U.S. IMPORTERS' QUESTIONNAIRE

CORROSION INHIBITORS FROM CHINA

This questionnaire must be received by the Commission by <u>November 2, 2020</u> See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping and countervailing duty investigations concerning corrosion inhibitors from China (Inv. Nos. 701-TA-638 and 731-TA-1473 (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 f	firm			
Address _				
City		State	Zip Code	
Website _				
Has your fir January 1, 2	rm imported corrosion inhibitors (as de 2017?	efined on next	page) from any country at any	time since
	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)			
YES	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)			
Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: CIFC)				

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.—<u>GENERAL INFORMATION</u>

Background.--_This proceeding was instituted in response to petitions filed on February 5, 2020, by Wincom Incorporated, Blue Ash, Ohio. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2020/corrosion_inhibitors_china/preliminary.htm.

<u>Corrosion inhibitors</u> covered by these investigations is tolyltriazole and benzotriazole. This includes tolyltriazole and benzotriazole of all grades and forms, including their sodium salt forms. Tolyltriazole is technically known as Tolyltriazole IUPAC 4,5 methylbenzotriazole. It can also be identified as 4,5 methyl benzotriazole, tolutriazole, TTA, and TTZ.

Benzotriazole is technically known as IUPAC 1,2,3-Benzotriazole. It can also beidentified as 1,2,3 Benzotriazole, 1,2-Aminozophenylene, 1H-Benzotriazole, and BTA.

All forms of tolyltriazole and benzotriazole, including but not limited to flakes, granules, pellets, prills, needles, powder, or liquids, are included within the scope of these petitions.

The scope includes tolyltriazole/sodium tolyltriazole and benzotriazole/sodium benzotriazole that are combined or mixed with other products. For such combined products, only the tolyltriazole/sodium tolyltriazole and benzotriazole/sodium benzotriazole component is covered by the scope of these investigations. Tolyltriazole and sodium tolyltriazole that have been combined with other products is included within the scope, regardless of whether the combining occurs in third countries.

Tolyltriazole, sodium tolyltriazole, benzotriazole and sodium benzotriazole that is otherwise subject to these investigations is not excluded when commingled with tolyltriazole, sodium tolyltriazole, benzotriazole, or sodium benzotriazole from sources not subject to these investigations. Only the subject merchandise component of such commingled products is covered by the scope of these investigations.

A combination or mixture is excluded from this investigation if the total tolyltriazole or benzotriazole component of the combination or mixture (regardless of the source or sources) comprises less than 5 percent of the combination or mixture, on a dry weight basis.

Notwithstanding the foregoing language, a tolyltriazole or benzotriazole combination or mixture that is transformed through a chemical reaction into another product, such that, for example, the tolyltriazole or benzotriazole can no longer be separated from the other products through a distillation or other process is excluded from this investigation.

Tolyltriazole has the Chemical Abstracts Service ("CAS") registry number 29385–43–1. Tolyltriazole is classified under Harmonized Tariff Schedule of the United States ("HTSUS") subheading 2933.99.82.20.

Sodium Tolyltriazole has the CAS registry number 64665–57–2 and is classified under HTSUS subheading 2933.99.82.90. Benzotriazole has the CAS registry number #95–14–7 and is classified under HTSUS subheading 2933.99.82.10.

Sodium Benzotriazole has the CAS registry number 15217–42–2. Sodium Benzotriazole is classified under HTSUS subheading 2933.99.82.90.

Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.

Note: All references to sodium tolytriazole and sodium benzotriazole are referred to as liquid tolytriazole and liquid benzotriazole or liquid TTA or liquid BTA.

<u>Crude TTA in liquid form</u> is the form of TTA that is produced when ortho toluene diamene and sodium nitrite are reacted under the requisite pressure and temperature conditions and subsequently cooled. Crude TTA in liquid form typically has a Gardner color value > 18, or is not otherwise capable of being rated using the Gardner color scale. Color impurities present within this product intermediate are not removed.

<u>Crude TTA in solid form</u> is the form of TTA that is produced when orthotoluene diamene and sodium nitrite are reacted under the requisite pressure and temperature conditions and subsequently cooled. It is then subjected to an acidification process and processed into the solid form. Crude TTA in solid form is brown to black in color. It can be made into a sodium salt solution that can be analyzed on the Gardner color scale. If analyzed as a liquid, Crude TTA in solid form typically has a Gardner color value > 18, or is not otherwise capable of being rated using the Gardner color scale.

Purified TTA in liquid form is the form of TTA that is produced by processing crude TTA in a purification process that greatly reduces impurities in the crude TTA and increases the purity level of the liquid TTA. Purified TTA in liquid form typically has a Gardner color scale value lower than or equal to 12.

Purified TTA in solid form is the form of TTA that is produced by processing crude TTA in a purification process that greatly reduces the impurities in the crude TTA and increases the purity level of the TTA. It is then subjected to a process that produces the solid form of the product. The purified solid TTA is typically light tan/yellow to off-white in color. If processed into a liquid form, it typically would have a Gardner color scale rating lower than or equal to 12.

<u>Crude BTA in liquid form</u> is the form of BTA that is produced when orthophenylene diamene and sodium nitrite are reacted under the requisite pressure and temperature conditions and subsequently cooled. Crude BTA in liquid form is dark in color. Color impurities present within this prospective product intermediate are not removed.

<u>Crude BTA in solid form</u> is the form of BTA that is produced when orthophenylene diamene and sodium nitrite are reacted under the requisite pressure and temperature conditions and subsequently cooled. It is then subjected to an acidification process and processed into the solid form. Crude BTA in solid form is tan to dark in color.

Purified BTA in liquid form is the form of BTA that is produced by processing crude BTA in a purification process that greatly reduces the impurities in the crude BTA and increases the purity level of the BTA. Purified BTA in liquid form typically has a Gardner color scale value lower than 12.

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Purified BTA in solid form is the form of BTA that is produced by processing crude BTA in a purification process that greatly reduces the impurities in the crude BTA and increases the purity level of the BTA. It is then subjected to a process that produces the solid form of the product. The purified solid BTA is typically light tan/yellow to off-white in color and, if put in a liquid form, would typically have a Gardner color scale rating lower than or equal to 12.

<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.

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.

<u>Release of information</u>.--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.

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 <u>optional</u>. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

I-1. **OMB 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. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>importation</u> of corrosion inhibitors, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

- I-2b. <u>Stock symbol information.</u>-- 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):	

Contains Business Proprietary Information

U.S. Importers' Questionnaire - Corrosion Inhibitors from China (Final)

- I-3. <u>**Ownership**</u>.--Is your firm owned, in whole or in part, by any other firm?
 - No Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (<i>percent</i>)

- I-4. **<u>Related importers/exporters</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in importing corrosion inhibitors from China into the United States or that are engaged in exporting corrosion inhibitors from China to the United States?
 - No Yes--List the following information.

Firm name	Country	Affiliation

I-5. **<u>Related producers</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of corrosion inhibitors?

No

Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Importing operations**.--Please indicate the nature of your firm's importing operations on corrosion inhibitors. More than one answer may be applicable.

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

I-7. <u>**Consignee**</u>.--If your firm is an importer of record of corrosion inhibitors 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 corrosion inhibitors into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports corrosion inhibitors 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.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Lawrence Jones (202-205-3358, <u>Lawrence.jones@usitc.gov</u>). Supply all data requested on a <u>calendar-year</u> basis.

II-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 II.

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of corrosion inhibitors since January 1, 2017.

(cheo	ck as many as appropriate)	(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)	

II-3a. <u>Arranged imports</u>.--Has your firm imported or arranged for the importation of corrosion inhibitors for delivery after June 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.

	Period						
Source	Jul-Sept 2020	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021			
	Quantity (in pounds dry weight)						
China							
All other sources							

II-3b. Imports in the 12 month period preceding the petition.--Has your firm imported corrosion inhibitors from any source between February 2019 through January 2020? (i.e., the last eleven months in 2019 and first month in 2020 combined)

No	Yes	
		If yes, report the quantity of such import below by source.

Quantity (in pounds of	lry weight)
Source	February 2019 through January 2020
China	
All other sources	

II-4. **<u>Reasons for importing if producer</u>**.--If your firm also produces corrosion inhibitors in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

Definitions

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

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

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

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

"Internal consumption" – 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>U.S. imports from China</u>.–Report your firm's imports and your firm's shipments and inventories of corrosion inhibitors imported from China by your firm during the specified periods.

China

		Calendar year		January-June	
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)					
Value ² (G)					
Transfers to related firms: ² Quantity (H)					
Value ² (I)					
Export shipments: ³ Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

² 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.

³ Identify your firm's principal export markets: _____

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

		Calendar years	S	Janua	ry-June
Reconciliation	2017	2018	2019	2019	2020
A + B - D - F - H - J - L = should equal					
zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields ab	ove are returr	ning values oth	ner than zero (i	i.e., "0") but ai	re nonetheless
accurate:					

II-5b. **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 by channel of distribution during the specified periods.

China

ltem		January-June				
	2017	2018	2019	2019	2020	
	Quantity (in pounds dry weight)					
U.S. shipments: to Distributors (M)						
to Processors (N)						
to End users (O)						

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

		Calendar years		Januar	y-June
Reconciliation item	2017	2018	2019	2019	2020
M + N + O – D - F - H = zero ("0"), if					
not revise.	0	0	0	0	0

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

Quantity (<i>in pounds dry weight</i>); Gross weight (<i>in pounds total weight</i>); value (<i>in dollars</i>)								
Quantity (in pounds dry	weight); Gross		unds total weig					
		Calendar year	1	January				
ltem	2017	2018	2019	2019	2020			
U.S. shipments: Crude <u>TTA</u> : In solid form: Quantity (P)								
Value (Q)								
In liquid form: Quantity (R)								
Gross weight (S)					1			
Value (T)					1			
Purified <u>TTA</u> : In solid form: Quantity (U)								
Value (V)								
In liquid form: Quantity (W)								
Gross weight (X)								
Value (Y)								
Crude <u>BTA</u> : In solid form: Quantity (Z) Value (AA)								
					Ţ.			
In liquid form: Quantity (AB)		-	-					
Gross weight (AC)		-						
Value (AD)					1			
Purified <u>BTA</u> : In solid form: Quantity (AE)								
Value (AF)								
In liquid form: Quantity (AG)								
Gross weight (AI)								
Value (AJ)								

CHINA

II-5c. U.S. shipments by type and form.--Continued.

<u>RECONCILIATION OF US SHIPMENTS BY TYPE AND FORM</u>--Please ensure that the quantities and values reported for U.S. shipments by type (i.e., lines P through AJ) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period from question II-5c. 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 to June		
Reconciliation	2017	2018	2019	2019	2020	
Quantity: P + R + U + W + Z+AB + AE + AG - D - F - H =						
zero ("0"), if not revise.	0	0	0	0	0	
Value: $Q + T + V + Y + AA + AD$ + AF + AI - E - G - I = zero						
("0"), if not revise.	0	0	0	0	0	

II-6a. Imports from all other sources.-Report your firm's imports and your firm's shipments and inventories of corrosion inhibitors imported from all other sources (i.e., sources other than China) by your firm during the specified periods.

All other sources

(list sources: _____

Quan	tity (<i>in pounds</i>	dry weight), va	lue (<i>in dollars</i>)		
		Calendar years		January-June	
Item	2017	2018	2019	2019	2020
Beginning-of-period inventories (<i>quantity</i>) (A)					
Imports: ¹ Quantity (B)					
Value (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption: ² Quantity (F)					
Value ² (G)					
Transfers to related firms: ² Quantity (H)					
Value ² (I)					
Export shipments: ³ Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					

Please identify the foreign producers, if known:

² 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.

³ Identify your firm's principal export markets: _

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

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

II-6b. **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

		Calendar years			y-June		
Item	2017	2018	2019	2019	2020		
		Quantity (in pounds dry weight)					
U.S. shipments: to Distributors (M)							
to Processors (N)							
to End users (O)							

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

	Calendar years January-June				y-June
Reconciliation item	2017	2018	2019	2019	2020
M + N + O – D - F - H = zero ("0"), if					
not revise.	0	0	0	0	0

II-6c. <u>U.S. shipments by type of imports from all other sources</u>.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other source by product type during the specified periods.

ALL OTHER SOURCES

Quantity (in pounds dry	weight); Gross	s weight (<i>in pou</i>	unds total weig	ht); value (in d	ollars)
		Calendar years		January	to June
ltem	2017	2018	2019	2019	2020
U.S. shipments:					
Crude <u>TTA</u> :					
In solid form:					
Quantity (P)					
Value (Q)					
In liquid form:					
Quantity (R)					
Gross weight (S)					
Value (T)					
Purified <u>TTA</u> :					
In solid form:					
Quantity (U)					
Value (V)					
In liquid form:					
Quantity (W)					
Gross weight (X)					
Value (Y)					
Crude <u>BTA</u> :					
In solid form:					
Quantity (Z)					
Value (AA)					
In liquid form:					
Quantity (AB)					
Gross weight (AC)					
Value (AD)					
Purified <u>BTA</u> :					
In solid form:					
Quantity (AE)					
Value (AF)					
In liquid form:					
Quantity (AG)					
Gross weight (AI)					
Value (AJ)					

II-6c. U.S. shipments by type and form.--Continued.

<u>RECONCILIATION OF US SHIPMENTS BY TYPE AND FORM</u>--Please ensure that the quantities and values reported for U.S. shipments by type (i.e., lines P through AJ) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period from question II-6c. 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 to June		
Reconciliation	2017	2018	2019	2019	2020
Quantity: P + R + U + W + Z+AB + AE + AG - D - F - H =					
zero ("0"), if not revise.	0	0	0	0	0
Value: $Q + T + V + Y + AA + AD$ + AF + AI - E - G - I = zero					
("0"), if not revise.	0	0	0	0	0

- 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.
- II-8. 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.

PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Amelia Preece (202-205-3250, <u>amelia.preece@usitc.gov</u>).

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.**—Liquid TTA in totes of 2,400 to 2,600 pounds net weight (include only refined liquid TTA)
 - **Product 2.**—Liquid TTA in drums of 450 to 550 pounds met weight (include only refined liquid TTA)

Please note that values should be <u>f.o.b., U.S. 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-June 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. **Price data**.--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

Report data in *pounds dry weight* and *actual dollars* (not 1,000s).

	(Quantity in pound	s dry weight, value i	in dollars)		
	Produ	Product 1 Pro			
Period of shipment	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					

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:

III-2b. **Price data checklist.-**-Please 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 (<i>not</i> \$1,000) and pounds dry weight?			
Weights converted to dry weight?			
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?			
Less than reported commercial shipments in part II in each year?			
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-2e. <u>Conversion factor</u>.-- Please provide the specific conversion factor that was used to convert the gross weight for liquid TTA to dry weight.

III-3. <u>Price setting</u>.--How does your firm determine the prices that it charges for sales of corrosion inhibitors (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

III-4. **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

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

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

III-6. Contract versus spot.--Approximately what share of your firm's sales of corrosion inhibitors 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	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)	Tota (shoul sum t 100.09	ld o
Share of 2019 sales	%	%	%	%	0.0	%

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- III-7. <u>Contract provisions</u>.--Please fill out the table regarding your firm's typical sales contracts for corrosion inhibitors 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	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)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicab	Not applicable			
¹ Please identify the indexes used:				

III-8. <u>Lead times</u>.--What is your firm's share of sales of corrosion inhibitors 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 corrosion inhibitors?

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 %	

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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 corrosion inhibitors 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 corrosion inhibitors 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. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold corrosion inhibitors 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.	
Midwest.–IL, 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.	
Mountains.–AZ, 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-11. <u>Inland transportation costs.</u>—What is the approximate percentage of the cost of corrosion inhibitors imported from China that is accounted for by U.S. inland transportation costs? ______ percent.

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

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

- III-13. Substitutes.--Can other products be substituted for corrosion inhibitors?
 - 🗌 No

Yes--Please fill out the table.

		End use in which this		Have changes in the price of this substitu affected the price for corrosion inhibitor		
	Substitute	substitute is used	No	Yes	Explanation	
1.						
2.						
3.						

III-14. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for corrosion inhibitors has changed since January 1, 2017. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States					
Outside the United States					

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

No	Yes	If yes, please describe.

III-16. Conditions of competition.-

(a) Is the corrosion inhibitors market subject to business cycles and/or other conditions of competition distinctive to corrosion inhibitors?

Check all that apply.		Please describe.
	No	Skip to question III-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

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

No	Yes	If yes, describe.

III-17. Supply constraints.--Has your firm refused, declined, or been unable to supply corrosion inhibitors since January 1, 2017 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

III-18. **<u>Raw materials</u>.--**How have corrosion inhibitors 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 corrosion inhibitors.

III-19. **Interchangeability.--**Are corrosion inhibitors 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		
, , , , , ,	corrosion inhibitors that is <i>someti</i> plain the factors that limit or prec	•

III-20. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between corrosion inhibitors 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 f	actors other than price <i>always</i> or	frequently are a significant

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

III-21. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for corrosion inhibitors since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of corrosion inhibitors 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-22. <u>Other explanations</u>.--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.

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.

	boards and Languages Administrative		/boards and Languages Administrative	
Format: Italian (Italy)	-	English (United State	es)	
Date and time form	ats	Date and time form	nats	
Short date:	dd/MM/yyyy	Short date:	M/d/yyyy 👻	
Long date:	dddd d MMMM уууу	Long date:	dddd, MMMM dd, уууу	
Short time:	HH:mm	Short time:	h:mm tt 🔹	
Long time:	HH:mm:ss 🔹	Long time:	h:mm:ss tt	
First day of week:	lunedì 👻	First day of week:	Sunday 🗸	
What does the nota	tion mean?	What does the nota	ation mean?	
Examples		Examples		
Short date:	03/11/2015	Short date:	8/6/2015	
Long date:	martedì 3 novembre 2015	Long date:	Thursday, August 06, 2015	
Short time:	10:35	Short time:	2:47 PM	
Long time:	10:35:44	Long time:	2:47:25 PM	
	Additional settings		Additional settings	
Go online to learn ab	out changing languages and regional formats	Go online to learn ab	out changing languages and regional formats	

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

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: CIFC

• E-mail.—E-mail the MS Word questionnaire to Lawrence.jones@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 <u>did not</u> **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.