U.S. PRODUCERS' QUESTIONNAIRE

STEEL TRAILER WHEELS FROM CHINA

This questionnaire must be received by the Commission by May 23, 2019

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning steel trailer wheels ("trailer wheels") from China (Inv. Nos. 701-TA-609 and 731-TA-1421 (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 firm

City			State	Z	ip Co	de			
Website _									
Has your find January 1, 2		d/or galvanized stee	el trailer wheels (as define	ed on	next page)	at any tin	ne since	
☐ NO	(Sign the cer	tification below and p	romptly return onl	y this pag	ge of th	e questionr	aire to the	Commiss	ion)
YES	(Complete a	l parts of the question	nnaire, and return t	he entire	e questi	onnaire to	he Commi	ssion)	
-		a the U.S. Internate Iropbox.usitc.gov/			ion <i>Dr</i>	op Box by	clicking	on the	
			CERTIFICATION						
_		n supplied in respond	-	estionna		-			-
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PART I.—GENERAL INFORMATION

<u>Background</u>.--This proceeding was instituted in response to a petition filed on August 8, 2018, by Dexstar Wheel, Elkhart, Indiana. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at

https://www.usitc.gov/investigations/701731/2018/steel_trailer_wheels_china/final.htm.

<u>Trailer wheels</u> covered by these investigations are certain on-the-road steel wheels, discs, and rims for tubeless tires with a nominal wheel diameter of 12 inches to 16.5 inches, regardless of width. Certain on-the-road steel wheels with a nominal wheel diameter of 12 inches to 16.5 inches within the scope are generally for road and highway trailers and other towable equipment, including, inter alia, utility trailers, cargo trailers, horse trailers, boat trailers, recreational trailers, and towable mobile homes. The standard widths of certain on-the-road steel wheels are 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches, but all certain on-the-road steel wheels, regardless of width, are covered by the scope.

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

All on-the-road wheels sold in the United States must meet Standard 110 or 120 of the National Highway Traffic Safety Administration's (NHTSA) Federal Motor Vehicle Safety Standards, which requires a rim marking, such as the "DOT" symbol, indicating compliance with applicable motor vehicle standards. See 49 CFR 571.110 and 571.120. The scope includes certain on-the-road steel wheels imported with or without NHTSA's required markings.

Certain on-the-road steel wheels imported as an assembly with a tire mounted on the wheel and/or with a valve stem or rims imported as an assembly with a tire mounted on the rim and/or with a valve stem are included in the scope of this investigation. However, if the steel wheels or rims are imported as an assembly with a tire mounted on the wheel or rim and/or with a valve stem attached, the tire and/or valve stem is not covered by the scope.

The scope includes rims, discs, and wheels that have been further processed in a third country, including, but not limited to, the painting of wheels from China and the welding and painting of rims and discs from China to form a steel wheel, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in China.

Excluded from this scope are the following:

- (1) Steel wheels for use with tube-type tires; such tires use multi piece rims, which are two-piece and three-piece assemblies and require the use of an inner tube;
- (2) aluminum wheels;
- (3) certain on-the-road steel wheels that are coated entirely with chrome;
- (4) steel wheels that do not meet Standard 110 or 120 of the NHTSA's requirements other than the rim marking requirements found in 49 CFR 571.110S4.4.2 and 571.12OS5.2;
- (5) steel wheels that meet the following specifications: steel wheels with a nominal wheel diameter ranging from 15 inches to 16. 5 inches, with a rim width of 8 inches or greater, and a wheel backspacing ranging from 3.75 inches to 5.5 inches; and
- (6) steel wheels with wire spokes.

Certain on-the-road steel wheels subject to this investigation are properly classifiable under the following category of the Harmonized Tariff Schedule of the United States (HTSUS): 8716.90.5035 which covers the exact product covered by the scope whether entered as an assembled wheel or in components. Certain on-the-road steel wheels entered with a tire mounted on them may be entered under HTSUS 8716.90.5059 (Trailers and semi-trailers; other vehicles, not mechanically propelled, parts, wheels, other, wheels with other tires) (a category that will be broader than what is covered by the scope). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.

Non-galvanized wheels.--Trailer wheels that match the scope definition of trailer wheels, but have not been galvanized.

<u>Galvanized wheels</u>.--Trailer wheels that match the scope definition of trailer wheels, and which have been galvanized.

<u>Galvanization</u> is the process of applying a protective zinc coating to the trailer wheel to prevent corrosion.

<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.

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

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

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

<u>D-GRIDS tool.</u>--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 macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (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-1a. <u>OMB statistics</u>.--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

I-1b.	TAA information release In the event that the U.S. International Trade Commission (USITC)
	makes an affirmative final determination in this proceeding, do you consent to the USITC's
	release of your contact information (company name, address, contact person, telephone
	number, email address) appearing on the front page of this questionnaire to the Departments of
	Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made
	eligible for benefits under the Trade Adjustment Assistance program?

Yes	No

I-2. <u>Establishments covered</u>.--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 trailer wheels, 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 disc	ussion on establishments con	¹ Additional discussion on establishments consolidated in this questionnaire:		

I-3.	Petitioner status Is your firm the petitioner in this proceeding or a member firm of the
	petitioning entity?

No	Yes

I-4. **Petition support**.--Does your firm support or oppose the petition?

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

U.S. P	Producers' Questionnaire	– Trailer wheels (Final)		Page (
I-5.	OwnershipIs your f	rm owned, in whole or in part, by	any other firm?	
	□ No □ Ye	esList the following information.		
	Firm name	Address	Extent owners (percen	hip
				•
I-6.	foreign, that are enga are engaged in export	sportersDoes your firm have an ged in importing trailer wheels froing trailer wheels from China to the ser-List the following information.	om China into the United State the United States?	
	Firm name	Country	Affiliation	

I-7.	<u>Related producers</u> Does your firm have any related firms, either domestic or foreign, that are engaged in the production of trailer wheels?				
	No YesList the	No YesList the following information.			
	Firm name	Country	Affiliation		

PART II.--TRADE AND RELATED INFORMATION

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

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

II-2. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of trailer wheels since January 1, 2016.

(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 using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce trailer wheels and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

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

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7a. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope mercandhise, then the "average production capacity" numbers reported in question II-7a should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"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 (in pounds)							
	Calendar years January-March						
Item	2016	2017	2018	2018	2019		
Overall production capacity ¹							
Production of: Trailer wheels ²	0	0	0	0	0		
Other products ³							
Total production using same machinery or workers	0	0	0	0	0		

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

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

Hours per week	Weeks per year

II-3c.	<u>Capacity calculation.</u> Please describe the methodology used to calculate overall production
	capacity reported in II-3a, and explain any changes in reported capacity.

² Data entered for production of trailer wheels will populate here once reported in question II-7a.

³ Please identify these products: _____.

.S. Pr	oducers' Qı	uestionnaire	e – Trailer wheels (Final)	Page 10			
-3d.	Production constraintsPlease describe the constraint(s) that set the limit(s) on you production capacity.						
3e.	Product s	hifting.—					
		-	ble to switch production between traile ent and/or labor?	r wheels and other products using t			
	No		f yes—(i.e., have produced other prod products) Please identify other actual o	-			
1.	TollingS	ese factors	ducts (e.g., time, cost, relative price cha enhance or constrain such shifts. y 1, 2016, has your firm been involved i				
	"Toll agre	ement"Ag aterials and	greement between two firms whereby to the second firm ("TOLLER") uses the report the first firm with a charge for process	aw materials to produce a product			
	☐ No	□ No					
	v		greements entered into by your firm, per (the producer of trailer wheels) or tole toller).	-			
	Oui	r firm	Other firm(s)	Special instruction			
	Toller		Please name the tollee(s):	Please respond to data requested in Part V, and skip data requested in Parts II, III, and IV.			

Our firm	Other firm(s)	Special instruction			
Toller	Please name the tollee(s):	Please respond to data requested			
		in Part V, and skip data requested			
	in Parts II,				
Tollee ¹	Please name the toller(s):	Please respond to data requested			
		in Parts II, III, and IV, and skip data			
requested in Pa		requested in Part V. Please			
however respond		however respond to question V-			
1.					
¹ Identify the raw m	¹ Identify the raw material input(s) that your firm provided the toller(s):				

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II-5. Foreign trade zone	S
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(a) <u>Firm's FTZ operations</u>.--Does your firm produce trailer wheels in and/or admit trailer wheels 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) Other firms' FTZ operations.--To your knowledge, do any firms in the United States import trailer wheels into a foreign trade zone (FTZ) for use in distribution of trailer wheels and/or the production of downstream articles?

No	Yes	If yesIdentify the firms and the FTZs.

II-6. <u>Importer</u>.--Since January 1, 2016, has your firm imported trailer wheels?

"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>

A blank copy of the U.S. Importers' Questionnaire is available at: https://www.usitc.gov/investigations/701731/2018/steel trailer wheels china/final.htm.

- II-7a. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of trailer wheels in its U.S. establishment(s) during the specified periods.
 - "Average production capacity" or "capacity" The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
 - "**Production**" All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.
 - "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.
 - "Internal consumption" Product consumed internally by your firm. Such transactions are valued at fair market value. If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed. Please report commercial shipments of such trailer wheels with a tire and/or valve stem attached in rows D and E below (however, report only the quantity and value of the wheel itself and exclude the portion of the weight and value of the attached tire and/or valve stem).
 - "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.
 - "Original Equipment Manufacturer (OEM)" Manufacturer of trailers or mobile homes.
 - "Assembler" Firm which further modifies trailer wheels (e.g., by attaching a tire and/or valve stem) for sale to OEMs.
 - "Aftermarket" -- Distributors, retailers, and/or online sellers of trailer wheels for repairs, replacements, or other non-original equipment uses.

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.

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

Quantity (in pounds) and value (in dollars)						
	Calendar years			January	-March	
Item	2016	2017	2018	2018	2019	
Average production capacity¹ (quantity) (A)						
Beginning-of-period inventories (quantity) (B)						
Production (quantity) (C)						
U.S. shipments: ² Commercial shipments: Quantity (D)						
Value (E)						
Internal consumption: ³ <i>Quantity</i> (F)						
Value² (G)						
Transfers to related firms: ³ Quantity (H)						
Value² (I)						
Export shipments: ⁴ Quantity (J)						
Value (K)						
End-of-period inventories (quantity) (L)						
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 ² Report only the weight and value of the trailer wheel itself and exclude the portion of the weight and value accounted for by any attached tires and/or valve stems. ³ 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. If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed.						

⁴ Identify your firm's principal export markets:

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

2017 2018 2018 2019		
2017 2018 2018 2019	2016	Reconciliation
		B + C - D - F - H - J - L = should equal
0 0 0 0	0	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:_

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II-7b.	<u>Transfer value methodology</u> Explain the transfer pricing methodology used for prices reported
	for transfers to related firms (i.e., rows H and I) in question II-7a, if any, and explain any
	deviation between those prices and prices reported for commercial shipments.

II-8. <u>Channels of distribution</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of trailer wheels (both galvanized and non-galvanized) by channel of distribution.

Quantity (in pounds) and value (in dollars)					
		Calendar years	January-March		
Item	2016	2017	2018	2018	2019
Channels of distribution: Non-Galvanized Wheels: U.S. shipments: To OEMs/assemblers Quantity (M)					
Value (N)					
To the aftermarket Quantity (O)					
Value (P)					
Galvanized Wheels: U.S. shipments: To OEMs/assemblers Quantity (Q)					
Value (R)					
To the aftermarket <i>Quantity</i> (S)					
Value (T)					

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantity in weight and values reported for channels of distribution in this question equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in each time period in question II-7a. 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-March		
Reconciliation	2016	2017	2018	2018	2019	
Quantity: M + O + Q + S - D - F - H = zero ("0"), if not revise.	0	0	0	0	0	
Value: N + P + R + T - E - G - I = zero ("0"), if not revise.	0	0	0	0	0	

II-9. <u>U.S. shipments by product type</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of trailer wheels by product type during the specified periods.

"Whole trailer wheels"-- A fully assembled trailer wheel consisting of, generally, a rim and a center disc.

	Calendar years			January-March	
Item	2016	2017	2018	2018	2019
U.S. shipments.—					
Rims:					
Quantity (U) in units					
Weight (V) in pounds					
Value (W) in dollars					
Center discs:					
Quantity (X) in units					
Weight (Y) in pounds					
Value (Z) in dollars					
Whole trailer wheels without					
tires/valve stems:					
Quantity (AA) in units					
Weight (AB) in pounds					
Value (AC) in dollars					
Whole trailer wheels with tires/valve					
stems:1					
Quantity (AD) in units					
Weight (AE) in pounds					
Value (AF) in dollars ²					
Other in-scope products: ³					
Quantity (AG) in units					
Weight (AH) in pounds					
Value (AI) in dollars					

¹Report only the quantity and value of the wheel itself and exclude the portion of the weight and value of the attached tire and/or valve stem.

² Please explain the methodology your firm used to calculate the value of the trailer wheels only from the combined value of the wheels with tires and/or valve stems attached: .

³ Please describe these other in-scope products: .

II-9. **U.S. shipments by product type**.--*Continued*

<u>RECONCILIATION OF SHIPMENTS BY PRODUCT TYPE</u>.--Please ensure that the quantity in weight and values reported for product type shipments in this question equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in each time period in question II-7a. 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-March		
Reconciliation	2016	2017	2018	2018	2019	
Quantity: V + Y + AB + AE + AH - D - F -						
H = zero ("0"), if not revise.	0	0	0	0	0	
Value: W + Z + AC + AF + AI - E - G - I =						
zero ("0"), if not revise.	0	0	0	0	0	

II-10a. <u>U.S. shipments by wheel dimension.</u>--Please provide your firm's share of U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of trailer wheels by the specified wheel dimensions in 2018.

Mile of discounting (wheel discount on width)	Share of 2018 U.S. shipments
Wheel dimension (wheel diameter x width)	(percent)
12" x 4.0"	
13" x 4.5"	
13" x 5.5"	
14" x 5.5"	
14" x 6.0"	
15" x 5.0"	
15" x 6.0"	
16" x 6.0"	
Other wheel dimensions ¹	
Total (should sum to 100 percent)	0.0
¹ Please describe these other wheel dimensions: .	

II-10b. <u>U.S. Shipments by additional attributes.</u>--Please indicate the share (by percent in pounds) that each attribute contributed to the total amount of trailer wheels produced by your firm in each respective category in 2018. (Each of the three categories should separately sum to 100 percent.)

i. Steel used in production

Attribute	Share of 2018 U.S. shipments (percent)
Carbon hot-rolled steel	
High strength low alloy ("HSLA") hot-rolled steel	
Other steels (describe:)	
Total (should sum to 100 percent)	0.0

ii. Piloting

Attribute	Share of 2018 U.S. shipments (percent)
Hub-piloted	
Stud-piloted with ITR (improved torque retention) technology	
Stud-piloted without ITR technology	
Other (describe:)	
Total (should sum to 100 percent)	0.0

II-10b. Production by additional attributes.—Continued

iii. Coatings

Attribute	Share (percent)
Cationic electro-deposited grey primer base paint coat ("e-coat") ONLY (i.e., e-coat is the only coat applied with no further coating)	
Polyester powder paint	
Hot-dipped galvanized	
Other coatings (describe:)	
No coating	
Total (should sum to 100 percent)	0.0

51 .1			6. 1 1.	
Please use the spa	ace provided belo	w to explain any is	sues your firm had in pro	vidir
data in question I	I-10b (e.g., return	ing sums other tha	ın 100 percent).	
4	(3.6.)			

II-11a. <u>Captive production use.</u>--Please report your firm's internal consumption and/or transfers to related firms in 2018 by disposition. Identify below the use of the product your firm internally consumes or transfers to a related firm.

"Internal consumption" – Product consumed internally by your firm. If your firm is only adding a tire and/or valve stem to a trailer wheel, do not count such wheels as internally consumed.

"Transfers to related firms" - Shipments made to related domestic firms.

Products	Internal consumption 2018 (pounds)	Transfers to related firms 2018 (pounds)
Sold as trailer wheels ¹	N/A	
Processed into other products ²		
Unusable/not further processed ³		
Total	0	0

¹ For any trailer wheels reported here that are mounted with a tire and/or valve stem, report only the weight of the wheel itself and exclude the portion of the weight of the attached tire and/or valve stem.

<u>RECONCILIATION OF INTERNAL CONSUMPTION AND TRANSFERS</u>.—The sum of the data reported above should be equal to the 2018 quantity data reported for internal consumption and transfers in question II-7a for 2018. 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	Internal consumption 2018	Transfers to related firms 2018
Quantity data in this question minus		
data in question II-7a = zero ("0"), if not		
revise.	0	0

² Please identify the top 5 downstream products/uses trailer wheels were processed into by your firm or by your related firm(s) in part "b" of this question.

³ Please describe the final disposition of this merchandise:

II-11b. Captive production use: downstream products and share of cost.-- If the trailer wheels internally consumed by your firm, or transferred to a related firm, were processed into other products (as reported in question II-11a), please identify the top 5 downstream products/uses that trailer wheels were processed into by your firm or by your related firm(s) in the table below, and identify the share of total cost of the downstream product accounted for by the trailer wheel.

Downstream product	Share of the total cost of the downstream product accounted for by trailer wheels (percent)

Explanation of trends:

II-12. **Employment data**.--Report your firm's employment-related data related to the production of trailer wheels 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 March periods, calculate similarly and divide by 3.

"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-March	
ltem	2016	2017	2018	2018	2019
Average number of PRWs (number)					
Hours worked by PRWs (Hours)					
Wages paid to PRWs (Dollars)					

II-13.	Related firmsIf your firm reported transfers to related firms in question II-7a, 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. Please also discuss to what extent other affiliated companies (including common parent companies) participated in determining relevant terms and conditions (e.g., decision-making, pricing factors, etc.) of these transfers.

II-14.	<u>Purchases</u> Has your firm purchased trailer wheels produced in the United States or in other countries since January 1, 2016? (Do not include imports for which your firm was the importer
	of record. These should be reported in an importer questionnaire).

"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.

"Import" –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	If yes Report such purchases in the table below and explain the reasons for your firms' purchases:

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

	(Quantity	in pounds)			
	Calendar years		January-March		
Item	2016	2017	2018	2018	2019
Purchases from U.S. importers ¹ of trailer wheels from— China					
All other sources					
Purchases from domestic producers ²					
Purchases from other sources ²					

II-15.	Other explanationsIf your firm would like to further explain a response to a question in Part II
	for which a narrative box was not provided, 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.

I		

² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: _____.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire Samuel Varela-Molina (202	2-205-3429,
samuel.varelamolina@usitc.gov).	

Na	me	
Tit		
	nail	
Te	lephone	
<u>Ac</u>	counting sy	rstemBriefly 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) f which financial statements are prepared that include trailer wheels:
	2.	Does your firm prepare profit/loss statements for trailer wheels: Yes No
	3.	How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below. Audited, unaudited, annual reports, 10Ks, 10 Qs, Monthly, quarterly, semi-annually, annually
	4.	Accounting basis: GAAP, cash, tax, or other comprehens basis of accounting (specify)
	used in regard submit profit-o	As requested in Part I of this questionnaire, please keep all supporting documents/recorn the preparation of the financial data, as Commission staff may contact your firm ling questions on the financial data. The Commission may also request that your compart copies of the supporting documents/records (financial statements, including internal and-loss statements for the division or product group that includes trailer wheels, as we c statements and worksheets) used to compile these data.
	st accountii st, job ordei	ng systemBriefly describe your firm's cost accounting system (e.g., standard r cost. etc.).

ı	١ς	Producers'	Questionnaire	- Trailer wheels	(Final)
L	ı.s.	ribuuceis	Questionnane	– Hallel Wileels	trillal

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 trailer wheels, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Trailer wheels	%
Trailer wrieers	70
	%
	%
	%
	70
	%

U.S. Producers'	Questionnaire –	Trailer wheels	(Final)
			,

U.S. Pro	aucers' Qi	uestionnai	re – Trailer wheels (Fir	181)		Page 25		
III-6.	<u>Inputs from related suppliers.</u> Does your firm purchase inputs (raw materials, labor, en any services) used in the production of trailer wheels from any related suppliers (e.g., incof transactions between related firms, divisions and/or other components within the sar company)?							
	YesContinue to question III-7a NoSkip to question III-9a.							
III-7a.	Ya. Inputs from related suppliers detailedPlease identify the inputs used in the production trailer wheels that your firm purchases from related suppliers and that are reflected in que III-9a. For "Share of total COGS" please report this information by relevant input on the beginning your most recently completed fiscal year. For "Input valuation" please describe the basis 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 su	upplier	Share of tota	l cogs		
	Input va	luation as	recorded in the firm's	accounting books and recor	ds			
III-7b.	II-7b. Inputs purchased from related suppliersPlease confirm that the inputs purchased from related suppliers, as identified in III-7a, were reported in III-9a (financial results on trailer wheels) in a manner consistent with your firm's accounting books and records. If noIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.:							
					'			
III-8.	<u>Internal consumption and transfers to related firms</u> Please confirm that both internal consumption and transfers to related firms were reported in III-9a (financial results on trailer wheels) at fair market value.							
	Yes	No	· ·	low, please report the valuates nsfers to related firms as rep				

III-9a. Operations on trailer wheels.--Report the revenue and related cost information requested below on the trailer wheels operations of your firm's U.S. establishment(s). 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.

Quar	Quantity (in pounds) and value (in dollars)						
Item	Fiscal years ended			January-N	March		
	2016	2017	2018	2018	2019		
Net sales quantities: ² Commercial sales ("CS")							
Internal consumption ("IC")							
Transfers to related firms ("Transfers")							
Total net sales quantities	0	0	0	0	0		
Net sales values: ² Commercial sales							
Internal consumption							
Transfers to related firms							
Total net sales values	0	0	0	0	0		
Cost of goods sold (COGS): ³ Raw materials							
Direct labor							
Other factory costs							
Total COGS	0	0	0	0	0		
Gross profit or (loss)	0	0	0	0	0		
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							
Net income or (loss) before income taxes	0	0	0	0	0		
Depreciation/amortization included above							

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

Note -- The table above contains calculations that will appear when you have entered data in the MS Word form fields.

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 <u>costs associated with CS, IC, and Transfers.</u>

III-9b. Operations on trailer wheels—Merchant market.--Report the revenue and related cost information requested below on the trailer wheels operations in the merchant market (exclude internal consumption and transfers to related firms) of your firm's U.S. establishment(s).¹ Do not report resales of products. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Quantity (in pounds) and value (in dollars)							
	Fiscal years ended			January-March			
Item	2016	2017	2018	2018	2019		
Net commercial sales quantities: ²	0	0	0	0	0		
Net commercial sales values: ²	0	0	0	0	0		
Cost of goods sold (COGS): ³ Raw materials							
Direct labor							
Other factory costs							
Total COGS	0	0	0	0	0		
Gross profit or (loss)	0	0	0	0	0		
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							
Net income or (loss) before income taxes	0	0	0	0	0		
Depreciation/amortization included above							

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

Note -- The table above contains calculations that will appear when you have entered data in the MS Word form fields.

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. These fields will fill automatically from question III-9a.

³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

115	Droducars'	Questionnaire -	- Trailer wheels	(Final)
U.S.	Producers	Questionnaire -	- Trailer wheels	trinai

III-9c.	Financial data reconciliationThe 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 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 negativeinstances 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-9d. Raw materials.--Please report the share of total raw material costs in 2018 (reported in III-9a) for the following raw material inputs:

		Procureme	nt method	
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm	
Steel costs				
Painting/coating costs				
Other material inputs ¹				
Total (should sum to 100 percent)	0.0			
161		1 . 1		

¹ Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs that they account for:

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.

		Fiscal years			_/ -March
	2016	2017	2018	2018	2019
Item			Value (in dollars)		
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

Nonrecurring item: In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

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 trailer wheels. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for trailer wheels 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 (in dollars)					
	Fiscal years ended				
Item	2016	2017	2018		
Total assets (net) ¹					
¹ Describe					

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

Value (in dollars)						
Item	Item Fiscal years ended January-March					
	2016	2017	2018	2018	2019	
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.

115	Droducars'	Questionnaire -	- Trailer wheels	(Final)
U.S.	Producers	Questionnaire -	- Trailer wheels	trinai

III-14.	Data consistency and reconciliationPlease indicate whether your firm's financial data for
	questions III-9a, III-9b, 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-7a (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 for total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, 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.

Reconciliation	Fiscal years ended					
	2016	2017	2018			
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0			
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0			

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

Yes	No	If no, please explain.

Other

No	Yes		
		If yes, my firm has experienced ac	ctual negative effects as follows
	lohas	ok as many as appropriate)	(plages describe)
	(criec	ck 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	

ПC	Producers'	Ougstion	naira	Trailer	whoole	/Einall
U.S.	Producers	Question	naire –	Trailer	wneeis	(Final)

III-16.	<u>Effects of imports on growth and development</u> Since January 1, 2016, 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 trailer wheels from China?				
	No	Yes	If was many firms have a consortion	and natural magnetics officets on fallows	
			ir yes, my firm nas experier	ced actual negative effects as follows.	
		(chec	k 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.	Anticipat trailer wh			n anticipate any negative effects due to imports of	
	No	Yes	If yes, my firm anticipates	s negative effects as follows:	
III-18.	for which explanati firm had	a narrati on in the in providi	ive box was not provided, plo space provided below. Plea	further explain a response to a question in Part III ease note the question number and the se also use this space to highlight any issues your including but not limited to technical issues with	

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Andrew Knipe (202-205-2390, andrew.knipe@usitc.gov).

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	

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, 2016 of the following products produced by your firm.

Product 1.--12 inches by 4 inches steel wheels, coated with polyester powder paint

Product 2.--13 inches by 4.5 inches steel wheels, coated with polyester powder paint

Product 3.--15 inches by 5 inches steel wheels, coated with polyester powder paint

Product 4.--16 inches by 6 inches steel wheels, coated with polyester powder paint

Product 5.--15 inches by 5 inches steel wheels, galvanized

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> <u>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 2016-March 2019, 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. <u>Price data: OEM/assemblers.</u>--Report below the quarterly price data¹ for pricing products² produced and sold by your firm to unaffiliated OEM/assemblers.

Please report sales of trailer wheels that are unmounted only. Trailer wheels that are assembled with a tire mounted should NOT be included.

To unaffiliated OEM/assemblers

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

		(Quantity in v	vheels, value in dol	llars)		
	Product 1 Product 2		Product 3			
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2016:						
January-March						
April-June						
July-September						
October-December						
2017:						
January-March						
April-June						
July-September						
October-December						
2018:						
January-March						
April-June						
July-September						
October-December						
2019:						
January-March						
¹ Net values (i.e., gross	s sales values less	all discounts, all	lowances rehates	prepaid freight	and the value of re	turned goods)

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

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:

¹ 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.

² Pricing product definitions are provided on the first page of Part IV.

IV-2a. Price data: OEM/assemblers.--Continued

To unaffiliated OEM/assemblers

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

	(Quan	tity <i>in wheels,</i> value <i>in d</i>	lollars)		
	Produ		Product 5		
Period of shipment	Quantity	Value	Quantity	Value	
2016:					
January-March					
April-June					
July-September					
October-December					
2017:					
January-March					
April-June					
July-September					
October-December					
2018:					
January-March					
April-June					
July-September					
October-December					
2019:					
January-March					

¹ 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.

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 4:

Product 5:

² Pricing product definitions are provided on the first page of Part IV.

IV-2b. <u>Price data: Aftermarket/distributors.</u>--Report below the quarterly price data¹ for pricing products² produced and sold by your firm to unaffiliated aftermarket/distributors.

Please report sales of trailer wheels that are unmounted only. Trailer wheels that are assembled with a tire mounted should NOT be included.

To unaffiliated aftermarket/distributors

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

(Quantity in wheels, value in dollars)						
	Product 1 Product 2		Produ	ıct 3		
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
2016:						
January-March						
April-June						
July-September						
October-December						
2017:						
January-March						
April-June						
July-September						
October-December						
2018:						
January-March						
April-June						
July-September						
October-December						
2019:						
January-March						
1 Not values /i.e. grass	s calas valuas lass	ما مانجموری ما	lawanasa rahatas	propoid froight	and the value of re	turned seeds)

NoteIf 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.

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:	

¹ 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.

² Pricing product definitions are provided on the first page of Part IV.

IV-2b. Price data: Aftermarket/distributors.--Continued

To unaffiliated aftermarket/distributors

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

	Produ	uct 4	Product 5		
Period of shipment	Quantity	Value	Quantity	Value	
2016:					
January-March					
April-June					
July-September					
October-December					
2017:					
January-March					
April-June					
July-September					
October-December					
2018:					
January-March					
April-June					
July-September					
October-December					
2019:					
January-March					

¹ 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.

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 4:

Product 5:

² Pricing product definitions are provided on the first page of Part IV.

IV-2d.

IV-2c.	Price data checklistPlease check that the pricing data in question IV-2(a) and IV-2(b) has been
	correctly reported.

Is the price data reported above:	√ if Yes				
Value data in actual dollars (<i>not</i> \$1,000)?					
Quantity data in number of units (<i>not</i> pounds)?					
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?					
Net of all discounts and rebates?					
Have returns credited to the quarter in which the sale occurred?					
Less than reported commercial shipments in question II-7a in each year?					
Pricing data methodologyPlease 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.

Please respond to the remainder of part IV with respect to trailer wheels, of any type, as defined on pages 2-3. If your response varies by type of trailer wheel, such as galvanized vs. non-galvanized, please indicate in the narrative section of the question or at question IV-24.

IV-3. <u>Price setting.--</u>How does your firm determine the prices that it charges for sales of trailer wheels (*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. <u>Pricing terms.</u>--On what basis are your firm's prices of domestic trailer wheels 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 trailer wheels in 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	Type of sale					
ltem	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)	Spot sales (for a single delivery)	Total (shoul sum t 100.0%	d o
Share of 2018 sales	%	%	%	%	0.0	%

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

Typical sales contract provisions	ltem	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	No. of days		365		
Price renegotiation	Yes				
(during contract period)	No				
	Quantity				
Fixed quantity and/or price	Price				
3.1.5/ 5.1 p.1.55	Both				
Indexed to raw	Yes				
material costs ¹	No				
Not applicable					
¹ Please identify the indexes used:					

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 trailer wheels?

Source	Share of 2018 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

	IV-9.	Ship	ping	information
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(a)	What is the approximate percentage of the cost of U	J.Sproduced trailer v	wheels 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 trailer wheels 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. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold its U.S.-produced trailer wheels since January 1, 2016 (check all that apply)?

Geographic area	√ if applicable
NortheastCT, ME, MA, NH, NJ, NY, PA, RI, and VT.	
MidwestIL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	
Southeast.—AL, 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. <u>End uses.--</u>List the end uses of the trailer wheels that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by trailer wheels and other inputs?

	Share of total cost		
End-use product	Trailer wheels (unmounted)	Other inputs	Total (should sum to 100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

2. <u>Substitutes.</u> Can other products be substituted for trailer wheels?								
No YesPlease fill out the table.								
	Fi	nd use in v	which this	На		anges in the price of this substitute ted the price for trailer wheels?		
Substitute		substitute is used		No	Yes	Explanation		
V-13. <u>Demand trends</u> Indicate how demand within the United States and outside of the United States (if known) for trailer wheels has changed since January 1, 2016. Explain any trends and describe the principal factors that have affected these changes in demand.								
larket	Overall increase	No change	Overall decrease	with	no	Explanation and factors		
n the U.S.]			
le the U.S.								
	Demand treestates (if knowlescribe the larket	Demand trendsIndicate States (if known) for traited escribe the principal factor of the describe the principal factor of the U.S.	End use in v substitute Demand trendsIndicate how de States (if known) for trailer wheels describe the principal factors that Overall No increase change in the U.S.	End use in which this substitute is used Demand trendsIndicate how demand withis states (if known) for trailer wheels has change describe the principal factors that have affect of the larket of	End use in which this substitute is used Demand trendsIndicate how demand within the Unstates (if known) for trailer wheels has changed since describe the principal factors that have affected these larket increase change decrease clear to the U.S. Overall No	End use in which this substitute is used No Yes Demand trendsIndicate how demand within the United States (if known) for trailer wheels has changed since Janua describe the principal factors that have affected these characteristics arket Overall No Overall with no clear trend in the U.S.		

U.S. Pro	oducers' Qu	uestionnai	re – Trailer wheels (Fi	nal) Page 44				
IV-14.		<u>Product changes.</u> Have there been any significant changes in the product rangor marketing of trailer wheels since January 1, 2016?						
	No	Yes	If yes, please describ	e and quantify if possible.				
IV-15.	(a) Is	Conditions of competition (a) Is the market for trailer wheels subject to business cycles (other than general economywide conditions) and/or other conditions of competition distinctive to trailer wheels? If yes, describe.						
	Check all	that apply	у.	Please describe.				
		No		Skip to question IV-16.				
			usiness cycles (e.g. nal business)					
			ther distinctive					
	(b) If yes, have there been any changes in the business cycles or conditions of competition for trailer wheels since January 1, 2016?							
	No	No Yes If yes, describe.						
IV-16.	since Janu entry," de	<u>Supply constraints.</u> Has your firm refused, declined, or been unable to supply trailer wheels since January 1, 2016 (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 provide timely product delivery, etc.)?						
	No	Yes	If yes, please describ	e.				

IV-17.	Impact of the section 301 investigation This question concerns the section 301 investigation
	and tariffs that have been proposed and implemented by the United States in response to
	Chinese trade practices.

(a) Did the announcement in March 2018 and subsequent implementation of tariff

		estigation impact, or do you ss and/or the U.S. trailer wh	anticipate that it will impact neels market as a whole?		
Yes— Please fill out table below and a	answer part (b)	No	Don't know		
			-		
Item	Description				
Impact on your firm ¹	Impact on your firm ¹				
Impact on overall U.S. market ¹					
¹ Please identify the magnitud market before and after the a	_		•		
(h) Plassa indicata t	he impact of the	announcement and subse	quent implementation of		

Please indicate the impact of the announcement and subsequent implementation of (b) remedies in the section 301 investigation and tariff actions regarding trailer wheels.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Overall demand for trailer wheels in the U.S. market					
Prices for trailer wheels in the U.S. market					

IV-18.	Raw materialsHow have trailer wheels' ra	aw material prices chang	ged since January	1, 2016?
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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 trailer wheels.

IV-19. <u>Assessment of specific impacts of the section 232 investigation</u>.--Please indicate the impact of the announcement and subsequent implementation of remedies in the section 232 investigation and tariff tariffs on imported steel products.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Cost of raw materials used to produce trailer wheels in the U.S. market					
Overall demand for trailer wheels in the U.S. market					
Prices for trailer wheels in the U.S. market					

IV-20. <u>Interchangeability.--</u>Are trailer wheels 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	Other countries
United States		
China		

For any country-pair producing trailer wheels which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:

IV-21. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between trailer wheels 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	Other countries
United States		
China		

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of trailer wheels, 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 trailer wheels since January 1, 2016. Indicate the share of the quantity of your firm's total shipments of trailer wheels that each of these customers accounted for in 2018.

	Customer's name	City	State	Share of 2018 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

	IV-23.	Com	petition	from	impo	orts
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(a) <u>Lost revenue</u>.--Since January 1, 2016: To avoid losing sales to competitors selling trailer wheels from China, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>--Since January 1, 2016: Did your firm lose sales of trailer wheels to imports of this product from China?

No	Yes

IV-24.	Other explanationsIf your firm would like to further explain a response to a question in Part
	IV for which a narrative response box was not provided, 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 INFORMATION

Address questions on this part of the questionnaire to Jordan Harriman (202-205-2610, jordan.harriman@usitc.gov) and Samuel Varela-Molina (202-205-3429, samuel.varelamolina@usitc.gov)

V-1. <u>Comparability of non-galvanized trailer wheels to galvanized trailer wheels.</u>--For each of the following, indicate whether non-galvanized trailer wheels and galvanized trailer wheels are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

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.

Note.--This product comparison question is being asked in multiple questionnaire types (U.S. producers' and U.S. importers' questionnaires). If your firm is completing more than one of these questionnaire types in relation to this proceeding, please respond to the alternative product comparisons question in only **one questionnaire type**. In general, your firm should make these comparisons in the questionnaire type that is most relevant to your firm's role in the market.

(a) <u>Physical Characteristics and End Uses</u>.--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 physical characteristics and uses:
Non-galvanized trailer wheels vs galvanized trailer wheels		

V-1. Comparability of non-galvanized trailer wheels to galvanized trailer wheels.-- Continued

(b) <u>Interchangeability</u>.--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>interchangeability</i> :
Non-galvanized trailer wheels vs galvanized trailer wheels		

(c) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether 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 manufacturing facilities, production processes, and production employees:
Non-galvanized trailer wheels vs galvanized trailer wheels		

(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 channels of distribution:
Non-galvanized trailer wheels vs galvanized trailer wheels		

V-1.	Comparability	of non-gal	vanized trailer	wheels to	galvanized	trailer whe	els Continued
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(e) <u>Customer and producer perceptions</u>.--Perceptions as to the differences and/or similarities 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 customer and product perceptions:
Non-galvanized trailer wheels vs galvanized trailer wheels		

(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>price</i> :
Non-galvanized trailer wheels vs galvanized trailer wheels		

V-2. Galvanizing operations.--Since January 1, 2016, has your firm galvanized trailer wheels?

No	Yes	If yes —Please describe the nature and extent of the following items in relation to your firm's trailer wheel galvanizing operations <u>in the United States</u> .			
		Capital investments			
		Technical expertise			
		Value added			
		Employment			
		Quantity, type and source of parts			
		Costs and activities			

V-3.	Galvanized trailer wheel operations' complexity and importanceOn a scale of 1 to 5, please
	provide your firm's subjective opinion as to the complexity, intensity, and importance of
	activities related to galvanizing trailer wheels. 1 being minimally complex, intense or important
	5 being extremely complex, intense, and important.

1: Minimally complex, intense, and important	2	3	4	5: Extremely complex, intense, and important		
Please describe the reason for your rating.						

V-4. <u>Trade data on operations by TOLLER.</u>—If your firm performed tolling operations on behalf of another firm (i.e., produced for the tollee), report your firm's production capacity, production, shipments returned to the tollee, and employment related to the production of galvanized trailer wheels in your firm's U.S. establishment(s) during the specified periods. (See definition of toller/tollee in II-4).

Quantity (in pounds) and value (in dollars)						
	(Calendar year	rs	Januar	y-March	
ltem	2016 2017 20		2018	2018	2019	
Average production capacity ¹ (quantity) (A)						
Production (quantity) (B)						
U.S. shipments returned to the tollee: Quantity (C)						
Tolling fee(s) received (value) (D)						
Employment data: Average number of PRWs (number)						
Hours worked by PRWs (actual hours)						
Wages paid to PRWs (value)						
¹ The production capacity reported is based describe the methodology used to calculate proadditional pages as necessary).						

V-5. Operations on galvanized trailer wheels by TOLLERS.--Report the revenue and related cost information requested below on the galvanized trailer wheel tolling operations of your firm's U.S. establishment(s). The reported net sales values should be representative of the tolling fees received. Do not include the value or the cost of the transferred inputs received from the tollee in your firm's reported financial performance data.

Quantity (in pounds) and value (in dollars)						
	Fiscal years ended January-March					
ltem	2016 2017		2018	2018	2019	
Net tolling quantities ¹						
Net tolling values (tolling fees) ¹						
Tolling and production costs: Additional raw materials ²						
Direct labor						
Other factory costs						
Total tolling and production costs	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	C	
Other expenses and income: Interest expense						
All other expense items						
All other income items						
Net income or (loss) before income taxes	0	0	0	0	C	
Depreciation/amortization included above						

¹ Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part V-4 of this questionnaire.

Note--The table above contains calculations that will appear when you have entered data in the MS Word form fields.

² Please describe these additional raw materials:

V-6.	<u>Financial data reconciliation</u> The calculable line items from question V-5 (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 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 negativeinstances 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.

V-7. <u>Asset values for TOLLERS</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of galvanized trailer wheels. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for galvanized trailer wheels 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 V-4.

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 (in dollars)						
	Fiscal years ended Item 2016 2017 2018					
Item						
Total assets (net) ¹						
¹ Describe						

V-8. Capital expenditures and research and development expenses for TOLLERS.--Report your firm's capital expenditures and research and development expenses for galvanized trailer wheels. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Value (in dollars)						
	Fiscal years ended			January-March		
ltem	2016	2017	2018	2018	2019	
Capital expenditures ¹						
Research and development expenses ²						
¹ Please describe the nature, for subject product ² Please describe the nature, for product		·	•			

V-9. <u>Data consistency and reconciliation.</u>--Please indicate whether your firm's financial data for questions V-5, V-7, and V-8 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 V-5 should reconcile with the data reported in question V-4 as long as they are reported on the same calendar year basis.

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for U.S. shipments returned to the tollee in V-4 equal the quantities and values reported for total net sales in V-5 of this questionnaire in each time period unless the financial data from V-5 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.

	Fiscal years ended			January-March	
Reconciliation	2016	2017	2018	2018	2019
Quantity: Trade data from question V-4 (line C) less financial total net sales quantity data from question V-5 = zero ("0").	0	0	0	0	0
Value: Trade data from question V-4 (line D) less financial total net sales value data from question V-5 = zero ("0").	0	0	0	0	0

Do these data in question V-5 reconcile with data in question V-4?

Yes	No	If no, please explain.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://www.usitc.gov/investigations/701731/2018/steel_trailer_wheels_china/final.ht m.

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: TRAIL

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

If your firm <u>does not</u> produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

<u>Parties to this proceeding</u>.—If your firm is a party to this proceeding, 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.