

## U.S. IMPORTERS' QUESTIONNAIRE

### UTILITY SCALE WIND TOWERS FROM INDIA, MALAYSIA, AND SPAIN

This questionnaire must be received by the Commission by **October 14, 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 duty and antidumping investigations concerning wind towers from India, Malaysia, and Spain (inv. Nos. 701-TA-660-661 and 731-TA-1543-1545 (Preliminary)). 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)).

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>Website _____</p> <p>Has your firm imported wind towers (as defined on next page) from any country at any time since January 1, 2017?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return <b>only</b> this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> <b>YES</b> (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)</p> <p>Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a>. (PIN: <b>WIND</b>)</p>
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#### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.*

*I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.*

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**PART I.—GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to petitions filed on September 30, 2020, by the Wind Tower Trade Coalition (Arcosa Wind Towers Inc. (Dallas, Texas) and Broadwind Towers, Inc. (Manitowoc, Wisconsin)). 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://usitc.gov/investigations/701731/2020/utility\\_scale\\_wind\\_towers\\_india\\_malaysia\\_and\\_spain/pr eliminary.htm](https://usitc.gov/investigations/701731/2020/utility_scale_wind_towers_india_malaysia_and_spain/pr eliminary.htm).

**Wind towers** covered by these investigations is certain wind towers, whether or not tapered, and sections thereof. Certain wind towers support the nacelle and rotor blades in a wind turbine with a minimum rated electrical power generation capacity in excess of 100 kilowatts and with a minimum height of 50 meters measured from the base of the tower to the bottom of the nacelle (i.e., where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment, or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical buss boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section. Several wind tower sections are normally required to form a completed wind tower.

Wind towers and sections thereof are included within the scope whether or not they are joined with nonsubject merchandise, such as nacelles or rotor blades, and whether or not they have internal or external components attached to the subject merchandise.

Specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Also excluded are any internal or external components which are not attached to the wind towers or sections thereof, unless those components are shipped with the tower sections.

Merchandise covered by these orders is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheading 7308.20.0020 or 8502.31.0000. Wind towers of iron or steel are classified under HTSUS 7308.20.0020 when imported separately as a tower or tower section(s). Wind towers may be classified under HTSUS 8502.31.0000 when imported as combination goods with a wind turbine (i.e., accompanying nacelles and/or rotor blades). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these orders is dispositive.

**Unit.**—A unit, unless otherwise stated, is a complete wind tower (whether or not comprised of multiple sections) or wind tower equivalent (e.g., one section of a wind tower comprised of four sections would be equal to ¼ or 0.25 wind towers).

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

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

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

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

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

**Valid number error messages.**--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Calvin Chang (202-205-3062, [calvin.chang@usitc.gov](mailto:calvin.chang@usitc.gov)).

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

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

Hours	Dollars

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

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

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

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

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I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: \_\_\_\_\_.

I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	



I-6. **Importing operations.**—

(a) Please indicate the nature of your firm's importing operations of wind towers. More than one answer may be applicable.

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

(b) Did your foreign supplier take over the formal importation of products for which your firm had otherwise served as the importer of record during the period of investigation?

No	Yes	If yes, please indicate the foreign suppliers/importers of record involved, and describe the timing and reasons for such change in your firm's role relating to importation of wind towers.
<input type="checkbox"/>	<input type="checkbox"/>	

I-7. **Consignee.**--If your firm is an importer of record of wind towers 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. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters wind towers into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports wind towers under the TIB (temporary importation under bond) program.

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

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

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

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

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

No	Yes	If yes, Yes--Please specify.
<input type="checkbox"/>	<input type="checkbox"/>	

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

Further information on this part of the questionnaire can be obtained from Calvin Chang (202-205-3062, [calvin.chang@usitc.gov](mailto:calvin.chang@usitc.gov)). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

Name	
Title	
Email	
Telephone	

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

<i>(check as many as appropriate)</i>		<i>(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable)</i>
<input type="checkbox"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Other (e.g., technology)	



II-2b. **COVID-19 pandemic.**-- Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in relation to your firm's supply chain arrangements, importation, employment, and sales relating to wind towers?

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

II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of wind towers 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.

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

<b>Source</b>	<b>Period</b>			
	<b>Jul-Sep 2020</b>	<b>Oct-Dec 2020</b>	<b>Jan-Mar 2021</b>	<b>Apr-Jun 2021</b>
	<b>Quantity (in units)</b>			
India				
Malaysia				
Spain				
All other sources				

II-3b. **Imports in the 12-month period preceding the petition.**--Has your firm imported wind towers from any source between September 1, 2019 and August 31, 2020? (i.e., the last four months in 2019 and first eight months in 2020 combined)

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

<b>Quantity (in units)</b>	
<b>Source</b>	<b>September 2019 through August 2020</b>
India	
Malaysia	
Spain	
All other sources	

II-4. **Reasons for importing if producer.**--If your firm also produces wind towers 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.S. imports from India.**—Report your firm’s imports and your firm’s shipments and inventories of wind towers imported from India by your firm during the specified periods.

## India

Item	Quantity (in units), value (in \$1,000)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					
<p><sup>1</sup> Please identify the foreign producers, if known: _____.</p> <p><sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>3</sup> Identify your firm’s principal export markets: _____.</p>					

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

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

II-5b. **U.S. shipments of imports by region: India.**--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 India to each of the specified regions during the specified period.

## India

**"Northeast"**--CT, ME, MA, NH, NJ, NY, PA, RI, and VT.

**"Upper Midwest"**--MI, MN, NE, ND, SD, and WI.

**"Lower Midwest"**--IL, IN, IA, KS, OH, and MO.

**"Upper Southeast"**--DE, DC, MD, VA, and WV.

**"Lower Southeast"**--AL, FL, GA, KY, MS, NC, SC, and TN.

**"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.

Geographic region	Quantity (in units)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
Northeast (M)					
Upper Midwest (N)					
Lower Midwest (O)					
Upper Southeast (P)					
Lower Southeast (Q)					
Central Southwest (R)					
Mountains (S)					
Pacific Coast (T)					
Other (U)					

**RECONCILIATION OF SHIPMENTS BY GEOGRAPHIC REGION.**--Please ensure that the quantities reported for shipments by region (i.e., lines M through U) equal the quantities reported for U.S. shipments (i.e., lines D,F, and H). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Quantity:</b> M + N + O + P + Q + R + S + T + U – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-5c. **U.S. shipments of wind towers without internal components: India.**— Please report the share of your firm's U.S. shipments of wind towers reported in II-5a that were shipped without any mechanical and/or electrical fittings such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and/or other accessories/internal components: \_\_\_\_\_ percent.

II-6a. **U.S. imports from Malaysia.**—Report your firm’s imports and your firm’s shipments and inventories of wind towers imported from Malaysia by your firm during the specified periods.

## Malaysia

Item	Quantity (in units), value (in \$1,000)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					
<p><sup>1</sup> Please identify the foreign producers, if known: _____.</p> <p><sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>3</sup> Identify your firm’s principal export markets: _____.</p>					

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

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

II-6b. **U.S. shipments of imports by region: Malaysia.**--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 Malaysia to each of the specified regions during the specified period.

## Malaysia

**"Northeast"**--CT, ME, MA, NH, NJ, NY, PA, RI, and VT.

**"Upper Midwest"**--MI, MN, NE, ND, SD, and WI.

**"Lower Midwest"**--IL, IN, IA, KS, OH, and MO.

**"Upper Southeast"**--DE, DC, MD, VA, and WV.

**"Lower Southeast"**--AL, FL, GA, KY, MS, NC, SC, and TN.

**"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.

Geographic region	Quantity (in units)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
Northeast (M)					
Upper Midwest (N)					
Lower Midwest (O)					
Upper Southeast (P)					
Lower Southeast (Q)					
Central Southwest (R)					
Mountains (S)					
Pacific Coast (T)					
Other (U)					

**RECONCILIATION OF SHIPMENTS BY GEOGRAPHIC REGION.**--Please ensure that the quantities reported for shipments by region (i.e., lines M through U) equal the quantities reported for U.S. shipments (i.e., lines D,F, and H). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Quantity:</b> M + N + O + P + Q + R + S + T + U – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-6c. **U.S. shipments of wind towers without internal components: Malaysia.**— Please report the share of your firm's U.S. shipments of wind towers reported in II-6a that were shipped without any mechanical and/or electrical fittings such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and/or other accessories/internal components: \_\_\_\_\_ percent.

II-7a. **U.S. imports from Spain.**—Report your firm’s imports and your firm’s shipments and inventories of wind towers imported from Spain by your firm during the specified periods.

## Spain

Item	Quantity (in units), value (in \$1,000)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm’s principal export markets: \_\_\_\_\_.

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

Reconciliation	Calendar year			January-June	
	2017	2018	2019	2019	2020
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0

<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.



II-7b. **U.S. shipments of imports by region: Spain.**--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 Spain to each of the specified regions during the specified period.

## Spain

**"Northeast"**--CT, ME, MA, NH, NJ, NY, PA, RI, and VT.

**"Upper Midwest"**--MI, MN, NE, ND, SD, and WI.

**"Lower Midwest"**--IL, IN, IA, KS, OH, and MO.

**"Upper Southeast"**--DE, DC, MD, VA, and WV.

**"Lower Southeast"**--AL, FL, GA, KY, MS, NC, SC, and TN.

**"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.

Geographic region	Quantity (in units)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
Northeast (M)					
Upper Midwest (N)					
Lower Midwest (O)					
Upper Southeast (P)					
Lower Southeast (Q)					
Central Southwest (R)					
Mountains (S)					
Pacific Coast (T)					
Other (U)					

**RECONCILIATION OF SHIPMENTS BY GEOGRAPHIC REGION.**--Please ensure that the quantities reported for shipments by region (i.e., lines M through U) equal the quantities reported for U.S. shipments (i.e., lines D,F, and H). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Quantity:</b> M + N + O + P + Q + R + S + T + U – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-7c. **U.S. shipments of wind towers without internal components: Spain.**— Please report the share of your firm's U.S. shipments of wind towers reported in II-7a that were shipped without any mechanical and/or electrical fittings such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and/or other accessories/internal components: \_\_\_\_\_ percent.

II-8a. **Imports from all other sources.**—Report your firm’s imports and your firm’s shipments and inventories of wind towers imported from all other sources by your firm during the specified periods.

## All other sources

(list sources: \_\_\_\_\_ )

Item	Quantity (in units), value (in \$1,000)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm’s principal export markets: \_\_\_\_\_.

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

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

II-8b. **U.S. shipments of imports by region: 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 to each of the specified regions during the specified period.

## All other sources

**"Northeast"**--CT, ME, MA, NH, NJ, NY, PA, RI, and VT.

**"Upper Midwest"**--MI, MN, NE, ND, SD, and WI.

**"Lower Midwest"**--IL, IN, IA, KS, OH, and MO.

**"Upper Southeast"**--DE, DC, MD, VA, and WV.

**"Lower Southeast"**--AL, FL, GA, KY, MS, NC, SC, and TN.

**"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.

Geographic region	Quantity (in units)				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
Northeast (M)					
Upper Midwest (N)					
Lower Midwest (O)					
Upper Southeast (P)					
Lower Southeast (Q)					
Central Southwest (R)					
Mountains (S)					
Pacific Coast (T)					
Other (U)					

**RECONCILIATION OF SHIPMENTS BY GEOGRAPHIC REGION.**--Please ensure that the quantities reported for shipments by region (i.e., lines M through U) equal the quantities reported for U.S. shipments (i.e., lines D,F, and H). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Quantity:</b> M + N + O + P + Q + R + S + T + U – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

II-8c. **U.S. shipments of wind towers without internal components: All other sources.**— Please report the share of your firm's U.S. shipments of wind towers reported in II-8a that were shipped without any mechanical and/or electrical fittings such as platforms, ladders, lighting, lifts (elevators), electrical-cable harnesses, storage lockers, and/or other accessories/internal components: \_\_\_\_ percent.

- II-9. **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-10. **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, [amelia.preece@usitc.gov](mailto:amelia.preece@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

**PURCHASE COST DATA**

III-2. This question requests quarterly quantity and value data for your firm's imports since January 1, 2017 of the following products your firm imported from India, Malaysia, and Spain:

**Product 1.**— Wind towers, more than 80 meters but less than or equal to 90 meters in height

**Product 2.**—Wind towers, more than 90 meters but less than or equal to 100 meters in height

**Product 3.**—Wind towers, more than 100 meters but less than or equal to 110 meters in height

**Product 4.**—Wind towers, more than 110 meters but less than or equal to 120 meters in height

**Please note that values should be reported on a landed duty paid costs (LDP) basis. Values should reflect the *final net* L.D.P. amount your firm paid (i.e., should be net of all deductions for discounts or rebates).**

III-2. **Imports for internal use/installation**--This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above for internal consumption from India, Malaysia, and Spain since January 1, 2017. These are imports that your firm installs and therefore does not resell as wind towers.

During January 2017-June 2020, did your firm import any of the products listed above from India, Malaysia, and Spain for installation?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following table(s) as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question III-3.

III-2a. **Imports for internal use.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from India and installed by your own firm.

**Please note that values should be landed, duty-paid (LDP) 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).**

## India

Report data in units and actual dollars (not 1,000s).

<i>(Quantity in units, value in dollars)</i>								
Period of importation	Product 1		Product 2		Product 3		Product 4	
	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
<b>2017:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2018:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								

<sup>1</sup> 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).

<sup>2</sup> 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 data.

Product 1:  
 Product 2:  
 Product 3:  
 Product 4:

III-2b. **Imports for internal use.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from Malaysia and installed by your own firm.

**Please note that values should be landed, duty-paid (LDP) 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).**

## Malaysia

Report data in units and actual dollars (not 1,000s).

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

<sup>1</sup> 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).

<sup>2</sup> 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 data.

Product 1:  
Product 2:  
Product 3:  
Product 4:

III-2c. **Imports for internal use.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from Spain and installed by your own firm.

**Please note that values should be landed, duty-paid (LDP) 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).**

## Spain

Report data in units and actual dollars (not 1,000s).

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

<sup>1</sup> 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).

<sup>2</sup> 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 data.

Product 1:  
 Product 2:  
 Product 3:  
 Product 4:



**Complete these questions only if your firm reported data on the previous page, otherwise skip to question III-3.**

**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 wind towers rather than purchase from a U.S. producer or importer of wind towers.**

**III-2d. Additional costs for your firm's imports of wind towers for your firm's internal use.—**

- i. Did your firm incur any additional costs by importing wind towers 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                       Yes—Please answer parts ii, iii, and iv.

- ii. Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing wind towers 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.

- iii. 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 wind towers, 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 wind towers from a U.S. producer or importer.)

Costs	Estimated percentage compared to LDP value (percent)	Explanation
	%	
	%	
	%	
	%	

- iv. Briefly describe how your firm's additional costs (beyond the purchase price) by importing wind towers directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer.

III-2e. **Decision basis.**—To which source(s) does your firm compare costs in determining whether or not to import wind towers? Check all that apply.

U.S. importers	U.S. producers	Neither U.S. importers nor U.S. producers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-2f. **Benefits of importing wind towers.**

i. Briefly identify the benefits of importing wind towers instead of purchasing wind towers from a U.S. importer or from a U.S. producer.

--

ii. Is it your firm's experience that the wind towers your firm imported from India, Malaysia, and Spain 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	<input type="checkbox"/>	<input type="checkbox"/>
Including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>

iii. Please estimate your firm's savings by importing wind towers 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-2b).

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-2diii (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-2iii based on	√ if Yes
Previous company transactions	<input type="checkbox"/>
Market research	<input type="checkbox"/>
Other – Please explain	<input type="checkbox"/>

*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.*

III-2g. **Purchase cost data checklist.**--Please check that the purchase cost data in question III-2(a) has been correctly reported.

Are the purchase cost data reported above:	✓ if Yes
In actual dollars ( <b>not</b> \$1,000) and number of wind towers?	<input type="checkbox"/>
L.D.P. value is value at U.S. port of entry (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Quantities for subject imports do not exceed imports reported for the same country in part II in each year?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

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

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-5. **Pricing terms.**--On what basis are your firm's prices of installed wind tower produced in the United States and imported wind towers from India, Malaysia, and Spain usually quoted (*check one*)?

Source	Delivered	F.o.b.	If f.o.b., specify point
U.S. produced	%	%	
Subject imports	%	%	

III-6. **Contract versus spot.**--Approximately what share of your firm's sales of wind towers purchased from U.S. producers and imported from India, Malaysia, and Spain in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

Share of 2019 sales	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
U.S. produced	%	%	%	%	0.0 %
Subject imports	%	%	%	%	0.0 %

III-7. **Contract provisions.**—Please fill out the table regarding your firm’s typical sales contracts for wind towers purchased from U.S. producers and imported from India, Malaysia, and Spain (or check “not applicable” if your firm does not sell on a short-term, annual and/or long-term contract basis).

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

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

III-8. **Lead times.**--What is your firm's share of sales of wind towers imported from India, Malaysia, and Spain from inventory and produced to order and what is the typical lead time between a your or your customer's order and the date of delivery for your firm's sales or purchases of wind towers? (If your firm is an importer and re-seller of wind towers, please answer for your sales. If your firm is an importer and installer of wind towers, please answer for the wind towers installed.)?

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

III-9. **Shipping information.**—

- (a) What is the approximate percentage of the cost of installed wind towers produced in the United States and imported from India, Malaysia, and Spain that is accounted for by U.S. inland transportation costs?

	<b>U.S.</b>	<b>Subject Import</b>
Share of costs of wind towers accounted for by U.S. transportation costs	%	%

- (b) Who generally arranges the transportation of subject imports and U.S. produced product to your firm's customers' locations?

<b>Source</b>	<b>Your firm</b>	<b>Purchaser</b>
U.S. product <i>(check one)</i>	<input type="checkbox"/>	<input type="checkbox"/>
Subject imported product <i>(check one)</i>	<input type="checkbox"/>	<input type="checkbox"/>

- (c) When your firm sells wind towers imported from India, Malaysia, and Spain, from where are they shipped, i.e., where is the initial point of shipment in the United States?  
 Point of importation     Your U.S. storage facility *(check one)*

Additional explanation if needed: \_\_\_\_\_

- (d) When your firm sells wind towers produced in the United States, from where are they shipped, i.e., where is the initial point of shipment in the United States?  
 Producers' facility     Your U.S. storage facility *(check one)*

Additional explanation if needed: \_\_\_\_\_

- (e) Indicate the approximate percentage of your firm's sales of wind towers produced in the United States and imported from India, Malaysia, and Spain that are delivered the following distances from your firm's U.S. point of shipment.

<b>Distance from your firm's U.S. point of shipment</b>	<b>U.S. product Share</b>	<b>Import Share</b>
Within 100 miles	%	%
101 to 500 miles	%	%
501 to 1,000 miles	%	%
Over 1,000 miles	%	%
<b>Totals</b> (should sum to 100.0%)	0.0 %	0.0 %

- (f) Are your FOB prices that you pay for the same wind tower models consistent across all shipping distances or do they vary by shipping distances? Please explain and report if this response differs between U.S. and imported wind towers. \_\_\_\_\_

II-10. **Geographical shipments.**— Describe the importance, if any, of geographic location in your firm's sales/installation of wind towers.

--

III-11. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for wind towers 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-12. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of wind towers since January 1, 2017?

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

III-13. **Conditions of competition.**—

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

Check all that apply.	Please describe.
<input type="checkbox"/> <b>No</b>	Skip to question III-14.
<input type="checkbox"/> <b>Yes-Business cycles (e.g. seasonal business)</b>	
<input type="checkbox"/> <b>Yes-Other distinctive conditions of competition</b>	

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

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



**III-14. Supply constraints.--**

(a) Has your firm refused, declined, or been unable to supply wind towers 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.
<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has any firm refused, declined, or been unable to supply your firm with wind towers 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.
<input type="checkbox"/>	<input type="checkbox"/>	

**III-15. Raw materials.—**

(a) How have wind towers 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 purchase or import prices for wind towers.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has information on raw material prices affected your firm’s negotiations or contracts to purchase or import wind towers since 2017?

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

III-16. **Impact of the PTC expiration and wind-down.**—This question concerns the anticipated expiration of the Federal wind energy production tax credit (PTC).

(a) Has the anticipated expiration of the PTC at the end of 2020 had an impact on the U.S. market for wind towers?

<b>Yes—Please answer part (b)</b>	<b>No</b>	<b>Don't know</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) **Assessment of impact of the anticipated PTC expiration.**-- Please indicate the impact of the anticipated expiration of the Federal wind energy PTC.

<b>Item</b>	<b>Increase</b>	<b>No change</b>	<b>Decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explanation and factors</b>
Acquisitions of wind towers by your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial performance of your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Demand for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for wind towers in the U.S. market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Timing of U.S. wind energy projects in the development pipeline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-17. **Interchangeability**.--Is wind towers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

<b>Country-pair</b>	India	Malaysia	Spain	Other countries
United States				
India	X			
Malaysia	X	X		
Spain	X	X	X	
For any country-pair producing wind towers 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-18. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between wind towers produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

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

III-19. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for wind towers since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of wind towers that each of these customers accounted for in 2019.

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

III-20. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

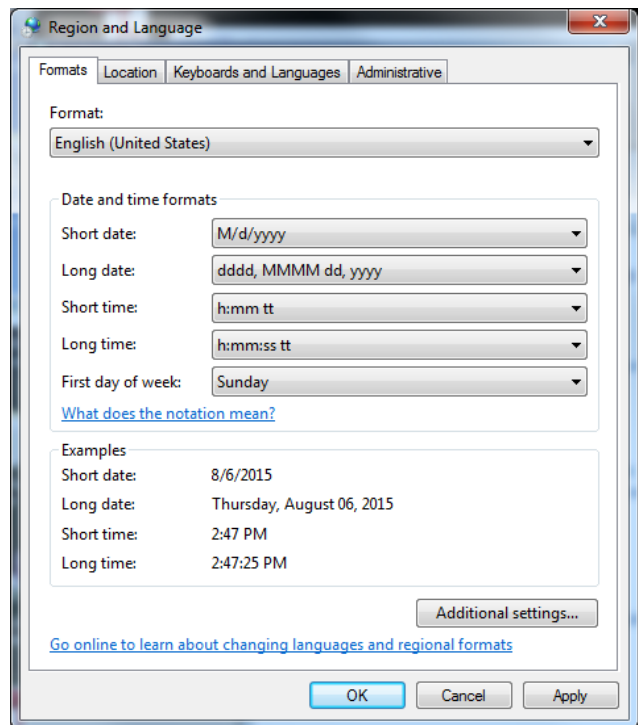
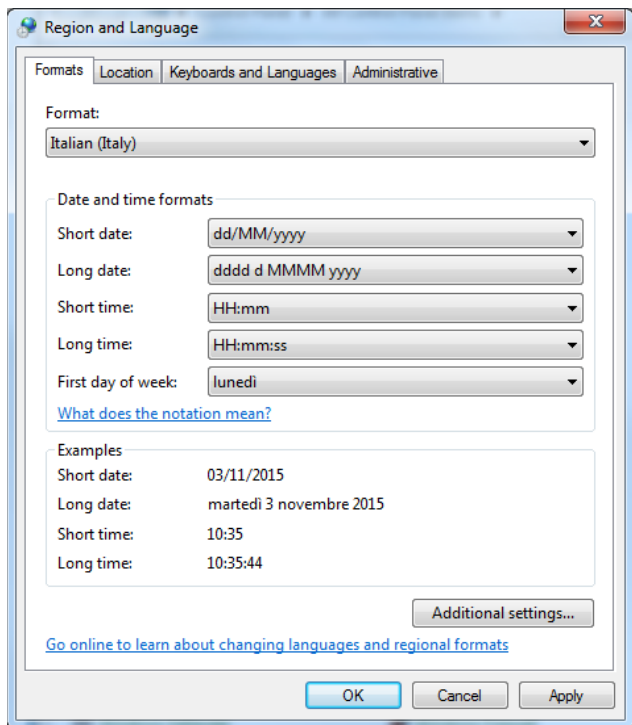
**Correcting valid number error messages.**--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric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

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

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

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

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



## HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: [https://usitc.gov/investigations/701731/2020/utility\\_scale\\_wind\\_towers\\_india\\_malaysia\\_and\\_spain/pr\\_eliminary.htm](https://usitc.gov/investigations/701731/2020/utility_scale_wind_towers_india_malaysia_and_spain/pr_eliminary.htm).

***Please do not attempt to modify the format or permissions of the questionnaire document.*** Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

- **Upload via Secure Drop Box.**—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission’s secure upload facility:

**Web address:** <https://dropbox.usitc.gov/oinv/>      **Pin:** WIND

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

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

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