

LOST SALES AND LOST REVENUE SURVEY

UTILITY SCALE WIND TOWERS FROM INDIA, MALAYSIA, AND SPAIN

This survey must be received by the Commission by **October 14, 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 and antidumping investigations concerning wind towers from India, Malaysia, and Spain (inv. Nos. 701-TA-660-661 and 731-TA-1543-1545 (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 Amelia Preece (202-205-3250, amelia.preece@usitc.gov).

Name of firm _____		
Address _____		
City _____	State _____	Zip Code _____
Website _____		
Has your firm purchased, 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 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: https://dropbox.usitc.gov/oinv/ . (PIN: WIND)		

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 petitions filed on September 30, 2020, by the Wind Tower Trade Coalition (Arcosa Wind Towers Inc. (Dallas, Texas) and Broadwind Towers, Inc. (Manitowoc, Wisconsin)). 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://usitc.gov/investigations/701731/2020/utility_scale_wind_towers_india_malaysia_and_spain/pr_eliminary.htm.

Wind towers covered by these investigations is certain wind towers, whether or not tapered, and sections thereof. Certain wind towers 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.

Merchandise covered by these orders is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheading 7308.20.0020 or 8502.31.0000. 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). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these orders is dispositive.

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.

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 wind towers.

“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 wind towers)		
Purchases of wind towers produced in—			
United States			
India			
Malaysia			
Spain			
All other countries ¹			
Sources unknown ²			
Total purchases	0	0	0
Imports of wind towers from—			
India			
Malaysia			
Spain			
All other countries ¹			
Total imports ³	0	0	0

¹ Please identify these countries:

² Please indicate the firm(s) from which you purchased this merchandise:

³ If your firm imported wind towers 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 wind towers 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"/>	
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Spain	<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 wind towers.

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 wind towers from India, Malaysia, and Spain instead of purchasing U.S.-produced wind towers? **Respond for each subject country.**

Source	Yes (also respond to parts (b) and (c))	No (If “No” for all countries, skip to next question)
India	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Spain	<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
India	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Spain	<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 wind towers)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
India	<input type="checkbox"/>		<input type="checkbox"/>	
Malaysia	<input type="checkbox"/>		<input type="checkbox"/>	
Spain	<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 wind towers to your firm, did U.S. producers reduce their prices of domestically produced wind towers in order to compete with lower-priced imports of wind towers from the subject countries?

Respond for each subject country.

Source	Yes (also respond to question part (b))	No (If “No” for all countries, skip to next question)	Don’t know
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spain	<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.

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
India	%	
Malaysia	%	
Spain	%	

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

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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: WIND

- **E-mail.**—E-mail the MS Word survey to amelia.preece@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.