailing duty orders on boltless steel shelving units prepackaged for sale from the People's Republic of China. See Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Antidumping Duty Order, 80 Fed. Reg. 63,741 (October 21, 2017); Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order, 80 Fed. Reg. 63,745 (October 21, 2017).

Merchandise covered by this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheadings: 7326.90.8688<sup>1</sup> and 9403.20.0080.<sup>2</sup> Subject merchandise may also enter under subheadings 7308.90.3000, 7308.90.6000, 7308.90.9590, and 9403.20.0090. The HTSUS subheadings set forth above are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.

***Importer.***--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing steel racks (as defined above) into the United States from a foreign manufacturer or through its selling agent.

***Reporting of information.***--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

***Verification.***-- The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting

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<sup>1</sup> Prior to January 1, 2017, such merchandise was classified under HTS statistical reporting number 7326.90.8588.

<sup>2</sup> From July 1, 2015 through December 31, 2017, such merchandise was classified under HTS statistical reporting number 9403.20.0080. Prior to July 1, 2015 such merchandise was classified under HTS statistical reporting number 9403.20.0020.

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.

**Valid number error messages.**--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 Amelia Shister (202-205-2047, [Amelia.Shister@usitc.gov](mailto:Amelia.Shister@usitc.gov)).

**D-GRIDS tool.**--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage ([https://www.usitc.gov/trade\\_remedy/question.htm](https://www.usitc.gov/trade_remedy/question.htm)) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is *optional*. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

I-1. **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 40 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 covered.**--Provide 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 involved in the importation of steel racks, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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I-3. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No             Yes--List the following information

Firm name	Address	Extent of ownership (percent)

I-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing steel racks from China into the United States or that are engaged in exporting steel racks from China to the United States?

No             Yes--List the following information.

Firm name	Country	Affiliation

I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of steel racks?

No             Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Importing operations.**--Please indicate the nature of your firm's importing operations on steel racks. More than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-7. **Consignee.**--If your firm is an importer of record of steel racks but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters steel racks into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports steel racks under the TIB (temporary importation under bond) program.

**"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, as well as other savings. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

**"Bonded warehouse"** is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

**"Temporary Importation under Bond ("TIB") program"** is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States (HTS).

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

I-9. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes, Yes--Please specify.
<input type="checkbox"/>	<input type="checkbox"/>	

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

Further information on this part of the questionnaire can be obtained from Amelia Shister (202-205-2047, [amelia.shister@usitc.gov](mailto:amelia.shister@usitc.gov)). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of steel racks since January 1, 2015.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe; leave blank if not applicable)</i>
<input type="checkbox"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Other (e.g., technology)	



II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of steel racks for delivery after **March 31, 2018**?

**"Arranged imports"** are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

<b>No</b>	<b>Yes</b>	<b>If yes, fill out the table below.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Apr-Jun 2018	Jul-Sept 2018	Oct-Dec 2018	Jan-Mar 2019
	<b>Quantity (in pounds)</b>			
China				
Other sources				

II-3b. **Imports in the 12 month period preceding the petition.**--Has your firm imported steel racks from any source between June 1, 2017 and May 30, 2018? (i.e., the last seven months in 2017 and first five months in 2018 combined)

<b>No</b>	<b>Yes</b>	<b>If yes, report the quantity of such import below by source.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in pounds)	
Source	June 2017 through May 2018
China	
Other sources	

II-4. **Reasons for importing if producer.**--If your firm also produces steel racks in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

**Definitions**

***“Imports”*** –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty) or consignee (i.e., to which the merchandise was first delivered).

***“Import quantities”*** –Quantities reported should be net of returns.

***“Import values”*** –Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

***“U.S. commercial shipments”*** – Shipments made within the United States as a result of an arm’s length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

***“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-5a. **U.S. imports from China.**—Report your firm's imports and your firm's shipments and inventories of steel racks imported from China by your firm during the specified periods.

## China

Quantity (in pounds), value (in dollars)					
Item	Calendar years			January-March	
	2015	2016	2017	2017	2018
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1 2</sup>					
Quantity (B)					
Value (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>3</sup>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>3</sup>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>4</sup>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Please identify the HTS statistical reporting numbers used for the imports of these products: \_\_\_\_\_.

<sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>4</sup> Identify your firm's principal export markets: \_\_\_\_\_.

II-5a. **U.S. imports from China.--Continued**

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather 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.

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

II-5b. **Channels of distribution: China.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related parties) of imports from China by channel of distribution.

## China

Item	Calendar years			January-March	
	2015	2016	2017	2017	2018
<b>Quantity (in pounds)</b>					
<b>Channels of distribution: U.S. shipments:<sup>1</sup></b>					
To distributors / for re-sale (M)					
To end users / for installation (N)					
<sup>1</sup> Sales to retailers should be classified as "end users" to the degree the sales are not merchandise intended for resale.					

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

Reconciliation item	Calendar years			January-March	
	2015	2016	2017	2017	2018
M + N – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-5c. **Rack coatings: China.**--Please indicate the share of quantity of your firm's U.S. shipment (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China in 2017 by coating type.

## China

Coating	Share of 2017 U.S. Shipments (percent)
No coating	
Paint	
Epoxy coated	
Zinc or other galvanized	
Other <sup>1</sup>	
Total (should sum to 100.0 percent)	0.0
<sup>1</sup> Please identify: _____.	

II-6a. **Imports from all other sources.**—Report your firm’s imports and your firm’s shipments and inventories of steel racks imported from all other sources by your firm during the specified periods.

## All other sources

(list sources: \_\_\_\_\_)

Quantity (in pounds), value (in dollars)					
Item	Calendar years			January-March	
	2015	2016	2017	2017	2018
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1 2</sup>					
Quantity (B)					
Value (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>3</sup>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>3</sup>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>4</sup>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Please identify the HTS statistical reporting numbers used for the imports of these products: \_\_\_\_\_.

<sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>4</sup> Identify your firm’s principal export markets: \_\_\_\_\_.

**II-6a. Imports from all other sources.--Continued**

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather 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.

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

**II-6b. Channels of distribution: All other sources.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related parties) of imports from all other sources by channel of distribution.

### All other sources

Item	Calendar years			January-March	
	2015	2016	2017	2017	2018
<b>Quantity (in pounds)</b>					
<b>Channels of distribution: U.S. shipments:<sup>1</sup></b>					
To distributors / for re-sale (M)					
To end users / for installation (N)					
<sup>1</sup> Sales to retailers should be classified as "end users" to the degree the sales are not merchandise intended for resale.					

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

Reconciliation item	Calendar years			January-March	
	2015	2016	2017	2017	2018
M + N – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-6c. **Rack coatings: All other sources.**--Please indicate the share of quantity of your firm's U.S. shipment (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources in 2017 by coating type.

### **All Other Sources**

<b>Coating</b>	<b>Share of 2017 U.S. Shipments (percent)</b>
No coating	
Paint	
Epoxy coated	
Zinc or other galvanized	
Other <sup>1</sup>	
Total (should sum to 100.0 percent)	0.0
<sup>1</sup> Please identify: _____.	



II-7. **Rack types.**--Please indicate which of the following steel racks your firm imports and sells or uses.

<i>(check as many as appropriate)</i>	
<input type="checkbox"/>	<b>Cantilever Rack.</b> --A rack structure comprised primarily of vertical columns, extended bases, horizontal arms projecting from the face of the columns, and down-aisle bracing between columns. There can be shelf beams between arms depending on the product being stored. Cantilever columns may be free-standing or overhead tied.
<input type="checkbox"/>	<b>Case-Flow Rack.</b> --A specialized pallet rack structure in which either the horizontal shelf beams support case-flow lanes or case-flow shelf assemblies are supported by the upright frames. The case-flow lanes or shelves are installed at a slight pitch permitting multiple-depth case or box storage with loading from one service aisle and unload or picking from another service aisle.
<input type="checkbox"/>	<b>Drive-In Rack.</b> --A rack structure comprised primarily of vertical upright frames, horizontal support arms, and horizontal load rails typically used for one-wide by multiple-depth storage. This structure includes an "anchor section" with horizontal beams supporting the load rails. Loading and unloading within a bay must be done from the same aisle. A two-way drive-in rack is a special case where back-to-back rows of drive-in racks are combined into a single entity with a common rear post.
<input type="checkbox"/>	<b>Drive-Through Rack.</b> --A rack structure comprised primarily of vertical upright frames, horizontal support arms, and horizontal load rails typically used for one-wide by multiple-depth storage. This structure lacks the 'anchor section' found in drive-in racks; therefore, loading and unloading can be accomplished from both ends of a bay.
<input type="checkbox"/>	<b>Movable-Shelf Rack.</b> --A rack structure comprised primarily of vertical upright frames and horizontal shelf beams and typically used for one-deep pallet or hand-stack storage. Typically, the locations of a couple of shelf levels are "fixed" with the location of the in-fill shelves being flexible.
<input type="checkbox"/>	<b>Pallet-Flow Rack.</b> --A specialized pallet rack structure in which the horizontal shelf beams support pallet-flow lanes. The pallet-flow lanes are typically installed on a slight pitch permitting multiple-depth pallet storage with loading from one service aisle and unloading from another service aisle.
<input type="checkbox"/>	<b>Pallet Rack.</b> --A rack structure comprised primarily of vertical upright frames and horizontal shelf beams and typically used for one and two-deep pallet storage.
<input type="checkbox"/>	<b>Pick Modules.</b> --A rack structure comprised primarily of vertical frames and horizontal beams, typically having one or more platform levels of selective, case-flow, or pallet-flow bays feeding into a central pick aisle(s) {work platform(s)} supported by the rack structure.
<input type="checkbox"/>	<b>Portable Rack (Stacking Frames).</b> --An assembly, typically with four corner columns, that permits stacking of one assembly on top of another without applying any additional load to the product being stored on each assembly.
<input type="checkbox"/>	<b>Push-Back Rack.</b> --A specialized pallet rack structure in which the horizontal shelf beams support push-back lanes comprised of tracks and carts. The push-back lanes are installed on a slight pitch permitting multiple-depth pallet storage. Loading and unloading are done from the same service aisle by pushing the pallets back.
<input type="checkbox"/>	<b>Stacker Rack.</b> --A rack structure similar to one of the other rack structures that is serviced by an automated storage and retrieval machine.
<input type="checkbox"/>	<b>Other steel racks or parts thereof<sup>1</sup></b>
<sup>1</sup> Please identify: _____.	

II-8. **Other explanations.**--If your firm would like to further explain a response to a question in Part II 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.

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

Further information on this part of the questionnaire can be obtained from Jon Ruder (202-205-3435, [jonathan.ruder@usitc.gov](mailto:jonathan.ruder@usitc.gov)).

III-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	

**PRICE DATA**

III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2015 of the following products imported from China:

**Product 1.**--Beam, non-galvanized, 96" length, 4" face, 3 pins connection, 1 5/8" step

**Product 2.**--Beam, non-galvanized, 120" length, 5" face, 4 pins connection, 1 5/8" step

**Product 3.**--Frame, non-galvanized, 14 gauge, 3" x 1 5/8" posts, 42" x 120"

**Product 4.**--Frame, non-galvanized, 14 gauge, 3" x 3" posts, 42" x 192"

**Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).**

During January 2015-March 2018, did your firm import from China and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

III-2(a). **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm.

## China

Report data in **pounds** and **dollars**

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

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment.

<sup>2</sup> Pricing product definitions are provided on the first page of Part III.

**Note.**--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:  
Product 2:  
Product 3:  
Product 4:

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

Is the price data reported above:	✓ if Yes
Value data reported in dollars?	<input type="checkbox"/>
Quantity data reported in pounds?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have returns credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Less than reported commercial shipments in part II in each year?	<input type="checkbox"/>

III-2(c). **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.*

III-3. **Price setting.**--How does your firm determine the prices that it charges for sales of steel racks (check all that apply)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-5. **Pricing terms.**--

(a) What are your firm's typical sales terms for steel racks imported from China?

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

(b) On what basis are your firm's prices of imported steel racks from China usually quoted (*check one*)?

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

III-6. **Contract versus spot.**--Approximately what share of your firm's sales of steel racks imported from China in 2017 was on a (1) long-term contract basis, (2) annual contract basis, (3) short-term contract basis, and (4) spot sales basis?

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

III-7. **Contract provisions.**—Please fill out the table regarding your firm's typical sales contracts for steel racks from China (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	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Meet or release provision	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-8. **Lead times.**--What is your firm's share of sales of steel racks imported from China 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 steel racks?

Source	Share of 2017 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

III-9. **Shipping information.**—

- (a) What is the approximate percentage of the cost of steel racks imported from China 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) When your firm sells steel racks imported from China, from where is it shipped?  
 Point of importation     Storage facility (check one)
- (d) Indicate the approximate percentage of your firm's sales of steel racks imported from China that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

III-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold steel racks imported from subject countries since January 1, 2015 (check all that apply)?

Geographic area	China
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<input type="checkbox"/>
<b>Other.</b> --All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>

III-11. **End uses.**--List the end uses of the steel racks that your firm imports. For each end-use product, what percentage of the total cost is accounted for by steel racks and other inputs?

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

III-12. **Substitutes.**--Can other products be substituted for steel racks?

No                       Yes--Please fill out the table.

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



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

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

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

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

III-15. **Conditions of competition.**—

(a) Is the steel racks market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to steel racks?

Check all that apply.	Please describe.
<input type="checkbox"/> <b>No</b>	Skip to question III-16.
<input type="checkbox"/> <b>Yes-Business cycles (e.g. seasonal business)</b>	
<input type="checkbox"/> <b>Yes-Other distinctive conditions of competition</b>	

(b) If yes, have there been any changes in the business cycles or conditions of competition for steel racks since January 1, 2015?

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

III-16. **Supply constraints.**--Has your firm refused, declined, or been unable to supply steel racks since January 1, 2015 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

III-17. **Raw materials.**--How have steel racks raw material prices changed since January 1, 2015?

Item	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 steel racks.
Steel tubing or long products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other steel components	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Interchangeability.**--Is steel racks produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Other countries
United States		
China		
For any country-pair producing steel racks that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:		

III-19. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between steel racks produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Other countries
United States		
China	X	
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of steel racks, identify the country-pair and report the advantages or disadvantages imparted by such factors:		

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

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

III-21. **Other explanations.**--If your firm would like to further explain a response to a question in Part III 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.

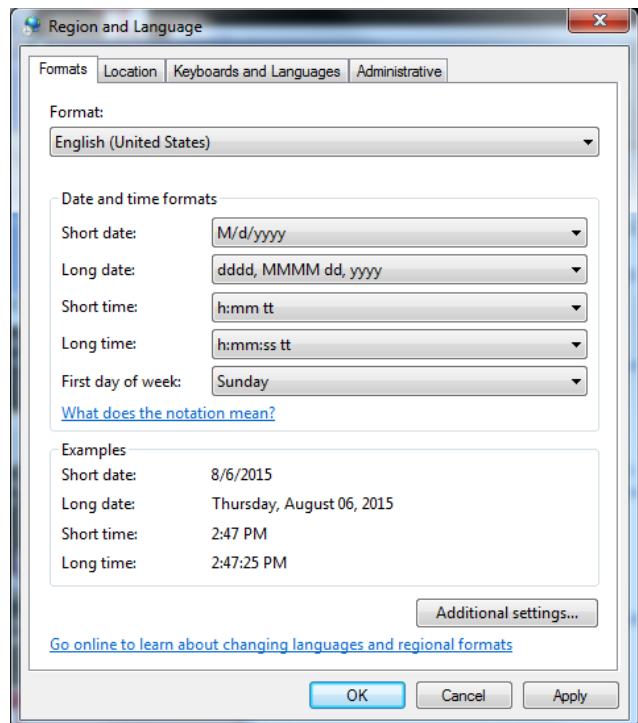
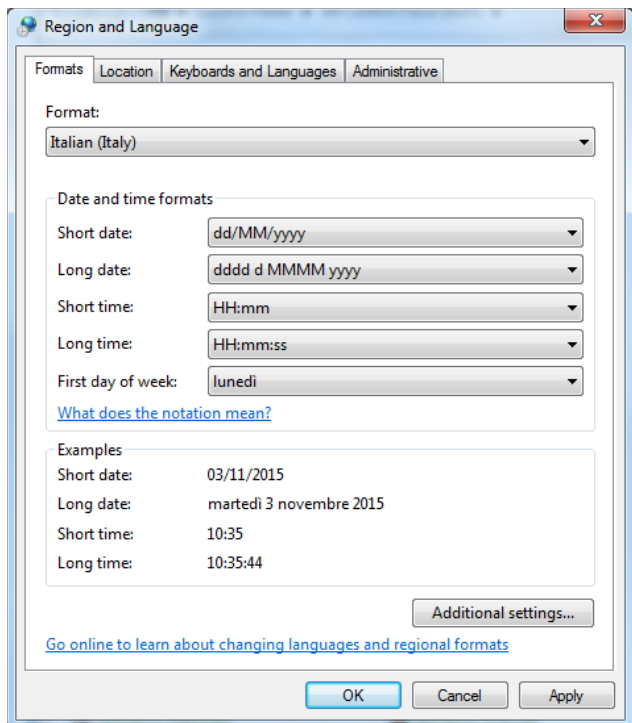
**Correcting Valid number error messages.**--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric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

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

- **Upload via Secure Drop Box.**—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission’s secure upload facility:

**Web address:** <https://dropbox.usitc.gov/oinv/>      **Pin:** **SRACK**

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

**If your firm did not import 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.