U.S. PRODUCERS' QUESTIONNAIRE

LIGHT-WALLED RECTANGULAR PIPE AND TUBE FROM CHINA, KOREA, MEXICO AND TURKEY

This questionnaire must be received by the Commission by March 19, 2020

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 review of the countervailing and antidumping duty orders concerning light-walled rectangular pipe and tube from China, Korea, Mexico and Turkey (Inv. Nos. 701-TA-449 and 731-TA-1118-21 (Second Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm

City	State Zip Code	
Website _		
Has your fir January 1, 2	rm produced light-walled rectangular pipe and tube (as defined on the next page) 2014?	at any time since
□ NO	(Sign the certification below and promptly return only this page of the questionnaire t	to the Commission)
YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Co	ommission)
-	restionnaire via the Commission <i>Drop Box</i> by clicking on the following linlopbox.usitc.gov/oinv/ (PIN: LWRPT)	k:
	CERTIFICATION	
nd understa I also grant	CERTIFICATION ation herein supplied in response to this questionnaire is complete and correct to and that the information submitted is subject to audit and verification by the Cor at consent for the Commission, and its employees and contract personnel, to use to throughout this proceeding in any other import-injury proceedings or reviews cor	mmission. By med the information p
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PART I.—GENERAL INFORMATION

<u>Background.</u>--On May 30, 2008, the Department of Commerce ("Commerce") issued an antidumping duty order on imports of light-walled rectangular pipe and tube ("LWR pipe and tube") from Turkey. On August 5, 2008, Commerce issued antidumping duty orders on imports of LWR pipe and tube from China, Korea, and Mexico, and a countervailing duty order on imports of LWR pipe and tube from China. On May 1, 2019, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the orders will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the orders. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2019/light walled rectangular pipe and tube china ko rea/second review full.htm.

Light-walled rectangular pipe and tube ("LWR pipe and tube") covered by these investigations is certain welded carbon quality light-walled steel pipe and tube, of rectangular (including square) cross section, having a wall thickness of less than 4 mm. The term carbon-quality steel includes both carbon steel and alloy steel which contains only small amounts of alloying elements. Specifically, the term carbon-quality includes products in which none of the elements listed below exceeds the quantity by weight respectively indicated: 1.80 percent of manganese, or 2.25 percent of silicon, or 1.00 percent of copper, or 0.50 percent of aluminum, or 1.25 percent of chromium, or 0.30 percent of cobalt, or 0.40 percent of lead, or 1.25 percent of nickel, or 0.30 percent of tungsten, or 0.10 percent of molybdenum, or 0.10 percent of niobium, or 0.15 percent vanadium, or 0.15 percent of zirconium. The description of carbon-quality is intended to identify carbon-quality products within the scope.

LWR pipe and tube is currently imported under statistical reporting numbers 7306.61.5000 and 7306.61.7060 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

Reporting of information.--If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

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

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

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

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

I-1. <u>OMB statistics</u>.--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

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

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

I-2a. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. Firms operating more than one establishment should combine the data for all establishments into a single report.

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

Establishments Covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discu	ussion on establishments con	solidated in this questic	onnaire:

	<u>Stock symbol information.</u> If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol:	
I-2c. <u>External counsel.</u> — If your firm or parent firm is represented by external counsel in this proceeding, please specify the name of the law firm and the lead attorney(s).		· · · · · · · · · · · · · · · · · · ·
	Law firm:	

I-3. Position regarding continuation of orders.--Does your firm support or oppose continuation of the following antidumping and countervailing duty orders currently in place for LWR pipe and tube?

Lead attorney(s):

Country	Support	Oppose	Take no position
China (AD)			
China (CVD)			
Korea (AD)			
Mexico (AD)			
Turkey (AD)			

Business Proprietary

U.S. Pro	oducers' Questionnaire – Light-W	/alled Rectangular Pipe and Tube (Se	cond Review) Page 5		
I-4.	OwnershipIs your firm owned, in whole or in part, by any other firm?				
	No YesList the following information, relating to the ultimate parent/owner.				
	Firm name	Country	Extent of ownership (percent)		
I-5.	Related importers/exportersDoes your firm have any related firms, either domestic or foreign, that are engaged in importing LWR pipe and tube into the United States or that are engaged in exporting LWR pipe and tube to the United States? No YesList the following information.				
	Firm name	Country	Affiliation		
	L				

Firm name	Country	Affiliation
Business planIn Par	s II and IV of this questionnaire we	request a copy of your compan ve a business plan or any intern

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Andres Andrade (202-205-2078, Andres.Andrade@usitc.gov). **Supply all data requested on a <u>calendar-year</u> basis**.

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

Name	
Title	
Email	
Telephone	

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of LWR pipe and tube since January 1, 2014.

		If checked, please describe; leave blank if not applicable.
	Plant openings	
	Plant closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or production curtailments	
	Revised labor agreements	
	Other (e.g., technology)	

II -2b	Anticipated changes in operations.—Does your firm anticipate any changes in the character of
	its operations or organization relating to the production of LWR pipe and tube in the future?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.

II-3a. **Production using same machinery.**-- Please report your firm's production of products made using the same equipment, machinery, or employees as used to produce LWR pipe and tube, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

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

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

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

II-3a. Production using same machinery.--Continued

Quantity (in short tons)				
	Calendar years			
Item	2017	2018	2019	
Overall production capacity ¹				
Production of:				
LWR pipe and tube ²	0	0	0	
Other products ³				
Total production using same machinery or				
workers	0	0	0	

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

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

Hours per week	Weeks per year

II-3c.	<u>Capacity calculation</u> Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.
II-3d.	<u>Production constraints</u> Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

² Data entered for production of LWR pipe and tube will populate here once reported in question II-7.

³ Please identify these products: _____

II-3e.	Product	shifting.—
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(i)	Is your firm able to switch production (capacity) between LWR pipe and tube and other
	products using the same equipment and/or labor?

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

(ii)	Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.		

II-4a. <u>Production, shipment, and inventory data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of LWR pipe and tube in its U.S. establishment(s) during the specified periods.

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

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

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

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

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

"Related firm" —A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

"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-4a. Production, shipment, and inventory data. --Continued

Quantity (in short tons) and value (in \$1,000)			
	Calendar year		
Item	2017	2018	2019
Average production capacity ¹ (Quantity) (A)			
Beginning-of-period inventories (Quantity) (B)			
Production (Quantity) (C)			
U.S. shipments: Commercial shipments: Quantity (D)			
Value (E)			
Internal consumption: ² Quantity (F)			
Value (G)			
Transfers to related firms: ² Quantity (H)			
Value (I)			
Export shipments: ³ Quantity (J)			
Value (K)			
End-of-period inventories (Quantity) (L)			
¹ The production capacity reported is based Please describe the methodology used to calcul capacity (use additional pages as necessary) ² Internal consumption and transfers to rela a different basis for valuing these transactions, (however, provide the data above at fair marke	late production capa ted firms must be va please specify that b t value).	acity, and explain any a	changes in reported
3 Identify your firm's principal export marke	ts·		

II-4a. Production, shipment, and inventory data.--Continued

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

	Calendar year			
Item	2017	2018	2019	
B + C - D - F - H - J - L =				
should equal zero ("0") or				
provide an explanation. ¹	0	0	0	
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:				

II-4b. <u>Historical U.S. shipment data</u>. --Report the quantity and value of your firm's U.S. shipments (including commercial U.S. shipments, internal consumption, and transfers, but <u>not</u> including exports) of LWR pipe and tube produced in your U.S. establishment(s) during the specified periods.

Quantity (in short tons)					
Item 2014 2015 2016					
LWR pipe and tube					
Quantity					
Value					

II-5. <u>Channels of distribution</u>.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in short tons)			
	Calendar year		
Item	2017	2018	2019
Channels of distribution: U.S. shipments— to distributors (M)			
to automotive manufacturers and manufacturers of automotive parts and components (N)			
to non-automotive or related component manufacturers (O)			

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

	Calendar year		
Reconciliation item	2017	2018	2019
M + N + O - D - F - H = zero ("0"), if			
not revise.	0	0	0

- II-6. <u>U.S. shipments by product type</u>. --Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by product type.
 - Processed.--LWR pipe and tube which has been further manufactured such as by sawcutting, laser cutting-to-length, drilling, perforating and/or bending, or a combination thereof
 - Unprocessed.--LWR pipe and tube which has not been further manufactured and is sold in mill lengths.

Quantity (in short tons)			
		Calendar year	
Item	2017	2018	2019
U.S. shipments: Processed¹(P)			
Unprocessed (Q)			

¹ Please describe the post-mill length fabrication activities your firm conducted on these shipments and the customers for which your firm conduct these fabrication activities:

<u>RECONCILIATION OF SHIPMENTS BY PRODUCT TYPE.</u>--Please ensure that the quantities reported for U.S. shipments by product type (i.e., lines P and Q) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

		Calendar year	
Reconciliation item	2017	2018	2019
P + Q - D - F -H = zero ("0"), if not			
revise.	0	0	0

II-7. <u>Employment data</u>.--Report your firm's employment-related data related to the production of LWR pipe and tube and provide an explanation for any trends in these data.

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

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

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

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

	Calendar year			
Item	2017	2018	2019	
Employment data: Average number of PRWs (number) (R)				
Hours worked by PRWs (1,000 hours) (S)				
Wages paid to PRWs (\$1,000) (T)				

Explanation of trends:

ple rel ma	insfers to related firmsIf your firm reported transfers to related firms in question II-4, wase identify the firm(s) and indicate the nature of the relationship between your firm and the lated firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at larket value or by a non-market formula, whether your firm retained marketing rights to all insfers, and whether the related firms also processed inputs from sources other than your m.

II-9.	PurchasesHas your firm purchased LWR pipe and tube produced in the United States or in
	other countries since January 1, 2014? (Do not include imports for which your firm was the
	importer of record. These should be reported in an importer questionnaire).

"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

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

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

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

	Quantity	y (in short tons)	
	Calendar years		
Item	2017	2018	2019
Purchases from U.S. importers¹ of LWR pipe and tube from— China			
Korea			
Mexico			
Turkey			
All other sources			
Purchases from domestic producers ²			
Purchases from other sources ³			
suppliers differ by source, ple ² Please list the name of th	ase identify the source ne U.S. producer(s) fron	ich your firm purchased this pro for each listed supplier: n which your firm purchased thi our firm purchased this product	s product:

II-10. <u>Imports.--</u>Since January 1, 2014, has your firm imported LWR pipe and tube?

"Importer" – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf.

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

U.S. Producers' Questionnaire – Light-Walled Rectangular Pipe and Tube (Second Review)	U.S.	Producers'	Questionnaire -	Light-Walled	Rectangular Pi	pe and Tube ((Second Review)	
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II-11.	Toll productionSince January 1, 2014, has your firm been involved in a toll agreement
	regarding the production of LWR pipe and tube?

"Toll agreement"--Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

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

II-12. Foreign trade zones.--

(a) <u>Firm's FTZ operations</u>.--Does your firm produce LWR pipe and tube in and/or admit LWR pipe and tube into a foreign trade zone (FTZ)?

"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	If yes Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.

For questions II-13 and II-14, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

orders coveri its effect on y employment development	ing imports your firm's p , revenues, t expenditu	be the significance of the existing countervailing and antidumping duty of LWR pipe and tube from China, Korea, Mexico and Turkey in terms of production capacity, production, U.S. shipments, inventories, purchases, costs, profits, cash flow, capital expenditures, research and res, and asset values. You may wish to compare your firm's operations position of the orders.
operations of inventories, presearch and and tube in t	r organizatio ourchases, o developmo he future if	ionWould your firm anticipate any changes in the character of its on, including its production capacity, production, U.S. shipments, employment, revenues, costs, profits, cash flow, capital expenditures, ent expenditures, or asset values relating to the production of LWR pipe the countervailing and antidumping duty orders on LWR pipe and tube co and Turkey were to be revoked?
No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.
for which a n explanation i firm had in p	arrative bo n the space roviding the	your firm would like to explain further a response to a question in Part II is was not provided, please note the question number and the provided below. Please also use this space to highlight any issues your e data in this section, including but not limited to technical issues with aire.
	corders cover its effect on yemployment development before and a likely impact operations or inventories, presearch and and tube in the from China, but the likely impact operations or inventories, presearch and and tube in the from China, but the likely impact operations or inventories, presearch and and tube in the from China, but the likely impact operations or inventories, presearch and and tube in the from China, but the likely impact operations or inventories or	orders covering imports its effect on your firm's pemployment, revenues, development expenditure before and after the importation or organization inventories, purchases, eresearch and development and tube in the future if from China, Korea, Mexion China, Korea,

PART III.--FINANCIAL INFORMATION

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

Nam	e	
Title		
Ema	il	
Tele	phone	
Αςςοι	ınting syst	emBriefly describe your firm's financial accounting system.
A.	When d	oes your firm's fiscal year end (month and day)?
	If your f	irm's fiscal year changed during the data-collection period, explain below:
B.1.		e the lowest level of operations (e.g., plant, division, company-wide) for which I statements are prepared that include LWR pipe and tube:
2.	Does yo	ur firm prepare profit/loss statements for LWR pipe and tube:
3.	How oft annual r	ten did your firm (or parent company) prepare financial statements (including reports, 10Ks)? Please check relevant items below. ited, unaudited, annual reports, 10Ks, 10 Qs, athly, quarterly, semi-annually, annually
4.	Account	ting basis: GAAP, cash, tax, or other comprehensive basis ing (specify)
	used in ti regarding submit co profit-an	s requested in Part I of this questionnaire, please keep all supporting documents/recorn the preparation of the financial data, as Commission staff may contact your firm ag questions on the financial data. The Commission may also request that your compar opies of the supporting documents/records (financial statements, including internal d-loss statements for the division or product group that includes LWR pipe and tube, coecific statements and worksheets) used to compile these data.
Cost a	accounting	systemBriefly describe your firm's cost accounting system (e.g., standard

Ľ		m produces in the facilities in which it produces t sales accounted for by these products in your
fi	rm's most recent calendar year.	
ı		
	Products	Share of sales
	LWR pipe and tube	%
		%
		%
		%
		%
n	oes your firm purchase inputs (raw materials, l	
lr a 9 y	roduction of LWR pipe and tube from any related etween related firms, divisions and/or other continue to question III-7. No Puts from related suppliersPlease identify the tube that your firm purchases from related suppliersPlease report this	ed suppliers (e.g., inclusive of transactions omponents within the same company)? Continue to question III-9a. The inputs used in the production of LWR pipe suppliers and that are reflected in question III-information by relevant input on the basis of or "Input valuation" please describe the basis, a tem, of the purchase cost from the related

III-8. <u>Inputs from related suppliers at cost.</u>--Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on LWR pipe and tube) in a manner consistent with the firm's accounting books and records.

Yes	No	If noIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.:

III-9a. Operations on LWR pipe and tube.--Report the revenue and related cost information requested below on the LWR pipe and tube operations of your firm's U.S. establishment(s). Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed calendar years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Samuel Varela-Molina at (202) 205-3429 before completing this section of the questionnaire.

Quantity	(in short tons) and value (in	\$1,000)	
	Ca	lendar years ended	
Item	2017	2018	2019
Net sales quantities: ² Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ² Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS): ³ Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative (SG&A) expenses: Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	0	0	0
Other expenses and income: Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			

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

II-9b.	quantitie have bee return th	data reconciliation The calculable line items from question III-9a (i.e., total net sales is and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) in calculated from the data submitted in the other line items. Do the calculated fields in correct data according to your firm's financial records ignoring non-material ites that may arise due to rounding?
	Yes	NoIf the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.
		Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negative—instances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive, expenses or reversals are negative).
		If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-9c. Raw materials.--Please report the share of total raw material costs in 2019 (reported in III-9a) for the following raw material inputs:

		Procurement method	
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm
Ungalvanized hot-rolled steel strip			
Galvanized hot-rolled steel strip			
Ungalvanized cold-rolled steel strip			
Galvanized cold-rolled steel strip			
Post welding galvanization materials			
Other material inputs ¹			
Total (should sum to 100 percent)	0.0		

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

III-10. Nonrecurring items (charges and gains) included in the subject product financial results.--For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

	Calendar years ended		
	2017	2018	2019
Item		Value (<i>\$1,000</i>)	
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

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

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

<u>Classification of identified nonrecurring items (charges and gains) in the accounting books and </u>
<u>records of the company</u> If non-recurring items were reported in question III-10 above, please
identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9a.

III-12. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of LWR pipe and tube. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for LWR pipe and tube in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's six most recently completed calendar years.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted.

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

Value (in \$1,000)							
	Calendar years ended						
Item	2017	2018	2019				
Total assets (net) ¹							
¹ Describe							

III-13. <u>Capital expenditures and research and development expenses.</u>--Report your firm's capital expenditures and research and development expenses for LWR pipe and tube. Provide data for your firm's six most recently completed calendar years, and for the specified interim periods.

Value (<i>in \$1,000</i>)					
Calendar years ended					
Item	2017	2018	2019		
Capital expenditures ¹					
Research and development expenses ²					

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

² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.

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III-14.	Data consistency and reconciliation. Please indicate whether your firm's financial data for
	questions III-9a, 12, and 13 are based on a calendar year or your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-4a (including export shipments) as long as they are reported on the same calendar year basis.

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

		Years ended	
Reconciliation	2017	2018	2019
Quantity: Trade data from question II-4a (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II- 4a (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

Do these data in question III-9a reconcile with data in question II-4a?

Yes	No	If no, please explain.

III-15.	Other explanationsIf your firm would like to further explain a response to a question in Part III
	for which a narrative box was not provided, please note the question number and the
	explanation in the space provided below. Please also use this space to highlight any issues your
	firm had in providing the data in this section, including but not limited to technical issues with
	the MS Word questionnaire.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from James Horne (202-205-2722, James.Horne@usitc.gov).

IV-1. <u>Contact information.</u>--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers of the following products produced by your firm.
 - **Product 1.**-- ASTM A-513 (mechanical) or A-500 grade A or B (ornamental), carbon welded, not pickled and oiled, 2 inch square, 0.120 inch (+ or -10 percent) wall thickness (11 gauge), 20 foot or 24 foot lengths.
 - **Product 2.**-- ASTM A-513 (mechanical) or A-500 grade A or B (ornamental) tubing, carbon welded, pickled and oiled, 1 inch square, 0.065 inch nominal wall thickness (+ or -10 percent) (16 gauge), 20 foot or 24 foot mill lengths.
 - **Product 3.--** ASTM A-513 (mechanical) or A-500 grade A or B (ornamental), hot-rolled, not pickled and oiled, 11 gauge or 0.120 inch +/- 10% wall, three inch square to four inches square, or in rectangular circumferences of 12 inches to 16 inches, lengths of 20 to 24 feet.
 - **Product 4.**-- ASTM A-513 (mechanical) or A-500 grade A or B (ornamental) tubing, galvanized, 2.5 inch square, 0.083 nominal wall thickness (+ or 10 percent) (14 gauge), lengths of 20 to 24 feet.

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

(a)	During January 2017 – December 2019, did your firm produce and sell to unrelated U.S.
	customers any of the above listed products (or any products that were competitive with
	these products)?

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

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

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

(Quantity in short tons, value in dollars)									
	Product 1		Produ	Product 2		Product 3		Product 4	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	
2017:									
January-March									
April-June									
July-September									
October-December									
2018:									
January-March									
April-June									
July-September									
October-December									
2019:									
January-March									
April-June									
July-September									
October-December									

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

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

provide a description of the product. Also, please explain any anomalies in your firm's reported pricing data.				
Product 1:				
Product 2:				
Product 3:				
Product 4:				

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

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U.J.	ribuuceis	Questionnane –	LIZIIL-VV alieu	Nectaligular	rıbe allu Tu	DE IJELUIIU NEVIEW <i>i</i>

	Price data chec				cing data in question IV-2(a) has be				
	Are the price of	lata reported	above:			√ if Yes			
	In actual dol	lars (not \$1,0	00) and s	hort tons	5?				
	In actual sho	ort tons (not 1	,000 sho	rt tons)?					
	F.o.b. U.S. p	oint of shipm	ent (i.e.,	does not	include U.S. transport costs)?				
	Net of all dis	scounts and re	ebates?						
	Have returns	s credited to	the quart	er in whi	ch the sale occurred?				
	Less than re	ported comm	ercial shi	pments i	n question II-6 in each year?				
(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.								
;	and tube (<i>check</i>	all that apply)? If you	r firm issu	ne prices that it charges for sales o ues price lists, please submit samp es based on purchaser type.				
	Transaction by transaction	Contracts	Set price lists	Other	If other, describe	<u> </u>			

IV-4.	Discount policyPlease indicate and describe your firm's discount policies (check all that apply).
	Please describe any difference based on purchaser type.

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

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U.S. Producers	' Ouestionnaire -	- Light-Walled I	Rectangular Pipe	e and Tube ((Second Review)

IV-5.	Pricing termsOn what basis are your firm's prices of domestic LWR pipe and tube usually
	quoted (check one)?

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

IV-6. <u>Contract versus spot.</u>--Approximately what share of your firm's sales of its U.S.-produced LWR pipe and tube in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

		Type of sale					
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	Total (should sum to 100.0%	d o	
Share of 2019 sales	%	%	%	%	0.0	%	

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

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

IV-8. <u>Lead times.--</u>What is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced LWR pipe and tube?

Source	Share of 2019 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9.	Shipping	information
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(a)	that is accounted for by U.S. inland transportation costs?%
(b)	Who generally arranges the transportation to your firm's customers' locations? Your firm Purchaser (check one)
(c)	Indicate the approximate percentage of your firm's sales of LWR pipe and tube that are

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

delivered the following distances from your firm's production facility.

IV-10. <u>Geographical shipments.</u>--In which U.S. geographic market area(s) has your firm sold its U.S.-produced LWR pipe and tube since January 1, 2014 (check all that apply)?

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

IV-11. **End uses.**--Have there been any changes in the end uses of LWR pipe and tube since January 1, 2014? Do you anticipate any future changes?

Changes in end uses	No	Yes	Explain
Changes since January 1, 2014			
Anticipated changes			

IV-12. <u>Substitutes.</u>--Have there been any changes in the number or types of products that can be substituted for LWR pipe and tube since January 1, 2014? Do you anticipate any future changes?

Changes in substitutes	No	Yes	Explain
Changes since January 1, 2014			
Anticipated changes			

IV-13. Availability of supply.--Has the availability of LWR pipe and tube in the U.S. market changed since January 1, 2014? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
Changes since January 1, 2	2014:		
U.Sproduced product			
Imports from China			
Imports from Korea			
Imports from Mexico			
Imports from Turkey			
Imports from all other countries			
Anticipated changes:			
U.Sproduced product			
Imports from China			
Imports from Korea			
Imports from Mexico			
Imports from Turkey			
Imports from all other countries			

IV-14. <u>Demand trends.</u>--Indicate how demand within the United States and outside of the United States (if known) for LWR pipe and tube has changed since January 1, 2014, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors		
	Demand since January 1, 2014						
Within the United States							
Outside the United States							
Anticipated future demand							
Within the United States							
Outside the United States							

IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of LWR pipe and tube since January 1, 2014? Do you anticipate any future changes?

Changes in product range, product mix, or marketing	No	Yes	Explain
Changes since January 1, 2014			
Anticipated changes			

IV-16. Conditions of competition

(a)	Is the LWR pipe and tube market subject to business cycles (other than general	al economy-
	wide conditions) and/or other conditions of competition distinctive to LWR pi	pe and tube?

Check all th	at apply.	Please describe.
	No	Skip to question IV-17.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	
b) If yes, ha	ve there been any changes in	the business cycles or conditions of competition for

LWR pipe and tube since January 1, 2014?

No	Yes	If yes, describe.

IV-17. Supply constraints.-- Has your firm refused, declined, or been unable to supply LWR pipe and tube since January 1, 2014 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

IV-18. <u>Impact of the section 232 tariffs.</u>— Did the imposition of tariffs on imported steel/aluminum products under section 232 have an impact on the LWR pipe and tube market in the United States?

Yes— Please indicate the impact in the table below.	No	Don't know

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 232 affected each factor of the LWR pipe and tube market in the United States.
Supply of U.S produced LWR pipe and tube					
Supply of imported LWR pipe and tube					
Prices for LWR pipe and tube					
Overall U.S. demand for LWR pipe and tube					

۱۱	/-19	. Raw	materials.—
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(a) How have LWR pipe and tube raw material costs changed since January 1, 2014, and how you expect they will change in the future?

Cost of raw materials	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material cost changes have affected your firm's selling prices for LWR pipe and tube.
Changes since January 1, 2014					
Anticipated changes					

(b) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact raw material costs for LWR pipe and tube?

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend
Cost of raw materials after section 232 tariffs imposed				

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IV-20.	Impact of section 301 tariffs Did the imposition of tariffs on Chinese-origin products under
	section 301 have an impact on the LWR pipe and tube market in the United States?

Yes — Please indicate the impact in the table below.	No	Don't know

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 301 affected each factor of the LWR pipe and tube market in the United States.
Supply of U.S produced LWR pipe and tube					
Supply of LWR pipe and tube imported from China					
Supply of LWR pipe and tube imported from other countries					
Prices for LWR pipe and tube					
Overall U.S. demand for LWR pipe and tube					
Raw material costs for LWR pipe and tube					

IV-21.	<u>Price comparisons.</u> Please compare market prices of LWR pipe and tube in U.S. and non-U.S.
	markets, if known. Provide specific information as to time periods and regions for any price
	comparisons.

IV-22 Market studies.--Please provide as a separate attachment to this request any studies, surveys, etc. that you are aware of that quantify and/or otherwise discuss LWR pipe and tube supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including China, Korea, Mexico and Turkey, and (3) the world as a whole. Of particular interest is such data from 2017 to the present and forecasts for the future.

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U.S. P	roducers	Ouestionnaire –	Light-Walled	Kectangular	Pipe and I	upe (Second	a keviewi

IV-23.	Export constraintsDescribe how easily your firm can shift its sales of LWR pipe and tube between the U.S. market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting LWR pipe and tube between the U.S. and alternative country markets within a 12-month period.							
IV-24.	<u>Barriers to trade</u> Are your firm's exports of LWR pipe and tube subject to any tariff or non-tariff barriers to trade in other countries?							
If yes, please list the countries and describe any such barriers an significant changes in such barriers that have occurred since Janu No Yes 2014, or that are expected to occur in the future.								
	 interchangeable (i.e., can they physically be used in the same applications)? Please indicate A, F, S, N, or 0 in the table below: A = the products from a specified country-pair are always interchangeable F = the products are frequently interchangeable S = the products are sometimes interchangeable N = the products are never interchangeable 0 = no familiarity with products from a specified country-pair 							
	Country-	pair	China	Korea	Mexico	Turkey	Other countries	
	United States							
	China		> <					
	Korea		>					
	Mexico		><					
	Turkey							
For any country-pair producing LWR pipe and tube which is <i>sometimes</i> interchangeable, please identify the country-pair and explain the facto preclude interchangeable use:								

IV-26. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between LWR pipe and tube produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Korea	Mexico	Turkey	Other countries
United States					
China					
Korea					
Mexico					
Turkey			han price of war		_

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

IV-27. Other explanations.--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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/701731/2019/light_walled_rectangular_pipe_and tube_china korea/second_review_full.htm

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

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

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

• E-mail.—E-mail the MS Word questionnaire to Andres.Andrade@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 <u>does not </u>**produce this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

<u>Parties to this proceeding</u>.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission's Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.