FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

CORROSION INHIBITORS FROM CHINA

This questionnaire must be received by the Commission by November 2, 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 countervailing and antidumping 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.

Name	of firm			
Addres	ss			
Websit	te			
	or firm produced or ϵ	exported corrosion inhibitors from (China (as defined on next page) at any time since	
□NO	(Sign the cert	ification below and promptly return on	nly this page of the questionnaire to the Commission)	
YES	(Complete all	parts of the questionnaire, and return	the entire questionnaire to the Commission)	
	-	a the Commission <i>Drop Box</i> by c v/oinv/. (PIN: CIFC)	clicking on the following link:	
		CERTIFICATION	N	•
knowledge and be means of this cer information provid	elief and understand tification I also gr	d that the information submitted in cant consent for the Commission, maire and throughout this proceed	uestionnaire is complete and correct to the bes is subject to audit and verification by the Commis and its employees and contract personnel, to ding in any other import-injury proceedings condu	sion. By use the
proceeding or oth personnel (a) for a reviews, and eval	er proceedings may developing or main luations relating to	y be disclosed to and used: (i) by a taining the records of this or a rel to the programs, personnel, and o	onse to this request for information and through the Commission, its employees and Offices, and o lated proceeding, or (b) in internal investigations, operations of the Commission including under a nel, solely for cybersecurity purposes. I understand	
• •	•	te nondisclosure agreements.	ici, solely for cyneriscentisty purposess i unuclistanu	U.S.C.
contract personne	l will sign appropria		Date	U.S.C.
• •	l will sign appropria	te nondisclosure agreements.		U.S

PART I.—GENERAL INFORMATION

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.

<u>Purified TTA in liquid form</u> 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.

<u>Purified TTA in solid form</u> 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.

<u>Purified BTA in liquid form</u> 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.

<u>Purified BTA in solid form</u> 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, purchaser and/or foreign producer 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.

<u>Valid number error messages.</u>—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 Lawrence Jones (202-205-3358, lawrence.jones@usitc.gov).

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Hot	ırs	Dollars	
issues of and as lin 20 hours completi We welco reducing	concern nited as p per res ng and rev ome comr the burde	are adequately a ossible. Public reponse, including viewing the quest ments regarding ten, and any sugge	have been reviewed with market participants to ensure ddressed and that data requests are sufficient, meaning porting burden for this questionnaire is estimated to average the time for reviewing instructions, gathering data, ionnaire. The accuracy of this burden estimate, suggestions for stions for improving this questionnaire. Please attach suggestions for the Office of Investigations, USITC, 500 E St. SW,
	on, DC 20	0436.	
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Related I	hment"	Each facility of a find in the from and such facility of a find in the from and such facility of a find in the fin	irm in China involved in the production or export of ary facilities operated in conjunction with (whether or naties. Firms operating more than one establishment in Chiblishments into a single report. or any related firm produce, have the capability to produce ion inhibitors in the United States or other countries? ame the firm(s) and country below and, if U.S. produce by complete the Commission's producer questionnaire.

I-5.	<u>Stock symbol information.</u> If your firm or any of the entities reported in questions I-2 through I-4 are publicly traded in the United States, please specify the stock exchange and trading symbol (including American Depository Receipts, if applicable):
I-6.	External counsel If your firm or parent firm is represented by external counsel in relation to

this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

I-7. <u>U.S. importers</u>.--Please provide the names, contacts, telephone numbers, and e-mail addresses of the <u>FIVE</u> largest U.S. importers of your firm's corrosion inhibitors in 2019.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2019 U.S. exports (%)
1					
2					
3					
4					
5					

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.	Contact inform	nationPlease ider	ntify the responsible	individual and the	manner by which
	Commission st	taff may contact tha	at individual regardi	ng the confidential	information submitted
	in part II.				
				1	
	Name				
	Title				
	Email				
	Telephone				

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

(che	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)
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other (e.g., technology)	

II-2b.	Anticipated changes in operationsDoes your firm anticipate any changes in the character of
	its operations or organization (as noted above) relating to the production of corrosion inhibitors
	in the future?

No	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions.

II-3a. **Production using same machinery**.--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce corrosion inhibitors, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

"Overall production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-8. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-8 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"Production" -- All production in your establishment(s) in China, including production consumed internally within your firm.

II-3a. **Production using same machinery**.--**Continued**.

	Quantity (in	pounds, dry w	veight)		
	C	alendar years		January	/-June
Item	2017	2018	2019	2019	2020
Overall production capacity ¹					
Production of: Corrosion inhibitors ²	0	0	0	0	(
Other products ³					
Total production using same machinery or workers	0	0	0	0	(
-3b. Operating parameter operating paramaters	:			based on the fo	llowing
Hours per we	ek	Weeks per ye	ar		
-3c. Capacity calculationcapacity reported in II		_	•		oduction
-3d. Production constraint production capacity.	t <u>s</u> Please describe	the constrain	t(s) that set th	e limit(s) on yo	ur firm's

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
b	etween p	cribe the factors that affect your firm's ability to shift production capacity roducts (e.g., time, cost, relative price change, etc.), and the degree to which rs enhance or constrain such shifts.
represent	ed by sale	nat percentage of your firm's total sales in its most recent fiscal year was es of corrosion inhibitors? percent. nare of production in ChinaPlease estimate the percentage of total production in ChinaPlease estimate the percentage of total production.
represent	ed by sale timated sl on inhibit	es of corrosion inhibitors? percent.
Firm's est of corrosi production Firm's est the Unite	timated sloon inhibit on inhibit on in 2019 timated sl d States o	es of corrosion inhibitors? percent. nare of production in ChinaPlease estimate the percentage of total production in the country specified on the certification page accounted for by your percent.
Firm's est of corrosi production Firm's est the Unite accounte	timated slope in the slope in 2019 timated slope in the s	es of corrosion inhibitors? percent. nare of production in ChinaPlease estimate the percentage of total production in the country specified on the certification page accounted for by your percent. nare of country's exportsPlease estimate the percentage of total exports of corrosion inhibitors from the country specified on the certification page
Firm's est of corrosi production Firm's est the Unite accounte	timated slope in the slope in 2019 timated slope in the s	es of corrosion inhibitors? percent. nare of production in ChinaPlease estimate the percentage of total production in the country specified on the certification page accounted for by your percent. nare of country's exportsPlease estimate the percentage of total exports from the country specified on the certification page our firm's exports in 2019 percent. exactionsIs the corrosion inhibitors exported by your firm subject to

- II-8. <u>Trade data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of corrosion inhibitors in your establishment(s) in China during the specified periods. Do not include resales of corrosion inhibitors that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-9.
 - "Average production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).
 - "Production" -- All production in your establishment(s) in China, including production consumed internally within your firm.
 - "Shipments"--Shipments of products produced in your establishment(s) in #China. Quantities reported should be net of returns.
 - "Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within China.
 - "Home market internal consumption/transfers to related firms"--Shipments made to related firms in China, including product consumed internally by your firm.
 - **"Export shipments"**--Shipments to destinations outside of the country indicacted on page 1 (China), 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-8. <u>Trade data</u>.--*Continued*.

	C	Quantity (in	pounds, dry	vweight)			
		Actu	ıal experien	ce		Project	tions ¹
ltem	Ca	lendar year	•	January	/-June	Cale	ndar year
	2017	2018	2019	2019	2020	2020	2021
Average production capacity ² (A)							
Beginning-of-period inventories (B)							
Production (C)							
Home market shipments: Internal consumption/ transfers (D)							
Commercial shipments (E)							
Exports to the United States (F)							
Exports to all other markets ³ (G)							
Total exports (H) (should equal F+G)	0	0	0	0	0	0	0
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0	0	0
End-of-period inventories (J)							
¹ Please explain the b ² The production capa year. Please describe the in reported capacity. ³ Identify principal otl	acity reporte e methodolo 	d is based o	n operating	 ; hou			

II-8. <u>Trade data</u>.--*Continued*.

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, E, F, and G). 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.

	Actual experience					Projections ¹		
Item	Calendar year			January-June		Calendar year		
	2017	2018	2019	2019	2020	2020	2021	
B + C - D - E - F - G - J = should equal zero ("0") or								
provide an explanation.1	0	0	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-9. Exports to the United States not produced by your firm.—Report your firm's exports to the United States of corrosion inhibitors that was produced in China but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-8.

Quantity (in pounds, dry weight)							
	Actual experience Projections ¹					tions ¹	
Item	Calendar year			January-June		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
Exports of corrosion inhibitors to the United States not produced by your firm ¹							

II-10.	liquid for question gross we your fir No.	Conversion into liquid TTA/BTAAre the quantity data reported in part II properly reported in liquid form TTA/BTA? If you converted the gross weight of liquid TTA or BTA to dry weight for question II-8 and II-9, please provide the specific conversion factor that was used to convert the gross weight for liquid TTA or BTA to dry weight. Also, please indicate whether the value that your firm reported for liquid forms is based on gross weight or dry weight? NoPlease revise your questionnaire to report your firm's data in the requested measure (liquid form TTA/BTA) prior to submission to the Commission. YesPlease indicate how your firm came up with its quantity data in the requested measure (liquid form TTA/BTA).						
	Method			Description of methodology				
			Firm's records maintained in liquid TTA/BTA	Not applicable				
			Firm specific conversion factor or estimates based on specific products produced					
			Other					
II-11.	for whi explana firm ha	ch a na ation in d in pro	lanationsIf your firm would like to further explain a response to a question in Part II a narrative box was not provided, please note the question number and the on in the space provided below. Please also use this space to highlight any issues your in providing the data in this section, including but not limited to technical issues with ord questionnaire.					

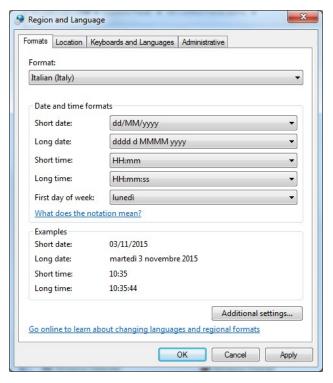
Correcting Valid number error messages. --If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form 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.

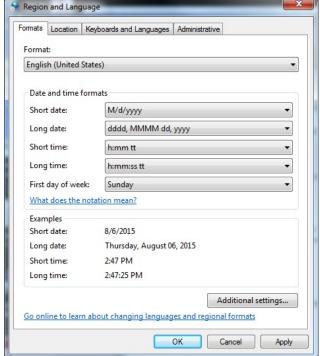
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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 USITC foreign producer questionnaire form. 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/corrosion inhibitors china/preliminary.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: CIFC

• E-mail.—E-mail your 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 did not produce or export 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, you are 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.