

U.S. IMPORTERS' QUESTIONNAIRE

TWIST TIES FROM CHINA

This questionnaire must be received by the Commission by **January 23, 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 imported twist ties (as defined on next page) from any country at any time since January 1, 2017?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: TIES)

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.

Twist ties covered by these investigations consists of 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.

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

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

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.

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Chris Robinson (202-205-2542, chris.robinson@usitc.gov).

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

I-1. **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 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

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

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

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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-6. **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"/>

I-7. **Importing operations.**--Please indicate the nature of your firm's importing operations of twist ties. More than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-8. **Consignee.**--If your firm is an importer of record of twist ties but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-9. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters twist ties into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports twist ties under the TIB (temporary importation under bond) program.

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

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

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

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

I-10. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes--Please specify.
<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). **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 importation 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"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation 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, importation, employment, and shipments relating to twist ties in the United States?

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

II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of twist ties for delivery after **September 30, 2020**?

“Arranged imports” are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

No	Yes	If yes, fill out the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021
	Quantity (in 1,000s twist ties)			
China				
All other sources				

II-3b. **Imports in the 12 month period preceding the petition.**--Has your firm imported twist ties from any source between June 1, 2019 and May 30, 2020? (i.e., the last seven months in 2019 and first five months in 2020 combined)

No	Yes	If yes, report the quantity of such import below by source.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in 1,000s twist ties)	
Source	June 2019 through May 2020
China	
All other sources	

- II-4. **Reasons for importing if producer.**--If your firm also produces twist ties in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

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Definitions

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

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

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

"Commercial U.S. shipments"— Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

"Internal consumption" –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-5a. **U.S. imports from China.**—Report your firm's imports and your firm's shipments and inventories of twist ties imported from China by your firm during the specified periods.

China

Quantity (in 1,000s twist ties), value (in dollars)					
Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
Beginning-of-period inventories (quantity) (A)					
Imports: ^{1,2}					
Quantity (B)					
Value (C)					
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption: ³					
Quantity (F)					
Value ³ (G)					
Transfers to related firms: ³					
Quantity (H)					
Value ³ (I)					
Export shipments: ⁴					
Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

¹ Please identify the foreign producers, if known: _____.

² Please identify the HTSUS codes used by your firm to import these products: _____.

³ 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.

⁴ Identify your firm's principal export markets: _____.

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

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

Reconciliation	Calendar year			January-September	
	2017	2018	2019	2019	2020
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-5b. U.S. imports from China (additional detail).—Report additional detail relating to your firm's imports of twist ties from China during the specified periods.

Item	Calendar Year			January-September	
	2017	2018	2019	2019	2020
Imports					
Quantity (in 1,000 twist ties) ¹	0	0	0	0	0
Quantity (pounds)					
Value (in dollars)	0	0	0	0	0
¹ Data for <i>Quantity</i> (in 1,000s twist ties) and <i>Value</i> (in dollars) will automatically populate from question II-5a.					

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

China

Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
U.S. shipments:					
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
Quantity: M + P + S – D – F – H = zero ("0"), if not revise.	0	0	0	0	0
Value: O + R + U – E- G- I = zero ("0"), if not revise.	0	0	0	0	0

II-5d. **Product mix: China.**--Does your firm import from China 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

II-6a. **Imports from all other sources.**—Report your firm's imports and your firm's shipments and inventories of twist ties imported from all other sources by your firm during the specified periods.

All other sources

(list sources: _____)

Quantity (in 1,000s twist ties), value (in dollars)					
Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
Beginning-of-period inventories (quantity) (A)					
Imports: ^{1,2}					
Quantity (B)					
Value (C)					
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption: ³					
Quantity (F)					
Value ³ (G)					
Transfers to related firms: ³					
Quantity (H)					
Value ³ (I)					
Export shipments: ⁴					
Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

¹ Please identify the foreign producers, if known: _____.

² Please identify the HTSUS codes used by your firm to import these products: _____.

³ 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.

⁴ Identify your firm's principal export markets: _____.

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

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

Reconciliation	Calendar year			January-September	
	2017	2018	2019	2019	2020
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-6b. U.S. imports from all other sources (additional detail).—Report additional detail relating to your firm's imports of twist ties from all other sources during the specified periods.

Item	Calendar Year			January-September	
	2017	2018	2019	2019	2020
Imports					
Quantity (in 1,000 twist ties) ¹	0	0	0	0	0
Quantity (pounds)					
Value (in dollars)	0	0	0	0	0
¹ Data for <i>Quantity</i> (in 1,000s twist ties) and <i>Value</i> (in dollars) will automatically populate from question II-6a.					

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

All other sources

Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
U.S. shipments:					
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
Quantity: M + P + S – D – F – H = zero ("0"), if not revise.	0	0	0	0	0
Value: O + R + U – E- G- I = zero ("0"), if not revise.	0	0	0	0	0

II-6d. **Product mix: All other sources.**--Does your firm import from sources other than China 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-7. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.

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II-8. **Measurements in your firm's books and records.**--Please indicate in what metrics your firm measures its importation 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 imported 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 imported, 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 importation. You do not have to individually measure and assess each product imported individually, 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.

Yes--All data have been provided based on information readily available in our books and records	Yes--All data have provided but some metrics were based on carefully drawn estimates to the best of our ability	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:
<input type="checkbox"/>	<input type="checkbox"/>	

II-9. **Other explanations.**--If your firm would like to further explain a response to a question in Part II 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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PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Lauren Gamache (natalia.king@usitc.gov, 202-205-2049).

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	

PRICE DATA

III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2017 of the following products your firm imported from China:

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

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

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).

During January 2017-September 2020, did your firm import from China 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"/>	Yes. --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	No. --Skip to question III-3.

III-2a. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

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

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

¹ 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.

² Pricing product definitions are provided on the first page of Part III.

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:

III-2b. **Price data checklist.**--Please check that the pricing data in question III-2a has been correctly reported.

Are the price data reported above:	v if Yes
In actual dollars (not \$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:	

III-2c. **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.

III-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"/>	

III-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"/>	

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

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

III-6. **Contract versus spot.**--Approximately what share of your firm's sales of twist ties imported from China in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

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 %

III-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for twist ties imported from China (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used: _____.				

III-8. **Lead times.**--What share of your firm's sales of twist ties imported from China 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 twist ties?

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

III-9. **Shipping information.**—

- (a) Who generally arranges the transportation to your firm's customers' locations?
 Your firm Purchaser *(check one)*
- (b) When your firm sells twist ties imported from China, from where are they shipped?
 Point of importation Storage facility *(check one)*
- (c) Indicate the approximate percentage of your firm's sales of twist ties imported from China that are delivered the following distances from your firm's U.S. point of shipment.

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

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

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

III-11. **Inland transportation costs.**—What is the approximate percentage of the cost of twist ties imported from China that is accounted for by U.S. inland transportation costs? _____ percent.

III-12. **End uses.**--List the end uses of the twist ties that your firm imports. 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 %

III-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"/>	

III-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"/>	

III-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.
<input type="checkbox"/>	<input type="checkbox"/>	

III-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?

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

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

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

III-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.)?

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

III-18. **Raw materials.**—

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

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for twist ties.
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?

Factor	Overall Increase	No change	Overall Decrease	Fluctuate with no clear trend	Explanation
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?

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

III-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?

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

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 301 affected each factor of the twist ties market in the United States.
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"/>	

III-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		
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:		

III-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		
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:		

III-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.

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

III-23. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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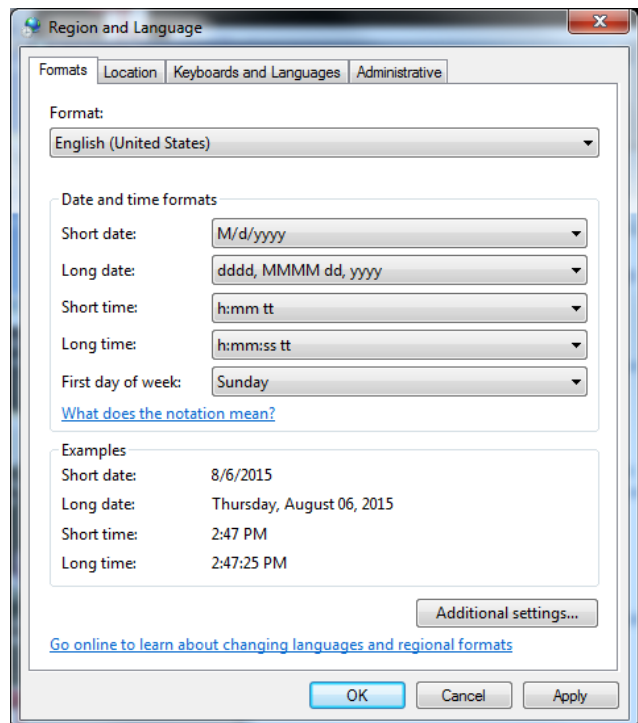
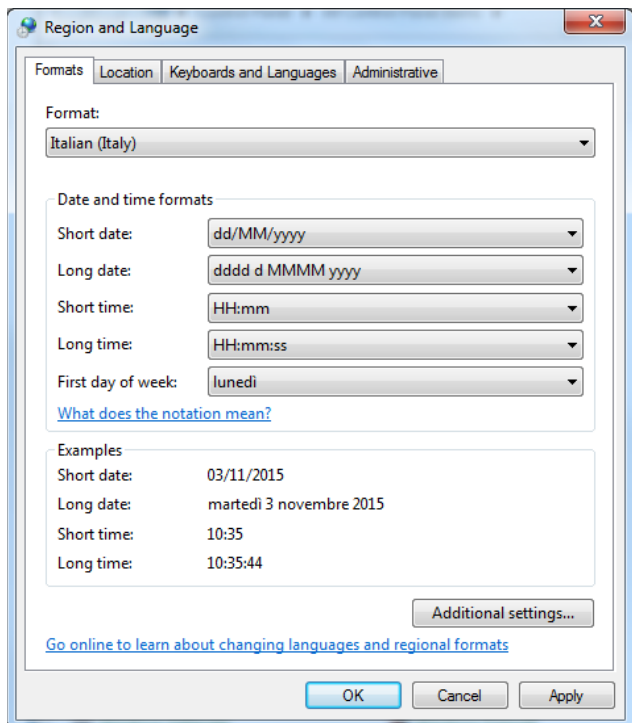
Correcting Valid number error messages.--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form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

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

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

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

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



HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

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

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

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