

## U.S. PRODUCERS' QUESTIONNAIRE

### TWIST TIES FROM CHINA

This questionnaire must be received by the Commission by **January 13, 2021**.  
*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 twist ties from China (Inv. Nos. 701-TA-649 and 731-TA-1523 (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 twist ties (as defined on next page) at any time since January 1, 2017?					
<input type="checkbox"/>	<b>NO</b>	(Sign the certification below and promptly return <b>only</b> this page of the questionnaire to the Commission)			
<input type="checkbox"/>	<b>YES</b>	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)			
<b>Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a>. (PIN: <b>TIES</b>)</b>					

#### 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 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://usitc.gov/investigations/701731/2020/twist\\_ties\\_china/final.htm](https://usitc.gov/investigations/701731/2020/twist_ties_china/final.htm).

**Twist ties** covered by these investigations are thin, bendable ties for closing containers, such as bags, bundle items, or identifying objects. A twist tie in most circumstances 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. However, it is possible to make a twist tie with plastic and no metal wires. The metal wire that is generally used in a twist tie is 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; and a thickness between .002" and .020" in areas without wire. The scope includes an all-plastic twist tie containing a plastic core as well as a plastic covering (the wing) over the core, just like paper and/or plastic in a metal tie. An all-plastic twist tie (without metal wire) would be of the same measurements as a twist tie containing one or more metal wires. 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), or plastic, 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 may also have a tag or label attached to it or a pre-applied adhesive attached to it.

Excluded from the scope of the order are twist ties packaged with bags for sale together where the quantity of twist ties does not exceed twice the number of bags in each package. Also excluded are twist ties that constitute part of the packaging of the imported product, for example, merchandise anchored/secured to a backing with twist ties in the retail package or a bag of bread that is closed with a twist tie.

Twist ties are imported into the United States under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 8309.90.0000 and 5609.00.3000. Subject merchandise may also be imported under HTSUS subheadings 3920.51.5000, 3923.90.0080, 3926.90.9990, 4811.59.6000, 4821.10.2000, 4821.10.4000, 4821.90.2000, 4821.90.4000, and 4823.90.8600. These HTSUS subheadings are provided for reference only. The written description of the scope of the investigation is dispositive.

**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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of twist ties and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

**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](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 twist ties, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> 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?

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

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

Country	Investigation type	Support	Oppose	Take no position
China	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



I-8. **Related firms sent USITC questionnaires.**--Please confirm that you have sent all related U.S. importers and any related producers located in the United States or China the relevant USITC questionnaire for the final phase of this proceeding. The questionnaires are available for download from the USITC's website [link](#) found on page two.

Related firm	Relevant questionnaire	Check "yes" to confirm that your firm has sent to your contacts at the related firm(s) the relevant USITC questionnaire(s), if applicable	
		Yes, sent	No, not applicable
Related U.S. importer	U.S. importers' questionnaire	<input type="checkbox"/>	<input type="checkbox"/>
Related producer in the United States	U.S. producers' questionnaire	<input type="checkbox"/>	<input type="checkbox"/>
Related producer in China	Foreign producers' /exporters' questionnaire	<input type="checkbox"/>	<input type="checkbox"/>
Related exporter in China	Foreign producers' /exporters' questionnaire	<input type="checkbox"/>	<input type="checkbox"/>

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

Further information on this part of the questionnaire can be obtained from Christopher W. Robinson (202-205-2542, [chris.robinson@usitc.gov](mailto:chris.robinson@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-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of twist ties since January 1, 2017.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely 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-2b. **COVID-19 pandemic.**-- Since January 1, 2020 has the COVID-19 pandemic, or have any government actions taken to contain the spread of the COVID-19 virus, resulted in changes in relation to your firm's supply arrangements, production, employment, and shipments relating to twist ties?

<b>No</b>	<b>Yes</b>	<b>If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) production and shipments impact, and (c) employment impact of the COVID-19 pandemic.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

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 twist ties, 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).

**"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.

<b>Quantity (in pounds)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2019</b>	<b>2020</b>
<b>Overall production capacity<sup>1</sup></b>					
<b>Production of:</b>					
Twist ties					
Other products <sup>2</sup>					
<b>Total production using same machinery or workers</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<sup>1</sup> Data reported for capacity (first line) should be greater than data reported for total production (last line). <sup>2</sup> Please identify these products: _____.					

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

Hours per week	Weeks per year

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

II-3d. **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 twist ties 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 twist ties?

**“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 twist ties in and/or admit twist ties 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 firm's operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

(b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import twist ties into a foreign trade zone (FTZ) for use in distribution of twist ties 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 twist ties 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

<b>Quantity (in 1,000s twist ties) and value (in dollars)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2019</b>	<b>2020</b>
<b>Average production capacity<sup>1</sup></b> <i>(quantity) (A)</i>					
<b>Beginning-of-period inventories</b> <i>(quantity) (B)</i>					
<b>Production</b> <i>(quantity) (C)</i>					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
<i>Quantity (D)</i>					
<i>Value (E)</i>					
<b>Internal consumption:<sup>2</sup></b>					
<i>Quantity (F)</i>					
<i>Value<sup>2</sup> (G)</i>					
<b>Transfers to related firms:<sup>2</sup></b>					
<i>Quantity (H)</i>					
<i>Value<sup>2</sup> (I)</i>					
<b>Export shipments:<sup>3</sup></b>					
<i>Quantity (J)</i>					
<i>Value (K)</i>					
<b>End-of-period inventories</b> <i>(quantity)</i> <b>(L)</b>					
<p><sup>1</sup> 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 _____.</p> <p><sup>2</sup> 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.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>					

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 year			January-September	
	2018	2019	2019	2019	2020
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-8. **Channels of distribution.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) in pounds and 1,000s of twist ties by channel of distribution.

Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
<b>U.S. shipments:</b>					
To <u>distributors / wholesalers</u> :					
Quantity in 1,000 twist ties (M)					
Quantity in pounds (N)					
Value in dollars (O)					
To <u>retailers</u> :					
Quantity in 1,000 twist ties (P)					
Quantity in pounds (Q)					
Value in dollars (R)					
To <u>end users</u> :					
Quantity in 1,000 twist ties (S)					
Quantity in pounds (T)					
Value in dollars (U)					

***RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines M through U) in each time period equal the quantity reported for U.S. shipments (i.e., lines D through I) 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.*

Reconciliation item	Calendar year			January-September	
	2017	2018	2019	2019	2020
<b>Quantity:</b> $M + P + S - D - F - H =$ zero ("0"), if not revise.	0	0	0	0	0
<b>Value:</b> $O + R + U - E - G - I =$ zero ("0"), if not revise.	0	0	0	0	0

II-9. **Product mix.**--Does your firm produce and sell the following products? (check all that apply):

Core type

- Single stainless steel wire
- Single galvanized steel wire
- More than one stainless steel wire
- More than one galvanized steel wire
- Plastic

Wire gauge sizes

- <= Gauge 19
- Gauges 20 & 21
- Gauges 22 & 23
- Gauges 24 & 25
- Gauges 26 & 27
- Gauges 28 & 29
- >= Gauge 30

Coverings

- Dry paper
- Wet paper
- Polyethylene
- Other plastic
- Paper and plastic combo

Cutting

- Pre-cut <= 4" lengths
- Pre-cut > 4" and <=6" lengths
- Pre-cut > 6" and <=8" lengths
- Pre-cut > 8" and <=10" lengths
- Pre-cut > 10" lengths
- Spool
- Gangs

End-use

- Bib ties/Flag ties
- Other grocery ties (bread bag ties and produce ties)
- Dry cleaner ties
- Nose wires for face masks
- Industrial ties (television cables, computer cords, other appliances and household ties)

Describe any other unique characteristics or applications



II-10. **Measurements in your firm's books and records.**--Please indicate in what metrics your firm measures its production of twist ties in the normal course of business:

Measurement(s) used in your firm's books and records to record twist ties (check all that apply):

- Value (dollars or other currency)
- Individual twist ties/ units / or counts
- Aggregate weight measures (kilograms, pounds, et cetera)
- Other metric:

In this questionnaire, quantity measures are requested both in terms of (i) units, or "1,000 twist ties," and (ii) pounds, depending on the question. Please confirm that your firm has either reported the data as available in your firm's books and records, or that your firm has reported data based on carefully crafted estimates (to the best of your availability), such that your firm has not left any relevant data point empty or blank due a particular metric not being stored in the normal course of business. For example, if your firm produced *spools* of twist ties, but does not store information on the count of individual twist ties or the weight of those twist ties, please make an effort to assess the largest volume spools your firm produced, and if those large volume spools contained approximately 500 twist ties and weighted on average 3 pounds, use that to estimate the aggregate quantities (in 1,000 of twist ties) and quantities (in pounds) for all production. You do not have to individually measure and assess each product produced, but use some systematic method to report in every metric that has been requested (value, units, and weight). Please do not report only one metric; please always provide each of the metrics requested.

<p align="center"><b>Yes--All data have been provided based on information readily available in our books and records</b></p>	<p align="center"><b>Yes--All data have been provided but some metrics were based on carefully drawn estimates to the best of our ability</b></p>	<p align="center"><b>If your firm had to use estimates to arrive at some metrics, please briefly described the metrics estimated and the methodology used to do so:</b></p>
<p align="center"><input type="checkbox"/></p>	<p align="center"><input type="checkbox"/></p>	

II-11. **Employment data.**--Report your firm's employment-related data related to the production of twist ties 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. For the January to September periods, calculate similarly and multiply by 9.

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

**"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 year			January-September	
	2017	2018	2019	2019	2020
Average number of PRWs ( <i>number</i> )					
Hours worked by PRWs ( <i>hours</i> )					
Wages paid to PRWs ( <i>dollars</i> )					

Explanation of trends:

II-12. **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-13. **Purchases.**--Has your firm purchased twist ties 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.

<b>No</b>	<b>Yes</b>	<b>If yes--Report such purchases in the table below and explain the reasons for your firms' purchases.</b>
<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

<b>(Quantity in 1,000s twist ties)</b>					
Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
<b>Purchases from U.S. importers<sup>1</sup> of twist ties from—</b>					
China					
All other sources					
<b>Purchases from domestic producers<sup>2</sup></b>					
<b>Purchases from other sources<sup>3</sup></b>					
<sup>1</sup> 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: _____. <sup>2</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. <sup>3</sup> Please list the name of the firm(s) from which your firm purchased this product: _____.					

II-14. **Imports.**--Since January 1, 2017, has your firm imported twist ties?

<b>No</b>	<b>Yes</b>	<b>If yes--<u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u></b>
<input type="checkbox"/>	<input type="checkbox"/>	

II-15. **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 **Joanna Lo (202-205-1888, [joanna.lo@usitc.gov](mailto:joanna.lo@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.**—Please provide the following information on your company'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:

\_\_\_\_\_

**Note.--Please report all financial data in part III on a calendar year basis.**

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

\_\_\_\_\_

2. Does your firm prepare profit/loss statements for twist ties:

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 twist ties, as well as specific statements and worksheets) used to compile these data.*

III-3. **Cost accounting system.**--Briefly describe your company's cost accounting system (e.g., standard cost, job order cost, etc.). If your firm uses standard cost, how often does your company review variances from standard cost (e.g. monthly, yearly)?

III-4. **Allocation basis.**--Briefly describe your company's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses. Please also describe the method and types of documents/records used to compile your financial data.

--

III-5. **Product listing.**--Please list the products your company produced in the facilities in which your company produced twist ties and provide the share of net sales accounted for by these products in 2019.

<b>Products</b>	<b>Share of sales in 2019</b>
Twist ties	%
	%
	%
	%
	%

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

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

III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of twist ties that your company purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input in 2019. 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 in 2019
<b>Input valuation as recorded in the company's accounting books and records:</b>		

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

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

III-9a. **Operations on twist ties.**--Report the revenue and related cost information requested below on the twist ties operations of your firm's U.S. establishment(s).<sup>1</sup> **Do not report resales of twist ties.** 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 2017, 2018, 2019, and the specified interim periods.

Quantity (in 1,000s twist ties) and value (in dollars)					
Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
<b>Net sales quantities:</b> <sup>2</sup>					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b> <sup>2</sup>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>Selling, general, and administrative (SG&amp;A) expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense items					
All other income items					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<b>Depreciation/amortization included above</b>					

<sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

<sup>2</sup> 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.

<sup>3</sup> 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 checklist.**--Please check that the financial data in question III-9a have been correctly reported.

<b>Confirm the following regarding your financial data in question III-9a:</b>	<b>✓ if Yes</b>
In actual dollars ( <i>not</i> 1,000 dollars)?	<input type="checkbox"/>
Include only the in-scope product?	<input type="checkbox"/>
Do not include any resales of twist ties?	<input type="checkbox"/>
IC and transfers to related firms reported at fair market value?	<input type="checkbox"/>
Net Sales (CS, IC, and Transfers) <b>exclude</b> discounts, returns, allowances, prepaid freight, and all freight out to customers?	<input type="checkbox"/>
COGS <b>excludes</b> finished goods freight to customers?	<input type="checkbox"/>
SG&A <b>excludes</b> finished goods freight to customers?	<input type="checkbox"/>
All costs <b>exclude</b> finished goods freight to customers?	<input type="checkbox"/>
<b>If you did not ✓ Yes in any of the boxes above, go back to III-9a and revise your responses.</b>	

III-9c. **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), operating income (or loss), 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--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.



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

Input	Share of total raw material costs in 2019 (percent)
Wire	
Paper	
Plastic components	
Other material inputs <sup>1</sup>	
Total (should sum to 100 percent)	0.0
<sup>1</sup> Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs accounted for by these "other" raw materials in 2019: _____.	

III-9e. **Procurement of raw materials.**--Please report the procurement method of raw materials in 2019 (reported in III-9a) for the following raw material inputs listed below.

Note.--The term "your company" or "your firm" should include only the facilities listed in question I-2a allocated to the subject product and reflect the raw materials reported in question III-9a. If you procured raw materials from related entities, check "primarily purchased by your company" below and ensure that you included the raw material input from related entities are reported in question III-7 above.

Input	Procurement method	
	Primarily produced by your company	Primarily purchased by your company <sup>1</sup>
Wire	<input type="checkbox"/>	<input type="checkbox"/>
Paper	<input type="checkbox"/>	<input type="checkbox"/>
Plastic components	<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Purchases include those from related and unrelated entities. For purchases from related entities, confirm that those raw materials are listed in response to question III-7.		

III-9f. **Raw materials checklist.**--Please check that the raw materials information in questions III-9d and III-9e have been correctly reported.

Confirm the following regarding your responses in questions III-9e and III-9f:	√ if Yes
Include only raw materials used for twist ties?	<input type="checkbox"/>
Reflect the raw materials reported in question III-9a?	<input type="checkbox"/>
Inputs "produced by your company" are from the facilities listed in question I-2a and not separate legal entities with common ownership or other affiliation?	<input type="checkbox"/>
Inputs purchased from related entities are purchases listed in question III-7?	<input type="checkbox"/>
"Other" raw materials, if any, are specified and listed in question III-9d, footnote 1?	<input type="checkbox"/>
Total sums to 100 percent in question III-9d?	<input type="checkbox"/>
<b>If you did not √ Yes in any of the boxes above, go back to III-9d or III-9e and revise your responses.</b>	

III-9g. **Explanation of trends.**--Please indicate the primary decisions, events, or factors that impacted the trends in the following metrics reported in question III-9a from 2017 to 2019 and interim

2020.

<b>Metric</b>	<b>Explanation of trends</b>
Net sales quantity	
Net sales values	
Raw material costs	
Direct labor costs	
Other factory costs	
SG&A costs	

III-9f. **Effects on financial performance of COVID-19.**--Please explain how the COVID-19 pandemic has affected the financial performance of your firm's operations on twist ties as reported in III-9a.

III-10a. **Nonrecurring items (charges and gains) included in the subject product 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 actual dollars*), 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	Calendar year			January-September	
	2017	2018	2019	2019	2020
	<i>Value (in dollars)</i>				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

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

	Description of the nonrecurring item	Income statement classification of the nonrecurring item in III-9a
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-10b. **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-10a 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-10a identify where these items are reported in question III-9a.

III-11a. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of twist ties. If your firm does not maintain some or all of

the specific asset information necessary to calculate total assets for twist ties 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.

**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.

<b>Value (in dollars)</b>			
<b>Item</b>	<b>Calendar year</b>		
	<b>2017</b>	<b>2018</b>	<b>2019</b>
Total assets (net)			

III-11b. **Description of reported assets.**--Describe the main asset categories (both current and long-term assets) in the above response. 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.

III-12a. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development ("R&D") expenses for twist ties. Provide data for 2017, 2018, 2019, and the specified interim periods.

<b>Value (in dollars)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2019</b>	<b>2020</b>
Capital expenditures					
R&D expenses					

III-12b. **Description of reported capital expenditures.**--Describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data are reported, explain.

III-12c. **Description of reported R&D expenses.**--Describe the nature, focus, and significance of your firm's reported R&D expenses. If no R&D expenses are reported, explain.

III-13. **Assets, capital expenditures, and R&D checklist.**--Please check that the assets, capital expenditures, and R&D information in questions III-11a, III-11b, III-12a, III-12b, and III-12c are complete.

<b>Confirm the following regarding your responses in questions III-11a, III-11b, III-12b, and III-12c:</b>	<b>√ if Yes</b>
In actual dollars ( <i>not</i> 1,000 dollars)?	<input type="checkbox"/>
Top assets are listed in question III-11b?	<input type="checkbox"/>
Substantial changes in assets are described in question III-11b, if applicable?	<input type="checkbox"/>
Capital expenses are described in question III-12b?	<input type="checkbox"/>
R&D are described in question III-12c?	<input type="checkbox"/>
Provided explanations if your firm did not have capital expenditures or R&D?	<input type="checkbox"/>
<b>If you did not √ Yes in any of the boxes above, go back to question III-11a, III-11b, III-12a, III-12b, and/or II-12c and update your responses.</b>	

III-14. **Data consistency and reconciliation.**--Please note that we are requesting your firm's financial data for questions III-9a, III-10a, III-11a, and III-12a on a calendar year basis. Please confirm that your firm reported these data on a calendar-year basis:

<b>Yes</b>	<b>No</b>	<b>If no, please explain.</b>
<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).

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for total shipments in question II-7 equal the quantities and values reported for total net sales in question III-9a of this questionnaire in each time period. If the calculated fields below return values other than zero (i.e., "0"), please explain the discrepancy below.*

Reconciliation	Calendar year			January-September	
	2017	2018	2019	2019	2020
<b>Quantity:</b> 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	0	0
<b>Value:</b> 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	0	0

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

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

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 twist ties from China?

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

<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 twist ties from China?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm has experienced actual negative effects as follows.</b>
<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 twist ties from China?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm anticipates negative effects as follows.</b>
<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 Natalia King ([natalia.king@usitc.gov](mailto:natalia.king@usitc.gov), 202-205-2049).

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	

**PRICE DATA**

IV-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 produced by your firm.

**Product 1.**-- Paper/paper 29 gauge cut tie, ranging from 4" x 5/32" to 4" x 3/16"

**Product 2.**-- Paper/paper 29 gauge cut tie, ranging from 7" x 5/32" to 7" x 3/16"

**Product 3.**-- Produce tie, wet strength paper/paper 27 gauge, galvanized wire, 8" x 7/16"

**Product 4.**-- Produce tie, wet strength paper/paper 27 gauge, galvanized wire, 10" x 7/16"

**Please note that values should be f.o.b., U.S. 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).**

IV-2a. During January 2017-September 2020, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question IV-3.

IV-2b. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

Report data in **1,000s twist ties** and **actual dollars** (not 1,000s).

<b>(Quantity in 1,000s twist ties, value in dollars)</b>								
<b>Period of shipment</b>	<b>Product 1</b>		<b>Product 2</b>		<b>Product 3</b>		<b>Product 4</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<b>2017:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2018:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.

<sup>2</sup> Pricing product definitions are provided on the first page of Part IV.

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

Product 1:

Product 2:

Product 3:

Product 4:

IV-2c. **Price data checklist.**--Please check that the pricing data in question IV-2(b) has been correctly reported.

Are the price data reported above:	<b>v if Yes</b>
In actual dollars ( <b>not</b> \$1,000)?	<input type="checkbox"/>
In 1,000 twist ties?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Quantities do not exceed commercial shipments in question II-7 in each year?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

IV-2d. **Pricing data methodology.**--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.*

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of twist ties (*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 twist ties 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 twist ties 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.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced twist ties (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

<b>Typical sales contract provisions</b>	<b>Item</b>	<b>Short-term contracts</b> (multiple deliveries for less than 12 months)	<b>Annual contracts</b> (multiple deliveries for 12 months)	<b>Long-term contracts</b> (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 <sup>1</sup>	<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"/>
<sup>1</sup> Please identify the indexes used: _____.				

IV-8. **Lead times.**--What share of your firm's sales is 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 twist ties?

<b>Source</b>	<b>Share of 2019 sales</b>	<b>Lead time (Average number of days)</b>
From inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

IV-9. **Shipping information.**--

(a) Who generally arranges the transportation to your firm's customers' locations?

Your firm     Purchaser (*check one*)

(b) Indicate the approximate percentage of your firm's sales of twist ties that are delivered the following distances from its production facility.

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

IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced twist ties since January 1, 2017 (check all that apply)?

<b>Geographic area</b>	<b>√ if applicable</b>
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<input type="checkbox"/>
<b>Other.</b> --All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>

IV-11. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced twist ties that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent

IV-12. **End uses.**--List the end uses of the twist ties that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by twist ties and other inputs?

End-use product	Share of total cost of end-use product accounted for by		Total (should sum to 100.0% across)
	Twist ties	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-13. **Substitutes.**--Can other products be substituted for twist ties?

No       Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for twist ties?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for twist ties has changed since January 1, 2017. Explain any trends and describe the principal factors that have affected these changes in demand. If demand trends vary by market segments (e.g., grocery, dry cleaning, face masks), please discuss each separately. *Please also note any changes resulting from the COVID-19 pandemic.*

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-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of twist ties since January 1, 2017?

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

IV-16. **Conditions of competition.**--

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

<b>Check all that apply.</b>	<b>Please describe.</b>
<input type="checkbox"/> <b>No</b>	Skip to question IV-17.
<input type="checkbox"/> <b>Yes-Business cycles (e.g. seasonal business)</b>	
<input type="checkbox"/> <b>Yes-Other distinctive conditions of competition</b>	

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

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

IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply twist ties 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, shortages related to COVID-19 shutdowns, etc.)?

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



IV-18. **Raw materials.**—

(a) How have twist ties raw material costs changed since January 1, 2017?

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

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

<b>Factor</b>	<b>Overall Increase</b>	<b>No change</b>	<b>Overall Decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explanation</b>
Cost of raw materials after section 232 tariffs imposed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

<b>Factor</b>	<b>Overall Increase</b>	<b>No change</b>	<b>Overall Decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explanation</b>
Prices for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-19. **Impact of section 301 tariffs.**-- Did the imposition of tariffs on Chinese-origin products under section 301 have an impact on the twist ties market in the United States?

<b>Yes</b> — Please indicate the impact in the table below.	<b>No</b>	<b>Don't know</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Factor</b>	<b>Overall increase</b>	<b>No change</b>	<b>Overall decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explain, noting how the imposition of tariffs under section 301 affected each factor of the twist ties market in the United States.</b>
Supply of U.S.-produced twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of twist ties imported from China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of twist ties imported from other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**--Are twist ties 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	China	Other countries
United States		
China	X	
For any country-pair producing twist ties 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 twist ties 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	China	Other countries
United States		
China	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 twist ties, 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 twist ties since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of twist ties that each of these customers accounted for in 2019.

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

IV-23. **Competition from imports.--**

(a) **Lost revenue.**--Since January 1, 2017: To avoid losing sales to competitors selling twist ties from China, did your firm:

<b>Item</b>	<b>No</b>	<b>Yes</b>
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 twist ties to imports of this product from China?

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

IV-24. **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.

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## 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://usitc.gov/investigations/701731/2020/twist\\_ties\\_china/final.htm](https://usitc.gov/investigations/701731/2020/twist_ties_china/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:** **TIES**

- **E-mail.**—E-mail the MS Word questionnaire to [chris.robinson@usitc.gov](mailto:chris.robinson@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.