

U.S. IMPORTERS' QUESTIONNAIRE

STEEL RACKS FROM CHINA

This questionnaire must be received by the Commission by **May 1, 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 racks from China (Inv. Nos. 701-TA- 608 and 731-TA-1420 (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 _____
Address _____
City _____ State _____ Zip Code _____
Website _____
Has your firm imported steel racks (as defined on next page) from any country at any time since January 1, 2016?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: RACKS)

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.

Steel racks covered by these investigations are steel racks and parts thereof, assembled, to any extent, or unassembled, including but not limited to, vertical components (e.g., uprights, posts, or columns), horizontal or diagonal components (e.g., arms or beams), braces, frames, locking devices (e.g., end plates and beam connectors), and accessories (including, but not limited to, rails, skid channels, skid rails, drum/coil beds, fork clearance bars, pallet supports, row spacers, and wall ties).

Subject steel racks and parts thereof are made of steel, including, but not limited to, cold and/or hot-formed steel, regardless of the type of steel used to produce the components and may, or may not, include locking tabs, slots, or bolted, clamped, or welded connections. Subject steel racks have the following physical characteristics:

- (1) Each steel vertical and horizontal load bearing member (e.g., arms, beams, posts, and columns) is composed of steel that is at least 0.044 inches thick;
- (2) Each steel vertical and horizontal load bearing member (e.g., arms, beams, posts, and columns) is composed of steel that has a yield strength equal to or greater than 36,000 pounds per square inch;
- (3) The width of each steel vertical load bearing member (e.g., posts and columns) exceeds two inches; and
- (4) The overall depth of each steel roll-formed horizontal load bearing member (e.g., beams) exceeds two inches.

In the case of steel horizontal load bearing members other than roll-formed (e.g., structural beams, Z-beams, or cantilever arms), only the criteria in subparagraphs (1) and (2) apply to these horizontal load bearing members. The depth limitation in subparagraph (4) does not apply to steel horizontal load bearing members that are not roll-formed.

Steel rack components can be assembled into structures of various dimensions and configurations by welding, bolting, clipping, or with the use of devices such as clips, end plates, and beam connectors, including, but not limited to the following configurations: 1) racks with upright frames perpendicular to the aisles that are independently adjustable, with positive-locking beams parallel to the aisle spanning the upright frames with braces; and 2) cantilever racks with vertical components parallel to the aisle and cantilever beams or arms connected to the vertical components perpendicular to the aisle. Steel racks may be referred to as pallet racks, storage racks, stacker racks, retail racks, pick modules, selective racks, or cantilever racks and may incorporate moving components and be referred to as pallet-flow racks, carton-flow racks, push-back racks, movable-shelf racks, drive-in racks, and drive-through racks. While steel racks may be made to ANSI MH16.1 or ANSI MH16.3 standards, all steel racks and parts thereof

meeting the description set out herein are covered by the scope of these investigations, whether or not produced according to a particular standard.

The scope includes all steel racks and parts thereof meeting the description above, regardless of

- (1) other dimensions, weight, or load rating;
- (2) vertical components 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, and cantilever beam);
- (4) number of supports;
- (5) number of levels;
- (6) surface coating, if any (including but not limited to paint, epoxy, powder coating, zinc, or other metallic coatings);
- (7) rack 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) whether or not the steel rack has moving components (including but not limited to rails, wheels, rollers, tracks, channels, carts, and conveyors).

Subject merchandise includes merchandise matching the above description that has been finished or packaged in a third country. Finishing includes, but is not limited to, coating, painting, or assembly, including attaching the merchandise to another product, or any other finishing or assembly operation that would not remove the merchandise from the scope of these investigations if performed in the country of manufacture of the steel racks and parts thereof. Packaging includes packaging the merchandise with or without another product or any other packaging operation that would not remove the merchandise from the scope of these investigations if performed in the country of manufacture of the steel racks and parts thereof.

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

The scope of these investigations does not cover: 1) decks, i.e., shelving that sits on or fits into the horizontal supports to provide the horizontal storage surface of the steel racks; 2) wire shelving units, i.e., units made from wire that incorporate both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create a finished unit; 3) pins, nuts, bolts, washers, and clips used as connecting devices; and 4) non-steel components.

Specifically excluded from the scope of these investigations are any products covered by Commerce's 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).

Also excluded from the scope of these investigations are bulk-packed parts or components of boltless steel shelving units that were specifically excluded from the scope of the Boltless Steel Shelving Orders because such bulk-packed parts or components do not contain the steel vertical supports (i.e., uprights

and posts) and steel horizontal supports (i.e., beams, braces) packaged together for assembly into a completed boltless steel shelving unit.

Such excluded components of boltless steel shelving are defined as:

- (1) boltless horizontal supports (beams, braces) that have each of the following characteristics: (a) a length of 95 inches or less, (b) made from steel that has a thickness of 0.068 inches or less, and (c) a weight capacity that does not exceed 2500 lbs per pair of beams for beams that are 78" or shorter, a weight capacity that does not exceed 2200 lbs per pair of beams for beams that are over 78" long but not longer than 90", and/or a weight capacity that does not exceed 1800 lbs per pair of beams for beams that are longer than 90";
- (2) shelf supports that mate with the aforementioned horizontal supports; and
- (3) boltless vertical supports (upright welded frames and posts) that have each of the following characteristics: (a) a length of 95 inches or less, (b) with no face that exceeds 2.90 inches wide, and (c) made from steel that has a thickness of 0.065 inches or less.

Excluded from the scope of these investigations are: (1) wall-mounted shelving and racks, defined as shelving and racks that suspend all of the load from the wall, and do not stand on, or transfer load to, the floor; (2) ceiling-mounted shelving and racks, defined as shelving and racks that suspend all of the load from the ceiling and do not stand on, or transfer load to, the floor; and (3) wall/ceiling mounted shelving and racks, defined as shelving and racks that suspend the load from the ceiling and the wall and do not stand on, or transfer load to, the floor. The addition of a wall or ceiling bracket or other device to attach otherwise subject merchandise to a wall or ceiling does not meet the terms of this exclusion.

Also excluded from the scope of these investigations is scaffolding that complies with ANSI/ASSE A10.8 - 2011 – Scaffolding Safety Requirements, CAN/CSA S269.2-M87 (Reaffirmed 2003) – Access Scaffolding for Construction Purposes, and/or Occupational Safety and Health Administration regulations at 29 C.F.R. Part 1926 subpart L – Scaffolds.

Also excluded from the scope of these investigations are tubular racks such as garment racks and drying racks, i.e., racks in which the load bearing vertical and horizontal steel members consist solely of: (1) round tubes that are no more than two inches in diameter; (2) round rods that are no more than two inches in diameter; (3) other tubular shapes that have both an overall height of no more than two inches and an overall width of no more than two inches; and/or (4) wire.

Also excluded from the scope of these investigations are portable tier racks. Portable tier racks must meet each of the following criteria to qualify for this exclusion:

- (1) They are freestanding, portable assemblies with a fully welded base and four freely inserted and easily removable corner posts;
- (2) They are assembled without the use of bolts, braces, anchors, brackets, clips, attachments, or connectors;
- (3) One assembly may be stacked on top of another without applying any additional load to the product being stored on each assembly, but individual portable tier racks are not securely attached to one another to provide interaction or interdependence; and
- (4) The assemblies have no mechanism (e.g., a welded foot plate with bolt holes) for anchoring the assembly to the ground.

Also excluded from the scope of these investigations are accessories that are independently bolted to the floor and not attached to the rack system itself, i.e., column protectors, corner guards, bollards, and end row and end of aisle protectors.

Merchandise covered by these investigations is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheadings: 7326.90.8688, 9403.20.0080, and 9403.90.8041. Subject merchandise may also enter under subheadings 7308.90.3000, 7308.90.6000, 7308.90.9590, and 9403.20.0090. The HTSUS subheadings 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 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 Stamen Borisson (202-205-3125, stamen.borisson@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) 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 Stamen Borisson (202-205-3125 stamen.borisson@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, 2016.

<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, 2019**?

"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.

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

Source	Period			
	Apr-Jun 2019	Jul-Sept 2019	Oct-Dec 2019	Jan-Mar 2020
	Quantity (in pounds)			
China				
Mexico				
All 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)

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

Quantity (in pounds)	
Source	June 2017 through May 2018
China	
Mexico	
All 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	
	2016	2017	2018	2018	2019
Beginning-of-period inventories (quantity) (A)					
Imports:¹ Racks imported under HTS number 7326.90.8688 and 7326.90.8588 Quantity (B)					
Value (C)					
Racks imported under all other HTS numbers² Quantity (D)					
Value (E)					
U.S. shipments: Commercial shipments: Quantity (F)					
Value (G)					
Internal consumption: Quantity (H)					
Value ³ (I)					
Transfers to related firms: Quantity (J)					
Value ³ (K)					
Export shipments:⁴ Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____.

² Please identify the HTS statistical reporting numbers used for the imports of these products: _____.

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.

⁴ 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 N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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	
	2016	2017	2018	2018	2019
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-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 firms) of imports from China by channel of distribution in the specified periods.

China

Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
	Quantity (in pounds)				
Channels of distribution:					
U.S. shipments:¹					
To distributors / for re-sale (O)					
To end users / for installation (P)					
¹ 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 O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, and J) 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	
	2016	2017	2018	2018	2019
O + P – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

II-5c. **U.S. shipments by rack coating: China.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by coating type in 2018.

China

U.S. shipments by coating type	Calendar year 2018
No coating	
<i>Quantity in pounds (Q)</i>	
<i>Value in dollars (R)</i>	
Painted (not galvanized)	
<i>Quantity in pounds (S)</i>	
<i>Value in dollars (T)</i>	
Epoxy coated	
<i>Quantity in pounds (U)</i>	
<i>Value in dollars (V)</i>	
Zinc or other galvanized¹	
<i>Quantity in pounds (W)</i>	
<i>Value in dollars (X)</i>	
Other²	
<i>Quantity in pounds (Y)</i>	
<i>Value in dollars (Z)</i>	
¹ Whether or not painted.	
² Please identify: _____.	

RECONCILIATION OF COATINGS.--Please ensure that the quantities and values reported for US shipments by rack coating (i.e., lines Q through Z) equal the quantity and value reported for U.S. shipments (i.e., line F through K) in 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 item	Calendar year 2018
Quantity: $Q + S + U + W + Y - F - H - J =$ zero ("0"), if not revise.	0
Value: $R + T + V + X + Z - G - I - K =$ zero ("0"), if not revise.	0

II-5d. **Rack components: China.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China of racks as complete sets versus rack components in 2018.

China

U.S. shipments by rack sale types	Calendar year 2018
Complete rack set	
<i>Quantity in pounds (AA)</i>	
<i>Value in dollars (AB)</i>	
Rack components not sold as a complete set	
<i>Quantity in pounds (AC)</i>	
<i>Value in dollars (AD)</i>	

RECONCILIATION OF SALES TYPE.--Please ensure that the quantities and values reported for rack sales type (i.e., lines AA, AB, AC, and AD) equal the quantity and value reported for U.S. shipments (i.e., lines F through K) in 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 item	Calendar year 2018
Quantity: AA + AC – F – H – J = zero ("0"), if not revise.	0
Value: AB + AD - G – I – K = zero ("0"), if not revise.	0

II-5e. **Rack load: China.**--Please indicate which of the following rack load capacities your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China had in 2018 (check all that apply):

U.S. shipments by load capacity	Calendar year 2018
Less than 2,500 pounds	<input type="checkbox"/>
2,500 pounds – 4,999 pounds	<input type="checkbox"/>
5,000 pounds and greater	<input type="checkbox"/>

II-6a. **U.S. imports from Mexico.**—Report your firm's imports and your firm's shipments and inventories of steel racks imported from Mexico by your firm during the specified periods.

Mexico

Quantity (in pounds), value (in dollars)					
Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Beginning-of-period inventories (quantity) (A)					
Imports:¹ Racks imported under HTS number 7326.90.8688 and 7326.90.8588 Quantity (B)					
Value (C)					
Racks imported under all other HTS numbers² Quantity (D)					
Value (E)					
U.S. shipments: Commercial shipments: Quantity (F)					
Value (G)					
Internal consumption: Quantity (H)					
Value ³ (I)					
Transfers to related firms: Quantity (J)					
Value ³ (K)					
Export shipments:⁴ Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____.

² Please identify the HTS statistical reporting numbers used for the imports of these products: _____.

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.

⁴ Identify your firm's principal export markets: _____.

II-6a. U.S. imports from Mexico.--Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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	
	2016	2017	2018	2018	2019
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

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

Mexico

Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity (in pounds)					
Channels of distribution:					
U.S. shipments:¹					
To distributors / for re-sale (O)					
To end users / for installation (P)					
¹ 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 O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, and J) 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	
	2016	2017	2018	2018	2019
O + P – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

II-6c. **Rack coatings: Mexico.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Mexico by coating type in 2018.

Mexico

U.S. shipments by coating type	Calendar year 2018
No coating	
<i>Quantity in pounds (Q)</i>	
<i>Value in dollars (R)</i>	
Painted (not galvanized)	
<i>Quantity in pounds (S)</i>	
<i>Value in dollars (T)</i>	
Epoxy coated	
<i>Quantity in pounds (U)</i>	
<i>Value in dollars (V)</i>	
Zinc or other galvanized¹	
<i>Quantity in pounds (W)</i>	
<i>Value in dollars (X)</i>	
Other²	
<i>Quantity in pounds (Y)</i>	
<i>Value in dollars (Z)</i>	
¹ Whether or not painted.	
² Please identify: _____.	

RECONCILIATION OF COATINGS.--Please ensure that the quantities and values reported for US shipments by rack coating (i.e., lines Q through Z) equal the quantity and value reported for U.S. shipments (i.e., line F through K) in 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 item	Calendar year 2018
Quantity: $Q + S + U + W + Y - F - H - J =$ zero ("0"), if not revise.	0
Value: $R + T + V + X + Z - G - I - K =$ zero ("0"), if not revise.	0

II-6d. **Rack components: Mexico.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Mexico as complete sets versus rack components in 2018.

Mexico

U.S. shipments by rack sale types	Calendar year 2018
Complete rack set	
<i>Quantity in pounds (AA)</i>	
<i>Value in dollars (AB)</i>	
Rack components not sold as a complete set	
<i>Quantity in pounds (AC)</i>	
<i>Value in dollars (AD)</i>	

RECONCILIATION OF SALES TYPE.--Please ensure that the quantities and values reported for rack sales type (i.e., lines AA, AB, AC, and AD) equal the quantity and value reported for U.S. shipments (i.e., lines F through K) in 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 item	Calendar year 2018
Quantity: AA + AC – F – H – J = zero ("0"), if not revise.	0
Value: AB + AD - G – I – K = zero ("0"), if not revise.	0

II-6e. **Rack load: Mexico.**--Please indicate which of the following rack load capacities your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Mexico had in 2018 (check all that apply):

U.S. shipments by load capacity	Calendar year 2018
Less than 2,500 pounds	<input type="checkbox"/>
2,500 pounds – 4,999 pounds	<input type="checkbox"/>
5,000 pounds and greater	<input type="checkbox"/>

II-7a. **U.S. 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	
	2016	2017	2018	2018	2019
Beginning-of-period inventories <i>(quantity)</i> (A)					
Imports:¹ Racks imported under HTS number 7326.90.8688 and 7326.90.8588 <i>Quantity</i> (B)					
<i>Value</i> (C)					
Racks imported under all other HTS numbers² <i>Quantity</i> (D)					
<i>Value</i> (E)					
U.S. shipments: Commercial shipments: <i>Quantity</i> (F)					
<i>Value</i> (G)					
Internal consumption: <i>Quantity</i> (H)					
<i>Value³</i> (I)					
Transfers to related firms:³ <i>Quantity</i> (J)					
<i>Value³</i> (K)					
Export shipments:⁴ <i>Quantity</i> (L)					
<i>Value</i> (M)					
End-of-period inventories <i>(quantity)</i> (N)					

¹ Please identify the foreign producers, if known: _____.

² Please identify the HTS statistical reporting numbers used for the imports of these products: _____.

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.

⁴ Identify your firm's principal export markets: _____.

II-7a. U.S. 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 N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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	
	2016	2017	2018	2018	2019
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. 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 firms) of imports from all other sources by channel of distribution.

All other sources

Item	Calendar years			January-March	
	2016	2017	2018	2018	2019
Quantity (in pounds)					
Channels of distribution:					
U.S. shipments:¹					
To distributors / for re-sale (O)					
To end users / for installation (P)					
¹ 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 O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, and J) 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	
	2016	2017	2018	2018	2019
O + P – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

II-7c. **Rack coatings: All other sources.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by coating type in 2018.

All other sources

U.S. shipments by coating type	Calendar year 2018
No coating	
<i>Quantity</i> in pounds (Q)	
<i>Value</i> in dollars (R)	
Painted (not galvanized)	
<i>Quantity</i> in pounds (S)	
<i>Value</i> in dollars (T)	
Epoxy coated	
<i>Quantity</i> in pounds (U)	
<i>Value</i> in dollars (V)	
Zinc or other galvanized¹	
<i>Quantity</i> in pounds (W)	
<i>Value</i> in dollars (X)	
Other²	
<i>Quantity</i> in pounds (Y)	
<i>Value</i> in dollars (Z)	
¹ Whether or not painted.	
² Please identify: _____.	

RECONCILIATION OF COATINGS.--Please ensure that the quantities and values reported for US shipments by rack coating (i.e., lines Q through Z) equal the quantity and value reported for U.S. shipments (i.e., line F through K) in 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 item	Calendar year 2018
Quantity: $Q + S + U + W + Y - F - H - J =$ zero ("0"), if not revise.	0
Value: $R + T + V + X + Z - G - I - K =$ zero ("0"), if not revise.	0

II-7d. **Rack components: All other sources.**--Please indicate the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources as complete sets versus rack components in 2018.

All other sources

U.S. shipments by rack sale types	Calendar year 2018
Complete rack set	
<i>Quantity in pounds (AA)</i>	
<i>Value in dollars (AB)</i>	
Rack components not sold as a complete set	
<i>Quantity in pounds (AC)</i>	
<i>Value in dollars (AD)</i>	

***RECONCILIATION OF SALES TYPE.**--Please ensure that the quantities and values reported for rack sales type (i.e., lines AA, AB, AC, and AD) equal the quantity and value reported for U.S. shipments (i.e., lines F through K) in 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 item	Calendar year 2018
Quantity: $AA + AC - F - H - J = \text{zero ("0")}$, if not revise.	0
Value: $AB + AD - G - I - K = \text{zero ("0")}$, if not revise.	0

II-7e. **Rack load: All other sources.**--Please indicate which of the following rack load capacities your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources had in 2018 (check all that apply):

U.S. shipments by load capacity	Calendar year 2018
Less than 2,500 pounds	<input type="checkbox"/>
2,500 pounds – 4,999 pounds	<input type="checkbox"/>
5,000 pounds and greater	<input type="checkbox"/>

II-8. **Rack types.**—Please indicate which of the following steel racks your firm imports and sells.

<i>(check as many as appropriate)</i>	
<input type="checkbox"/>	<u>Cantilever Rack</u> - 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"/>	<u>Case-Flow Rack</u> - 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"/>	<u>Drive-In Rack</u> - 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"/>	<u>Drive-Through Rack</u> - 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"/>	<u>Movable-Shelf Rack</u> - 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"/>	<u>Pallet-Flow Rack</u> - 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"/>	<u>Pallet Rack</u> - 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"/>	<u>Pick Modules</u> - 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"/>	<u>Portable Rack (Stacking Frames)</u> - 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"/>	<u>Push-Back Rack</u> - 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"/>	<u>Stacker Rack</u> - A rack structure similar to one of the other rack structures that is serviced by an automated storage and retrieval machine.
<input type="checkbox"/>	<u>Other</u> ¹
¹ Please identify: _____.	

- II-9. **Transfers to related firms.**-- If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.

- II-10. **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.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, cindy.cohen@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, 2016 of the following products imported from China and Mexico:

Product 1.--Beam, non-galvanized, 16 gauge, 96" length, 4" face, 3 pins connection, 1 5/8" step, RMI certified

Product 2.--Beam, non-galvanized, 16 gauge, 120" length, 5" face, 4 pins connection, 1 5/8" step, RMI certified

Product 3.--Frame, non-galvanized, 15 gauge, 3" x 1 5/8" posts, 42" x 120," RMI certified

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

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 2016-March 2019, did your firm import from China or Mexico 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"/>	Yes. --Please complete the following pricing data table(s) as appropriate.
<input type="checkbox"/>	No. --Skip to question III-3.

III-2a. **Price data.**--Report below the quarterly price data¹ for pricing products² 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
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.

² 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-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from Mexico and sold by your firm.

Mexico

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
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.

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

Is the price data reported above:	√ if Yes
Quantity data in pounds?	<input type="checkbox"/>
Value data in dollars?	<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 questions II-5 and II-6 in each year?	<input type="checkbox"/>

III-2d. **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.**--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 2018 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

Item	Type of sale				Total (should sum to 100.0%)
	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)	
Share of 2018 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"/>
Indexed to raw material costs ¹	<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"/>
¹ Please identify the indexes used:				

III-8. **Lead times.**--What share of your firm’s sales of steel racks imported from China is 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 2018 sales	Lead time (Average number of days)
From your firm’s U.S. inventory	%	
From foreign manufacturers’ inventory	%	
Produced to order	%	
Total (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	%
Total (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 since January 1, 2016 (check all that apply)?

Geographic area	China
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
Midwest. —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
Southeast. —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
Central Southwest. —AR, LA, OK, and TX.	<input type="checkbox"/>
Mountains. —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
Pacific Coast. —CA, OR, and WA.	<input type="checkbox"/>
Other. —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, assembly, or installation costs	
	%	%	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, 2016. 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, 2016?

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

(b) If yes, have there been any changes in the business cycles or conditions of competition for steel racks since January 1, 2016?

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, 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 meet timely shipment commitments, etc.)?

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

III-17. **Raw materials.**—

(a) How have steel racks raw material prices changed since January 1, 2016?

	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 costs	<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"/>	

(b) Have raw material price changes affected your firm's selling prices for steel racks?

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

III-18. **Impact of the section 232 investigation.**--This question concerns the section 232 investigation and subsequent tariffs imposed on imported steel products.

- (a) Did the announcement of the section 232 investigation in April 2017 or the subsequent imposition of tariffs on imported steel products beginning in March 2018 have an impact on the steel rack market?

Yes —Please fill out table below and answer part (b)	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item	Response
Impact on your firm ¹	
Impact on overall U.S. market ¹	
¹ Please identify the magnitude and timing of any effects, and compare your firm's operations/overall market before and after the application of additional tariffs on imported steel products.	

- (b) **Assessment of impact of the section 232 tariffs.**--Please indicate the impact of the 232 investigation and subsequent imposition on imported steel products beginning in March 2018.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Overall demand for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Impact of the section 301 investigation.**--This question concerns the section 301 investigation and subsequent announcement of additional tariffs that include steel racks proposed and implemented by the United States in response to Chinese trade practices.

(a) Did the announcement of the section 301 investigation in June 2018 or the subsequent imposition of tariffs on Chinese-origin products have an impact on the steel rack market?

Yes —Please fill out table below and answer part (b)	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item	Response
Impact on your firm ¹	
Impact on overall U.S. market ¹	
¹ Please identify the magnitude and timing of any effects, and compare your firm's operations/overall market before and after the announcement of the section 301 measures.	

(b) **Assessment of impact of the section 301 investigation.**--Please indicate the impact of the announcements and subsequent imposition of duties under the section 301 investigation.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Overall demand for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for steel racks in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-20. **Interchangeability.**--Are 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	Mexico	Other countries
United States			
China	X		
Mexico	X	X	
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-21. **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	Mexico	Other countries
United States			
China	X		
Mexico	X	X	
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of steel racks, identify the country-pair and report the advantages or disadvantages imparted by such factors: .			

III-22. **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.

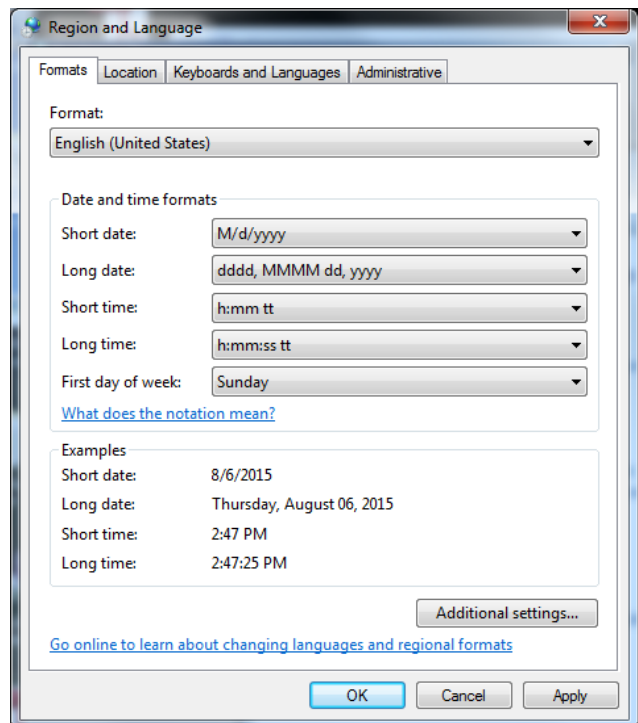
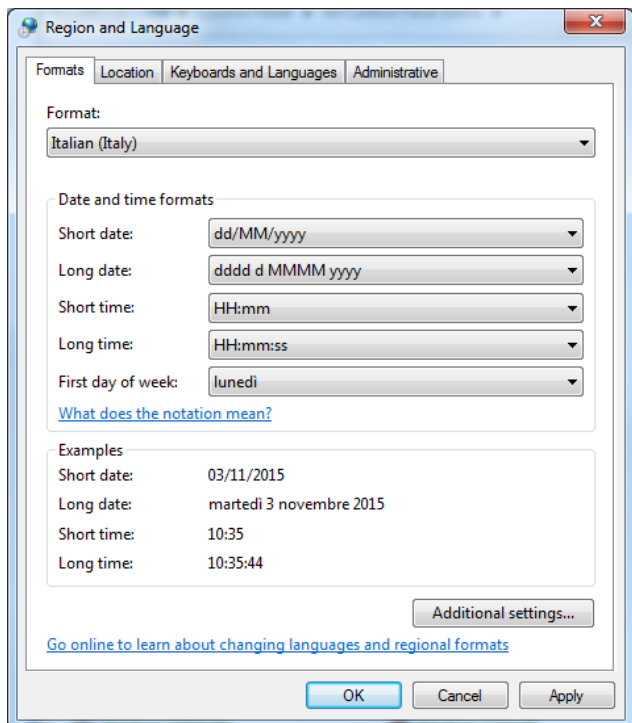
Correcting Valid number error messages.--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form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

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

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

- **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:** **RACKS**

- **E-mail.**—E-mail the MS Word questionnaire to stamen.borisson@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.