

U.S. PRODUCERS' QUESTIONNAIRE

UTILITY SCALE WIND TOWERS FROM CANADA, INDONESIA, KOREA, AND VIETNAM

This questionnaire must be received by the Commission by **April 6, 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 countervailing and antidumping duty investigations concerning utility scale wind towers ("wind towers") from Canada, Indonesia, Korea, and Vietnam (Inv. Nos. 701-TA-627-629 and 731-TA-1458-1461 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____
Has your firm produced wind towers (as defined on next page) at any time since January 1, 2017?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: WIND)

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.—This proceeding was instituted in response to a petition filed on July 9, 2019, by the Wind Tower Trade Coalition (Arcosa Wind Towers, Inc. (Dallas, TX) and Broadwind Towers, Inc. (Manitowoc, WI)). 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/title_7/2020/utility_scale_wind_towers_canada_indonesia_korea/final.htm.

Wind towers covered by these investigations are certain wind towers, whether or not tapered, and sections thereof. Certain wind towers are designed to support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity in excess of 100 kilowatts and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (*i.e.*, where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment, or method of manufacture, and with or without flanges, doors, or internal or external components (*e.g.*, flooring/decking, ladders, lifts, electrical buss boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section. Several wind tower sections are normally required to form a completed wind tower.

Wind towers and sections thereof are included within the scope whether or not they are joined with nonsubject merchandise, such as nacelles or rotor blades, and whether or not they have internal or external components attached to the subject merchandise.

Specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Also excluded are any internal or external components which are not attached to the wind towers or sections thereof, unless those components are shipped with the tower sections.

Further, excluded from the scope of the antidumping duty investigations are any products covered by the existing antidumping duty order on utility scale wind towers from the Socialist Republic of Vietnam. See Utility Scale Wind Towers from the Socialist Republic of Vietnam: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order, 78 FR 11150 (February 15, 2013).

Wind towers are currently imported under statistical reporting numbers 7308.20.0020¹ or 8502.31.0000² of the Harmonized Tariff Schedule of the United States (HTSUS). Wind towers of iron or steel are classified under HTSUS 7308.20.0020 when imported separately as a tower or tower section(s). Wind towers may be classified under HTSUS 8502.31.0000 when imported as combination goods with a wind turbine (*i.e.*, accompanying nacelles and/or rotor blades). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

¹ Wind towers of iron or steel are classified under HTSUS 7308.20.0020 when imported separately as a tower or tower section(s).

² Wind towers may also be classified under HTSUS 8502.31.0000 when imported as combination of goods with a wind turbine (*i.e.*, accompanying nacelles and/or rotor blades).

Unit.—A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

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.

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

I-1a. **OMB statistics.**—Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

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

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

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

Yes No

I-2a. **Establishments covered.**--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.**

"Establishment"--Each facility of a firm involved in the production of wind towers, 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 discussion on establishments consolidated in this questionnaire: _____.			

I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

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

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

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

Country	Support	Oppose	Take no position
Canada- AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Canada- CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indonesia- AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indonesia- CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Korea- AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam- AD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam- CVD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-5. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

I-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing wind towers from Canada, Indonesia, Korea, and Vietnam into the United States or that are engaged in exporting wind towers from Canada, Indonesia, Korea, and Vietnam to the United States?

No Yes--List the following information.

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Ahdia Bavari** (202-205-3191, ahdia.bavari@usitc.gov). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of wind towers since January 1, 2017.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe; leave blank if not applicable)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns or production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	other (e.g., technology)	

II-3a. **Production using same machinery.**—Please report your firm’s production of products using the same equipment, machinery, or employees as used to produce wind towers, 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.

Quantity (in units)			
Item	Calendar years		
	2017	2018	2019
Overall production capacity¹			
Production of:			
Wind towers 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). ² Data entered for production of wind towers will populate here once reported in question II-7. ³ Please identify these products: _____.			

II-3b. **Production using same machinery by weight.**—Please report your firm’s production of products, by weight, using the same equipment, machinery, or employees as used to produce wind towers, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

Quantity (in short tons)			
Item	Calendar years		
	2017	2018	2019
Overall production capacity¹			
Production of: Wind towers			
Other products ²			
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). ² Please identify these products: _____.			

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

Hours per week	Weeks per year

II-3d. **Capacity calculation.**—Please describe the methodology used to calculate overall production capacity reported in II-3a and II-3b, and explain any changes in reported capacity.

II-3e. **Production constraints.**—Please describe the constraint(s) that set the limit(s) on your firm’s production capacity.

II-4. **Product shifting.**—

(a) Is your firm able to switch production (capacity) between wind towers and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

(b) 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-5. **Tolling.**--Since January 1, 2017, has your firm been involved in a toll agreement regarding the production of wind towers?

“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.
<input type="checkbox"/>	<input type="checkbox"/>	

II-6. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce wind towers in and/or admit wind towers 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	Yes	If yes--Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-7. **Production, shipment, and inventory data**--Report your firm's production capacity, production, shipments, and inventories related to the production of wind towers 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 net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

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

"Transfers to related firms" –Shipments made to related 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-7. **Production, shipment, and inventory data.**--Continued

Quantity (in units) and value (in \$1,000)			
Item	Calendar years		
	2017	2018	2019
Average production capacity by establishment¹ (quantity)			
Establishment 1			
Establishment 2			
Establishment 3			
Establishment 4			
Establishment 5			
Establishment 6			
All other establishments			
Average production capacity across all establishments ² (quantity) (A)	0	0	0
Beginning-of-period inventories (quantity) (B)			
Average production by establishment³ (quantity)			
Establishment 1			
Establishment 2			
Establishment 3			
Establishment 4			
Establishment 5			
Establishment 6			
All other establishments			
Production across all establishments ⁴ (quantity) (C)	0	0	0

Table continued on next page. Footnotes next page.

II-7. **Production, shipment, and inventory data.**— *Continued*

Quantity (in units) and value (in \$1,000)			
Item	Calendar years		
	2017	2018	2019
U.S. shipments:			
Commercial shipments:			
Quantity (D)			
Value (E)			
Internal consumption:⁵			
Quantity (F)			
Value ² (G)			
Transfers to related firms:⁵			
Quantity (H)			
Value ² (I)			
Export shipments:⁶			
Quantity (J)			
Value (K)			
End-of-period inventories (quantity) (L)			

¹ Report your firm's average production capacity of wind towers in each of your U.S. establishment(s) during the specified periods. Note the establishments listed above should correspond with the establishments listed in question I-2.

² The production capacity reported is based on operating _____ hours per week, _____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity _____.

³ Report your firm's production of wind towers in each of your U.S. establishment(s) during the specified periods. Note the establishments listed above should correspond with the establishments listed in question I-2.

⁴ Please confirm whether the information above is reported in wind tower equivalents, rather than complete towers. Please identify the number of sections per complete tower for each period: _____.

⁵ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____.

However, the data provided above in this table should be based on fair market value.

⁶ Identify your firm's principal export markets: _____.

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

Reconciliation	Calendar years		
	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-8. **Order book production.**—Report your firm's expected production based on its "order books" for the specified periods.

Quantity (in units)				
Item	Jan-Mar 2020	Apr-Jun 2020	Jul-Sept 2020	Oct-Dec 2020
Expected production				

II-9. **U.S. shipments by height.**— Report your firm's U.S. shipments of wind towers during 2017-19 in each specified size range, as measured from the base of the tower to the hub ("hub height").

Quantity (in units) and value (\$1,000)			
Size range	2017	2018	2019
Below 80 meters			
Quantity (O)			
Value (P)			
80 - 89.9 meters			
Quantity (Q)			
Value (R)			
90 - 99.9 meters			
Quantity (S)			
Value (T)			
100 - 109.9 meters			
Quantity (U)			
Value (V)			
110 - 119.9 meters			
Quantity (W)			
Value (X)			
120 meters or more			
Quantity (Y)			
Value (Z)			

RECONCILIATION OF SHIPMENTS. .—Please ensure that the quantities and values reported for shipments by size (i.e., lines O, Q, S, U, W, Y and P, R, T, V, X, Z, respectively,) equal the quantity and value reported for U.S. shipments (i.e., lines D, F, H and E, G, I, respectively). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year		
	2017	2018	2019
Quantity: O + Q + S + U + W + Y – D – F – H = zero ("0"), if not revise.	0	0	0
Value: P + R + T + V + X + Z – E – G – I = zero ("0"), if not revise.	0	0	0

- II-10. **U.S. shipments of wind towers without internal components.**— Please report the share of your firm's U.S. shipments of wind towers reported in II-9 that were shipped without any mechanical and/or electrical fittings such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and/or other accessories ("internals"): ____ %.
- II-11. **U.S. shipments of wind tower sections.**— Report your firm's U.S. shipments of wind tower sections during the specified periods.

Quantity (in units) and value (in \$1,000)			
Item	Calendar years		
	2017	2018	2019
U.S. shipments of sections^{1,2}. — <i>Quantity (AA)</i>			
<i>Value (AB)</i>			
¹ Reminder, reported units are to be based on full wind tower equivalents as described in the definitions on page 2. ² Please describe the sections shipped, how the customer created or built a full tower (i.e., what other source of supply), and where and how these data are reported in question II-7: _____.			

- II-12. **Sections sold for repowering.**— Please report the share of wind tower sections reported in the previous question that were used for the purpose of repowering: ____ %.
- II-13. **Offshore wind towers.**--Did your firm supply any domestically manufactured wind towers from your U.S. establishments to your customers for any offshore applications in 2017-19?

No	Yes	If yes—Please report the information for these towers in the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in units) and value (in \$1,000)			
Item	Calendar years		
	2017	2018	2019
U.S. shipments of wind towers for offshore applications^{1,2}. — <i>Quantity (AC)</i>			
<i>Value (AD)</i>			
¹ Please provide the geographic locations of the offshore wind towers: _____.			

II-14. **Employment data.**--Report your firm's employment-related data related to the production of wind towers 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.

Item	Calendar years		
	2017	2018	2019
Average number of PRWs (<i>number</i>)			
Hours worked by PRWs (<i>1,000 hours</i>)			
Wages paid to PRWs (<i>\$1,000</i>)			

II-15. **Employment data.— Continued**

Explanation of trends:

II-16. **Related firms.**--If your firm reported transfers to related firms in question II-7, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-17. **Purchases.**--Has your firm purchased wind towers produced in the United States or in other countries since January 1, 2017? (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	Yes	If yes--Report such purchases in the table below and explain the reasons for your firms' purchases.
<input type="checkbox"/>	<input type="checkbox"/>	

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

(Quantity in units)			
Item	Calendar years		
	2017	2018	2019
Purchases from U.S. importers¹ of wind towers from—			
Canada			
Indonesia			
Korea			
Vietnam			
All other sources			
Purchases from domestic producers²			
Purchases from other sources²			

¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: _____.

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

II-18. **Imports.**--Since January 1, 2017, has your firm imported wind towers?

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

If yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

II-19. **Internal consumption/transfers to related firms** — In 2019, did your firm internally consume and/or transfer to a related firm any portion of its wind towers production, as reported in lines F and H of question II-7?

No- Do not complete question II-20.	Yes- Complete question II-20.
<input type="checkbox"/>	<input type="checkbox"/>

II-20. **Captive production use.** — Please report the share of your firm's 2019 internal consumption and/or transfers to related firms for the uses identified below. **These data should reconcile with the 2018 quantities reported in question II-7 (lines F and H).**

Products	Internal consumption 2019 (units)	Transfers to related firms 2019 (units)
Sold as is (Re-entry into merchant market)	N/A	
Assembled into wind turbines		
Assembled into other products ¹		

¹Please describe these products: _____.

RECONCILIATION OF CAPTIVE PRODUCTION USE. — *The sum of the data reported above should be equal to the data reported in lines F and H of question II-7 of 2019.*

Reconciliation	Calendar year
	2019
Internal consumption (line F in II-7) reconciliation.	0
Transfers to related parties (line H in II-7) reconciliation.	0

These data should reconcile with the 2018 quantities reported in question II-7 (lines F and H). If not, please revise.

II-21. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to David Boyland at (202) 708-4725 (David.Boyland@usitc.gov).

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

Name	
Title	
Email	
Telephone	

III-2. **Accounting system.**--Briefly describe your firm's financial accounting system.

- A. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed during the data-collection period, explain below:

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include wind towers:

- 2. Does your firm prepare profit/loss statements for wind towers:
 Yes No
- 3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 Audited, unaudited, annual reports, 10Ks, 10 Qs,
 Monthly, quarterly, semi-annually, annually
- 4. Accounting basis: U.S. GAAP, IFRS, cash, tax, or other comprehensive basis of accounting (specify) _____

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes wind towers, as well as specific statements and worksheets) used to compile these data.

III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. A. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

B. **Procurement process in general.**--Please describe the company's procurement process for its primary raw materials and the manner/extent to which wind tower customers are involved (directly or indirectly) with purchase decisions.

C. **Procurement process and cost controls.**--During the period examined and to the extent applicable, please describe efforts to minimize fluctuations and/or otherwise control the cost of primary raw materials.

D. **Sales/production levels and conversion costs.**--Please describe how changes in production and sales volume of wind towers during the period examined impacted the level of average wind tower conversion costs. As applicable, please also identify and describe specific examples of anticipated/negotiated production and sales volume that was not undertaken and its corresponding impact on conversion costs.

III-5. **Product listing.**--Please list the products your firm produced in the facilities in which your firm produced wind towers, and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
Wind towers	%
	%
	%
	%
	%

III-6. **Inputs from related suppliers.**--Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of wind towers from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

Yes--Continue to question III-7	No--Continue to question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>

III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of wind towers that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input on the basis of your most recently completed fiscal year. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS
Input valuation as recorded in the firm's accounting books and records		

III-8. **Inputs purchased from related suppliers.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on wind towers) in a manner consistent with your firm's accounting books and records.

Yes	No	If no--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>	

III-9a. **Operations on wind towers.**--Report the revenue and related cost information requested below on the wind towers operations of your firm's U.S. establishment(s).¹ Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years that most closely correspond to calendar-years 2017-19. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact David Boyland at (202) 708-4725 before completing this section of the questionnaire.

Quantity (in units) and value (in \$1,000)			
Item	Fiscal years ended--		
	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			
Steel plate (HSLA and/or alloy)			
Flanges			
Other raw materials			
Total raw material costs	0	0	0
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			

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.
² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.
³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

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

III-9b. **Financial data reconciliation.**--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

Yes	No	<p>If no--If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise. Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are 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.</p>
<input type="checkbox"/>	<input type="checkbox"/>	

III-10. **Nonrecurring items (charges and gains) included in wind tower financial results.**--For each annual 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.

Item	Fiscal years ended--		
	2017	2018	2019
	Value (\$1,000)		
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

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

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

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--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. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of wind towers. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for wind towers in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's three most recently completed fiscal years that most closely correspond to calendar-years 2017-19.

Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted.

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

Value (in \$1,000)			
Item	Fiscal years ended--		
	2017	2018	2019
Total assets (net) ¹			
¹ Describe _____.			

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for wind towers. Provide data for your firm's three most recently completed fiscal years that most closely correspond to calendar-years 2017-19.

Value (in \$1,000)			
Item	Fiscal years ended--		
	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. _____.			

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

Calendar year	Fiscal year	Specify fiscal year
<input type="checkbox"/>	<input type="checkbox"/>	

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for 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.*

Reconciliation	Fiscal years ended--		
	2017	2018	2019
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

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

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. **Effects of imports on investment.**--Since January 1, 2017, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of wind towers from Canada, Indonesia, Korea, and Vietnam?

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes, my firm has experienced actual negative effects as follows.

	<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

III-16. **Effects of imports on growth and development.**--Since January 1, 2017, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of wind towers from Canada, Indonesia, Korea, and Vietnam?

No	Yes	If yes, my firm has experienced actual negative effects as follows.
<input type="checkbox"/>	<input type="checkbox"/>	

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

III-17. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of wind towers from Canada, Indonesia, Korea, and Vietnam?

No	Yes	If yes, my firm anticipates negative effects as follows.
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Other explanations.**--If 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 John Benedetto (202-205-3270, john.benedetto@usitc.gov).

IV-1. **Contact information.**--Please identify the individual that Commission staff may contact regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	

BID DATA

IV-2b. **Bid data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your bid 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.

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

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

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

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

IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic wind towers usually quoted (check one)?

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

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

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

IV-7. **Contract provisions.**—

(a) Please fill out the table regarding your firm's typical sales contracts for U.S.-produced wind towers (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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used: _____.				

(b) Are any of your contracts with U.S. Original Equipment Manufacturers (OEMs) conversion price contracts? That is, did the negotiated price include labor and mark-up, but not major input costs, such as steel?

Yes—All contracts are conversion price contracts. Please answer part (c)	Yes—Some contracts are conversion price contracts. Please answer part (c)	No.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (c) List the top 5 OEMs with which you have or had conversion price contracts since January 1, 2017, and complete the table below.

OEM	Inputs Not Included in Conversion Price						
	Steel	Fixtures (ladders, elevators, doors, etc.)	Paint	Bus bars	Power cables	Platforms	Other (please describe)
	<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"/>	<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"/>	
	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-8. **Lead times.**--What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced wind towers?

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.**--

- (a) What is the approximate percentage of the total delivered cost of U.S.-produced wind towers that is accounted for by U.S. inland transportation costs? _____ percent

If your firm does not know, please explain. _____

- (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 wind towers that are delivered the following distances from its production facility.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 500 miles	%
501 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

- (d) Are your FOB prices for the same wind tower models consistent across all shipping distances or do they vary by shipping distances? Please explain. _____

IV-10. Geographical shipments.—

- (a) Report your firm's shipments of its U.S.-produced wind towers based on the U.S. geographic market area(s) in which the wind towers were installed, during the specified periods. **If exact data are not readily available from your records, provide carefully prepared estimates.**

Geographic area	2017	2018	2019
	Number of wind towers produced		
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.			
Upper Midwest. —MI, MN, NE, ND, SD, and WI.			
Lower Midwest. —IL, IN, IA, KS, OH, and MO.			
Upper Southeast. —DE, DC, MD, VA, and WV.			
Lower Southeast. —AL, FL, GA, KY, MS, NC, SC, and TN.			
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.			

- (b) Describe the importance, if any, of geographic location in your firm's sales of wind towers.

IV-11. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for wind towers has changed since January 1, 2017. 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"/>	

IV-12. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of wind towers since January 1, 2017?

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

IV-13. **Conditions of competition.**--

(a) Is the wind towers market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to wind towers? If yes, describe.

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question IV-14.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for wind towers since January 1, 2017?

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

IV-14. **Supply constraints.**--Has your firm refused, declined, or been unable to supply wind towers since January 1, 2017 (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"/>	

IV-15. **Raw materials.**—

(a) How have wind towers raw material prices changed since January 1, 2017?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for wind towers.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has information on raw material prices affected your firm's negotiations or contracts to produce wind towers since 2017?

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

IV-16. **Impact of the section 232 investigation.**--This question concerns the section 232 investigation and subsequent tariffs imposed on imported steel products.

(a) Did the imposition of tariffs on imported steel products beginning in March 2018 have an impact on the wind towers market?

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

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

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

IV-17. **Impact of the CTL Plate AD/CVD orders.**--This question concerns the most recent antidumping and countervailing duty orders on CTL (cut-to-length) plate.

(a) Did the issuance of antidumping and countervailing duty orders over the first half of 2017 have an impact on the market for wind towers?

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

(b) **Assessment of impact of the CTL Plate AD/CVD orders.**-- Please indicate the impact of the issuance of antidumping and countervailing duty orders over the first half of 2017.

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

IV-18. **Impact of the section 301 actions.**—This question concerns the section 301 investigation and subsequent announcement of additional tariffs that apply to wind towers, which were proposed and implemented by the United States in response to Chinese trade practices. Has the implementation of tariffs in the section 301 investigation impacted your firm or the U.S. wind towers market?

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

IV-19. **Impact of the PTC expiration and wind-down.**—This question concerns the anticipated expiration of the Federal wind energy production tax credit (PTC).

(a) Has the anticipated expiration of the PTC at the end of 2019 had an impact on the U.S. market for wind towers?

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

(b) **Assessment of impact of the anticipated PTC expiration.**-- Please indicate the impact of the anticipated expiration of the Federal wind energy PTC.

Item	Increase	No change	Decrease	Fluctuate with no clear trend	Explanation and factors
Production of wind towers by your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial performance of your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Demand for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Timing of U.S. wind energy projects in the development pipeline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**--Are wind towers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	Canada	Indonesia	Korea	Vietnam	Other countries
United States					
Canada	X				
Indonesia	X	X			
Korea	X	X	X		
Vietnam	X	X	X	X	
For any country-pair producing wind towers that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:					

IV-21. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between wind towers produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

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

IV-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for wind towers since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of wind towers that each of these customers accounted for in 2019.

	Customer's name	City	State	Share of 2019 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-23. **Largest projects.**—List the five largest U.S. projects for which your firm provided U.S.-produced wind towers since January 1, 2017.

	Project/customer's name	Location	Type of wind towers provided (height, weight, other identifying details)	Number of wind towers provided
1				
2				
3				
4				
5				

IV-24. Competition from imports.--

(a) **Lost revenue.**--Since January 1, 2017: To avoid losing sales to competitors selling wind towers from Canada, Indonesia, Korea, and Vietnam, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

(b) **Lost sales.**--Since January 1, 2017: Did your firm lose sales of wind towers to imports of this product from Canada, Indonesia, Korea, and Vietnam?

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

IV-25. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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/title_7/2020/utility_scale_wind_towers_canada_indonesia_korea/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:** **WIND**

- **E-mail.**—E-mail the MS Word questionnaire to ahdia.bavari@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 produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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