U.S. PURCHASERS' QUESTIONNAIRE

NON-REFILLABLE STEEL CYLINDERS FROM CHINA

This questionnaire must be received by the Commission by <u>January 19, 2021</u>

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning non-refillable steel cylinders from China (Inv. Nos. 701-TA-644 and 731-TA-1494 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from Lauren Gamache (lauren.gamache@usitc.gov, 202-205-3489).

City			State	Z	Zip Cod	e			
Website									
•	•	imported for its ow (domestic or foreign		-		•	linders (a	s defined	on
□ NO	(Sign the cert	fication below and pro	omptly return onl y	y this pa	ge of the	questionna	ire to the	Commissio	n)
YES	(Complete all	parts of the questionn	aire, and return t	he entire	e questic	nnaire to th	ne Commis	sion)	
-		the U.S. Internation			ion <i>Dro</i>	<i>p Box</i> by	clicking	on the	
		•	ERTIFICATION	•					
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PART I.—GENERAL INFORMATION

<u>Background.--</u>This proceeding was instituted in response to a petition filed on March 27, 2020, by Worthington Industries, Columbus, Ohio. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and dumping. Questionnaires and other information pertinent to this proceeding are available at https://usitc.gov/investigations/701731/2020/non_refillable_steel_cylinders_china/preliminary.htm.

Non-refillable steel cylinders covered by these investigations are certain non-refillable steel cylinders meeting the requirements of, or produced to meet the requirements of, U.S. Department of Transportation ("USDOT") Specifications 39, TransportCanada Specification 39M, or United Nations pressure receptacle standard ISO 11118 and otherwise meeting the description provided below ("nonrefillable steel cylinders"). The subject non-refillable steel cylinders are portable and range from 300-cubic inch (4.9 liter) water capacity to 1,526-cubic inch (25 liter) water capacity. Subject non refillable steel cylinders may be imported with or without a valve and/or pressure release device and may be filled or unfilled at the time of importation.

Specifically excluded are seamless non-refillable steel cylinders.

Also excluded from the scope of these petitions are non-refillable steel cylinders filled at the time of importation whose content is subject to another antidumping and/or countervailing duty order. At the time of filing this petition, there are existing antidumping duty orders on Hydrofluorocarbon Blends from the People's Republic of China and 1,1,1,2-Tetrafluoroethane (R-134A) from the People's Republic of China. See Hydrofluorocarbon Blends From the People's Republic of China: Antidumping Duty Order, 81 Fed. Reg. 55,436 (Dep't Commerce Aug. 19, 2016); 1,1,1,2 Tetrafluoroethane (R-134a) from the People's Republic of China: Antidumping Duty Order, 82 Fed. Reg. 18,422 (Dep't Commerce Apr. 19, 2017). In the case of non-refillable steel cylinders entering the United States filled with merchandise covered by the scope of these orders or future antidumping and/or countervailing duty orders covering the gas or material content of the nonrefillable steel cylinders, such other orders control. In the case of non-refillable steel cylinders entering the United States filled with merchandise not covered by the scope of any other antidumping and/or countervailing duty order, the scope of this petition controls.

Non-refillable steel cylinders are currently imported under statistical reporting numbers 7311.00.0060 and 7311.00.0090 of the Harmonized Tariff Schedule of the United States (HTSUS). They may also be imported under HTSUS statistical reporting number 7310.29.0025. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Purchaser</u>.--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing non-refillable steel cylinders from another firm that produces, imports, or otherwise distributes non-refillable steel cylinders.

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.

<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.

l-1a.	<u>Establishments covered.</u> Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. Firms operating more than one establishment should combine the data for all establishments into a single response.					
		of a firm involved in the <u>purchase</u> erated in conjunction with (whethe	·			
I-1b.	Stock symbol information I stock exchange and trading sy	f your firm or parent firm is publicly mbol:	traded, please specify the			
I-1c.	·	n or parent firm is represented by ϵ y the name of the law firm and the				
	Law firm:					
	Lead attorney(s):					
I-2.		ed, in whole or in part, by any othe	o the ultimate parent/owner.			
	Firm name	Country	Extent of ownership (percent)			
		·				
I-3.	foreign, which import non-ref refillable steel cylinders to the	Does your firm have any related fillable steel cylinders into the United United States? The following information.	•			
	Firm name	Country	Affiliation			
	_					

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I-4.	-	efillable steel cylir	•		omestic or foreign, which
	Firm name		Country		Affiliation
PART I	IPURCHASES				
		•	•		nner by which Commission nitted in this questionnaire
	Name				
	Title				
	Fmail				

Telephone

II-1. Purchases and imports. -

(a) Report separately your firm's domestic purchases and imports of non-refillable steel cylinders.

"Purchase" – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

"Import" – Purchase directly from a foreign supplier and your firm is the importer of record.

	2017	2018	2019
Item		Quantity (in units)	
Purchases of non-refillable steel cylinders produced in— United States			
China			
All other countries ¹			
Sources unknown ²			
Total purchases	0	0	0
Imports of non-refillable steel cylinders			
from— China			
All other countries ¹			
Total imports ³	0	0	0
¹ Please identify these countries:			

² Please indicate the firm(s) from which you purchased this merchandise: _____.

³ If your firm imported non-refillable steel cylinders at any time since January 1, 2017, please also complete and return a U.S. importers' questionnaire in this proceeding.

II-2.	Changes in purchasing patternsPlease indicate how the shares of your firm's purchases of
	non-refillable steel cylinders from different sources have changed since January 1, 2017.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States						
China						
All other countries						
Sources unknown						

II-3. <u>Country knowledge.</u>--Please indicate the countries of origin with which your firm has experience or information in the non-refillable steel cylinders market.

United States	China	Other countries	Other countries (specify)

II-4. <u>Supplier identification.</u>--Please list your firm's <u>FIVE</u> largest suppliers for non-refillable steel cylinders since January 1, 2017. Also, provide the share of the quantity of your firm's total purchases of non-refillable steel cylinders that each of these suppliers accounted for in 2019.

No.	Supplier's name	City and state	Share of quantity of 2019 purchases
1			%
2			%
3			%
4			%
5			%

PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES

III-1. <u>Firm type.--</u>Which of the following best describes your firm as a purchaser of non-refillable steel cylinders (check all that apply)?

Filler (Refrigerants)	Filler (Helium)	Filler (Other:	Distributor (unfilled)	Other	Describe other

If your firm is a distributor of non-refillable steel cylinders, please answer questions III-2 and III-3.

III-2. <u>Competition for sales.</u>--Does your firm compete for sales to customers with the manufacturers or importers from which your firm purchases non-refillable steel cylinders?

No	Yes	If yes, please describe.

III-3.	Types of customersWhat are the major types of consumers to which your firm sells non-
	refillable steel cylinders?

If your firm is an end user of non-refillable steel cylinders, please answer questions III-4 and III-5.

III-4. **End uses.**--List the top 3 products your firm makes using non-refillable steel cylinders and estimate the percent of your <u>total production cost</u> that is accounted for by non-refillable steel cylinders and by other inputs (such as labor, energy, and other raw materials).

	Share of total cost in each of the product(s) your firm produces accounted for by			Total (should	
Product(s) your firm produces	non-refillable steel cylinders		Other inputs		sum to 100.0% across)
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	Ш	0.0 %

Demand for end-use products.--

III-5.

	Γ	lmanaJ	Na alas				Flushushad
		Increased	No chan	ige De	ecrease	d	Fluctuated
	(b) F	las this had a	ny effect on	your firm's o	demand	d for no	on-refillable steel cylinders?
		No '	res			E	xplain
III-6.	<u>Substitut</u>	esCan othe	· 	e substitute			llable steel cylinders?
			End use in v	which this	ı		hanges in the price of this substitute ed the price for non-refillable steel cylinders?
	Substitut	e	substitute	ostitute is used No		Yes	Explanation
1.							
2.							
3.							
III-7.	States (if trends an	known) for n	on-refillable ne principal f	steel cylindo actors that h	ers has nave aff	change ected t	ates and outside of the United ed since January 1, 2017. Explain any these changes in demand. <i>Please c</i> .
	arket	Overal increas		Overall decrease	Fluct with clear	no no	Explanation and factors
Ma			+			1	
	United State	s					

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III-8.	<u>Country preferences</u> Do you or your customers ever specifically order non-refillable steel
	cylinders from one country in particular over other possible sources of supply? Please also note
	any changes resulting from the COVID-19 pandemic.

No	Yes	If yes, identify the countries and explain.

III-9. <u>Importance of purchasing domestic product</u>.—

(a) Please fill out the table below, estimating the percentage of your firm's total 2019 purchases of non-refillable steel cylinders that required non-refillable steel cylinders produced in the United States.

	Estimated percentage of your firm's total 2019 purchases of non-refillable steel cylinders
Purchases that did not require domestic product	%
Purchases that were required by law or regulation to be domestic product (e.g., government purchases under "Buy American" provisions)	%
Purchases that were not required by law or regulation, but were required by your customers to be domestic product	%
Purchases that were required to be domestic product for other reasons	
(explain:)	%
Total (should sum to 100.0%)	0.0 %

(b) Has the COVID-19 pandemic affected your firm's or your customers' domestic product requirements?

No	Yes	If yes, please explain.

III-10.	Conditions	of com	petition

(a)	Is the non-refillable steel cylinders market subject to business cycles (other than general
	economy-wide conditions) and/or other conditions of competition distinctive to non-
	refillable steel cylinders?

Check all that apply.		Please describe.
	No	Skip to question III-11.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) Have there been any changes in the business cycles or conditions of competition for non-refillable steel cylinders since January 1, 2017?

No	Yes	If yes, describe.

III-11. <u>Decisions based on producer and country-of-origin.</u>—How often does your firm, and if known, do your customers, make purchasing decisions involving non-refillable steel cylinders based on its producer or country of origin?

Item	Always	Usually	Sometimes	Never	If at least sometimes, explain.		
Decision based on producer							
Your firm							
Your customers							
		Decis	ion based on c	ountry of	origin		
Your firm							
Your customers							

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III-12.	Availability of supplyHas the availability of non-refillable steel cylinders in the U.S. mark changed since January 1, 2017? Please also note any changes resulting from the COVID-19 pandemic.									
	Availal	oility in t market		No	Yes	Please explai changes.	n, noting the	countries	and reasons for	the
	U.Spr	oduced _l	oroduct							
	Subject	imports	5							
	Nonsuk	oject imp	orts							
III-13.	<u>Supply constraints.</u> Has any firm refused, declined, or been unable to supply your firm with non-refillable steel cylinders since January 1, 2017 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, shortages related to COVID-19 shutdowns, etc.)?								n ng	
	No	Ye	s If y	es, pl	ease c	lescribe.				
]							
III-14.	Availability of specific product typesAre certain grades/types/sizes of non-refillable steel cylinders only available from certain country sources?							eel		
	No	Yes	If yes	, plea	se ide	entify the cour	tries and the	grade/ty	pe/size.	
III-15.	Purchasing frequency (a) How frequently does your firm make purchases of non-refillable steel cylinders (check one)?							check		
		Daily	Weekl	y N	1onth	ly Quarterly	Annually	Other	If other, specif	y
	(b)	Has this	purchas	sing fr	equer	ncy changed si	nce January 1,	2017?		
		No	Yes	If ye	s, plea	ase describe.				
			1							

III-16.	Raw	material	prices.—

(a) Is your firm familiar with the prices for raw materials used in the production of non-refillable steel cylinders?

No	Yes – please answer (b)

(b) Has information on raw material prices affected your firm's negotiations or contracts to purchase non-refillable steel cylinders since 2017?

No	Yes	Explain

III-20.	Impact of section 301 tariffs Did the imposition of tariffs on Chinese-origin products under
	section 301 have an impact on the non-refillable steel cylinders market in the United States?

Yes— Please indicate the impact in the table below.	No	Don't know

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 301 affected each factor of the non-refillable steel cylinders market in the United States.
Supply of U.S produced non- refillable steel cylinders					
Supply of non- refillable steel cylinders imported from China					
Supply of non- refillable steel cylinders imported from other countries					
Prices for non- refillable steel cylinders					
Overall U.S. demand for non-refillable steel cylinders					
Raw material costs for non-refillable steel cylinders					

III-17.				tedHow many suppliers does your firm generally contact before n and firms
III-18.				our firm's purchases of non-refillable steel cylinders usually involve ier and purchaser?
	No	Yes		plain the factors your firm generally negotiates and note whether quotes competing prices during negotiations.
III-19.	Change i	n supplie	rs Has yo	our firm changed suppliers since January 1, 2017?
	No	Yes		ease list the supplier(s), whether the firm was added or dropped, easons for the change.
III-20.	-			are of any new suppliers, either foreign or domestic, that have nuary 1, 2017?
	No	Yes	If yes, ple	ease identify the firms.
III-21.		-		you require your suppliers to be or to become certified or qualified linders to your firm?
	If yes, pro	ovide the	following	information.
			-	to qualify a new supplier.
	c	descriptio	n of the fa	n of the certification or qualification process. Also, a brief actors that you consider when qualifying a new supplier (e.g., quality y of supplier, etc.).
	No	Yes	Number of days	Process and factors
			•	
	-			·

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			•	d status?
	No			ase identify these firms, the countries where they are located, easons why they failed the certification/qualification.
(or returned	l non-ref	illable cy	nce January 1, 2017, have you or your customers complained about linders from any supplier? If yes, please describe the source, eturn(s), and provide any relevant documentation.
		No	Yes	If yes, please identify these firms, the countries where they are located, and the reasons for the complaint and/or return.
	Complaint			
	Return			
(6	considers ii	n decidin extensio	g from won of crea	Please list, in order of their importance, the main factors your firm thom to purchase non-refillable steel cylinders (examples include dit, contracts, price, quality, range of supplier's product line,
	1.			
	2.			

III-25.

III-24. <u>Purchasing factors.</u>--Please rate the importance of the following factors in your firm's purchasing decisions for non-refillable steel cylinders.

Factor	Very important	Somewhat important	Not important
Availability			
Delivery terms			
Delivery time			
Discounts offered			
Minimum quantity requirements			
Packaging			
Payment terms			
Price			
Product consistency			
Product range			
Quality meets industry standards			
Quality exceeds industry standards			
Reliability of supply			
Technical support/service			
U.S. transportation costs			

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III-26.	Minimum qualityHow often does non-refillable steel cylinders from the following countries
	meet minimum quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States					
China					
Other:					

III-27. <u>Frequency of decisions based on price</u>.--How often does your firm purchase the non-refillable steel cylinders that is offered at the lowest price?

Always	Usually	Sometimes	Never

III-28. <u>Price leaders.</u>--A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. A price leader is not necessarily the lowest-priced supplier.

Please list the names of any firms you considered price leaders in the non-refillable steel cylinders market since January 1, 2017.

Firm(s)	Describe how the firm(s) exhibited price leadership	

111 20	D	la ! a a# ! a# a#la a	r than domestic products.—
111-79	PHICHASING SH	niect imnorts rathe	r than domestic brodilets —

(a)	Since January 2017, did your firm import and/or purchase imports of non-refillable steel
	cylinders from China instead of purchasing U.Sproduced non-refillable steel cylinders?

	Yes	No
Source	(also respond to parts (b) and (c))	(If "No", skip to next question)
China		

(b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?

Source	Yes	No
China		

(c) If you responded "Yes" to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2017 (in units)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
China				

III-30. <u>U.S. producers and import competition</u>.—

(a) Since January 1, 2017, in connection with a sale or offer to sell non-refillable steel cylinders to your firm, did U.S. producers reduce their prices of domestically produced non-refillable steel cylinders in order to compete with lower-priced imports of non-refillable steel cylinders from the subject countries?

Source	Yes (also respond to question part (b))	No (If "No", skip to next question)	Don't know
China			

III-30. <u>U.S. producers and import competition</u>.--Continued.

(b) If your firm responded "yes", please provide an estimate of the reduction in U.S. producers' prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

Source	Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
China	%	

PART IV.—PRODUCT COMPARISONS

IV-21. <u>Interchangeability.--</u>Is non-refillable steel cylinders produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Other countries
United States		
China		

For any country-pair producing non-refillable steel cylinders that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:

IV-22. <u>Factors other than price.</u>--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between non-refillable steel cylinders produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Other countries
United States		
China		

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

prices/U.S. transportation costs than the second country.

IV-3. Factor country comparisons.--For the factors listed below, please rate how non-refillable steel cylinders produced in each country you identified in your response to the first question in Part IV compares with non-refillable steel cylinders produced in each of the other countries you identified.

If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.

	Product from United States compared to product from China		Product from United States compared to product from Nonsubject countries			Product from <u>China</u> compared to product from <u>Nonsubject</u> countries				
Factor	Superior	Comparable	Inferior		Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability										
Delivery terms										
Delivery time										
Discounts offered										
Minimum quantity requirements										
Packaging										
Payment terms										
Price ¹										
Product consistency										
Product range										
Quality meets industry standards										
Quality exceeds industry standards										
Reliability of supply										
Technical support/service										
U.S. transportation costs ¹										
¹ A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower						wer				

PART V.—ADDITIONAL INFORMATION

V-1.	for which a narrative response box was not provided, please note the question number and the explanation in the space provided below.

V-2. <u>OMB statistics.</u>--Please report 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 25 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.

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/non_refillable_steel_cylinders_china/fina_l.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: NRSC

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

If your firm <u>does not </u>purchase this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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