### **U.S. IMPORTERS' QUESTIONNAIRE**

### **METAL LOCKERS AND PARTS FROM CHINA**

This questionnaire must be received by the Commission by <u>July 23, 2020</u>

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning metal lockers from China (Inv. Nos. 731-TA-656 and 701-TA-1533 (Preliminary)). 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	e	_ Zip Code			
Website _								
Has your fir 2017?	m imported m	etal lockers (as	defined on next	page) fror	n any count	ry at any time	e since Janua	ry 1,
☐ NO	(Sign the ce	rtification below	and promptly retu	ırn <b>only</b> this	s page of the	questionnaire	to the Commis	ssion)
YES	(Complete	II parts of the qu	estionnaire, and re	eturn the e	ntire questio	naire to the C	ommission)	
following	ink: <u>https://</u>	dropbox.usitc.	gov/oinv/. (PIN	N: LOCK)				
-			CERTIFICA response to th ormation submit	nis questic		-		
ge and belief of this certific tion provided mission on the ndersigned, ac ing or other p el (a) for deve and evaluat x 3; or (ii) by	and understa ation I also g in this questic e same or simi cknowledge the roceedings me eloping or ma ions relating U.S. governme	nd that the info grant consent j nnaire and thread ar merchandise nat information by be disclosed ntaining the re to the program nt employees o	response to the ormation submit for the Commis oughout this pro	nis question ted is substituted is substituted in the conceeding i	oject to aud its employ in any othe to this requ Commission, proceeding ations of the	it and verific ees and cor import-inju est for infor its employe , or (b) in in e Commissi	ation by the ntract person ry proceedin mation and res and Offic ternal invest on including	Commission connel, to us ags conduct throughoutes, and contigations, and under 5 of the contigations.
ge and belief of this certific tion provided mission on the ndersigned, ac ing or other p el (a) for deve and evaluat x 3; or (ii) by	and understa ation I also g in this questic same or simi knowledge the roceedings m loping or ma- ions relating U.S. governme I sign appropr	nd that the info grant consent j nnaire and threar ar merchandise at information ay be disclosed ntaining the re to the progran nt employees of ate nondisclose	response to the commission the Commission this property of the commission of the cords of this or the cords of the cords of the contract period records of the contract period	nis question ted is substituted is substituted in the conceeding i	oject to aud its employ in any othe to this requ Commission, proceeding ations of the	it and verific ees and cor import-inju est for infor its employe , or (b) in in e Commissi	ation by the ntract person ry proceedin mation and res and Offic ternal invest on including	Commission connel, to us ags conduct throughoutes, and contigations, and under 5 of the contigations.

#### PART I.—GENERAL INFORMATION

**Background.**--This proceeding was instituted in response to a petition filed on July 9, 2020, by List Industries, Inc., Deerfield Beach, Florida; Lyon LLC, Montgomery, Illinois; Penco Products, Inc., Greenville, North Carolina; and Tennsco Corp., Dickson, Tennessee. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at <a href="https://www.usitc.gov/investigations/701731/2020/metal\_lockers\_and\_parts\_thereof\_people%E2%80%99s\_republic/preliminary.htm">https://www.usitc.gov/investigations/701731/2020/metal\_lockers\_and\_parts\_thereof\_people%E2%80%99s\_republic/preliminary.htm</a>.

Metal lockers, covered by these investigations are metal lockers, with or without doors, and parts thereof ("metal lockers"). The subject metal lockers are metal storage devices less than 27 inches wide and less than 27 inches deep, whether floor standing, installed onto a base or wall-mounted. In a multiple locker assembly (whether a welded locker unit, otherwise assembled locker unit or knocked down unit or kit), the width measurement shall be based on the width of an individual locker not the overall unit dimensions. The subject metal lockers typically include the bodies (back, side, shelf, top and bottom panels), door frames with or without doors which can be integrated into the sides or made separately, and doors. The subject metal lockers typically are made of flat-rolled metal, metal mesh and/or expanded metal, which includes but is not limited to alloy or non-alloy steel (whether or not galvanized or otherwise metallically coated for corrosion resistance), stainless steel, or aluminum, but the doors may also include transparent polycarbonate, Plexiglas or similar transparent material or any combination thereof. The doors are configured with or for a handle or other device that permit the use of a mechanical or electronic lock or locking mechanism, including, but not limited to: a combination lock, a padlock, a key lock, lever or knob lock, and a wireless lock. The doors or body panels may also include vents (including wire mesh or expanded metal mesh vents) or perforations. The bodies, body components and doors are typically powder coated, otherwise painted or epoxy coated or may be unpainted. The subject merchandise includes metal lockers imported either as welded or otherwise assembled units (ready for installation or use) or as knocked down units or kits (requiring assembly prior to installation or use).

The subject lockers may be shipped as individual or multiple locker units preassembled, welded, or combined into banks or tiers for ease of installation or as sets of component parts, bulk packed (i.e., all backs in one package, crate, rack, carton or container and sides in another package, crate, rack, carton or container) or any combination thereof. The knocked down lockers are shipped unassembled requiring a supplier, contractor or end-user to assemble the individual lockers and locker banks prior to installation.

The scope also includes all parts and components of lockers made from flat-rolled metal or expanded metal (e.g., doors, frames, shelves, tops, bottoms, backs, side panels, etc.) as well as accessories that are attached to the lockers when installed (e.g., slope tops, bases, expansion filler panels, dividers, recess trim, decorative end panels and end caps) that may be imported together with other locker components or on their own. It also includes all hardware for assembly and installation of the lockers and locker banks that are imported with or shipped, invoiced or sold with the imported locker or locker system. The subject metal lockers are typically used for storage in schools, fitness centers, apartment buildings, offices, condominiums, single family homes, athletic facilities, public private, and government buildings, warehouses, factories, transportation hubs, healthcare facilities, amusement parks, military installations, retail businesses, and other commercial and industrial establishments.

Excluded from the scope are wire mesh lockers. Wire mesh lockers are those with each of the following characteristics:

- (1) at least three sides, including the door, made from wire mesh;
- (2) the width and depth each exceed 25 inches; and
- (3) the height exceeds 90 inches.

Also excluded are lockers with bodies made entirely of plastic, wood or any nonmetallic material.

Also excluded are exchange lockers with multiple individual locking doors mounted on one master locking door to access multiple units. Excluded exchange lockers have multiple individual storage spaces, typically arranged in tiers, with access doors for each of the multiple individual storage space mounted on a single frame that can be swung open to allow access to all of the individual storage spaces at once. For example, uniform or garment exchange lockers are designed for the distinct function of securely and hygienically exchanging clean and soiled uniforms. Thus, excluded exchange lockers are a multi-access point locker whereas covered lockers are a single access point locker for personal storage.

Also excluded are metal lockers that are imported with an installed electronic, internet-enabled locking device that permits communication or connection between the locker's locking device and other internet connected devices.

Also excluded are hardware and accessories for assembly and installation of the lockers, locker banks and storage systems that are separately imported in bulk and are not incorporated into a locker, locker system or knocked down kit at the time of importation. Such excluded hardware and accessories include but are not limited to bulk imported rivets, nuts, bolts, hinges, door handles, locks, door/frame latching components, and coat hooks. Accessories of sheet metal, including but not limited to end panels, bases, dividers and sloping tops, are not excluded accessories.

Metal lockers are currently imported under statistical reporting number 9403.20.0078 of the Harmonized Tariff Schedule of the United States (HTSUS). Parts of metal lockers that are subject to these investigations enter under HTSUS 9403.90.8041. Prior to July 1, 2019, metal lockers were classified under HTSUS statistical reporting number 9403.20.0080. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing metal lockers (as defined above) into the United States from a foreign manufacturer or through its selling agent.

**Reporting of information**.--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

<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 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.

<u>Valid number error messages.</u>--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Celia Feldpausch (202-205-2387, Celia.Feldpausch@usitc.gov).

<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 (<a href="https://www.usitc.gov/trade\_remedy/question.htm">https://www.usitc.gov/trade\_remedy/question.htm</a>) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is <u>optional</u>. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

I-1.	OMB statisticsPlease report below the actual number of hours required and the cost to your
	firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

I-2a.	<b>Establishments covered</b> Provide the name and address of establishment(s) covered by this
	questionnaire.

"Establishment" Each facility of a firm involved in the importation of metal lockers, including
auxiliary facilities operated in conjunction with (whether or not physically separate from) such
facilities.

- I-2b. **Stock symbol information.**-- 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 relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

	- Metal Lockers from China (Preliminary)	
<u>Ownership</u> Is your fi	rm owned, in whole or in part, by any other fi	rm?
☐ No ☐ Ye	sList the following information, relating to tl	he ultimate parent/ov
		Extent of ownership
Firm name	Country	(percent)
foreign, that are engag	portersDoes your firm have any related firn ged in importing metal lockers from China into ing metal lockers from China to the United Sta	o the United States or
_	sList the following information.	
Firm name	Country	Affiliation
engaged in the produc	oes your firm have any related firms, either detion of metal lockers?	omestic or foreign, th
engaged in the produc	ction of metal lockers?	lomestic or foreign, th
engaged in the produc	sList the following information.	
engaged in the produc	sList the following information.	
engaged in the produc	sList the following information.	
engaged in the produc	sList the following information.	
engaged in the produc	sList the following information.	

I-6.	Importing operations Please indicate the nature of your firm's importing operations of metal
	lockers. More than one answer may be applicable.

		Takes title to the	Consignee of the	Customs broker or
	Importer of record	imported product(s)	imported products(s)	freight forwarder
Ī				

I-7. <u>Consignee</u>.--If your firm is an importer of record of metal lockers but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. <u>FTZ, TIB, or bonded warehouses</u>.--Please indicate whether your firm enters metal lockers into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports metal lockers under the TIB (temporary importation under bond) program.

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

"Bonded warehouse" is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

"Temporary Importation under Bond ("TIB") program" is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States (HTS).

Item	No	Yes
Foreign trade zones		
Bonded warehouses		
Temporary importation under bond		

I-9. Other trade actions.--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes, Yes-Please specify.

### PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Celia Feldpausch (202-205-2387, <a href="mailto:Celia.Feldpausch@usitc.gov">Celia.Feldpausch@usitc.gov</a>). Supply all data requested on a <a href="mailto:calendar-year">calendar-year</a> basis.

II-1.		nationPlease identify the responsible raff may contact that individual regarding	individual and the manner by which ng the confidential information submitted
	Name		
	Title		
	Email		
	Telephone		

II-2. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the importation of metal lockers since January 1, 2017.

(ched	ck as many as appropriate)	(If checked, please describe; leave blank if not applicable)
	Office/warehouse openings	
	Office/warehouse closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or importation curtailments	
	Revised labor agreements	
	Other (e.g., technology)	

115	Importers'	<b>Questionnaire</b> -	- Metal Lockers	from China	(Preliminary)
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U.S. Im	iporters' Qi	uestionna	ire – <b>Metal Lockers</b>	from China (Prel	iminary)	Page 10			
II-3a.		<u>Arranged imports</u> Has your firm imported or arranged for the importation of metal lockers for delivery after March 31, 2020							
	_	t mercha	•	•	s placed an order with a s not scheduled to occu				
	No	Yes							
			If yes, fill out the	If yes, fill out the table below.					
				Period					
	Source		Apr-Jun 2020	Jul-Sept 2020	Oct-Dec 2020	Jan-Mar 2021			
				Quantit	ty (in pounds)				
	China								
	All other sources								
II-3b.	from any s	Imports in the 12 month period preceding the petitionHas your firm imported metal locker from any source between July 1, 2019 and June 30, 2020? (i.e., the last six months in 2019 and first six months in 2020 combined)							
	No	Yes	If yes report the	guantity of such i	import below by sourc	0			
			ii yes, report the	quantity of such	import below by source	C.			
				Quantity ( <i>in pour</i>	-				
			Source		July 2019 throug	h June 2020			
	China								
	All other	sources							
II-4.	States, ple	<u>Reasons for importing if producer</u> If your firm also produces metal lockers in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.							

#### **Definitions**

"Imports" – Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

"Import quantities" —Quantities reported should be net of returns.

"Import values" — Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

"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/ including for own retail sale"--Product consumed internally by your firm, which includes merchandise that your firm transferred to your own firm's retail establishments. Such transactions are to be valued at fair market value and <u>not</u> the total value of final downstream processed merchandise in the case of internal consumption, <u>nor</u> the retail sale value in the case of your firm owning and operating its own retail establishments.

"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-5a. <u>U.S. imports from China</u>.—Report your firm's imports and your firm's shipments and inventories of metal lockers imported from China by your firm during the specified periods.

# China

	Quantity ( <i>in p</i> o	ounds), value (i	in dollars)		
		Calendar years	s	January-March	
Item	2017	2018	2019	2019	2020
Beginning-of-period inventories (quantity) (A)					
Imports: <sup>1</sup> Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption / including product for own retail sale: <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
Transfers to related firms: <sup>2</sup> Quantity (H)					
Value² (I)					
Export shipments: <sup>3</sup> Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					
<sup>1</sup> Please identify the foreign producers, <sup>2</sup> Internal consumption and transfers to basis for valuing these transactions in you the data provided above in this table shou	related firms n r records, pleas uld be based on	— nust be valued at se specify that ba	sis (e.g., cost, cost		

#### II-5a. U.S. imports from China.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Calendar years			January-March	
Reconciliation	2017	2018	2019	2019	2020
A + B - D - F - H - J - L = should equal					
zero ("0") or provide an explanation.1	0	0	0	0	0

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.

II-5b. <u>Channels of distribution: China</u>.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

## China

		Calendar years	January-March		
Item	2017	2018	2019	2019	2020
	Quantity (in pounds)				
Channels of distribution: U.S. shipments: To distributors (M)					
To retailers (N)					
To end users (O)					

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, 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 years			January-March		
Reconciliation item	2017	2018	2019	2019	2020	
M + N + O - D - F - H = zero ("0"), if						
not revise.	0	0	0	0	0	

II-5c. <u>U.S. imports by level of assembly: China</u>.--Report your firm's U.S. imports from China of metal lockers, by level of assembly.

# China

Quantity (in pounds); Value (in dollars)								
	Calendar years			January-March				
Item	2017	2019	2019	2019	2020			
U.S. imports: Imported as preconstructed locker(s):  Quantity (P)								
Value (Q)								
Imported within kit /ready-to- assemble package: <sup>1</sup> Quantity (R)								
Value (S)								
Imported as component:  Quantity (T)								
Value (U)								
<sup>1</sup> The kit/package includes all necessary	parts for installa	tion	1					

RECONCILIATION FOR IMPORTS BY LEVEL OF ASSEMBLY: Please ensure that the quantities and values reported for U.S. imports from China by level of assembly (i.e., lines P through U) in each time period equal the quantity and value reported for U.S. imports (i.e., lines B and C) from part "a" of this question 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.

	С	alendar years	January-March		
Reconciliation	2017	2018	2019	2019	2019
Quantity: $P + R + T - B = zero$ ("0"), if not					
revise.	0	0	0	0	0
<b>Value</b> : Q + S + U – C= zero ("0"), if not					
revise.	0	0	0	0	0

II-5d. **Product mix: China.** -- Does your import the following products from China? (check all that apply):

	Less than 12"	•	•		>=24" deep		
Width (down) / Depth (across)	deep	to <16" deep	to <20" deep	to <24" deep	to <27" deep		
Less than 12" wide							
>=12" wide to <16" wide							
>=16" wide to <20" wide							
>=20" wide to <24" wide							
>=24" wide to <27" wide							
Standing type Floor standing Mounted, intended for mounting Other:  Latching type Gravity lift type Single point, finger pull Other: Finishing type Painted Galvanized Stainless steel Non-galvanized, non-stainless pickled oiled Epoxy or plastic Other: Describe any other unique characteristics or customizations of the metal lockers your firm imports from China:							

II-6a. <u>Imports from all other sources</u>.—Report your firm's imports and your firm's shipments and inventories of metal lockers imported from all other sources by your firm during the specified periods.

# All other sources

017	2018	2019	2019	2020
6	ed firms m		ed firms must be valued at fair market value	wn: ed firms must be valued at fair market value. If your firm uses rds, please specify that basis (e.g., cost, cost plus, etc.):

<sup>&</sup>lt;sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_\_

### II-6a. Imports from all other sources.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.—Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

		Calendar years	January-March		
Reconciliation	2017	2018	2019	2019	2020
A + B – D – F – H – J – L = should equal					
zero ("0") or provide an explanation.1	0	0	0	0	0

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.

II-6b. <u>Channels of distribution: All other sources.</u>—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

## All other sources

		Calendar years	January-March		
Item	2017	2018	2019	2019	2020
		uantity ( <i>in pounds</i> )			
Channels of distribution: U.S. shipments: To distributors (M)					
To retailers (N)					
To end users (O)					

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, 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 years	January-March		
Reconciliation item	2017	2018	2019	2019	2020
M + N + O - D - F - H = zero ("0"), if					
not revise.	0	0	0	0	0

II-6c. <u>U.S. imports by level of assembly: All other sources</u>.--Report your firm's U.S. imports from all other sources of metal lockers, by level of assembly.

# All other sources

Quai	ntity (in pounds	;); Value ( <i>in d</i>	ollars)			
	Calendar years			January-March		
Item	2017	2019	2019	2019	2020	
U.S. imports:						
Imported as preconstructed						
locker(s):						
Quantity (P)						
Value (Q)						
Imported within kit /ready-to-						
assemble package:1						
Quantity (R)						
Value (S)						
Imported as component:						
Quantity (T)						
Value (U)						
<sup>1</sup> The kit/package includes all necessary	parts for installa	tion	'		1	

RECONCILIATION FOR IMPORTS BY LEVEL OF ASSEMBLY: Please ensure that the quantities and values reported for U.S. imports from China by level of assembly (i.e., lines P through U) in each time period equal the quantity and value reported for U.S. imports (i.e., lines B and C) from part "a" of this question 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.

	С	alendar years	January-March		
Reconciliation	2017	2018	2019	2019	2019
Quantity: $P + R + T - B = zero$ ("0"), if not					
revise.	0	0	0	0	0
<b>Value</b> : Q + S + U – C= zero ("0"), if not					
revise.	0	0	0	0	0

II-6d. <u>Product mix: all other sources.</u>--Does your import the following products from all other sources? (check all that apply):

	Less than 12"	>=12" deep	>=16" deep	>=20" deep	>=24" deep
Width (down) / Depth (across)	deep		to <20" deep		
Less than 12" wide					
>=12" wide to <16" wide					
>=16" wide to <20" wide					
>=20" wide to <24" wide					
>=24" wide to <27" wide					
Standing type  Floor standing  Mounted, intended Other:  Latching type Gravity lift type Single point, finger Other: Painted Galvanized Stainless steel Non-galvanized, no Epoxy or plastic Other: Describe any other un imports from all other	pull on-stainless pic		izations of the	metal lockers y	your firm

II-7.	Comparability of metal locker parts/components and finished metal lockers/kitsPlease
	answer the following questions regarding the differences and similarities in unfinished (e.g.,
	metal locker parts/components) and finished metal lockers/metal locker kits.
	(a) Is the upstream article (the metal locker parts/components) dedicated to the production of the downstream article (finished metal locker/metal locker kits)?
	Yes, all metal locker parts/components are ultimately converted into finished metal lockers/kits.
	No, there are other end uses for unfinished metal locker parts/components besides ultimate conversion to finished metal lockers/kits.
	What percentage of unfinished metal locker parts/components did your firm use in the production of downstream finished metal lockers? percent. What were the other end uses for which your firm used metal locker parts/components?
	(b) Do you perceive the metal locker parts/components to be a separate market than the finished metal lockers/metal locker kit market?
	Yes, they are perceived as a distinct market.
	No, they are perceived as one market.
	(c) Are there differences in the physical characteristics and functions of the upstream (metal locker parts/components) and downstream articles (finished metal lockers/metal locker kits)?
	□ No
	Yes, please describe these differences:
	(d) Is there a significant difference in the cost or value between metal locker parts/components and finished metal lockers/kits?
	□ No
	Yes, please describe these differences:
	(e) Would you describe the processes used to transform the upstream metal locker parts/components into the downstream finished metal locker/ metal locker kit product as significant and particularly labor or capital intensive?
	□ No
	Yes, please describe this process:

<u>Transfers to related firms.</u> If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.
Other explanationsIf your firm would like to further explain a response to a question in Part
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 you firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

### PART III.--PRICING AND MARKET FACTORS

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

III-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 III.

Name	
Title	
Email	
Telephone	

### **PRICE DATA**

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2017 of the following products your firm imported from China:
  - Product 1.-- 12" wide x 18" deep x 72" high 1-Tier (one full height door within a single frame, one opening) locker, knockdown (KD), 24 gauge solid body, 16 gauge frame, 16 gauge louvered door, recessed or projecting die-cast handle, 3-point (multi-point) gravity lift-type latching, lock not included, with or without 6" legs (legs increase frame height to 78"), nut/bolt or rivet assembly required.
  - Product 2.-- 12" wide x 12" deep x 36"/72" high 2-Tier (two half-height doors stacked within a single frame, two openings) locker, knock-down (KD), 24 gauge solid body, 16 gauge frame, 16 gauge louvered door, recessed or projecting die-cast handle, 2-point (multi-point) gravity lift type latching, lock not included, with or without 6" legs (legs increase frame height to 78"), nut/bolt or rivet assembly required.
  - Product 3.-- 12" wide x 18" deep x 36"/72" high 2-Tier (two half-height doors stacked within a single frame, two openings) locker, knock-down (KD), 24 gauge solid body, 16 gauge frame, 16 gauge louvered door, recessed or projecting die-cast handle, 2-point (multi-point) gravity lift-type latching, lock not included, with or without 6" legs (legs increase frame height to 78"), nut/bolt or rivet assembly required.
  - **Product 4.--** 12" wide x 12" deep x 12"/72" high 6-Tier (six 12" high doors stacked within a single frame, 6 openings) locker, 24 knock-down (KD), 24 gauge solid body, 16 gauge frame, 18 gauge louvered door, single-point latching with thru-the-door finger pull handle, lock not included, with or without 6" legs (legs increase frame height to 78"), nut/bolt or rivet assembly required.

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).

III-2a. During January 2017-March 2020, did your firm import from China and sell to unrelated U.S.

U.S. Importers' Questionnaire – Metal Lockers from China (Preliminary)

Product 3: Product 4:

customers products)?	any of the ab	ove listed	products (or	any produ	cts that were	competitiv	e with these	
Yes	sPlease com	plete the f	following pric	cing data ta	able as approp	oriate.		
□ No	Skip to que:	stion III-3.						
	- 1 1							
	Report belo	w the qua	rterly price d	ata¹ for pri	icing products	<sup>2</sup> imported	from China	
and sold b	y your firm.		- • •					
			Chin	ıa				
	Report da	ta in <i>actud</i>	<u>ıl lockers</u> and	actual do	<u>llars</u> (not 1,00	0s).		
		(Quanti	ity in lockers	, value <i>in d</i>	lollars)			
	Produ	ıct 1	Produ	uct 2	Produ	ıct 3	Produ	ct 4
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2017:</b> January-March								
April-June								1
July-September								,
October-December								
2018:								T.
January-March			ļ		ļ			
April-June								1
July-September								
October-December								
2019:								
January-March					<u> </u>			T
April-June								<del>,</del>
July-September					<u> </u>			T
October-December	•							
<b>2020:</b> January-March								
<sup>1</sup> Net values (i.e., gross firm's U.S. point of shipment <sup>2</sup> Pricing product definit	t.				d freight, and the	e value of retu	urned goods), f.	o.b. your
<b>Note</b> -If your firm's product description of your firm's pro							product, provide	e a
Product 1:								
Product 2:								

III-2c.	Price data checklistPlease check that the pricing data in question III-2(a) has been correctly
	reported.

Are the price data reported above:	√ if Yes
In actual dollars (not \$1,000) and actual units (actual lockers)?	
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	
Net of all discounts and rebates?	
Have returns credited to the quarter in which the sale occurred?	
Quantities do not exceed commercial shipments in question II-7 in each year?	

III-2d.	<u>Pricing data methodology</u> Please describe the method and the kinds of documents/records that were used to compile your price data.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the price data, as Commission staff may contact your firm regarding questions on the price data. The Commission may also request that your company submit copies of the supporting documents/records (such as sales journal, invoices, etc.) used to compile these data.

U.S. Impo	rters' Question	nnaire – <b>Met</b> a	I Lockers fi	rom China	(Preliminary
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III-3.	Price settingHow does your firm determine the prices that it charges for sales of metal lockers
	(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

III-4. <u>Discount policy</u>.--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

III-5. **Pricing terms.**--On what basis are your firm's prices of imported metal lockers from China usually quoted *(check one)*?

De	elivered	F.o.b.	If f.o.b., specify point

III-6. <u>Contract versus spot.</u>--Approximately what share of your firm's sales of metal lockers imported from China 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					
ltem	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)	<b>Spot sales</b> (for a single delivery)	Total (shoul sum to 100.0%	d o
Share of 2019 sales	%	%	%	%	0.0	%

III-7. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for metal lockers imported from China (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			
3.1.5, 5.1 p.1.50	Both			
Indexed to raw	Yes			
material costs <sup>1</sup>	No			
Not applicab	Not applicable			
<sup>1</sup> Please identify the indexes used:				

III-8. <u>Lead times.</u>--What is your firm's share of sales of metal lockers imported from China 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 metal lockers?

Source	Share of 2019 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

.po.tc.	is questionnaire inetal Eschers from china (Freminia)	11	1 480 27					
<u>Ship</u>	oing information.—							
(a)	(a) Who generally arranges the transportation to your firm's customers' location Your firm Purchaser (check one)							
(b) When your firm sells metal lockers imported from China, from where is it sh  Point of importation Storage facility (check one)								
(c)	Indicate the approximate percentage of your firm's sal China that are delivered the following distances from y		•					
	Distance from your firm's U.S. point of shipment	Share						
	Within 100 miles	%						
	101 to 1,000 miles	%						
	Over 1,000 miles	%						
	Total (should sum to 100.0%)	0.0 %						
	graphical shipmentsIn which U.S. geographic market are ers imported from subject countries since January 1, 2017  Geographic area	• •						
Nor	theast.–CT, ME, MA, NH, NJ, NY, PA, RI, and VT.							
-	lwest.–IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI							
Sou	theastAL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, a	nd WV.						
Cen	tral Southwest.–AR, LA, OK, and TX.							
Mo	untains.–AZ, CO, ID, MT, NV, NM, UT, and WY.							
Pac	ific Coast.–CA, OR, and WA.							
	<b>er</b> .—All other markets in the United States not previously HI, PR, and VI.	listed, including						

III-11. <u>Inland transportation costs.</u>—What is the approximate percentage of the cost of metal lockers imported from China that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.

III-12. <u>End uses.--</u>List the end uses of the metal lockers that your firm imports. For each end-use product, what percentage of the <u>total cost</u> is accounted for by metal lockers and other inputs?

	Share of total cost	Total	
			(should sum to
End-use product	Metal lockers	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

□ N	0	YesP	lease fill ou	t the tab	ole.		
	E	nd use in v	which this	На		nges in the price	of this substitute metal lockers?
Substitute		substitute		No	Yes	Explanation	
1.							
2.							
3.							
States (if kno	wn) for me principal fa	tal lockers ctors that	has change have affect	ed since ed these	Januar e chang	ges in demand.	e of the United in any trends and
Market	Overall increase	No change	Overall decrease	Fluctua no clea			ation and factors
in the United States							
			i	_	_		

III-15.			ave there been any significant changes in the product range, product mix or ockers since January 1, 2017?					
	No	Yes	If yes, please des	cribe.				
III-16.		metal lock	ers market subjec	t to business cycles (other than general economy-widens of competition distinctive to metal lockers?				
	Check all	that apply	'•	Please describe.				
		No		Skip to question III-16.				
		Yes-Busin seasonal	ess cycles (e.g. business)					
			r distinctive s of competition					
			e been any change ace January 1, 201	es in the business cycles or conditions of competition for 7?				
	No	Yes	If yes, describe	e.				
III-17.	. <u>Supply constraints.</u> Has your firm refused, declined, or been unable to supply metal lockers 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 des	cribe.				

III-18.	Raw	materials
---------	-----	-----------

tai ilow have ilicial lockers raw iliaterial brices changed silice janua	(a)	How have metal lockers raw material prices changed since January 1, 201	17?
--	-----	---	-----

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 metal lockers.

(b) How did the imposition of tariffs under section 232 on imported steel or aluminum products impact raw material costs for metal lockers?

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

(c) How did the imposition of tariffs under section 232 on imported steel or aluminum products impact your firm's sales price for metal lockers?

Factor	Overall Increase	No change	Overall Decrease	Fluctuate with no clear trend	Explanation
Prices for metal lockers					

III-19.	Impact of section 301 tariffs Did the imposition of tariffs on Chinese-origin products under
	section 301 have an impact on the metal lockers market in the United States?

<b>Yes</b> — 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 metal lockers market in the United States.
Supply of U.S produced metal lockers					
Supply of metal lockers imported from China					
Supply of metal lockers imported from other countries					
Prices for metal lockers					
Overall U.S. demand for metal lockers					
Raw material costs for metal lockers					

III-20. <u>Interchangeability.--</u>Is metal lockers 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 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	Other countries			
United States					
China					
For any country-pair producing metal lockers that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:					

III-21. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between metal lockers 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	Other countries		
United States				
China				

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

III-22. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for metal lockers since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of metal lockers that each of these customers accounted for in 2019.

Cı	ustomer's name	Contact person	Email	Telephone	City	State	Share of 2019 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

III-23.	Other explanationsIf your firm would like to further explain a response to a question in Part III 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.

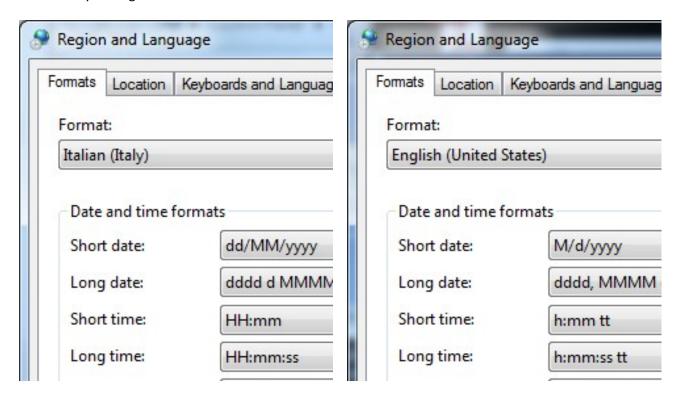
Correcting Valid number error messages. -- If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). The U.S. International Trade Commission's questionnaires are setup in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g. "Italian (Italy)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty five cents" would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the questionnaire. When you finish reporting the data then you can close the questionnaire and switch back to Italy settings.



# **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://www.usitc.gov/investigations/701731/2020/metal lockers and parts thereof people%E2%80%99s republic/preliminary.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: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: LOCK

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

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

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