

## U.S. PURCHASERS' 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 possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from Cindy Cohen (202-205-3230, [cindy.cohen@usitc.gov](mailto:cindy.cohen@usitc.gov)).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm purchased steel racks (as defined on next page) from any source (domestic or foreign) at any time since January 1, 2016?

**NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)

**YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

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

**Purchaser.**--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing steel racks from another firm that produces, imports, or otherwise distributes steel racks.

**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.

I-1. **Establishments covered.**--Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. **Firms operating more than one establishment should combine the data for all establishments into a single response.**

**"Establishment"**--Each facility of a firm involved in the purchase of steel racks, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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I-2. **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-3. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which import steel racks into the United States or which export steel racks to the United States?

No             Yes--List the following information.

Firm name	Country	Affiliation

I-4. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which produce steel racks?

No             Yes--List the following information.

Firm name	Country	Affiliation

**PART II.--PURCHASES**

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

Name	
Title	
Email	
Telephone	

II-1. **Purchases and imports.**<sup>1</sup>-- Report separately your firm's domestic purchases and imports of steel racks.

**"Purchase"** – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

**"Import"** – Purchase directly from a foreign supplier and your firm is the importer of record.

Item	2016	2017	2018	January-March 2019
	Quantity (in pounds)			
<b>Purchases of steel racks produced in--</b> United States				
China				
Mexico				
All other countries <sup>1</sup>				
Sources unknown <sup>2</sup>				
Total purchases	0	0	0	0
<b>Imports<sup>3</sup> of steel racks from--</b> China				
Mexico				
All other countries <sup>1</sup>				
Total imports <sup>3</sup>	0	0	0	0

<sup>1</sup> Please identify these countries: \_\_\_\_\_.  
<sup>2</sup> Please indicate the reason for not knowing the source of the steel racks purchased and indicate the firm(s) from which you purchased this merchandise: \_\_\_\_\_.  
<sup>3</sup> If your firm imported steel racks at any time since January 1, 2016, please also complete and return a U.S. importers' questionnaire in this proceeding.

<sup>1</sup> Please complete and return a U.S. importers' questionnaire if your firm is an importer of record.

II-2. **Changes in purchasing patterns.**--Please indicate how the shares of your firm's purchases of steel racks from different sources have changed since January 1, 2016.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mexico	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-3. **Country knowledge.**--Please indicate the countries of origin with which your firm has experience or information in the steel racks market.

United States	China	Mexico	Other countries	Other countries (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-4. **Supplier identification.**--Please list your firm's **FIVE** largest suppliers for steel racks since January 1, 2016. Also, provide the share of the quantity of your firm's total purchases of steel racks that each of these suppliers accounted for in 2018.

No.	Supplier's name	City and state	Share of quantity of 2018 purchases
<b>1</b>			%
<b>2</b>			%
<b>3</b>			%
<b>4</b>			%
<b>5</b>			%



**PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES**

III-1. **Firm type.**--Which of the following best describes your firm as a purchaser of steel racks (check all that apply)?

End user/retailer	Distributor	Other	Describe other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

***If your firm is a distributor of steel racks, please answer questions III-2 and III-3.***

III-2. **Competition for sales.**--Does your firm compete for sales to customers with the manufacturers or importers from which your firm purchases steel racks?

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

III-3. **Types of customers.**--What are the major types of consumers to which your firm sells steel racks?

**If your firm is an end user of steel racks, please answer questions III-4 and III-5.**

III-4a. **Cost share by end uses.**--List the top 3 products your firm makes using steel racks and estimate the percent of your total production cost that is accounted for by steel racks and by other inputs (such as labor, energy, and other raw materials).

Final product(s) your firm produces	Share of total cost in each of the product(s) your firm produces 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-4b. **End use categories.**--Please indicate what share of your firm's purchases of steel racks in 2018 were used for each of the following end user categories.

End use	Share of 2018 purchases (should sum to 100.0% down)
Used for retail or customer-visible displays	%
Used for warehousing and storage	%
Other uses, describe	%
<b>Total</b> (should sum to 100.0% down)	0.0 %

III-5. **Demand for end use products.**--

(a) Has the demand for your firm's final products incorporating steel racks changed since January 1, 2016?

Increased	No change	Decreased	Fluctuated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Has this had any effect on your firm's demand for steel racks?

No	Yes	Explain
<input type="checkbox"/>	<input type="checkbox"/>	

III-6. **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-7. **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-8. **Country preferences.**--Do you or your customers ever specifically order steel racks from one country in particular over other possible sources of supply?

No	Yes	If yes, identify the countries and explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-9. **Importance of purchasing domestic product.**--Please fill out the table below, estimating the percentage of your firm's total 2018 purchases of steel racks that required steel racks produced in the United States.

	<b>Estimated percentage of your firm's total 2018 purchases of steel racks</b>
<b>Purchases that did not require domestic product</b>	%
<b>Purchases that were required by law or regulation to be domestic product</b> (e.g., government purchases under "Buy American" provisions)	%
<b>Purchases that were not required by law or regulation, but were required by your customers to be domestic product</b>	%
<b>Purchases that were required to be domestic product for other reasons</b> (explain: _____ )	%
<b>Total</b> (should sum to 100.0%)	0.0 %

III-10. **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?

<b>Check all that apply.</b>	<b>Please describe.</b>
<input type="checkbox"/> <b>No</b>	Skip to question III-11.
<input type="checkbox"/> <b>Yes-Business cycles (e.g. seasonal business)</b>	
<input type="checkbox"/> <b>Yes-Other distinctive conditions of competition</b>	

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

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

III-11. **Decisions based on producer and country-of-origin.**--How often does your firm, and if known, do your customers, make purchasing decisions involving steel racks based on its producer or country of origin?

Item	Always	Usually	Sometimes	Never	If at least sometimes, explain.
<b>Decision based on producer</b>					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Decision based on country of origin</b>					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-12. **Availability of supply.**--Has the availability of steel racks in the U.S. market changed since January 1, 2016?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Chinese imports	<input type="checkbox"/>	<input type="checkbox"/>	
Non-Chinese imports	<input type="checkbox"/>	<input type="checkbox"/>	

III-13. **Supply constraints.**--Has any firm refused, declined, or been unable to supply your firm with 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-14. **Availability of specific product types.**--Are certain grades/types/sizes of steel racks only available from certain country sources?

No	Yes	If yes, please identify the countries and the grade/type/size.
<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Purchasing frequency.**--

(a) How frequently does your firm make purchases of steel racks (check one)?

Daily	Weekly	Monthly	Quarterly	Annually	Other	If other, specify
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has this purchasing frequency changed since January 1, 2016?

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

III-16. **Number of suppliers contacted.**--How many suppliers does your firm generally contact before making a purchase? Between \_\_\_\_\_ and \_\_\_\_\_ firms

III-17. **Supplier negotiations.**--Do your firm's purchases of steel racks usually involve negotiations between supplier and purchaser?

No	Yes	If yes, explain the factors your firm generally negotiates and note whether your firm quotes competing prices during negotiations.
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Change in suppliers.**--Has your firm changed suppliers since January 1, 2016?

No	Yes	If yes, please list the supplier(s), whether the firm was added or dropped, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **New suppliers.**--Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2016?

No	Yes	If yes, please identify the firms.
<input type="checkbox"/>	<input type="checkbox"/>	

III-20. **Supplier qualification.**--Do you require your suppliers to be or to become certified or qualified to sell steel racks to your firm?

If yes, provide the following information.

- The number of days to qualify a new supplier.
- A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).

No	Yes	Number of days	Process and factors
<input type="checkbox"/>	<input type="checkbox"/>		

III-21. **Failure to certify.**--Since January 1, 2016, have any domestic or foreign producers failed in their attempts to certify or qualify their steel racks with your firm or have any producers lost their approved status?

No	Yes	If yes, please identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification.
<input type="checkbox"/>	<input type="checkbox"/>	

III-22. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase steel racks (examples include availability, extension of credit, contracts, price, quality, range of supplier's product line, traditional supplier, etc.).

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions: ____.	

III-23. **Purchasing factors.**--Please rate the importance of the following factors in your firm's purchasing decisions for steel racks.

Factor	Very important	Somewhat important	Not important
Assembly/installation service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corrosion protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum quantity requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Packaging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product consistency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability of supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RMI certification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical support/service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U.S. transportation costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visual aesthetics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



III-24. **Quality characteristics.**--What characteristics does your firm consider when determining the quality of steel racks?

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III-25. **Minimum quality.**--How often do steel racks from the following countries meet minimum quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mexico	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-26. **Frequency of decisions based on price.**--How often does your firm purchase the steel racks that are offered at the lowest price?

Always	Usually	Sometimes	Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-27. **Price leaders.**--A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. *A price leader is not necessarily the lowest-priced supplier.*

Please list the names of any firms you considered price leaders in the steel racks market since January 1, 2016.

Firm(s)	Describe how the firm(s) exhibited price leadership

III-28. **Purchasing subject imports rather than domestic products.**—

(a) Since January 2016, did your firm purchase imports of steel racks from China instead of available U.S.-produced steel racks?

<b>Source</b>	<b>Yes (also respond to parts (b) and (c))</b>	<b>No (Please ensure that this answer does not contradict the response in question II-1. If "No," skip parts (b) and (c))</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?

<b>Source</b>	<b>Yes</b>	<b>No</b>
China	<input type="checkbox"/>	<input type="checkbox"/>

(c) If you responded "Yes" to part (a), was price a primary reason for purchasing subject imports rather than domestic product?

<b>Source</b>	<b>Yes</b>	<b>If Yes, estimate the quantity of imports purchased instead of domestic product since January 2016 (in pounds)</b>	<b>No</b>	<b>If No, please do not estimate the quantity of imports, but instead indicate the reason your firm purchased imports instead of domestic product</b>
China	<input type="checkbox"/>		<input type="checkbox"/>	

III-29. **U.S. producers and import competition.** –

- (a) Since January 1, 2016, in connection with a sale or offer to sell steel racks to your firm, did U.S. producers reduce their prices of domestically produced steel racks in order to compete with lower-priced imports of steel racks from the subject countries?

<b>Source</b>	<b>Yes (also respond to question part (b))</b>	<b>No (If “No,” skip part (b))</b>	<b>Don’t know</b>
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes” above, please provide an estimate of the reduction in U.S. producers’ prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

<b>Source</b>	<b>Estimated reduction in U.S. prices (percent)</b>	<b>Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors</b>
China	%	

**PART IV.—PRODUCT COMPARISONS**

IV-1. **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

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

IV-2. **Interchangeability of components/parts.**--To what extent can steel rack components made by different manufacturers be used together to form a complete steel rack?

<b>Always</b>	<b>Frequently</b>	<b>Somewhat</b>	<b>Never</b>	<b>Additional explanation</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-3. **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 purchases 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			
Mexico			
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 purchases of steel racks, identify the country-pair and report the advantages or disadvantages imparted by such factors:  _____.			

IV-4. **Factor country comparisons.**--For the factors listed below, please rate how steel racks produced in each country you identified in your response to the first question in Part IV compares with steel racks produced in each of the other countries you identified.

Factor	Product from <u>United States</u> compared to product from <u>China</u>			Product from <u>United States</u> compared to product from <u>Nonsubject sources</u>			Product from <u>China</u> compared to product from <u>Nonsubject sources</u>		
	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Assembly/installation service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corrosion protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum quantity requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Packaging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price <sup>1</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product consistency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability of supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RMI certification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical support/service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U.S. transportation costs <sup>1</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visual aesthetics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>1</sup> A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.

**PART V.—ADDITIONAL INFORMATION**

V-1. **Other explanations.**--If your firm would like to further explain a response to any question that did not provide a narrative response box, please note the question number and the explanation in the space provided below.

--

V-2. **OMB statistics.**--Please report 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 25 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.

## 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](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 [Cindy.CohenE@usitc.gov](mailto:Cindy.CohenE@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 does not purchase 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 your firm submits (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.