

U.S. PURCHASERS' QUESTIONNAIRE

TWIST TIES FROM CHINA

This questionnaire must be received by the Commission by **DATE**
See last page for filing instructions.

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing duty/antidumping investigations concerning twist ties from China (Inv. Nos. 701-TA-649 and 731-TA-1523 (Final)). The information requested in the survey 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 survey can be obtained from Natalia King (natalia.king@usitc.gov, 202-205-2049).

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

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 submitting 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 a petition filed on June 26, 2020, by Bedford Industries Inc., Worthington, Minnesota. 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/twist_ties_china/final.htm

Twist ties covered by this investigation consists of twist ties, which are thin, bendable ties for closing containers, such as bags, bundle items, or identifying objects. A twist tie in most circumstances is comprised of one or more metal wires encased in a covering material, which allows the tie to retain its shape and bind against itself. However, it is possible to make a twist tie with plastic and no metal wires. The metal wire that is generally used in a twist tie is stainless or galvanized steel and typically measures between the gauges of 19 (.0410" diameter) and 31 (.0132") (American Standard Wire Gauge). A twist tie usually has a width between .075" and 1" in the cross-machine direction (width of the tie – measurement perpendicular with the wire); a thickness between .015" and .045" over the wire; and a thickness between .002" and .020" in areas without wire. The scope includes an all-plastic twist tie containing a plastic core as well as a plastic covering (the wing) over the core, just like paper and/or plastic in a metal tie. An all plastic twist tie (without metal wire) would be of the same measurements as a twist tie containing one or more metal wires. Twist ties are commonly available individually in pre-cut lengths ("singles"), wound in large spools to be cut later by machine or hand, or in perforated sheets of spooled or single twist ties that are later slit by machine or by hand ("gangs").

The covering material of a twist tie may be paper (metallic or plain), or plastic, and can be dyed in a variety of colors with or without printing. A twist tie may have the same covering material on both sides or one side of paper and one side of plastic. When comprised of two sides of paper, the paper material is bound together with an adhesive or plastic. A twist tie may also have a tag or label attached to it or a pre-applied adhesive attached to it.

Excluded from the scope of the order are twist ties packaged with bags for sale together where the quantity of twist ties does not exceed twice the number of bags in each package. Also excluded are twists ties that constitute part of the packaging of the imported product, for example, merchandise anchored/secured to a backing with twist ties in the retail package or a bag of bread that is closed with a twist tie.

Twist ties are imported into the United States under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 8309.90.0000 and 5609.00.3000. Subject merchandise may also be imported under HTSUS subheadings 3920.51.5000, 3923.90.0080, 3926.90.9990, 4811.59.6000, 4821.10.2000, 4821.10.4000, 4821.90.2000, 4821.90.4000, and 4823.90.8600. These HTSUS subheadings are provided for reference only. The written description of the scope of the investigation is dispositive.

Purchaser.--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing twist ties from another firm that produces, imports, or otherwise distributes twist ties.

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.

I-1a. **Establishments covered.**--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.**

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

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I-1b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

I-1c. **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-2. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

I-3. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which import twist ties into the United States or which export twist ties to the United States?

No Yes--List the following information.

Firm name	Country	Affiliation

I-4. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which produce twist ties?

No Yes--List the following information.

Firm name	Country	Affiliation

PART II.--PURCHASES

Contact information.--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this questionnaire.

Name	
Title	
Email	
Telephone	

II-1. **Purchases and imports.**--Report separately your firm's domestic purchases and imports of twist ties.

"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.

Item	2017	2018	2019
	Quantity (in 1,000 twist ties)		
Purchases of twist ties produced in— United States			
China			
All other countries ¹			
Sources unknown ²			
Total purchases	0	0	0
Imports of twist ties 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 twist ties 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 patterns.**--Please indicate how the shares of your firm's purchases of twist ties from different sources have changed since January 1, 2017.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-3. **Country knowledge.**--Please indicate the countries of origin with which your firm has experience or information in the twist ties market.

United States	China	Other countries	Other countries (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-4. **Supplier identification.**--Please list your firm's **FIVE** largest suppliers for twist ties since January 1, 2017. Also, provide the share of the quantity of your firm's total purchases of twist ties 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. **Firm type.**--Which of the following best describes your firm as a purchaser of twist ties (check all that apply)?

End user (Agricultural produce)	End user (Bakery goods)	End user (Face masks)	End user (Other:)	Distributor	Retailer	Other	Describe other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

If your firm is a distributor of twist ties, please answer questions III-2 and III-3.

III-2. **Competition for sales.**--Does your firm compete for sales to customers with the manufacturers or importers from which your firm purchases twist ties?

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

III-3. **Types of customers.**--What are the major types of consumers to which your firm sells twist ties?
Please note if there have been any changes due to COVID-19.

If your firm is an end user of twist ties, please answer questions III-4 and III-5.

III-4. **End uses.**--List the top 3 products your firm makes using twist ties and estimate the percent of your total production cost that is accounted for by twist ties and by other inputs (such as labor, energy, and other raw materials).

Product(s) your firm produces	Share of total cost in each of the product(s) your firm produces accounted for by				Total (should sum to 100.0% across)
	Twist ties		Other inputs		
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %

III-5. **Demand for end-use products.**--

(a) Has the demand for your firm's final products incorporating twist ties changed since January 1, 2017?

Increased	No change	Decreased	Fluctuated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Has this had any effect on your firm's demand for twist ties?

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

III-6. **Impact of section 301 tariffs.**-- Did the imposition of tariffs on Chinese-origin products under section 301 have an impact on the twist ties market in the United States?

Yes — Please indicate the impact in the table below.	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 twist ties market in the United States.
Supply of U.S.-produced twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of twist ties imported from China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of twist ties imported from other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for twist ties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-7. **Substitutes.**--Can other products be substituted for twist ties?

No Yes--Please fill out the table.

	Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for twist ties?		
			No	Yes	Explanation
1.			<input type="checkbox"/>	<input type="checkbox"/>	
2.			<input type="checkbox"/>	<input type="checkbox"/>	
3.			<input type="checkbox"/>	<input type="checkbox"/>	

III-8. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for twist ties has changed since January 1, 2017. Explain any trends and describe the principal factors that have affected these changes in demand. If demand trends vary by market segments (e.g., grocery, dry cleaning, face masks), please discuss each separately. *Please also note any changes resulting from the COVID-19 pandemic.*

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-9. **Country preferences.**--Do you or your customers ever specifically order twist ties from one country in particular over other possible sources of supply?

No	Yes	If yes, identify the countries and explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-10. **Importance of purchasing domestic product.**--Please fill out the table below, estimating the percentage of your firm's total 2019 purchases of twist ties that required twist ties produced in the United States.

	Estimated percentage of your firm's total 2019 purchases of twist ties
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 %

III-11. **Conditions of competition.**--

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

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question III-12.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

(b) Have there been any changes in the business cycles or conditions of competition for twist ties since January 1, 2017?

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

III-12. **Decisions based on producer and country-of-origin.**--How often does your firm, and if known, do your customers, make purchasing decisions involving twist ties based on its producer or country of origin?

Item	Always	Usually	Sometimes	Never	If at least sometimes, explain.
Decision based on producer					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Decision based on country of origin					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-13. **Availability of supply.**--Has the availability of twist ties in the U.S. market changed since January 1, 2017? *Please also note any changes resulting from the COVID-19 pandemic.*

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Subject imports	<input type="checkbox"/>	<input type="checkbox"/>	
Nonsubject imports	<input type="checkbox"/>	<input type="checkbox"/>	

III-14. **Supply constraints.**--Has any firm refused, declined, or been unable to supply your firm with twist ties 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.)?

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

III-15. **Availability of specific product types.**--Are certain grades/types/sizes of twist ties only available from certain country sources?

No	Yes	If yes, please identify the countries and the grade/type/size.
<input type="checkbox"/>	<input type="checkbox"/>	

III-16. **Purchasing frequency.**--

(a) How frequently does your firm make purchases of twist ties (check one)?

Daily	Weekly	Monthly	Quarterly	Annually	Other	<i>If other, specify</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has this purchasing frequency changed since January 1, 2017?

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

III-17. **Raw material prices.**—

(a) Is your firm familiar with the prices for raw materials used in the production of twist ties?

No	Yes – please answer (b)
<input type="checkbox"/>	<input type="checkbox"/>

(b) Has information on raw material prices affected your firm's negotiations or contracts to purchase twist ties since 2017?

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

III-18. **Number of suppliers contacted.**--How many suppliers does your firm generally contact before making a purchase? Between ____ and ____ firms

III-19. **Supplier negotiations.**--Do your firm's purchases of twist ties usually involve negotiations between supplier and purchaser?

No	Yes	If yes, explain the factors your firm generally negotiates and note whether your firm quotes competing prices during negotiations.
<input type="checkbox"/>	<input type="checkbox"/>	

III-20. **Change in suppliers.**--Has your firm changed suppliers since January 1, 2017?

No	Yes	If yes, please list the supplier(s), whether the firm was added or dropped, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **New suppliers.**--Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2017?

No	Yes	If yes, please identify the firms.
<input type="checkbox"/>	<input type="checkbox"/>	

III-22. **Supplier qualification.**--Do you require your suppliers to be or to become certified or qualified to sell twist ties to your firm?

If yes, provide the following information.

- The number of days to qualify a new supplier.
- A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).

No	Yes	Number of days	Process and factors
<input type="checkbox"/>	<input type="checkbox"/>		

III-23. **Failure to certify.**--Since January 1, 2017, have any domestic or foreign producers failed in their attempts to certify or qualify their twist ties with your firm or have any producers lost their approved status?

No	Yes	If yes, please identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification.
<input type="checkbox"/>	<input type="checkbox"/>	

III-24. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase twist ties (examples include availability, extension of credit, contracts, price, quality, range of supplier's product line, traditional supplier, etc.).

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions: _____.	

III-25. **Purchasing factors.**--Please rate the importance of the following factors in your firm's purchasing decisions for twist ties.

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

III-26. **Quality characteristics.**--What characteristics does your firm consider when determining the quality of twist ties?

III-27. **Minimum quality.**--How often does twist ties 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-28. **Frequency of decisions based on price.**--How often does your firm purchase the twist ties that is offered at the lowest price?

Always	Usually	Sometimes	Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-29. **Price leaders.**--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 twist ties market since January 1, 2017.

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

III-30. **Purchasing subject imports rather than domestic products.**—

(a) Since January 2017, did your firm import and/or purchase imports of twist ties from China instead of purchasing U.S.-produced twist ties?

Source	Yes (also respond to parts (b) and (c))	No (If "No", skip to next question)
China	<input type="checkbox"/>	<input type="checkbox"/>

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

Source	Yes	No
China	<input type="checkbox"/>	<input type="checkbox"/>

(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 1,000 twist ties)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
China	<input type="checkbox"/>		<input type="checkbox"/>	

III-31. **U.S. producers and import competition.** —

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

Source	Yes (also respond to question part (b))	No (If "No", skip to next question)	Don't know
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (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-1. **Interchangeability.**--Are twist ties 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

Country-pair	China	Other countries
United States		
China		
For any country-pair producing twist ties which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:		

IV-2. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between twist ties produced in the United States and in other countries a significant factor in your firm's purchases 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

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

IV-3. **Factor country comparisons.**--For the factors listed below, please rate how twist ties produced in each country you identified in your response to the first question in Part IV compares with twist ties 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.

Factor	Product from <u>United States</u> compared to product from <u>China</u>			Product from <u>United States</u> compared to product from <u>Nonsubject countries</u>			Product from <u>China</u> compared to product from <u>Nonsubject countries</u>		
	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum quantity requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Packaging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price ¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product consistency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality exceeds industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability of supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical support/service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U.S. transportation costs ¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹ A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.

PART V.—ADDITIONAL INFORMATION

V-1. **Other explanations.**--If your firm would like to further explain a response to any question that for which a narrative response box was not provided, please note the question number and the explanation in the space provided below.

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V-2. **OMB statistics.**--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/twist_ties_china/final.htm

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

- **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:** **TIES**

- **E-mail.**—E-mail the MS Word questionnaire to natalia.king@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 does not purchase 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 your firm submits (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.