U.S. IMPORTERS' QUESTIONNAIRE

DIFLUOROMETHANE (R-32) FROM CHINA

This questionnaire must be received by the Commission by November 6, 2020

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 antidumping investigation concerning difluoromethane ("R-32") from China (Inv. No. 731-TA-1472 (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 _____

City			State		_ Zip (Code				_
Website										_
Has your firm	imported R-3	2 (as defined on i	next page) from a	ny cou	intry at	any time	e since Ja	nuary 1,	2017?	
□ NO	(Sign the cer	ification below and	d promptly return o	nly this	page of	f the ques	tionnaire	to the Co	mmission))
☐ YES	(Complete al	parts of the questi	ionnaire, and returr	the en	ntire que	estionnair	e to the C	ommissio	n)	
_			national Trade C v/oinv/. (PIN: D		ission	Drop Bo	x by clic	king on	the	
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PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to a petition filed on January 23, 2020, by Arkema Inc., King of Prussia, Pennsylvania. 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 dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2020/difluoromethane r 32 china/final.htm.

<u>Difluoromethane ("R-32")</u> covered by this investigation is difluoromethane ("R-32") or its chemical equivalent, regardless of form, type or purity level. R-32 has the Chemical Abstracts Service ("CAS") registry number of 75-10-5 and the chemical formula CH_2F_2 . R-32 is also referred to as difluoromethane, HFC-32, FC-32, Freon-32, methylene difluoride, methylene fluoride, carbon fluoride hydride, halocarbon R32, fluorocarbon R32, and UN 3252.

Subject merchandise also includes R-32 and unpurified R-32 that are processed in a third country or the United States, including, but not limited to, purifying or any other processing that would not otherwise remove the merchandise from the scope of this investigation if performed in the country of manufacture of the in-scope R-32. R-32 that has been blended with products other than pentafluoroethane (R-125) is included within this scope if such blends contain 85% or more by volume on an actual percentage basis of R-32. In addition, R-32 that has been blended with any amount of R-125 is included within this scope if such blends contain more than 52% by volume on an actual percentage basis ofR-32. Whether R-32 is blended with R-125 or other products, only the R-32 component of the mixture is covered by the scope of these orders. The scope also includes R-32 that is commingled with R-32 from sources not subject to this investigation. Only the subject component of such commingled products is covered by the scope of this order.

Excluded is merchandise covered by the scope of the antidumping order on Hydrofluorocarbon Blends from the People's Republic of China. See Hydrofluorocarbon Blends from the People's Republic of China, 81 Fed. Reg. 55436 (Aug. 19, 2016).

R-32 is currently imported under statistical reporting number 2903.39.2035 of the Harmonized Tariff Schedule of the United States (HTSUS). It may also be imported under HTSUS statistical reporting numbers 2903.39.2045 or 3824.78.0020. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing R-32 (as defined above) into the United States from a foreign manufacturer or through its selling agent.

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

<u>Confidentiality</u>.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

<u>Verification</u>.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

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 Ahdia Bavari (202-205-3191, ahdia.bavari@usitc.gov).

<u>D-GRIDS tool.</u>--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (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.

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

Hours	Dollars

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

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

Establishments cove questionnaire.	eredProvide the name and address of establishment(s) covered by this
	ch facility of a firm involved in the <u>importation</u> of R-32, including auxiliary conjunction with (whether or not physically separate from) such facilities
	nation If your firm or parent firm is publicly traded, please specify the trading symbol:
stock exchange and t	
stock exchange and t	trading symbol: f your firm or parent firm is represented by external counsel in relation to

Firm name	Country	Extent of ownership (percent)

Yes--List the following information, relating to the ultimate parent/owner.

No Yes-	-List the following information.	
Firm name	Country	Affiliation
engaged in the product	es your firm have any related firms, on of R-32? -List the following information.	either domestic or foreign, t
engaged in the product	on of R-32?	either domestic or foreign, t Affiliation
engaged in the product	on of R-32? -List the following information.	
engaged in the product	on of R-32? -List the following information.	
engaged in the product	on of R-32? -List the following information.	
engaged in the product	on of R-32? -List the following information.	

I-6.	Importing operationsPlease indicate the nature of your firm's importing operations on R-32
	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

I-7. <u>Consignee</u>.--If your firm is an importer of record of R-32 but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

I-8. <u>FTZ, TIB, or bonded warehouses</u>.--Please indicate whether your firm enters R-32 into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports R-32 under the TIB (temporary importation under bond) program.

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

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

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

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

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

No	Yes	If yes, Yes-Please specify.

Telephone

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Ahdia Bavari (202-205-3191, ahdia.bavari@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 sta	Commission staff may contact that individual regarding the confidential information submitted				
	in part II.	,				
	Name					
	Title					
	Fmail					

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the importation of R-32 since January 1, 2017.

		(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)
	Office/warehouse openings	
	Office/warehouse closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or importation curtailments	
	Revised labor agreements	
	Other (e.g., technology)	

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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 sales relating to R-
	32?

supply chain impa		If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) importation and sales impact, and (c) employment impact of the COVID-19 pandemic.

II-3.	Arranged importsHas your firm imported or arranged for the importation of R-32 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.

		Peri		
Source	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sept 2021
	Quantity (in short tons)			
China				
All other sources				

II-4.	Reasons for importing if producerIf your firm also produces R-32 in the United States, please
	indicate the reasons for importing this product. If your firm's reasons differ by source, please
	elaborate

Definitions

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

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

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

"Commercial U.S. shipments"— Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. This excludes commercial arms-length transactions that involve, at least in part, non-monetary "in kind" transactions (a.k.a., swap transactions). 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.

"Swaps" – Shipments made commercially in arms-length transactions that involve, at least in part, non-monetary "in kind" transfer of product.

"Related firm" —A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

"Export shipments"— Shipments to destinations outside the United States, including shipments to related firms.

"Inventories" -- Finished goods inventory, not raw materials or work in progress.

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

II-5a. <u>U.S. imports from China</u>.—Report your firm's imports and your firm's shipments and inventories of R-32 imported from China by your firm during the specified periods.

China

	Quantity (in sho	ort tons), value	(in \$1,000)		
	Calendar years			January-S	eptember
Item	2017	2018	2019	2019	2020
Beginning-of-period inventories (quantity) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption: ² Quantity (F)					
Value² (G)					
Transfers to related firms: ² Quantity (H)					
Value² (I)					
Swaps: ³ Quantity (J)					
Value⁴ (K)					
Export shipments: ⁵ Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					
¹ Please identify the foreign producer ² Internal consumption and transfers basis for valuing these transactions in you the data provided above in this table sh ³ Please (1) identify the companies frogoods or services in-kind received pursuin the swap transactions in each calenda ⁴ Report the value inclusive of the "in the swap transactions. ⁵ Identify your firm's principal export	to related firms rour records, pleasould be based on om which your firent to your swaper year: kind" value of ar	se specify that ba fair market value on receives the g transactions, an	sis (e.g., cost, cos e. oods or services i d (3) quantify any	n-kind, (2) indicat n net monetary ex	However, e the particular change included

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

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

	Calendar years			January-September	
Reconciliation	2017	2018	2019	2019	2020
A + B - D - F - H - J - L - N = 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>Channels of distribution: China</u>.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, transfers to related firms, and swaps) of imports from China by channel of distribution during the specified periods.

China

	Qı	uantity (<i>in short</i>	tons)		
		Calendar years		January-S	eptember
Item	2017	2018	2019	2019	2020
U.S. shipments: to Distributors and service companies (O)					
to HFC component blenders (P)					
to OEMs and other non- blender end users (Q)					

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H, and J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years January-Septem				eptember
Reconciliation item	2017	2018	2019	2019	2020
O + P + Q - D - F - H - J = zero ("0"), if					
not revise.	0	0	0	0	0

II-6a. <u>Imports from all other sources</u>.—Report your firm's imports and your firm's shipments and inventories of R-32 imported from all other sources (i.e., sources other than China) by your firm during the specified periods.

All other sources

(list sources:	·
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	Quantity (in sho	ort tons), value	(in \$1,000)				
		Calendar years			January-September		
Item	2017	2018	2019	2019	2020		
Beginning-of-period inventories (quantity) (A)							
Imports: ¹ Quantity (B)							
Value (C)							
U.S. shipments: Commercial shipments: Quantity (D)							
Value (E)							
Internal consumption: ² Quantity (F)							
Value² (G)							
Transfers to related firms: ² Quantity (H)							
Value² (I)							
Swaps: ³ Quantity (J)							
Value⁴ (K)							
Export shipments: ⁵ Quantity (L)							
Value (M)							
End-of-period inventories (quantity) (N)							
¹ Please identify the foreign producer ² Internal consumption and transfers basis for valuing these transactions in you the data provided above in this table sh ³ Please (1) identify the companies for goods or services in-kind received pursuin in the swap transactions in each calendate ⁴ Report the value inclusive of the "in the swap transactions. ⁵ Identify your firm's principal export	to related firms rour records, pleas ould be based on om which your firmant to your swap ar year: kind" value of ar	must be valued at se specify that ba fair market value m receives the go transactions, and	sis (e.g., cost, cos e. oods or services i d (3) quantify an	st plus, etc.): in-kind, (2) indicatory except monetary except	However, e the particular change included		

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

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

	Calendar years			January-September	
Reconciliation	2017	2018	2019	2019	2020
A + B - D - F - H - J - L - N = 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>Channels of distribution: All other sources</u>.-- Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, transfers to related firms, and swaps) of imports from all other sources by channel of distribution during the specified periods.

All other sources

	Qı	uantity (in short t	tons)		
		Calendar years		January-S	eptember
Item	2017	2018	2019	2019	2020
U.S. shipments: to Distributors and service companies (O)					
to HFC component blenders (P)					
to OEMs and other non- blender end users (Q)					

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H, and J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar years January-Septem				eptember
Reconciliation item	2017	2018	2019	2019	2020
O + P + Q - D - F - H - J = zero ("0"), if					
not revise.	0	0	0	0	0

<u>Transfers to related firms</u> If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.
Other explanationsIf your firm would like to further explain a response to a question in Part 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.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Tyler Martin (202-205-3198, tyler.martin@usitc.gov).

III-1. <u>Contact information.</u>--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	

PRICE DATA

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

Product 1.—R-32, sold in bulk to blenders

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> <u>point of shipment</u> 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)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question III-3.

III-2a. <u>Price data</u>.--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm to blenders.

China

Report data in **short tons** and **actual dollars** (not 1,000s).

(Qualitity	in short tons, value in doll				
	Product 1				
Period of shipment	Quantity	Value			
017:					
January-March					
April-June					
July-September					
October-December					
018:					
January-March					
April-June					
July-September					
October-December					
019:					
January-March					
April-June					
July-September					
October-December					
)20:					
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.

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:

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

Yes

No

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

	Are the price data reported above:	√ if Yes
	In actual dollars (not \$1,000) and short tons?	
	F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	
	Net of all discounts and rebates?	
	Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	
	Have returns credited to the quarter in which the sale occurred?	
]
C	Less than reported commercial shipments in part II in each year? Pricing data methodologyPlease describe the method and the kinds of documents.	ints/records
c.	Less than reported commercial shipments in part II in each year? Pricing data methodologyPlease describe the method and the kinds of docume that were used to compile your price data.	nts/records

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.

If yes, describe the quarters and impact on the pricing data

PURCHASE COST DATA

III-3.	impor from (uestion requests quarterly quantity and landed-duty paid value data for your firm's ts of the products defined above (on the first page of part III) for internal consumption China since January 1, 2017. These are imports that your firm does not resell as R-32. g January 2017-September 2020, did your firm import any of the products listed on the age of part III from China for internal consumption?
		YesPlease complete the following table(s) as appropriate.
		NoSkin to question III-4

III-3a. <u>Imports for internal consumption and blending.</u>—Report below the import data¹ for pricing products² imported from China for <u>your own firm's domestic blending operations</u>. These are imports that your firm does not resell as R-32.

Please note that values should be <u>landed</u>, <u>duty-paid</u> (<u>LDP</u>) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

China

Report data in *short tons* and actual dollars (not 1,000s).

Proc Quantity	luct 1 LDP Value
Quantity	LDP Value

¹ LDP value (i.e., landed duty-paid 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). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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:

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

Complete these questions only if your firm reported data on the previous page, otherwise skip to question III-4.

The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import R-32 rather than purchase from a U.S. producer or importer of R-32.

III-3b.	Additional costs for v	your firm's imports of	R-32 for v	our firm's internal use.—

U w	Did your firm incur any additional costs by importing R-32 rather than purchasing from a U.S. producer or importer (e.g., logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)?				
	No—Skip to question	on III-3c.	es—Please answer parts ii, iii, and iv.		
cı p a ir	Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing R-32 rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do NOT include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) percent compared to LDP value.				
e a	Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for R-32 either directly or indirectly, and that are not already included in the LDP value. Do NOT report costs that your firm would incur when purchasing R-32 from a U.S. producer or importer.)				
re	eport costs that your f	• •	· · · · · · · · · · · · · · · · · · ·		
re	eport costs that your f	firm would incur when	· · · · · · · · · · · · · · · · · · ·		
re	eport costs that your f	firm would incur when Estimated	· · · · · · · · · · · · · · · · · · ·		
re	eport costs that your f	Estimated percentage	· · · · · · · · · · · · · · · · · · ·		
re	eport costs that your f	Estimated percentage compared to LDP	purchasing R-32 from a U.S. producer or		
re	eport costs that your f	Estimated percentage	· · · · · · · · · · · · · · · · · · ·		
re	eport costs that your f	Estimated percentage compared to LDP value (percent)	purchasing R-32 from a U.S. producer or		
re	eport costs that your f	Estimated percentage compared to LDP value (percent)	purchasing R-32 from a U.S. producer or		
re	eport costs that your f	Estimated percentage compared to LDP value (percent) % %	purchasing R-32 from a U.S. producer or		
re ir	costs Costs riefly describe how your formula to the control of the costs	Estimated percentage compared to LDP value (percent) % % % cour firm's additional courtiers	Explanation Explanation Sts (beyond the purchase price) by itional costs your firm incurs when		

11 C	Importors'	Questionnaire	D 22	/Einal
U.S.	. Importers	Questionnaire	- K-32	(Final)

III-3c.	Decision basis. —To which source(s) does your firm compare costs in determining whether or
	not to import R-32? Check all that apply.

U.S. importers	U.S. producers	Neither U.S. importers nor U.S. producers

III-3d. Benefits of importing R-32.

i.	Briefly identify the benefits of importing R-32 instead of purchasing R-32 from a U.S.
	importer or from a U.S. producer.

<u>- </u>		

ii. Is it your firm's experience that the R-32 your firm imported from China are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

Imports are priced lower when	No	Yes (If yes to either, please answer parts iii and iv.)
Not including the additional costs above		
Including the additional costs above		

iii. Please estimate your firm's savings by importing R-32 instead of purchasing from a U.S. producer or U.S. importer since January 1, 2017 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3b).

Factors	Estimated savings (percent of purchase price from U.S. importer/producer)	
U.S. producer	%	
U.S. importer	%	

iv. What methods or experience did you base the estimates in III-3diii (i.e. based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

Reported estimates in III-3diii based on	√ if Yes
Previous company transactions	
Market research	
Other – Please explain	

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U.S.	minomers	Questionnaire -	· K-32 (Fillal)

III-3e.	<u>Pricing data subject to litigation</u> Are any of the landed, duty-paid cost data reported above
	subject to ongoing litigation specific to R-32 non-payment? Please list which quarters would be
	impacted by such litigation.

	No	Yes	If yes, describe the quarters and impact on the pricing data
-			

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.

If your firm imports R-32 for internal use only, please skip to question III-12.

III-4. **Price setting.--**How does your firm determine the prices that it charges for sales of R-32 (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
-				

III-5. <u>Discount policy</u>.--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

III-6. **Pricing terms.**--On what basis are your firm's prices of imported R-32 from China usually quoted *(check one)*?

Delivered	F.o.b.	If f.o.b., specify point

III-7. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of R-32 imported from China in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	Type of sale					
ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	Total (shoul sum to 100.0%	d o
Share of 2019 sales	%	%	%	%	0.0	%

III-8. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for R-32 imported from China (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)		
Average contract duration	No. of days		365			
Price renegotiation	Yes					
(during contract period)	No					
_	Quantity					
Fixed quantity and/or price	Price					
ana, or price	Both					
Indexed to raw	Yes					
material costs ¹	No					
Not applicab	le					
	¹ Please identify the indexes used:					

III-9. <u>Lead times.</u>—What is your firm's share of sales of R-32 imported from China from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of R-32?

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-10.	Shipping	information.—
---------	----------	---------------

(a)	Who generally arranges the transportation to your firm's customers' locations? Your firm Purchaser (check one)
(b)	When your firm sells R-32 imported from China, from where is it shipped? Point of importation Storage facility (check one)
'c)	Indicate the approximate percentage of your firm's sales of R-32 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-11. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold R-32 imported from subject countries since January 1, 2017 (check all that apply)?

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

III-12.	<u>Inland transportation costs.</u> —What is the approximate percentage of the	e cost of R-32 imported
	from China that is accounted for by U.S. inland transportation costs?	percent.

Out-of-scope product

R-22

Other:

No

Yes

III-13. <u>End uses.--</u>List the end uses of the R-32 that your firm imports. For each end-use product, what percentage of the <u>total cost</u> is accounted for by R-32 and other inputs?

	Share of total cost	Total	
			(should sum to
End-use product	R-32	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

		F	nd use in v	which this	На		anges in the price of this sub affected the price for R-32?	ostitute
	Substitute		substitute		No	Yes	Explanation	
1.								
2.								
3.								
4	5 - 5 1 -							1
III-1		wn) for R-3	2 has char	nged since J	anuary 1	1, 201	States and outside of the Uni 7. Explain any trends and de mand.	
	States (if kno	wn) for R-3	2 has char	nged since J	anuary 1	1, 201 in de nte wi	7. Explain any trends and demand.	escribe
ľ	States (if kno the principal	own) for R-3 factors that	2 has char t have affe No	nged since Jected these Overall	anuary in changes	1, 201 in de nte wi	7. Explain any trends and demand.	escribe

Any impact on R-32?

Explanation of impact

U.S. Im	porters' Qu	ıestionnaiı	re - R-32 (Final)	Page 2
III-17.		_	lave there been ar nce January 1, 201	ny significant changes in the product range, product mix or .7?
	No	Yes	If yes, please des	cribe.
III-18.		R-32 mark	et subject to busir	ness cycles (other than general economy-wide conditions) tition distinctive to R-32?
	Check all	that apply	/.	Please describe.
		No		Skip to question III-19.
	Yes-Business cycles (e.g. seasonal business)			
			r distinctive s of competition	
	-		e been any change ary 1, 2017?	es in the business cycles or conditions of competition for
	No	Yes	If yes, describe	e.
III-19.	January 1, placing cu or renew o	2017 (exa stomers o existing cu	mples include not nallocation or "co	used, declined, or been unable to supply R-32 since selling product due to prioritizing internal blending, ntrolled order entry," declining to accept new customers g less than the quantity promised, being unable to meet
	No	Yes	If yes, please des	cribe.

III-20. Raw materials.--How have R-32 raw material prices changed since January 1, 2017?

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 R-32.

III-21. <u>Interchangeability.--</u>ls R-32 produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

0 = *no familiarity* with products from a specified country-pair

Country-pair	China	Other countries			
United States					
China					
For any country-pair producing R-32 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-22. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between R-32 produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

0 = no familiarity with products from a specified country-pair

Country-pair	China	Other countries		
United States				
China				
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of R-32, identify the country-pair and report the advantages or disadvantages imparted by such factors:				

III-23. <u>Customer identification.</u>--List the names and contact information for your firm's 10 largest U.S. customers for R-32 since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of R-32 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-24.	Other explanationsIf your firm would like to further explain a response to a question in Part III			
	for which a narrative response box was not provided, please note the question number and the			
	explanation in the space provided below. Please also use this space to highlight any issues your			
	firm had in providing the data in this section, including but not limited to technical issues with			
	the MS Word questionnaire.			

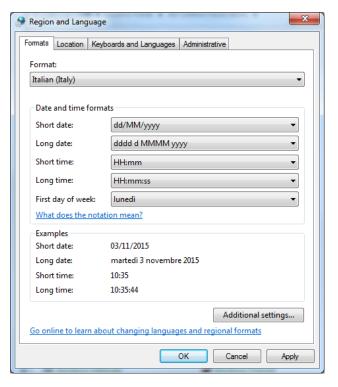
Correcting Valid number error messages.—If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form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

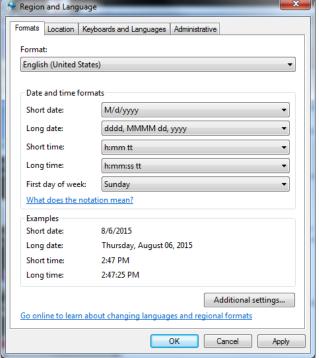
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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

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

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





HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

https://www.usitc.gov/investigations/701731/2020/difluoromethane r 32 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.

• <u>Upload via Secure Drop Box.</u>—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: DILFU

• E-mail.—E-mail the MS Word questionnaire to ahdia.bavari@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.

<u>Parties to this proceeding</u>.—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.