

Generic Clearance Renewal for Information Collections
OMB #3117-0016

Part B. Collections of Information Employing Statistical Methods

The Commission does not use statistical sampling methodology for information collections conducted under this generic clearance; instead, it typically sends questionnaires to the entire population or to a substantial portion of the population of firms producing, importing, or purchasing the product in question. In most proceedings, the petitioning domestic producer is required to identify all domestic producers and importers of the relevant product known to it, as well as the foreign producers in the subject country(ies). Domestic producers and importers provide purchaser names to the Commission. The Commission supplements this information with publicly available sources and where necessary 3rd party data sources to compile the lists of firms to receive questionnaires. (Section (16) above of this statement provides information on how the Commission maximizes response rates.)

For a specific investigation, the Commission typically sends producer questionnaires to all U.S. firms manufacturing the product(s) in question. In most investigations, there are no more than a total of 20 to 30 firms in the United States, and often far fewer, that produce the relevant product(s). Some of the information contained in the producers' questionnaire (e.g., questions as to the impact of imports on firms' operations) is relevant for the Commission's determinations regardless of the responding firm's size. Similarly, the Commission attempts to obtain data from all foreign manufacturers of the subject product, particularly if they are exporting the product to the United States. Typically, there are fewer than 10 foreign manufacturers per country involved in any Commission investigation.¹

In contrast to domestic and foreign producers, the Commission often does not attempt to obtain data from every U.S. importer and purchaser of the relevant product(s). Rather, Commission staff issue importer and purchaser questionnaires to the most substantial firms that import or purchase from the countries where the subject merchandise is produced. Concentrating staff effort on a smaller group of firms permits the Commission to edit and review fully the returned questionnaires and minimize the burden on smaller respondents. Where possible, the Commission uses official Commerce statistics to determine import levels, in some cases adjusting those statistics on the basis of importer questionnaire responses. Further, a key purpose of the purchasers' questionnaire is not to estimate population totals, but to obtain an objective assessment of market conditions and competition between domestically produced and imported products. The Commission report indicates the number of

¹ The Commission compiles separate data for each country considered.

firms in each category surveyed and notes the coverage by the responding firms of the estimated total firms in each category.