

## LOST SALES AND LOST REVENUE SURVEY

### TWIST TIES FROM CHINA

This survey must be received by the Commission by **July 10, 2020**  
See last page for filing instructions.

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing duty/antidumping investigations concerning twist ties from China (Inv. Nos. 701-TA-649 and 731-TA-1523 (Preliminary)). The information requested in the survey is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Lauren Gamache ([lauren.gamache@usitc.gov](mailto:lauren.gamache@usitc.gov), 202-205-3489).

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

#### CERTIFICATION

*I certify that the information herein supplied in this survey is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By submitting this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this survey 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 investigation or other proceeding 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

**GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on June 26, 2020, by Bedford Industries Inc., Worthington, Minnesota. Countervailing and 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 dumping. Questionnaires and other information pertinent to this proceeding are available at:

[https://www.usitc.gov/investigations/701731/2020/twist\\_ties\\_china/preliminary.htm](https://www.usitc.gov/investigations/701731/2020/twist_ties_china/preliminary.htm)

**Twist ties** covered by these investigations are consists of twist ties, which are thin, bendable ties for closing containers, such as bags, bundle items, or identifying objects. A twist tie is comprised of one or more metal wires encased in a covering material, which allows the tie to retain its shape and bind against itself. The metal wire in a twist tie is typically stainless or galvanized steel and typically measures between the gauges of 19 (.0410" diameter) and 31 (.0132") (American Standard Wire Gauge). A twist tie usually has a width between .075" and 1" in the cross-machine direction (width of the tie – measurement perpendicular with the wire); a thickness between .015" and .045" over the wire or other metal; and a thickness between .002" and .020" in areas without wire or other metal. Twist ties are commonly available individually in pre-cut lengths ("singles"), wound in large spools to be cut later by machine or hand, or in perforated sheets of spooled or single twist ties that are later slit by machine or by hand ("gangs").

The covering material of a twist tie may be paper (metallic or plain), plastic, or polyethylene, and can be dyed in a variety of colors with or without printing. A twist tie may have the same covering material on both sides or one side of paper and one side of plastic. When comprised of two sides of paper, the paper material is bound together with an adhesive or plastic. A twist tie also may have a tag or label attached to it or a pre-applied adhesive attached to it.

The scope includes ties used for television cable, computer cords, other appliances and household ties, all of which are manufactured by Petitioner. Twist ties without metal wire also are covered in the scope. An all plastic tie contains a plastic core as well as a plastic covering (the wing) over the core, just like paper and/or plastic in a metal tie. The scope does not include products with wire and plastic material (e.g., pipe cleaners used in craft activities, wire bristle brushes), or plastic "zip" ties.

Twist ties are imported into the United States under Harmonized Tariff System of the United States ("HTSUS") subheadings 8309.90.0000 and 5609.00.3000. Subject merchandise may also enter under HTSUS subheadings 3906.90.2000, 3920.51.5000, 3923.90.0080, 3926.90.9990, 4811.59.6000, 4821.10.4000, 4821.90.2000, and 4823.90.8600. These HTSUS subheadings are provided for reference only. The written description of the scope of the investigations is dispositive.

**Reporting of information.**-- If information is not readily available from your records, provide carefully prepared estimates.

**Confidentiality.**--The data furnished in response to this survey 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.

**Release of information.**--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

**Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

**Firms operating more than one establishment should combine the data for all establishments into a single response.**

**PURCHASE INFORMATION**

1. **Purchases and imports.**— Report separately your firm’s domestic purchases and imports of twist ties.

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

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

Item	2017	2018	2019
	Quantity (in 1,000 twist ties)		
<b>Purchases of twist ties produced in—</b> United States			
China			
All other countries <sup>1</sup>			
Sources unknown <sup>2</sup>			
Total purchases	0	0	0
<b>Imports of twist ties from—</b> China			
All other countries <sup>1</sup>			
Total imports <sup>3</sup>	0	0	0
<sup>1</sup> Please identify these countries: <sup>2</sup> Please indicate the firm(s) from which you purchased this merchandise: . <sup>3</sup> If your firm imported twist ties at any time since January 1, 2017, please also complete and return a U.S. importers' questionnaire in this proceeding.			

2. **Changes in purchasing patterns.**—Please indicate how the shares of your firm’s purchases of twist ties from different sources have changed since January 1, 2017.

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

3. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase twist ties.

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

4. **Purchasing subject imports rather than domestic products.**—

(a) Since January 2017, did your firm import and/or purchase imports of twist ties from China instead of purchasing U.S.-produced twist ties?

Source	Yes (also respond to parts (b) and (c))	No (If “No”, skip to next question)
China	<input type="checkbox"/>	<input type="checkbox"/>

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

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

(c) If you responded “Yes” to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2017 (in 1,000 twist ties)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
China	<input type="checkbox"/>		<input type="checkbox"/>	

5. **U.S. producers and import competition.**—

(a) Since January 1, 2017, in connection with a sale or offer to sell twist ties to your firm, did U.S. producers reduce their prices of domestically produced twist ties in order to compete with lower-priced imports of twist ties from the subject countries?

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

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

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

6. **Other explanations**--Please provide any additional comments in this box.

7. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: \_\_\_\_\_.

8. **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):	

**OMB INFORMATION**

- 9. **OMB statistics.**--Please report the actual number of hours required and the cost to your firm of completing this survey.

Hours	Dollars

The questions in this survey 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 survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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

## HOW TO FILE YOUR SURVEY RESPONSE

***Please do not attempt to modify the format or permissions of the survey document.***

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey 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 survey 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:** TIES

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

**If your firm did not purchase this product,** please fill out page 1, print, sign, and submit a scanned copy to the Commission.